



2023-2024

SYMBIOTEC PHARMALAB PRIVATE LIMITED

ESG REPORT

FRAMEWORK: BRSR
(Business Responsibilities and Sustainability Reporting)

Symbiotec Pharmalab Private Limited
385/2, Pigdamber, Rau,
Indore – 453331, India

MESSAGE FROM MANAGING DIRECTOR

Concern for Society, Employees, stakeholders and Environment is a part of the corporate DNA at Symbiotec Pharmed. We are committed to linking opportunity with responsibility and working towards a sustainable future. We have constituted a high level ESG committee for governance. This committee is responsible for determining, oversee environmental, social and governance strategies and policies for the group.

Symbiotec being a responsible corporate citizen has successfully established Environment management system and occupational health and safety management system in accordance with the requirement of ISO14001:2015 & ISO 45001: 2018 respectively. We understand that working towards ESG is a journey and satisfactory achievements in ESG objectives are evident at Symbiotec.

Care for the environment is driven through our EHS Policy and the Environmental Management System at sites. Our Policy clearly states that our commitment towards environment.

We shall uphold our position as a leader in the research and manufacturing of Corticosteroids and Hormones by conducting all its operations in a manner to protect the environment health and safety of our fellow employees, contractors, visitors and others affected by our operations. We are committed to operate our business considering environmental and social impacts.

One important aspect that is integral to Symbiotec's initiatives is resource conservation. Being committed to healthcare for improving quality of life and health of living beings, our efforts and initiatives towards conservation of resources are aimed at reducing the burden on the mother earth, and at the same time preserving, conserving and protecting the natural resources for the future generation. As a responsible corporate citizen, we are committed to design, construct and operate all our facilities, in a manner that results in conservation of all natural and man-made resources, including water and energy by efficient usage. It is, as has always been, our constant endeavor to acquire newer learning from technological advancements and employ them in the resource conservation efforts and improving skills and knowledge of the employees, thereby aiming at sustainable development. We give great emphasis for identifying opportunities to conserve resources by managing them more effectively throughout the life cycle of every product. Through this effort, Symbiotec Pharmed directly and indirectly addresses the social issues as well.

Our efforts are aligned to our values and our EHS policy as we endeavor to improve workforce Diversity, health and safety, well-being and environmental care. We have established clear and measurable objectives and have charted out plans for broadening the number of lives positively impacted through CSR initiatives, developing a responsible supply chain through ethical sourcing and ensuring the code of conduct compliance.

Symbiotec consciously embeds the highest standards of governance in its operations.

We recognize the criticality of governance challenges relating to business ethics, ever-evolving compliance landscape, and the imperative of improved disclosures. To effectively mitigate these challenges, we have in place a comprehensive Code of Ethics and policies that provides a holistic compliance framework and an integrated governance structure that carries a strong commitment to global ESG disclosure standards for promoting transparency and accountability.

Our efforts towards ESG initiatives during the past financial year are detailed in the later pages. Our commitment to ESG not only aligns to the global expectations but also serves as a catalyst for our long-term success and resilience in the face of evolving market dynamics.


ANIL SATWANI

Managing Director

DATE

Aug. 01, '24

OUR SUSTAINABILITY POLICY

We at Symbiotec are committed towards Sustainable Development and growth as an integral part of its business philosophy. The company includes environmental and social considerations into all its strategic and operational decisions and believes that acting in a Sustainable manner is not only a business imperative, but also provides it with a competitive advantage in the long run. The company endeavors to:

- Uphold the Symbiotec's values in our relationship with stakeholders and consider them as partners in our growth and development.
- Engage with local community in the vicinity of our operations to improve the overall quality of their lives in areas like Education, Employability, Entrepreneurship, Health and Sanitation in line with community priorities. We will also support the preservation and promotion of indigenous cultures and values.
- Motivate our human resources for superior performance and innovation through skill development, and by providing them a safe, fair and challenging work environment.
- Commit to conserve natural resources and ecology by (a) striving to be a leader in efficient management of natural resources, energy and wastes, and (b) minimizing the impact on the Ecology in our areas of operations.
- Promotes research and innovation, adopt cutting-edge technologies, green infrastructure, and clean energy wherever possible.
- Continue improvement in products and services to ensure customer delight.
- Deploy safe and environmentally friendly processes for our products and services.
- Ascertain and continually improve the safety and environmental efficiency of our customers and their products which use our products and services.
- Continuously engage with our employees, partners in the supply chain and other stakeholders to build awareness on sustainability, identify opportunities and promote adoption of Sustainable practices.
- Perform better than applicable legal requirements in the socio-economic and environmental areas.
- Measure and Report our Sustainability performance and initiatives to our stakeholders annually.

ESG COMMITTEE MEMBERS



RAGHAVENDER RAMACHANDRAN

Chief Finance Officer Chairman



KASHISH SATWANI

President HR



VIJAY BAJPAI

Chief Human Resource Officer



ANANT DESHPANDE

President Operations



NITIN NIKAM

AVP- Projects & Engineering



SALIL JAIN

Company Secretary



M.N SASI

GM- Administration



VIVEK ASTHANA

Head – EHS & Sustainability

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Principle-1	Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent and accountable	
Principle 2	Businesses should provide goods and services in a manner that is sustainable and safe	
Principle 3	Businesses should respect and promote the well-being of all employees, including those in their value chains	
Principle 4	Businesses should respect the interests of and be responsive to all its stakeholders	
Principle 5	Businesses should respect and promote human rights	
Principle 6	Businesses should respect and make efforts to protect and restore the environment	
Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	
Principle 8	Businesses should promote inclusive growth and equitable development	
Principle 9	Businesses should engage with and provide value to their consumers in a responsible manner	

SECTION A: GENERAL DISCLOSURES

I-DETAIL OF THE ENTITY

	PARTICULAR	COMPANY'S DETAIL
1	Corporate Identity No	U24232MP2002PTC015293
2	Name	SYMBIOTEC PHARMALAB PVT LTD
3	Year of incorporation	2004
4	Registered office address	Symbiotec Pharmalab Private Limited 385/2, Pigdamber, Rau, Indore – 453331 (MP) India
5	Corporate address	Symbiotec Pharmalab Private Limited 385/2, Pigdamber, Rau, Indore – 453331, India
6	E-mail	Symbiotec@Symbiotec.in
7	Telephone	+91-731-6676405-406
8	Website	www.symbiotec.in
9	Financial year for which reporting is being done	2023-2024
10	Name of the Stock Exchange(s) where shares are listed	Not Applicable
11	Paid-up Capital	Not Applicable
12	Name and contact details of the person who may be contacted in case of any queries on the BRSR report	Vivek Asthana (Corporate EHS Head), Symbiotec Pharmalab Private Limited 385/2, Pigdamber, Rau, Indore – 453331 (MP) India
13	Reporting Boundaries: 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)	
	- The financial, environmental, social and governance disclosures made in this report are on a consolidated basis for two operational sites of Symbiotec Pharmalab. Rau Unit – Established in 2004, dedicated facilities for Cortico-Steroid API Manufacturing SEZ Unit – Established in 2009, with dedicated facilities for Cortico-Steroid API, Hormone API, and Fermentation & Biotransformation Throughout this report, the phrase 'Symbiotec Pharmalab' or 'the Company' refers to the consolidated group of 02 entities mentioned above.	
14	Statement of Assurance	
	Please be noted that as per the SEBI Notification SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12th July 23, external assurance is not applicable to us. The indicators/information reported in the BRSR below have not been externally assured but the non-financial data provided in this report is assured by M/S Usha Consultancy.	
15	Type of Assurance Obtained	Not Applicable

II. PRODUCTS/SERVICES

16. DETAILS OF BUSINESS ACTIVITIES (ACCOUNTING FOR 90% OF THE TURNOVER)

Sl. No.	Main activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the Company
1.	C	Manufacturing	C6	Chemical and chemical products, pharmaceuticals, medicinal chemical and botanical products	100 %

17. PRODUCTS/SERVICES SOLD BY THE ENTITY (ACCOUNTING FOR 90% OF THE ENTITY'S TURNOVER):

S. No.	Product/Service	NIC Code	Turnover	% of total Turnover contributed
1	Sale of Cortico-Steroid and Hormone Active Pharmaceutical Ingredients	21001	651.6	100

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
India	02	01	02
Outside India	02	0	02

Our corporate office is situated at Rau site hence total no's are 02.

19. MARKETS SERVED BY THE ENTITY:

a. Number of locations

Locations	Number
National (No. of States)	47
International (No. of Countries)	19

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

	Amt in ₹ Cr	
Particulars	FY2023-24	FY2022-23
Exports Revenue	385.31	296.03
Total Revenue	651.6	542.55
% of exports in total revenue	59%	55%

A brief on types of customers:

We are manufacturing Active Pharmaceutical Ingredient which act as a raw material for formulation industries to for the production of capsules, injection and syrup. We are selling our product to formulation industries. Therefore, type of our business is B2B i.e. Business to Business.

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)	921	878	95%	43	5%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees(D + E)	921	878	95%	43	5%
WORKERS						
4.	Permanent (F)	421	421	100 %	0	0
5.	Other than Permanent (G)	256	254	99 %	2	1%
S.No	No Particulars	Total (A)	MALE		FEMALE	
			No. (B)	% (B / A)	No. (C)	% (C / A)
6	Total workers (F + G)	677	675	99 %	2	1%

Note 1:

Other than Permanent Workers, a part of workforce hired through third party i.e. manpower supply contractors. The organization is focused on skilling and automation to further optimize manpower and improve productivity.

Note 2:

Permanent employees include all personnel on rolls of the Company. Permanent workers are on rolls of the Company but do not perform managerial or administrative role.

Note 3:

We have employed 43 female employees and out of which three are at the level of General manager and above.

Symbiotec Pharmalab Pvt understands that historically certain sections of society have had lower participation in the workforce and faced exclusion and discrimination in employment across the world. This is felt even more acutely in the chemical and API manufacturing sector, which has traditionally been perceived as less attractive for women, compared to the service sector. However, at Symbiotec Pharmalab almost 5% participation is there, and they are working in Quality, R & D and Administration.

Furthermore, Symbiotec is operating in Indore historically there were limited opportunities available to marginalized communities and other minority groups, including the LGBTQIA+ community (Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, and more), Persons with Disabilities and Tribal Communities, to pursue education and gain the requisite work experience.

Symbiotec believes it is imperative for companies to strive to better represent the larger society and create opportunities for all sections of society in order to be successful. We also believe it is our responsibility to not only to employ from all segments of the society, but also to empower them to learn and grow equitably, to launch enabling policies and benefits that are critical for their psychological safety, and to ensure sustenance of such endeavors. Symbiotec has an organizational focus on the potential of Diversity & Inclusion and its philosophy is to be a truly world class organization that respects uniqueness of individuals, which will eventually create a diverse and inclusive atmosphere to be competitive in business by having access to a larger talent pool.

Our initiative aims to alleviate the barriers to employment for all sections of the society through inclusive recruitment, enabling policies, upskilling initiatives.

Symbiotec Pharmalab Pvt Ltd has onboard 43 female employees in quality and R& D functions and some are in administration. Also, three female employees are at above general manager grade.

We call Symbiotec Pharmalab as 'Symbiotec Family' to promote involvement of female in organization every year we celebrate 'Women's Day on 8th March'. Regularly female employees taking part in fire drills and health and safety training sessions.

a. Differently abled Employees and workers:

YEAR 2023-2024

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	921	1	0.1%	0	0%
2.	Other than Permanent (E)	0	0	0	0	0%
3.	Total differently abled employees D + E)	921	1	0.1%	0	0%
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	421	0	0%	0	0%
5.	Other than permanent (G)	256	0	0%	0	0%
6.	Total differentlyabled workers (F + G)	677	0	0%	0	0%

21. PARTICIPATION/INCLUSION/REPRESENTATION OF WOMEN

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	0	0	
Key Management Personnel	3	0	0%
Senior Leadership Team	9	1	11 %
% of woman within organization	1342	43	3.35 %
% of woman within middle Management	43	2	4.4 %

22. TURNOVER RATE FOR PERMANENT EMPLOYEES AND WORKERS

(Disclose trends for the past 3 years)

	2023-2024			FY 2022-2023			FY 2021-2022		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	17.87	0.68	18.56	NA	NA	NA	NA	NA	NA
Permanent Workers	4.35	NA	4.35	NA	NA	NA	NA	NA	NA

V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

23. (a) 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	Navi Sci Pte. Ltd (formerly Symbiotec Pharmedlab (Singapore) Pte. Ltd.) in Singapore,	Subsidiary	100 %	No
2	Symbiotec Zenfold Pvt Ltd	Under progress	100 %	No
3	Knovea Pharmaceutical Private Limited (KPPL)	Subsidiary	100 %	No
4	Xinjiang Symbiotec Biotechnology Limited	Joint Venture Company with Shanghai Fulland Pharmaceuticals Co., Ltd. (Company Registered in China) with your company holding 95% of the equity.	95 %	No

The Company has wholly owned subsidiaries named NaviSci Pte. Ltd (formerly Symbiotec Pharmalab (Singapore) Pte. Ltd.) in Singapore, and SPL Lifescience India Private Limited (Dormant Company) in India. The Company had incorporated two Wholly Owned Subsidiary Companies namely Knovea Pharmaceutical Private Limited (KPPL) and Zenfold Private Limited (SLPL) in the year 2020 for formulation project and Biotechnology project respectively in India. Both the Companies are yet to commence its manufacturing operations. KPPL has started its research and development operations.

The Company has set up Xinjiang Symbiotec Biotechnology Limited in Xinjiang, China, a Joint Venture Company with Shanghai Full and Pharmaceuticals Co., Ltd. (Company Registered in China) with your company holding 95% of the equity.

Apart from this, no other entity became or ceased to be its Subsidiaries, joint ventures or associate companies during the year. However, SPL Lifescience India Private Limited who has obtained a dormant status in the year 2017 has made an application for strike off to ROC Gwalior dated July 8, 2022 and the same is under process.

VI. CORPORATE SOCIAL RESPONSIBILITY DETAILS

24. CSR is applicable to Symbiotec Pharmalab

Section	Details	Company Particulars
22. (i)	Whether Corporate Social Responsibility is applicable as per Section 135 of Companies Act, 2013?	Yes
22. (ii)	Turnover (in ` Cr.) for Symbiotec Pharmalab Pvt Ltd	651.6 Cr
22. (iii)	Net worth (in ` Cr.) for Symbiotec Pharmalab Pvt Ltd	764.3 cr

Total CSR budget outlay for the year 2023-2024 was INR 2,15,15,252 whereas the actual amount spent on CSR was INR 2,47,16, 839. Thus, we spent INR 32,01,587.

The detail of CSR expenses is as follows:

Description	Amount (INR)
Education	4154347
Education- Dada Shyam Foundation (First Instalment)	450000
Shed fabrication work -Goshala shed	225000
Health – Dialysis Unit (SGSN)- II & III instalment	900000
Health – Cancer Facility -SGSN-II Instalment	957492
Health – Cancer Facility -SGSN-III & IV Instalment	17100000
Chair donation to MY Hospital	130001
TOTAL	24716839

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

GRIEVANCE REDRESSAL MECHANISM IN PLACE

COMMUNITIES

Yes, Symbiotec has grievance redressal mechanisms in place to address grievances of all key stakeholder groups across all the sites.

Symbiotec's team members regularly interact with the community members and speak with individuals and groups within the communities, as well as with various stakeholders, to ensure that the grievances are resolved.

Our Corporate Social Responsibility activities also lead to our engagement with the local communities.

Complaints can be done in written or on line on line to Whistle officer or Company Secretary of Symbiotec Pharmalab through e mail. Our vigil mechanism and whistle blower policy is available on our website at: <https://www.symbiotec.in/wp-content/uploads/2024/07/7.0MECHANISM-AND-WHISTLE-BLOWER-POLICY.pdf>

Whistle Officer Anil Satwani (Managing Director) Symbiotec Pharmalab Private Limited 385/2, Pigdambar, Near Mashal Hotel, Rau, Indore – 453331, India E-Mail: a.satwani@symbiotec.in	Salil Jain (Company Secretary) Symbiotec Pharmalab Private Limited 385/2, Pigdambar, Near Mashal Hotel, Rau, Indore – 453331, India E-Mail: grievance@symbiotec.in
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The Detail of complaint is as follows:

FY2023-2024		FY2022-23	
Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year
0	0	0	0

STAKEHOLDER GROUP
GRIEVANCE REDRESSAL MECHANISM IN PLACE
INVESTORS & SHAREHOLDERS

Yes, Symbiotec Pharmalab has comprehensive grievance redressal mechanisms in place to address grievances of investors. Because it is not a listing company and we do not have any obligation for ESG reporting however being a responsible corporate citizen we are taking ESG objectives and disclosing our status of our company.

The Company has a relationship team to oversee functioning of mechanisms for redressal of investor grievances it comprises of CFO, Company Secretary and GM Finance Strategy and Business Development.

They actively address and resolve all investor's grievances. The Annual Integrated Report is also available for reference.

The investor relations team also communicates key Symbiotec strategic initiatives/ plans through structured meets and reports to the investors & analysts. Investor events organized by Symbiotec Pharmalab includes one to one investor's meeting

FY2023-2024		FY2022-23	
Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year
0	0	0	0

STAKEHOLDER GROUP
GRIEVANCE REDRESSAL MECHANISM IN PLACE
EMPLOYEES AND WORKERS

Yes, Symbiotec Pharmalab has several grievance redressal mechanisms for addressing complaints and grievances of employees and workers, as below:

a) Symbiotec Pharmalab has a dedicated one-stop solution for all employee issues across all the sites. We have a policy on grievance handling and in compliance to this policy every site its own grievance handling committee. The tenure of the committee is one year. On the joining of new employee he is made aware of this policy whereas for existing old employees refresher training is being provided once in a year and record are kept. The aggrieved employee must first submit his grievance in writing to Site HR Head. Grievances must be submitted within 30 calendar days following the date employee first knew or should have known of the grievance. Site HR Head records the grievance in 'Grievance Register' and forward the grievance application to Grievance Redressal Committee. The Grievance Redressal Committee conducts investigation and set the grievance of the employee. The Grievance Redressal Committee

complete its proceedings within thirty days on receipt of a written application by or on behalf of the aggrieved party. The employee who is not satisfied with the decision of the Grievance Redressal Committee may prefer an appeal to the Chief Human Resource Officer (CHRO) against the decision of Grievance Redressal Committee. The Chief Human Resource Officer (CHRO) within 30 working days from the date of receipt of such appeal, dispose off the same and send a copy of his decision to the concerned employee.

b) Symbiotec Pharma Lab also has a Whistle-Blower Policy and associated mechanisms to redress grievances of all stakeholders, including employees. The link to the Policy is available on Symbiotec's website and accessible to everybody at <https://www.symbiotec.in/wp-content/uploads/2024/07/7.0MECHANISM-AND-WHISTLE-BLOWER-POLICY.pdf>

c) Although we have freedom of association to workers but at Symbiotec we do not have any union. We have safety committees at site level and departmental level at all the sites and worker's participation is there. All the discussion related to worker's health and safety, working conditions and consultations take place in both the meetings. These site safety committees and departmental safety committees meet on quarterly and bi-monthly basis respectively. Our workmen take active participation in identification of hazards and risk assessments and all these activities are recorded. To handle issues related to food we have a canteen committee also.

Challenges Faced: We found that in spite of having grievance handling policies in place employees are not coming up with their issues and suggestions. Also, in safety committees we have kept around 50 % workmen representatives however they have some hesitation in reporting their issues.

For their involvement and to motivate them we started safety suggestions in manual form. Apart from this we started Employees satisfaction Survey. Whatever output we received are taking actions on it.

FY2023-2024		FY2022-23	
Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year
509	172	27	7

Note: Includes behavioral complaints, Human Resource related complaints, complaints related to safety and improper use of company facilities and whistle blower complaints, Output from employees satisfaction survey, Employees suggestion and observations.

**STAKEHOLDER
GROUP**
GRIEVANCE REDRESSAL MECHANISM IN PLACE
CUSTOMERS

Yes, Symbiotec has a well-defined customer complaint management system which is governed by corporate quality assurance. All the complaints are taken very seriously to find the root cause of a complaint. Several tools like Why-Why analysis, Fishbone and many others are used to conclude correct route cause. Accordingly corrective and preventive actions are developed to prevent such recurrence of the incident in future. We at Symbiotec has an governance mechanism and status of CAPAs and effectiveness is assessed in review meetings. All the findings and recommendations are shared with our customers.

FY2023-2024		FY2022-23	
Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year
19	02	15	0

STAKEHOLDER GROUP
GRIEVANCE REDRESSAL MECHANISM IN PLACE
VALUE CHAIN PARTNERS

Yes, Symbiotec Pharmalab has vendor grievance redressal mechanisms in place across all its locations. All the grievances are addressed immediately by purchased head in consultation with Director- Commercial. At Symbiotec we ensure that 100 percent queries of suppliers are addressed in due time. Presently we are not recording how much complaints and queries raised.

For ethics we have a mechanism for sharing supplier's code of conduct with them and take their consent to abide by it.

FY2023-2024		FY2022-23	
Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year
10	NIL	Not recorded	Not recorded

We started to record the complaints from FY 2023-2024

23. 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.

Symbiotec has a structured Materiality Assessment process to identify business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity for the Company. Symbiotec has certified environment and OHS management systems against ISO14001 :2015 & ISO 45001:2018 standards. The risk assessments are being conducted on regular basis by internal trained team at corporate level and assessments are conducted by independent external advisors, in line with global standards, on a periodic basis. The risk assessment conducted in 2022 is revised annually and the most recent risk assessment as Symbiotec whole is conducted in FY 2023-2024 is mentioned here.

Based on the outcome of this materiality assessment, the following material issues pertaining to environmental and social matters have been identified by Symbiotec covering both risks and opportunities. Following is the materiality matrix .

MATERIALITY MATRIX

ENVIRONMENT	SOCIAL	GOVERNANCE
Greenhouse Gas Emissions and other emissions Importance: High Rationale: Significant carbon footprint and global issue and alignment of the company's goal with the UN SDG - 13(Climate Action) and SDG-12 (Responsible consumption and production)	Occupational Safety-Injuries, Accidents, Fire. Importance: High Rationale: Employee's care, Statutory requirements and alignment of the company's goal with the UN SDG -3 (Good Health and Wellbeing) and SDG-8 (Decent work and Economic Growth)	Research and Development/Technology, Product and Process Innovation Importance: Medium Rationale: Alignment of goal with UN SDG- 9 (Industry, innovation and Infrastructure), and SDG-8 (Decent work and Economic growth)
Water Consumption and Effluent Discharge Importance: High Rationale: Natural Resource conservation in line of UN sustainable development goal -12 (Responsible consumption	Industrial Hygiene-Exposure Control Importance: High Rationale: Employee's care, Statutory requirements and alignment of the company's goal with the	Ethics and Compliance Importance: Medium Rationale: SDG-16 (Peace , justice and strong institution), SDG-17 (Partnership for the goals), SDG-5 (Gender Equality)&

and production), SDG 14(Life below water and SDG-6 (Clean water and Sanitation)	UN SDG -3 (Good Health and Wellbeing) and SDG-8 (Decent work and Economic Growth	SDG-10 (Reduced inequalities) & SDG-8 (Decent work and economic growth)
Energy Efficiency and Energy Management Importance: Medium Rationale: Natural Resource conservation and alignment of company's goal with SDG-7 (Affordable and Clean Energy) and SDG-12 (Responsible consumption and production)	Supply Chain Sustainability Importance: Medium Rationale: : Alignment of Company's goals with the United nation's sustainable development goal no-17 (Partnership with the goals)	Board Diversity Importance: Medium Rationale: SDG-16 (Peace , justice and strong institution), SDG-17 (Partnership for the goals), SDG-5 (Gender Equality)& SDG-10 (Reduced inequalities) & SDG-8 (Decent work and economic growth)
Circular Economy and Waste Management Importance: High Rationale: Product use at the end of lifecycle, revenue generation and alignment of company's goal with UN SDG-13 (Climate Action and (SDG 15 (Life on land).	Employees Well being Importance: High Rationale: Alignment of Company's goals with the UN SDG -3 (Good Health and Wellbeing) and SDG-8 (Decent work and Economic Growth	NA
NA	Community Support and Corporate Social Responsibilities Importance: Medium Rationale: Alignment of Company's goals with the UN SDG -1 (No Poverty), SDG-2 (Zero Hunger), SDG-4 (Quality Education) & SDG-11 (Sustainable cities &communities) and SDG-16 (Peace, justice and strong Institution)	NA
-	Diversity , Equality and inclusion Importance: Medium Rationale: Compliance of company's sustainability policy, alignment of Company's goals with SDG-	

NA	16 (Peace, Justice and Strong Institution),SDG-10 (Reduce inequalities, SDG-5 (Gender equalities) and SDG-17 (Partnership for the goals)	NA
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MATERIAL ISSUES IDENTIFIED, RISK AND OPPORTUNITY & APPROACH ADOPTED TO MITIGATE THE RISK

ENVIRONMENT		
A1. Greenhouse Gas Emissions and other emissions		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Risk & Opportunity	At Symbiotec for the manufacturing of APIs we use steam from boilers and Deisel generators as a power back up which is an emission intensive process and contributes towards global warming. Because we are also using volatile chemicals and dry chemicals in the form of powder there is possibility of environmental pollution from these emissions for process.	Symbiotec being a responsible corporate citizen replaced its fossil oil-based boilers with that of bio briquette boilers at all the sites. It is decided that every new installation must have bio briquette boiler only. After replacing our boilers, we have taken target to reduce 25% remaining scope-1 and scope-2 emissions from base line 2020.Symbiotec has EHS management plan to achieve these targets. Symbiotec's new sites which are under construction and commissioning also procured bio briquette boilers. The DG sets using HSD are only being used as a power back up. To protect other emissions from process. Symbiotec has provided double stage condensers having cold water and brine in process reactors. At places isolators, glove hoods, and down flow booths, dust collectors are provided. Powder processing areas are provided with air handing units having HEPA filters. Scrubbers are installed to protect emissions in to atmosphere. The smooth running of systems is ensured by Symbiotec through periodic monitoring of environment by NABL approved laboratory and internal audits and preventive maintenance. Symbiotec phased out all the ODS gases with that of clean gases in chillers. We have a long term plan to replace our other air conditioners installed in offices which are consuming ODS gases.
Financial Implications: Negative		

ENVIRONMENT		
A2. Circular Economy and Waste Management		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Opportunity	Symbiotec produces a large quantity of waste which is of both the types i.e. hazardous and non hazardous. This waste can either be reused into its own process (and reduce operating costs) or be sold to external parties (e.g. sale of slag to the cement industry), paint industry etc creating additional revenue for the Company.	Symbiotec is looking at two approaches for value creation from circularity: As far as possible enhance captive consumption of solvents being generated in the form of mother liquor after distillation in in house solvent recovery plant. Symbiotec has set up solvent recovery plants, which operates on the 3R principle - Recover, Re-use and Re-cycle, and generates revenue from sale of spent solvents which are not useful for Symbiotec but can act as a raw material for other industries. This includes sale of range of solvents like Methylene di chloride, Methanol, Di Methyl Formamide, Acetone. a) Symbiotec sells it's all the non-hazardous waste to the recyclers who are authorized by pollution control board. This waste broadly includes packaging material like poly bags, drums, steel scrap etc. Thus selling of non-hazardous waste generates revenue. b) The hazardous waste comes in the form of distillation residues and ETP sludge. At SEZ site all the ETP sludge which is converted in to powder in paddle dryer has caloric value more than 2500. All the waste being sent to cement industry as an alternative fuel in cement kilns. Because of the constraint in volumes, the ETP sludge being generated at Rau site is sent to MPPCB authorized disposal facility Ramky. c) Electronic waste is collected and disposed at the end of authorized recyclers. d) All the batteries waste is sent to dealer as a buy back for new batteries.
Financial Implications: Positive		

ENVIRONMENT		
A3. Water Consumption and Effluent Discharge		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Risk	Symbiotec utilises a large quantity of water in its processes and draws this water from Industrial Development Corporation Symbiotec's water consumption is regulated under non-compliance to regulatory requirements with respect to effluent discharge & higher water usage may lead to environmental compensation by regulatory authorities, financial loss due to stoppage of operation and withdrawal of license to operate. Additionally, as a result of climate change, access to fresh water is expected to reduce in geography, making water a scarce resource. Symbiotec will need to minimise water requirement continually and maximise water recycling to be cost efficient.	Addressing water scarcity through 4R framework of Reduce, Reuse, Recycle and Recover and using best available technologies. Minimising withdrawal of fresh water from IIDC by maximising the recycling of treated waste effluents within the plant by setting up effluent treatment plants. Symbiotec is also reusing treated waste water & reusing steam condensate in boilers Symbiotec has installed Zero Effluent discharge facilities at both the sites i.e. Rau and SEZ. Ensuring health and connectivity of the installed online continuous effluent analysers. New plants are designed to be water efficient. We are continuously working on reduction in water consumption.
Financial Implications: Negative		

ENVIRONMENT		
A4. Energy Efficiency and Energy Management		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Opportunity	Production of Pharmaceutical products is a highly energy intensive process and Symbiotec Pharmalab consumes a large quantity of energy mainly from Electricity and other fossil fuel. Energy efficiency and management initiatives helps Symbiotec to manage and optimize energy consumption across its operations, resulting in lower operational costs (through lower consumption of energy), greater resilience in the event of energy disruptions, and greater ability to respond to regulatory obligations. Energy efficiency and adoption of renewable energy is also a key lever for Symbiotec to lower its Scope 2 greenhouse emissions.	Symbiotec Pharmalab has several initiatives to improve energy efficiency of the Company across all the sites., Symbiotec is also working on URJA project to identify and implement energy efficiency projects across various sites. Symbiotec Pharmalab is entering into an agreement with MP Windfarm Development Pvt Ltd. to purchase 1.25 MW of solar & wind hybrid renewable power capacity under captive arrangement. This will enable reduction of over 4500 MT tons of CO₂ per annum. Additional details are included later in this report.
Financial Implications: Positive		

SOCIAL		
B1. Occupational Safety-Incidents and Injuries		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Risk	Symbiotec has a large number of employees and contract workers working across all sites. In addition, some of the Company's plants	Symbiotec's safety and health responsibilities are driven by our commitment to zero harm to the people we work with, and the community at large. We endeavor to achieve this objective

	are situated in close proximity of the community. Therefore, ensuring the safety of its employees, contract workers and communities is critical for continued regulatory and social license to operate, especially considering process related hazard in Pharmaceutical plants. In case safety related processes or performance of the Company is deemed inadequate, or in case of a significant safety incident, prohibition order from the government may also lead to closure/ partial closure of the plant. Each safety incident also has a negative impact on the health, well-being and morale of employees along with a negative reputational impact on the Company. They may also result in operational and financial loss to the Company, including potential partial closure of the plant.	through a robust safety management system framework and a sound safety governance structure. Details on Symbiotec's approach on mitigating safety risk is provided later in this report
Financial Implications: Negative		

SOCIAL		
B2. Occupational Safety -Fire		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Risk	Major Fire, Vapor Cloud Explosion, BLEVE in Tank area with multiple injuries stopping site activities and supply /Small fire expanding to a large Fire due to lack of Emergency Response effectiveness. Due to loss of containment, there are	The risk is control with safety management system and governance. Safety is set as the line responsibilities. To improve safety behavior company has launched safety culture transformation program. Based on the risk assessments of all the plant adequate measures have been taken. Regular training of core members on emergency handling

	chances of vapor cloud explosion if any source of ignition like static charge is present. Further if once the fire is breaking out it may turn into a BLEVE. Plant susceptibility to fire: Electrostatic charges, electrical short circuit, Spillages, or leakages of flammable liquids, leakage of flammable gas, bursting of steam boiler, uncontrolled discharge of static charge in hazardous classified areas, uncontrolled rise of temperature during chemical reactions. Violation of EHS Systems during Unloading of Nutche/Centrifuges and Dryer Charging/ Batch charging in to reactor.	and is in place. Besides every employee working in technical areas is provided trainings on process related hazards. Company has provided all the measures to protect such incident
Financial Implications: Negative		

Social		
B3. Industrial Hygiene: Exposure Control		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Risk	Non-compliance related to regulatory requirements with respect chemical exposure to human Symbiotec may lead to adverse impact on the health of employees and workers. Compensation imposed by regulatory authorities, financial loss due to stoppage of operation, withdrawal of license to operate and can lead to loss of reputation. Further, violation of PSCI requirements may hamper	Symbiotec's Mitigation Strategies include the following: We are investing in various environment improvement projects such as upgradation of pollution control equipment, , installation of new extraction and providing scrubbers to reduce fugitive emissions and reduce dust emissions. Symbiotec has a comprehensive industrial hygiene program in place which involves, monitoring, risk assessment and providing specific engineering controls and effective respiratory protection.

	business activities and low demand of product.	
Financial Implications: Negative		

SOCIAL		
B4. Employees Well Being and Care		
Risk and Opportunity	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
	Risk: All the plants of Symbiotec Pharmed are installed in Indore and nearby areas in MP. Existence of pharma zone in Indore and Pithampur giving ease to large turnover of trained and skilled employees. This employee's turnover has potential to hamper overall efficiencies, effectiveness and employees health and safety in plant. Opportunity: Symbiotec believes that Employee Well-being development and care creates a healthy company culture, better employee satisfaction and higher employee engagement and therefore, helps attract and retain talent. The Company's ability to attract and retain talent provides the Company with a competent and experienced workforce and reduces recruitment costs for the Company. A high quality and motivated workforce is critical for Symbiotec to achieve its vision to be recognized as the most valued, trusted and 'top-of-mind' brand in Cortico-Steroid APIs and	Symbiotec believes that people are our greatest asset, and we adopt best practices to ensure healthy employee relations, employee growth and development as well as work satisfaction. Our agile working model has further strengthened the trust and outcome-based working culture. We also provide industry leading social security benefits to employees. Since its inception, Symbiotec has introduced several policies and practices for employee welfare and well-being and we continue to invest in our people, processes and supporting ecosystem. Symbiotec has recognition framework through which we appreciate our people for their contribution in EHS. Additional details of Symbiotec's employee well-being initiatives are provided later in this report.

	Steroid-Hormone APIs worldwide.	
Financial Implications: Positive		

SOCIAL		
B5. Community Support and Corporate Social Responsibilities		
Risk and Opportunity	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
	Some sites of Symbiotec are located in close proximity to the community. A mutually beneficial, two- way relationship with the community, anchored by transparency and trust, is critical socially for Symbiotec. A deep engagement with the community fosters goodwill amongst them for Symbiotec and helps maintain the public consent to operate. It also brings in a number of long-term benefits in terms of community support, loyalty, source of future employees and capital and the fostering of goodwill.	Symbiotec firmly believe the health and welfare of our people, the community and society are intrinsic to our approach to business. Symbiotec’ s Corporate Social Responsibility initiatives focus on four thrust areas – Education, Health, Livelihoods and Rural & Urban Infrastructure aimed at improving the communities’ quality of life. Our Corporate Social Responsibility approach revolves around six guiding principles – Impact, Partnerships, Affirmative Action, Volunteerism, Communication and Innovation. Whilst we ensure that all communities benefit from our Corporate Social Responsibility activities, we focus on those groups that are socially and economically marginalised, such as women, girl child. Further details of Symbiotec’ s Corporate Social Responsibility activities and community engagement is provided later in this report.
Financial Implications: Negative		

SOCIAL		
B6. Supply Chain Sustainability		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
	Symbiotec has a long-integrated value chain that	Symbiotec has also launched Sustainable procurement policy, which covers issues related to ethics, human rights, health & safety, and

Risk	extends from procurement to disposal of waste. The production, transportation, storage and handling of Finished goods, raw materials, chemicals, solvents etc. have a negative impact on the environment, including greenhouse gas and other emissions. This may also affect social aspects like child labour, wages, harassment etc. By implementing environmentally and socially responsible supply chain practices, Symbiotec can protect the long-term viability of their business . Scope 3 performance will also have a positive reputational to the Company	environmental sustainability. These policies are incorporated in the system and all vendors are made aware of and are required to adhere to these policies. Implementation of Sustainable procurement policy will also help in de-risking the Company's supply chain.
Financial Implications: Positive		

Governance		
C1. Research and Development/Technology, Product and Process Innovation		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Opportunity	We at Symbiotec are focused on production of high value-added or differentiated pharmaceutical products, which enables us to achieve higher margin for our products. Our continuous focus on Research & Development, new technologies and innovation in products and processes is critical for the Company to better serve and retain customers, retain leadership in differentiated products Research & Development	We continuously focus our research efforts to retain our leadership position in attractive segments like Steroid and Hormone APIs. Symbiotec is actively engaged in development and piloting of various new technologies, including continuous process chemistry which involves less energy, and less waste generation.

	and Innovation are also critical for Symbiotec to retain cost competitiveness by continuous improvement in process efficiency and resource utilization and access new markets. The importance of Research & Development has increased even more for the Company as we focus on increasing the technological maturity of high purity product with less waste generation to remain a sustainable partner for all our stakeholders	
Financial Implications: Positive		

Governance		
C2. Ethics and Compliance		
	Rationale for identifying the risk/ opportunity	Approach to adapt or mitigate
Opportunity	For the growth and success of any business it is necessary that all the employees including board members and KMPs behave ethically and have ethic's values. Also to align company's goal with that of united nations sustainable goals SDG-16 (Peace, justice and strong institution), SDG-17 (Partnership for the goals), SDG-5 (Gender Equality) & SDG-10 (Reduced inequalities) & SDG-8 (Decent work and economic growth, we have an opportunity for continual improvement in	Symbiotec Pharmalab provides training on ethics related policies on joining of employees and refresher training on annual basis to all its employees. Symbiotec has many ethics related policies like Bribery and Anti-corruption, Prevention of Sexual Harassment, Vigil Mechanism etc. Any findings if any is addressed and presented to board. Symbiotec has certain ethics related expectation from it's suppliers and vendors. For that Symbiotec has creates Supplier's Code of conduct. Key topics which get covered under these awareness sessions include governance, ethics, health and safety, labor practices and human rights and Environment.

	ethical values in entire organization	
Financial Implications: Positive		

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 National Guidelines for Responsible Business Conduct (NGRBC) Principles and Core Elements

1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)

Yes, Symbiotec's policies cover each principle and its core elements of the NGRBCs

SYMBIOTEC POLICIES	Category	NGRBC Principle								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
Environment Health and Safety Policy	Environment	✓	✓	✓			✓	✓		✓
Sustainability Policy	Governance	✓	✓	✓	✓	✓	✓	✓	✓	✓
Corporate Social Responsibility Policy	Governance				✓			✓	✓	
Vigil Mechanism and Whistle Blower	Governance	✓			✓			✓		✓
Anti-bribery & Anti-Corruption Policy	Governance	✓								
Prevention of Sexual Harassment	Governance	✓		✓	✓	✓				
Child Labor and Human Rights	Social	✓		✓	✓	✓				
Grievance Handling	Social			✓	✓	✓				
Information Security	Governance	✓								✓
Code of Conduct	Governance	✓		✓	✓	✓		✓	✓	✓
Sustainable procurement Policy	Governance	✓		✓		✓	✓			
Supplier's code of conduct	Governance	✓		✓		✓				
Quality Policy	-		✓							✓
Handling of Market Complaint*	Governance		✓		✓					
Quality Risk Assessment *	-		✓							
5 Days A Week Working Policy *	Social			✓		✓				
Flexi Time Policy *	Social			✓		✓				
Policy for contractors*	Social				✓	✓				
Contractors Vendors management Policy *	Social			✓	✓	✓				
Financial Assistance to employees *	Social			✓		✓				
Equal remuneration policy *	Social			✓		✓				
Measurement of environmental parameter and workplace monitoring*	Environment		✓				✓			
Waste Collection and Disposal	Environment		✓	✓			✓			
Training Procedure *	Social									
Environment Impact Assessment*	Environment						✓			

2	Whether the entity has translated the policy into procedures. (Yes/No)	Yes, all the policies of the entity have been translated into procedures, most of them have been implemented and some are in various stages of implementation. Various head of the departments designated with specific responsibilities for operationalizing these policies.
3	Do the enlisted policies extend to your value chain partner? (Yes/No)	Yes, Symbiotec's Supplier's Code of Conduct and Sustainable procurement program covers key aspects of Symbiotec policies related to its value chain partners. In case any vendor either does not accept these Code of Conduct or is in its breach, the relationship is terminated following due process.
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	Symbiotec adopts multiple domestic and international standards, as relevant. Some key certifications are listed below: 1. Symbiotec's both the operational sites at Pithampur and Rau are approved against ISO14001:2015 Standards since 30th November 2021. The certification was done by 'TUV Nord'. Symbiotec has a plan to take certification of two other sites also, as soon as the production at these sites gets started. 2. Symbiotec's both the operational sites at Pithampur and Rau are approved against ISO45001:2018 Standards since 30th November 2021. The certification was done by 'TUV Nord'. Symbiotec has a plan to take certification of two other sites also, as soon as the production at these sites gets started. 3. Symbiotec's both the sites are approved by Indian Food and Drug Administration. 4. Rau (Indore) Site is approved by WHO-GMP, US-FDA, EU-GMP (German Authority) and PMDA (Japan Authority) 5. SEZ (Pithampur) Site is approved by WHO-GMP, US-FDA, EU-GMP (German Authority) and KFDA
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	ENVIRONMENT: • Reduction in Generation of CO2 Emissions About 15 % Reduction in specific CO2 generation, from base line financial year 2020-21 (From 227 Kg / Kg of FG to 193 Kg/Kg of FG), by March 2026 • Reduction in Power Consumption About 10 % Reduction in specific electricity consumption by March 2026, from base line year 2020-2021. (From 318 KWH/ Kg of FG to 286 KWH/Kg of FG) • To go for green energy at Rau site (75%) by the end of 2024

		• Reduction In Hazardous Waste Generation 40 % Reduction in specific waste generation from base line year 2020-2021, by the end of year 2025, (From 15 Kg/Kg of FG to 9 Kg/Kg of FG) • • Reduction In Fresh Water Consumption 10 % Reduction in Fresh Water Consumption by March 2026, from base line of year 2020-21. (From 1.69 KL/Kg of FG to 1.52 KL/KG of FG) • Reduction in Specific Effluent generation 30 % Reduction in specific Effluent generation by the end of 2025, from base line of year 2020. (From 0.90 KL/KG of FG to 0.63 KL/KG of FG) OPERATIONS: • To install and commission facility based on continuous process flow chemistry for APIs at the end of year 2025. GOVERNANCE GOAL: • Supply Chain: • To conduct 100 percent assessment of critical suppliers by the end of 2030. • To provide ethics related trainings to the contractors (Engineering and Civil) by the end of year 2025 LABOUR AND HUMAN RIGHTS • Safety Culture Transformation: ✓ Maturity of the action plan by the end of year 2026: Implementation of differentiated safety improvement plan to include safety capabilities, Safety leadership to strengthen behaviour safety and SOP adherence with high risk activities • Improvement in existing health monitoring systems of employees and workmen in occupational health centres in Symbiotec Pharmalab: ✓ To review existing health check-up system and introduce corporate on OHC to include various required health check parameters.
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		• Establishment of a transparent and accessible HR Management Systems for employees and workmen. ✓ A digital system for human resource management shall be introduced where employees and workmen shall have a transparency and an easy access for attendance, OT, leaves including complete employee lifecycle. • Wellbeing and wellness of employees ✓ To provide meals at subsidize rates to employees and workmen at all the Symbiotec sites and construction of a new canteen at Rau site, by 30. March .2024 ✓ To provide medical consultation and treatment to workmen, employees and their families on discounted rates by tie ups with various renowned hospitals, by 30. March .2024 ✓ Free medical assistance to employees and their families via free OPD services at a multi-specialty and a eye care hospital, by 30. March .2024 ✓ All employees and workers shall be covered under medical insurance, group personal accidents and term life insurance, 30. March .2024 • Health and Safety -Objectives for 2024-25 a) Installation of ✓ Modular type extinguisher in solvent storage and document storage area (document cell). ✓ Supplied Air respirators at site to protect to person from the exposure of potent drugs ✓ Mist type extinguisher for electrical hazards (transformer protection).
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		✓ Surveillance in effluent treatment plant and boundary through CCTV. ✓ Implementation of Warehouse Safety Program. ✓ Implementation of PPEs Fit Testing Program
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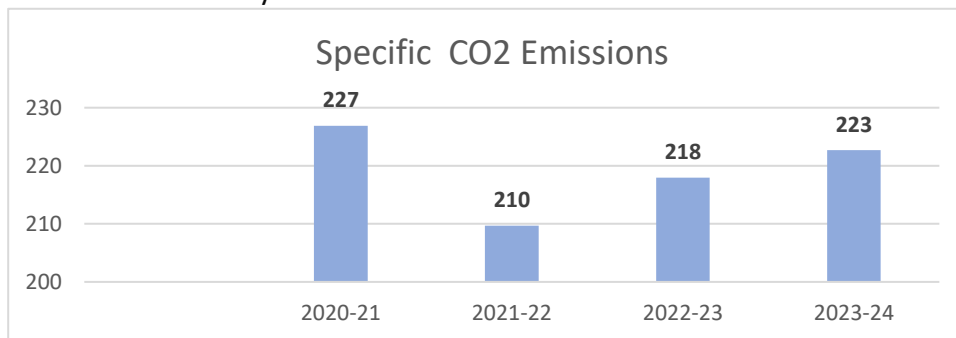
6	Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met.
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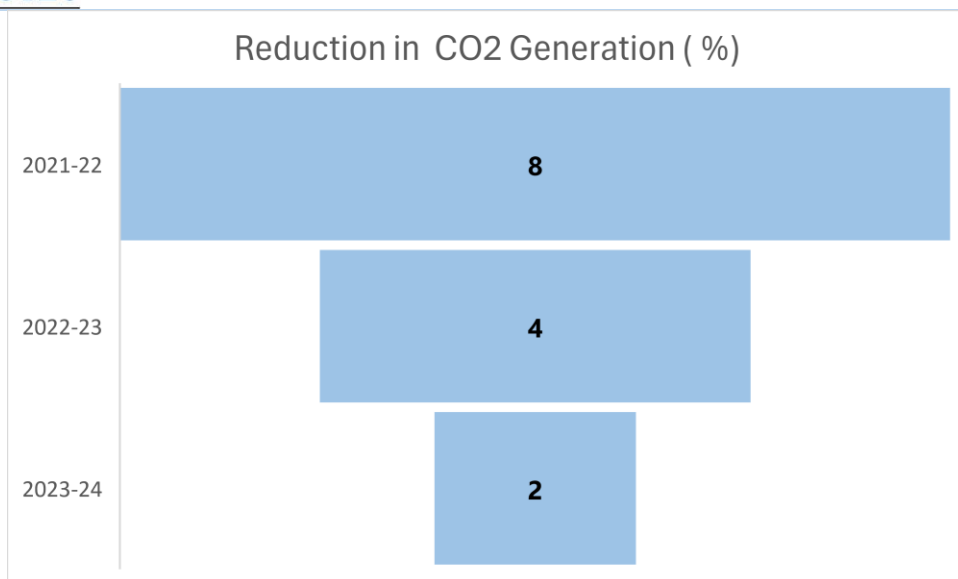
ENVIRONMENT: STATUS OF KEY PERFORMANCE INDICATORS

A) REDUCTION IN CARBON EMISSIONS:

Target: About 15 % Reduction in specific CO₂ generation, from base line financial year 2020-21 (From 227 Kg / Kg of FG to 193 Kg/Kg of FG)

Status: During the year 2022-2023, the reduction was 4 % whereas during 2023-2024 it was 2 % only





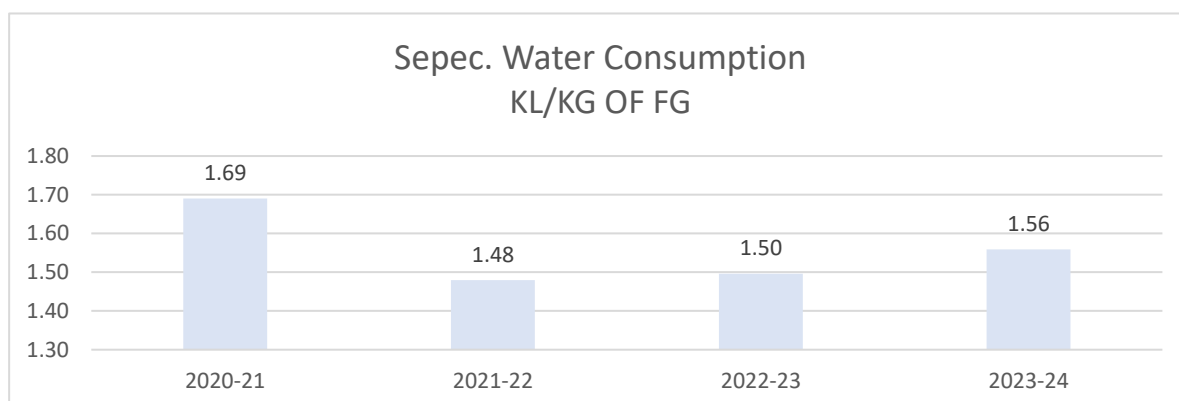
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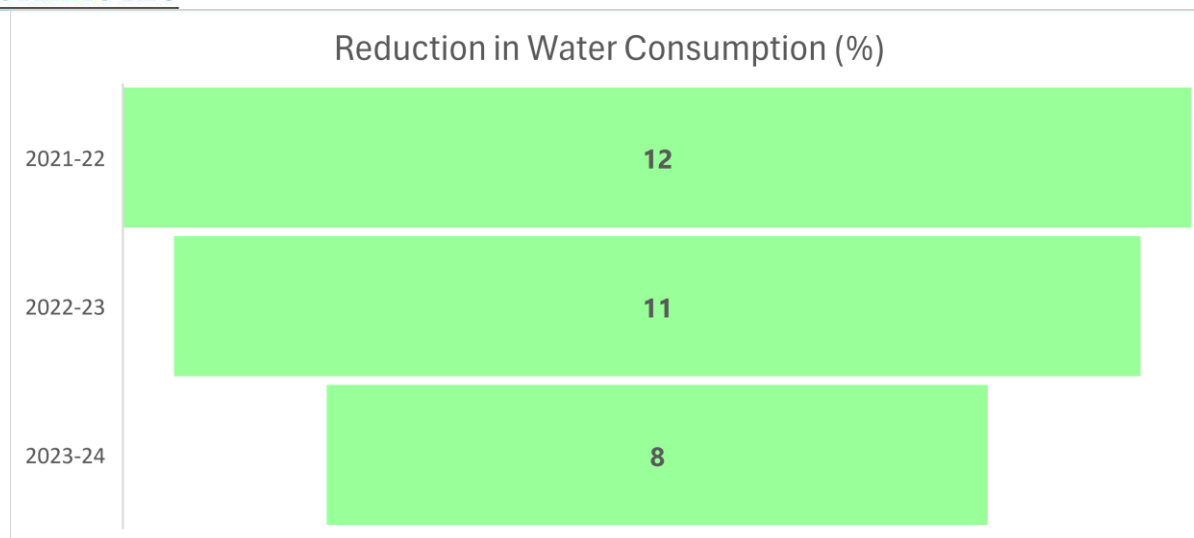
We had expansions at both the sites. We are manufacturing lifesaving drugs we maintain our plants as per cGMP Norms. Although there was almost negligible output from these modifications, but electricity consumption was significant to maintain CGMP Requirements like running of AHUs and machines etc. Therefore, denominator for specific CO₂ generation (Scope-2) was less.

REDUCTION IN WATER CONSUMPTION:

Target: 10 % Reduction in Fresh Water Consumption by March 2026, from base line of year 2020-21, (From 1.69 KL/Kg of FG to 1.52 KL/KG of FG)

STATUS: During 2022-2023 reduction was 11 percent whereas during year 2023-2024 reduction was 8 %.



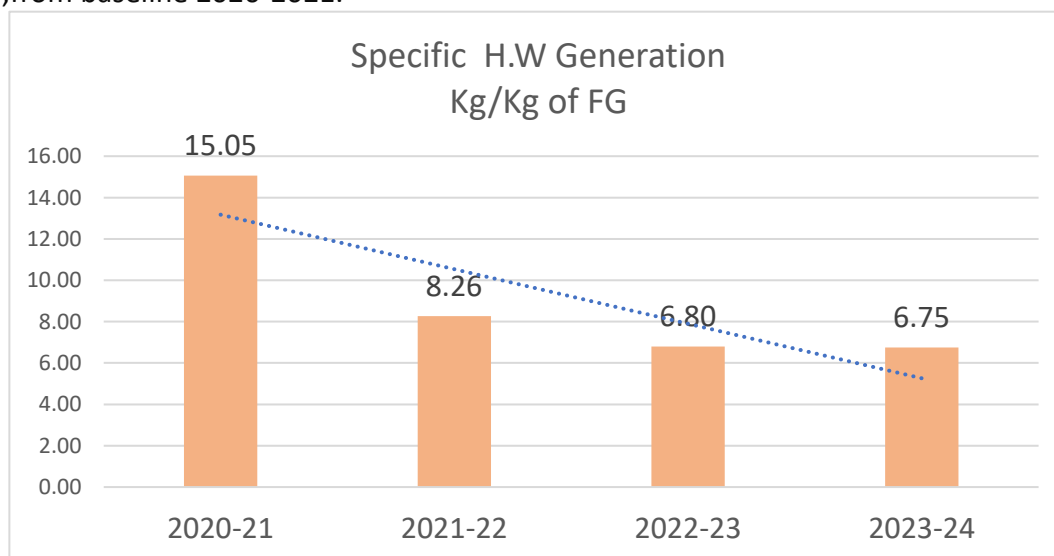


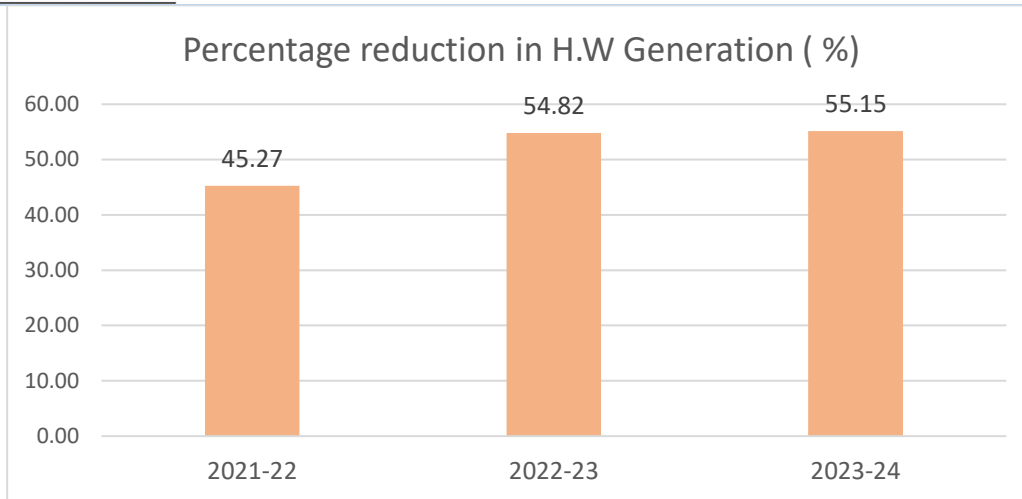
We had expansions at both the sites. We are manufacturing lifesaving drugs we maintain our plants as per cGMP Norms. Although there was almost negligible output from these modifications, but water consumption was significant to maintain CGMP Requirements like running cleanings etc. Therefore, denominator for water consumption was less.

REDUCTION IN HAZARDOUS WASTE:

Target: 40 % Reduction in specific waste generation from base line year 2020-2021, by the end of year 2025, (From 15 Kg/Kg of FG to 9 Kg/Kg of FG)

Status: Targets achieved and maintained we achieved 55 % reduction during 2023-20234 ,from baseline 2020-2021.



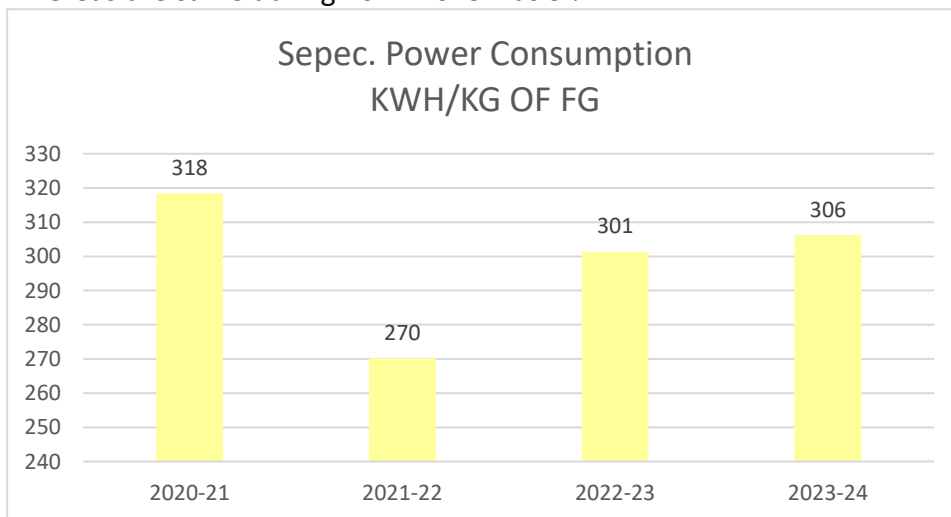


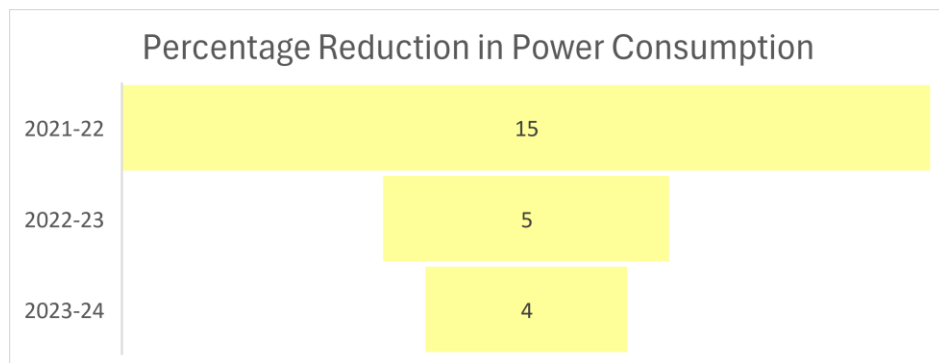
We achieved the targets and maintaining reduction values more than target of 45%

REDUCTION IN POWER CONSUMPTION:

Target: About 10 % Reduction in specific electricity consumption by March 2026, from base line year 2020-2021 (From 318 KWH/ Kg of FG to 286 KWH/Kg of FG)

Status: During FY 2023-2024 the reduction in specific electricity consumption was 4 % only whereas the same during 2022-2023 was 5 %.



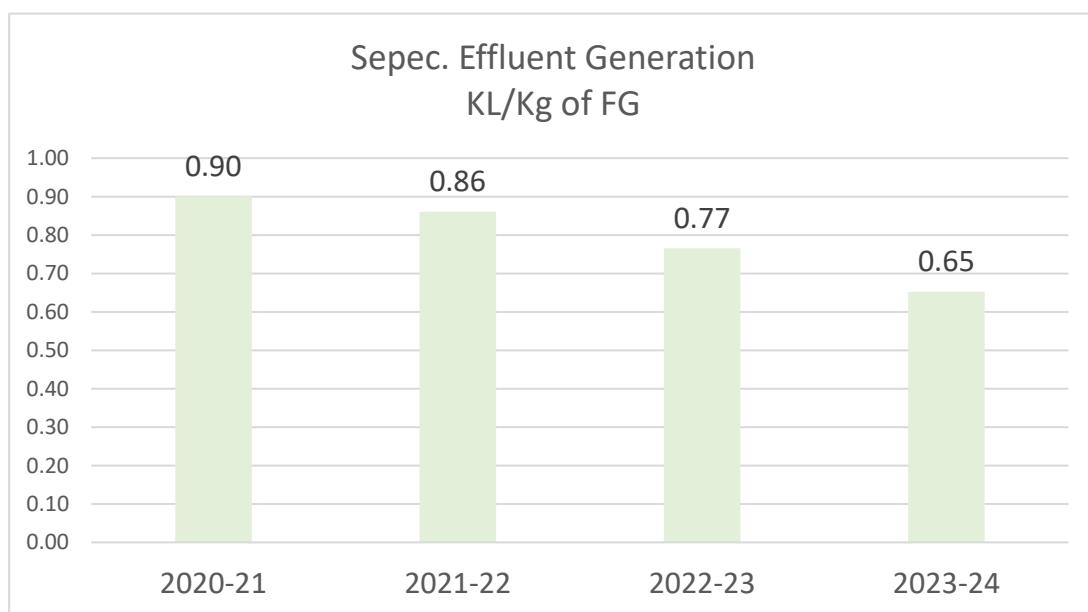


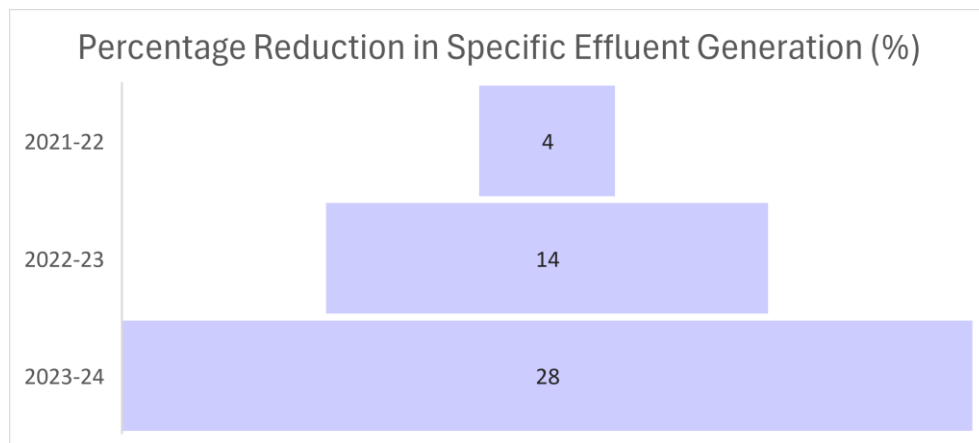
Reasons : We had expansions at both the sites. We are manufacturing lifesaving drugs we maintain our plants as per cGMP Norms. Although there was almost negligible output from these modifications, but electricity consumption was significant to maintain CGMP Requirements like running for Air handling units, running of compressors etc. Also, denominator for specific electricity consumption was less due to less/negligible production from these expansions.

REDUCTION IN EFFLUENT GENERATION:

Target: 30 % Reduction in specific Effluent generation by the end of 2025, from base line of year 2020, (From 0.90 KL/KG of FG to 0.63 KL/KG of FG)

Status: We are very closed to the targets we have achieved 28 % reduction during 2023-20234, from baseline 2020-2021.





SOCIAL

Sr No	OBJECTIVE	TARGET	TIMELINES	STATUS 2023-2024
1	Safety Culture transformation in Symbiotec	Preparation of safety culture transformation program	30.April 2023	Implemented
		To launch safety reward and reprimand policy and start giving awards and penalties.	31.03.2023	Implemented
		Training of Safety leadership on conducting Gemba	15.May.2023	Implemented
		Start of cross functional Gemba by SLTs	01.June.2023	Ongoing
		Start of tool box talks in shifts in production department and warehouse.	01June 2023	Ongoing
		Start of daily toolbox talk by safety officer for project areas and workshops	01 Aug 2023	Ongoing
		Start of departmental safety committees	01June 2023	Ongoing
		Review and revise permit to work system as per the standard requirements	31. Dec 2023	Implemented
2	Training of Employees	At least 01 man days per employee training	31.03.2025	Achieved
3	Improvement in existing health	To review existing health check up system and introduce corporate on OHC to	31. Dec 2023	Implemente d

	monitoring systems of employees and workmen in occupational health centers in Symbiotec Pharmalab .	include various required health check parameters		
4	Establishment of a transparent and accessible HR Management Systems for employees and workmen.	A digital system for human resource management shall be introduced where employees and workmen shall have a transparency and an easy access for attendance, OT, leaves including complete employee lifecycle	30.March .2024	Implemented
5	Wellbeing and wellness of employees	To provide meals at subsidize rates to employees and workmen at all the Symbiotec sites and construction of a new canteen at Rau site.	30.March .2024	Implemented
		To provide medical consultation and treatment to workmen, employees and their families on discounted rates by tie ups with various renowned hospitals.	30.March .2024	Implemented
		Free medical assistance to employees and their families via free OPD services at a multi-specialty and a eye care hospital.	30.March .2024	Implemented
		All employees and workers shall be covered under medical insurance, group personal accidents and term life insurance.	30.March .2024	Implemented
6	Ensuring of compliance at suppliers ends.	To conduct 100 percent assessment of key suppliers by the end of 2026.	Dec 2026	66 % of critical suppliers
		To provide ethics related training to the contractors (Engineering and Civil).	Dec 2024	0

Reason For not meeting Targets:

- 66 % assessment is up to March 2024, and assessment is going on.
- The data is up to March 2024, organization shall put all the efforts to complete the trainings of contractors by the end of 2024.

HEALTH AND SAFETY

OBJECTIVE: To reduce severity rate in 2024-25	Target- Less than < 1.0 %	
Severity rate (Status)	2022-23	2748.5
	2023-24	49.03
OBJECTIVE: To frequency rate in 2024-25	Target- Less than < 1.0 %	
Frequency rate (Status)	2022-23	0.46
	2023-24	0
OBJECTIVE: To find out unsafe acts/ unsafe conditions at <u>work place</u> by site leadership team.		
TARGET: Ensure the compliance of 90% planned Gemba by Site leadership team in 2024-25.		
Status of Gemba Round (in percent) (FY. 2023-24)		66.9 %
OBJECTIVE: To identify hazards in process..		
Target- 100% PHA by December 2026		
Status of completed PHA (in percent) (FY. 2023-24)		22.5 %
OBJECTIVE: To increase Training Hours in FY 2024-25		
Target: 2 Man-days / employee of training in FY 2024-25		
Status of training (in FY 2023-24)		10.7 Hrs. / Employee

Objectives for 2024-25:

- **Installation of:**

- Modular type extinguisher in solvent storage and document storage area (document cell).
- Supplied Air respirators at site to protect to person from the exposure of potent drugs.
- Mist type extinguisher for electrical hazards (transformer protection).
- Surveillance in effluent treatment plant and boundary through CCTV.

Implementation of Warehouse Safety Program like as:

- Effective controls are in place to prevent product from falling
- All PIT specifications fit the operational use of the equipment,
- Storage Racking (All racking has capacity at or above weight of product stored)
- Loading Bay / Dock Operations
- Any openings where a fall is a potential has appropriate guarding/ railing/ barrier
- All aiseways are clear of obstructions and trip hazards
- Blind corners and other obstructions have proper bollards for protection installed for pedestrians
- Fire protection / detection systems are designed appropriately
- Authorized access only to warehouse

➤ Implementation of PPEs Fit Testing Program	
7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements
Please refer the message of managing director	

*Not published on Company's website

- P1:** Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
- P2:** Businesses should provide goods and service in a manner that is sustainable and safe
- P3:** Businesses should respect and promote the well-being of all employees, including those in their value chains
- P4:** Businesses should respect the interests of and be responsive to all its stakeholders
- P5:** Businesses should respect and promote human rights
- P6:** Businesses should respect and make efforts to protect and restore the environment
- P7:** Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- P8:** Businesses should promote inclusive growth and equitable development
- P9:** Businesses should engage with and provide value to their consumers in a responsible manner

DISCLOSURE QUESTIONS	NGRBC Principle								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy And Management Process									
b) Has the policy been approved by the Board? (Yes/No)	Yes, Symbiotec's Governance provides for approval of key policies by Managing Director of the Company, based on the nature of the Policy and the associated regulatory requirements (if any). Key policies approved by M.D (Board) are listed below: • Anti-Bribery and Anti-Corruption Policy • Corporate Social Responsibility Policy • Vigil Mechanism and Whistle Blower • Sustainable procurement Policy • Environment, Health and Safety Policy. • Sustainability Policy • Employees Code of conduct								

	Supplier's code of conduct The remaining policies of Symbiotec's are approved by Key Management Positions.
C) Web Link of the Policies, if available	The Policies covering these principles are available on the Company's website, link -https://www.symbiotec.in/manufacturing-facility/ These are available under 'Environment' tab

8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Board of directors is the highest authority responsible for the oversight of the implementation of Business Responsibility policies. The Managing Director of the Company is the highest authority responsible for implementation of all policies in Symbiotec Pharmalab.
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.	No, board / directors are not responsible for decision making on sustainability related issues. We have an ESG Committee in place but it constitutes members from Key Management position
10	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.	Yes, the Board of Symbiotec has constituted various Board committees and ESG Committee which are responsible for and have a remit over key sustainability related policies of Symbiotec, as below: The Corporate Social Responsibility and Sustainability (CSR&S) Committee: The CSR committee of the Board governs and reviews the Corporate Social Responsibility and Sustainability activities of the Company. The CSR Committee recommends the annual business plan for Symbiotec's Corporate Social Responsibility initiatives to the Board for its approval. The plan includes resource requirements and allocation across interventions and locations. The CSR Committee also receives regular update on the performance of the Company against such plans. The Risk Management Committee: All the risks being explained to board by Managing Director

		3. Environment and Social Governance (ESG) Committee: Yes, it is available and It determines the priority issues that need to be focused on sustainability, creates the sustainability strategy, short, medium and long-term goals, roadmaps and policies. Also, it reviews the progress of sustainability initiatives periodically.
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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/ Quarterly/ Half Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action																		
Compliance with statutory requirements of relevance to the principles, and , rectification of any non-compliances																		
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 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
										✓								

- ✓ Symbiotec obtained certification under various national and international standards, including ISO 14001, ISO 45001. These certifications also include assessment of the policies of the Company by independent external assessor. A summary of certifications received by Symbiotec is included in Section B of this report.
- ✓ Symbiotec has obtained various certificates related to Good Manufacturing Certificates, these audits were conducted by various international statutory authorities on manufacturing and quality procedures and verifications at sites these agencies are -WHO-GMP, US-FDA, EU-GMP (German Authority) and PMDA (Japan Authority)) and KFDA
- ✓ All the sustainability procedures of Symbiotec are audited against the standards of Pharmaceutical Supply Chain Initiatives. These audits are conducted by PSCI approved third party auditors.

- ✓ Symbiotec's sustainability is assessed at the autonomous platform called EcoVadis.
- ✓ Symbiotec sites are audited on every three years by third party based on PSCI standards which are global standards for pharmaceutical business.

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated: **Not Applicable**



SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURES

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

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

Segment	Total number of training and awareness programs held	Topics /principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	NIL During the previous financial year no structured training was provided to board of directors.	The matters like Safety, Health and Environment, Strategy/Industry Trends, Ethics & Governance and Legal & Regulatory matters are regularly discussed and deliberated upon in Board meetings.	NIL
Key Managerial Personnel	On joining training being provided to KMPs. We have introduced a system for refresher trainings on annual basis	Ethics and Code of Conduct	100 % on Joining

Employees other than BoD and KMPs . And Workers	On joining, training being provided to all employees. We are going to introduce a system for refresher trainings on annual basis	Symbiotec Pharmalab provides training on Ethics related policies on joining and refresher training on annual basis In addition, employees and workers are provided need-based training as per their job requirement, covering aspects including Safety, environment, and good manufacturing practices. Symbiotec is also focussed on skill upgradation training and uses an online portal to assign individual e-learning modules regularly to employees for facilitating skill upgradation. The approach is to provide a range of courses with a strong focus on capability development in all functional areas across the levels.	100
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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 Requirements) Regulations, 2015 and as disclosed on the entity's website:

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	NA	NA	0	NA	NA
Settlement	NA	NA	0	NA	NA
Compounding fee	NA	NA	0	NA	NA
Non-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)
Imprisonment	NA	NA	0	NA	NA

Punishment	NA	NA	0	NA	NA
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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 Detail	Name of the regulatory/enforcement agencies/judicial institutions
Not Applicable	Not Applicable

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.

Yes, the Company has an anti-corruption and anti-bribery policy. The Company also communicates, creates awareness, and disseminates policy to all its employees, through e-modules. The web link of policy is: <https://www.symbiotec.in/wp-content/uploads/2024/07/3.0ANTI-BRIBERY-ANTI-CORRUPTION-POLICY.pdf>

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

	FY2023-24	FY2022-23
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY2023-24		FY2022-23	
	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 conflicts of interest: Not Applicable.

8. Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format

	FY 2023-2024	FY 2022-2023
No of days of account payable	138	109

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 2023-2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	-	-
	b. Number of trading houses where purchases are made from	-	-
	c. Purchases from top 10 trading houses as % of total purchases from trading houses.	-	-
Concentration of Sales	a. Sales to dealers / distributors as % of total sales.	-	
	b. Number of dealers / distributors to whom sales are made	-	
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors.	-	
Share of RPTsin	a. Purchases (Purchases with related parties / Total Purchases)	1.14 % (4.7 /411)	0.80% (2.2/286)
	b. Sales (Sales to related parties / Total Sales)	0.25% (1.6/651.60)	0.08% (0.40/542.5)
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	100% (196.27/196.27)	100% (112.6/112.6)
	d. Investments (Investments in related parties / Total Investments made)	100% (42.25/42.25)	100% (656/656)

Leadership Indicators

10. Awareness programs conducted for value chain partners on any of the Principles during the financial year.

We at Symbiotec Pharma lab taking some initiatives to create awareness amongst its value chain partner Most of the awareness programs conducted for value chain partners can be broadly classified into three segments i.e. Safety, Ethics and Business Responsibility:

- **Safety:** Symbiotec' s goal is to achieve 'Zero Harm'. Our EHS policy covers not only employees and workers, but to all value chain partners who enter our sites. All individuals, including contract employees working with vendor partners, needs a safety training through audio visual aids and personally by safety officer and to undergo compulsory safety training in order to work inside the plants. This ensures shared understanding of safety risks and principles between all personnel present on the site.
- **Ethics:** Symbiotec has certain ethics related expectations from it's suppliers and vendors. For that Symbiotec has creates Supplier's Code of conduct. Key topics which get covered under these awareness sessions include governance, ethics, health and safety, labour practices and human rights and Environment.
- **Supply Chain Responsibility:** Symbiotec Pharmalab has it's Sustainable procurement program. The programme covers issues related to ethical behaviour, human rights, health & safety, and environmental sustainability, amongst others. We conduct 66% Supplier's assessment based on relevant checklists. We have conducted assessment of 100 suppliers out of 150 KSM suppliers. Our target is to do assessment of 100 percent key suppliers by the end of year 2030.

11. 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, Symbiotec has a Code of Conduct for all members, which requires all Directors of the Company to always act in the interest of the Company and ensure that any other business or personal association which they may have does not involve any conflict of interest with the operations of the Company. In case of any actual or potential conflicts of interest, the concerned Director is required to immediately report such conflicts and seek approvals as required by the applicable law and under Company's policies.

The Company receives an annual declaration from its Board of Directors and all employees confirming adherence to the Code of Conduct, which includes the provisions on dealing with conflict of interest.

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:

	FY2023-24	FY2023-22	Details of improvements in environmental and social impacts
R&D	17.04 Cr.	13.48 Cr.	Improvement in product quality, yield improvement, thus reduction in waste, environmentally friendly and safe processes.
Capex	6.06 Cr.	0.98 Cr.	

Provide the description in detail: R & D is working towards development of safe and environmentally friendly processes, improvement in yield thus reduction in waste generation.

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

Yes. Symbiotec Pharma lab has a dedicated Sustainable Procurement Policy for its operations, which are applicable to all supply chain. The Policy aims to encourage suppliers to share Symbiotec's commitment to embedding sustainable business practices. The Sustainable Procurement Policy focusses on the following four principles on Environmental, Social, and Governance parameters:

- **Health and safety:** Symbiotec expects its suppliers to adopt management practices in respect of health and safety which provide a high safeguard for their workers.
- **Fair business practices:** Symbiotec's Code of Conduct outlines the ethical standards and fair business practices by which Symbiotec conducts its business, and the company expects its suppliers to adopt similar principles. Symbiotec has established code of conduct for its suppliers and expect the suppliers to comply with them.
- **Environmental protection:** Symbiotec expects suppliers shall take care of their environment and comply with all the legal requirements pertaining to environment.
- **Human rights:** Symbiotec expects suppliers to develop and implement policies and

procedures to promote and protect human rights in their business and to encourage their step-down suppliers to do likewise.

As a requirement of our Sustainable Procurement Policy, all our suppliers acknowledge the Supplier Code of Conduct. We assess our key suppliers on the principles of our policy. Our assessment includes questionnaire on the suppliers' Environmental, Social and Governance practices.

- The outcome of the Sustainable Procurement Policy assessment guides us onto the next steps – identifying the gaps/opportunities for improvement and taking collaborative projects with the Supply Chain partners to bridge the gaps. The overall governance, oversight and review of the sustainable procurement programme is led by the senior leadership team.

b) If yes, what percentage of inputs were sourced sustainably?

It is mandatory for all suppliers of Symbiotec to declare their commitments to Symbiotec's sustainability expectations. 100 % of Symbiotec's key inputs are sourced through suppliers who commit to our guiding principles i.e. supplier's code of conduct by providing declarations 100 % services are from the suppliers, contractors and vendors with whom our sustainable requirements are shared. 66% suppliers of key inputs have been assessed based on our sustainable procurement policy.

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:

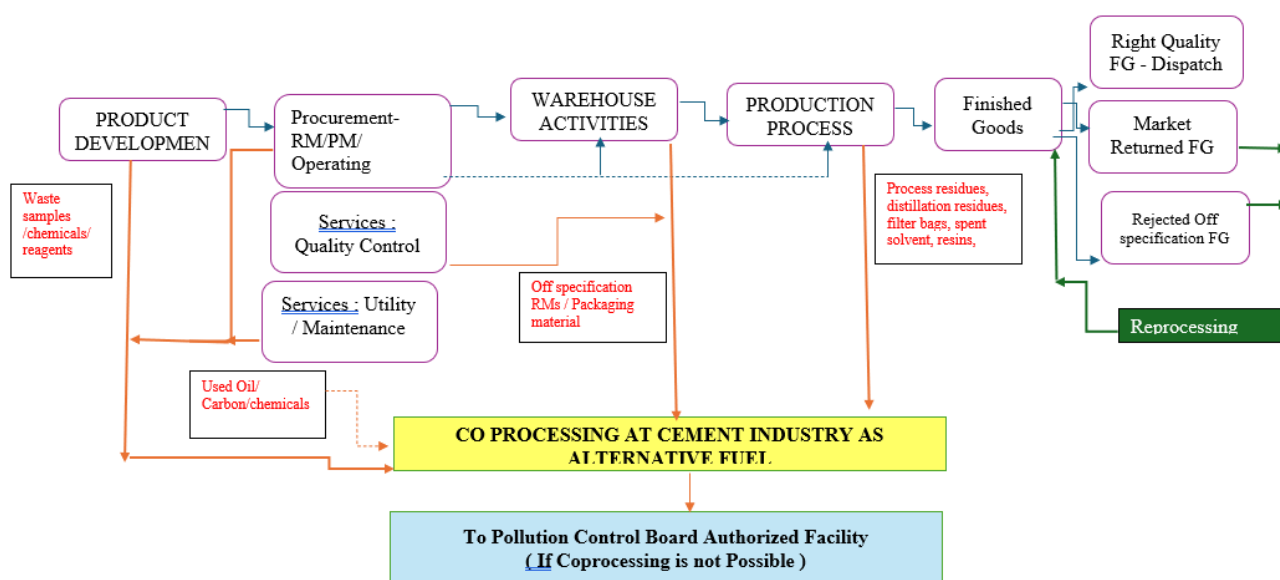
Our date expired product being a expensive pharma compounds are hazardous in nature. Our process is so validated and robust that there is no rejection and market return. However, Symbiotec Pharma lab being a responsible corporate citizen is taking utmost care for disposal of its hazardous and non-hazardous waste. For SEZ site which is the largest site, 100 % hazardous waste like sludge and process residues etc. being sent for coprocessing to cement industries as an alternative fuel for cement kilns. From Rau site all the hazardous waste is disposed at the end of MPPCB approved site Ramkey for safe disposal. Rau site is generating very less amount of hazardous waste which cannot be sent for recycling. Other waste like packaging materials, E Waste, Battery waste etc. is being sent to MPPCB authorized recyclers.

We consider Direct Environmental impacts generated from the end-of-life of the products. These impacts can include hazardous, non-hazardous waste generated, emissions and accidental pollution. An entire product flow diagram from product development stage to end of life is shown in subsequent pages.

From the product development stage to dispatch followed by market return if any, all the controls have been taken to mitigate significant environmental aspects. During manufacturing if it is found that any raw material is expired and cannot be reused due to off specification, wherever possible that RM is sent back supplier for reprocessing. If reprocessing is not possible the same raw material is

disposed in an environmentally friendly manner i.e. co processing for cement industry. If any batch of finished goods is not meeting the specification or is market returned material it is finally reprocessed to make it reusable. If for any reason it cannot be reprocessed, it shall be disposed in an environmentally friendly manner by sending it to cement industry where it is co processed with other waste and used as alternative fuel for cement kilns. Similarly hazardous waste which is generated at various stages like warehouse,

Engineering (utility & maintenance), Quality is sent for coprocessing and alternative fuel in cement industries. There are possibilities if due to any reason like shut down, maintenance etc. cement industries are not able to receive waste, we have an alternative way to handle this situation. We have agreement with pollution control board authorized 'TSDF (Treatment, Storage and Disposal Facility)'. Hence all the waste is disposed in a safe and environment friendly way.



Following is the quantity of waste generated during financial year 2023-2024

S n o	Type of waste	QTY DISPOSED (MT) /Nos	MODE OF DISPOSAL
1	Hazardous Waste	1013.73	SEZ- Recycling Rau- Safe disposal at govt approved facility
2	Non Hazardous Waste	373.7	Recycle
3	E Waste	0.348	Recycle
4	Battery Waste	471 nos	Recycle
5	Bio Medical Waste	7.6	Incineration

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:

As per Plastic Waste Management Rules, 2016 and its Amendments, Symbiotec comes under the obligations of Extended Producer Responsibility (EPR) for Plastic waste Management. We have applied for EPR Registration of Symbiotec Pharma lab to the Central Pollution Control Board.

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:

Life cycle assessment (LCA) is a powerful tool for identifying opportunities to reduce the environmental impact of a product including the raw materials and services involved throughout its life cycle.

Symbiotec has conducted life cycle assessment of it's products at each stage i.e. from developmental stage in R & D to market return to demonstrate that improvements in process.

A summary is provided below

Entity	NIC Code	Name of product/ service	Turnover (Cr)	% of total turnover (of the respective entity)	Boundary for which the life cycle perspective / assessment was conducted	Whether conducted by independent external agency	Result communicated in public domain
Symbiotec Pharma Lab Pvt Ltd RAU & SEZ Sites	21001	Cortico-Steroid and Hormone Active Pharmaceutical Ingredients	651.6 Cr	100%	From product development to market return inf any.	No	https://www.symbiotec.in/wp-content/uploads/2024/07/13.0PRO-DUCT-END-OF-LIFE-CYCLE.pdf

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 social or environmental concerns and/or risks arising from disposal of our products/services, as identified in the Life Cycle Perspective/Assessments (LCA). From our SEZ site we are sending about 90% hazardous waste to cement industries as an alternative fuel after coprocessing. From Rau site our hazardous waste is sent to MPPCB approved TSDF- Ramky.

All other nonhazardous waste like liners, scrap being sent to authorized recyclers.

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	
	FY2023-24	FY2022-23
Solvents- Acetonitrile	73.5	Data Not available

Because we are manufacturing lifesaving drugs, in line with good GMP practices and for quality improvement we are not using recovered solvents. We are recovering it from ML and sending it to third party for further usage like use in paint industry. We are using only acetonitrile in production after recovery.

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tons) reused, recycled, and safely disposed - plastic, e-waste, hazardous, others:

In metric tonnes	FY2023-24			FY2022-23		
	Reused	Recycled	Safely disposed	Reused disposed	Recycled	Safely disposed
Plastics (incl. packaging)	0	206.5 mt	0	0	176 mt	0
E-waste	0	0.348 mt	0	0	0.458 mt	0
Hazardous waste	0	842.11 mt	171.6 mt	0	751.0 mt	199.5 mt
Other waste	73.5 (Acetonitrile)	373.7 mt		0	950 mt	
Recovered Solvent sold to authorized recyclers	-	3153 KL				

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

Indicate Category	Product	Reclaimed products and their packaging materials as % of total products sold in respective category
Active Pharmaceutical Ingredient		No reclaimed product during the said periods i.e. 2022-23 & 2023-24. Symbiotec doesn't consider it waste. If it does not meet the quality criteria it can be reprocessed and sold.

PRINCIPLE 3 BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS.

ESSENTIAL INDICATORS

Details of measures for the well-being of employees and workers:

Details of measures for the well-being of Employee: (2023-2024)-

Category	% of employees covered by										
	Total I(A)	Health Insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Carefacilities	
		Num ber (B)	% (B / A)	Num ber (C)	% (C/ A)	Num ber (D)	% (D /A)	Numb er(E)	% (E/ A)	Number (F)	% (F / A)
Permanent employees											
Male	878	878	100 %	878	100 %	0	0	0	0	0	0
Female	43	43	100 %	43	100 %	43	100%	0	0	0	0
Total	921	921	0	921	0	0	0	0	0	0	0
Other than Permanent employees											
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

Details of measures for the well-being of worker: (2023-2024)-

Category	% of employees covered by										
	To tal (A)	Health Insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Num ber (B)	% (B / A)	Num ber (C)	% (C / A)	Num ber (D)	% (D /A)	Numb er(E)	% (E/ A)	Numbe r(F)	% (F / A)
Permanent employees											
Male	421	421	100 %	421	100 %	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	421	421	100 %	421	100 %	0	0	0	0	0	0
Other than Permanent employees											
Male	256	-	-	256	100 %	0	0	0	0	0	0
Female	0	-	-	0	0	0	0	0	0	0	0
Total	256	-	-	256	100 %	0	0	0	0	0	0

Additionally, we provide:

- Free medical assistance to employees and their families via free OPD services at a multi-specialty and a eye care hospital.
- To provide medical consultation and treatment to workmen, employees and their families on discounted rates by tie ups with various renowned hospitals.
- All employees and workers are covered under medical insurance, group personal accidents and term life insurance.
- To provide meals at subsidize rates to employees and workmen at all the Symbiotec sites.
- Company has policy for flexible hours. Duty hours are from 08:30 am to 10:00 am.

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

All Symbiotec entities provide retirement benefits to all its employees, aligned with regulatory requirements and market practices. Key retirement benefits provided by Symbiotec are:

Benefits	Applicability (Country)	FY2023-24			FY2022-23		
		No. of employees covered as a % of total employees in the relevant geographies	No. of workers covered as a % of total workers in the relevant geographies	Deducted & deposited with the authority or exempted fund	No. of employees covered as a % of total employees in the relevant geographies	No. of workers covered as a % of total workers in the relevant geographies	Deducted & deposited with the authority or exempted fund
Employee Provident Fund Benefits including pension	India	100%	100%	Yes	100%	100%	Yes
Gratuity Benefits	India	100%	100%	Yes	100%	100%	Yes
Leave Encashment	India	100%	100%	NA	100%	100%	NA
Employees' State Insurance Benefits	India	Covered as per rules	Covered as per rules	NA	Covered as per rules	Covered as per rules	NA
National Pension Scheme	India	Optional, open to employees. Interested employees can opt for it.					

A brief description of all the schemes is provided below:

- **Employee Provident Fund:** Defined contribution scheme with a lumpsum payment at superannuation, applicable to companies in India.
- **Gratuity:** Defined benefit scheme with a lumpsum payment at superannuation, applicable to companies in India
- **National Pension Scheme:** Defined contribution retirement savings scheme applicable to companies in India. The scheme is voluntary in nature.

- **Employee Pension Scheme:** Saving scheme that assures a pension to employees after retirement, wherein a part of the employer's contribution to the Employee Provident Fund is made towards the Employee Pension Scheme (in India).
- **Employees' State Insurance Benefits:** The Employees' State Insurance Act is a social security legislation that provides for medical care and cash benefit in the contingencies of sickness, maternity, disablement and death due to employment injury to workers in India

3.0 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.

Symbiotec has taken steps to comply with the Rights of Persons with Disability Act, 2016 (RPwD Act) across its sites and has put in accessibility measures in compliance and alignment to the accessibility mandate of the RPwD Act. Some key actions taken by Symbiotec are listed below:

As required under the RPwD Act 2016, all new building structures are in compliance with the accessibility requirement. Symbiotec has workstations and washrooms in accordance with the regulations.

Although presently we do not have differently abled employees as per Upper Limb, Lower Limb, Visual Disablement and Hearing Impairment, however Symbiotec is committed to provide all the necessary aids like specialized laptops as per the type of disability to its differently abled employees. Necessary Speech to Text, Text to Speech and Screen reading software and hardware aid shall be provided to persons with disabilities to facilitate the use of computers and IT systems.

3. 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, Symbiotec has a Child Labor and Human Rights Policy which also address equal opportunity for Persons with Disabilities please refer page no 5 of the policy which is available at link [http :](http://www.symbiotec.com) In addition, the Symbiotec's Code of Conduct incorporates key equal opportunity principles.

Symbiotec recognizes the value of diverse workforce. It is committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect & dignity. It strives to ensure that the Company's workforce is representative of all sections of the society and proactively works towards

ensuring fair representation of differently abled within its workforce. Symbiotec is committed to eliminating all forms of unlawful discrimination, bullying and harassment of people with disabilities.

Symbiotec encourages candidates with different abilities to apply for identified suitable positions and its decisions on employment, career progression, training or any other benefits are solely based on merit.

Symbiotec's Child Labor and Human Rights policy which includes discrimination is available at:

<https://www.symbiotec.in/wp-content/uploads/2024/07/4.0CHILD-LABOUR-AND-HUMAN-RIGHT-POLICY.pdf>

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

	Permanent Employees		Permanent Workers	
Gender	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Female	100 %	100 %	Not Applicable	Not Applicable
Total	100 %	100 %		

Company do not provide maternity leave to male employees.

5. 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	Yes, Symbiotec Pharmalab has grievance redressal mechanisms for addressing complaints and grievances of employees and workers, as below: Symbiotec Pharmalab has a dedicated one-stop solution for all employee issues across all the sites. We have a policy on grievance handling and in compliance to this policy every site its own grievance handling committee. The tenure of the committee is one year. On the joining of new employee he is made aware of this policy whereas for existing old employees refresher training is being provided once in a year and record are kept. The aggrieved employee must first submit his grievance in writing to Site HR Head. Grievances must be submitted within 30 calendar days following the date employee first knew or should have known of the grievance. Site HR Head records the grievance in 'Grievance Register'
Other than Permanent Workers	
Permanent Employees	

	and forward the grievance application to Grievance Redressal Committee. The Grievance Redressal Committee conducts investigation and set the grievance of the employee. The Grievance Redressal Committee complete its proceedings within thirty days on receipt of a written application by or on behalf of the aggrieved party. The employee who is not satisfied with the decision of the Grievance Redressal Committee may prefer an appeal to the Chief Human Resource Officer (CHRO) against the decision of Grievance Redressal Committee. The Chief Human Resource Officer (CHRO) within 30 working days from the date of receipt of such appeal, dispose off the same and send a copy of his decision to the concerned employee.
Other than Permanent Employees	Yes, Symbiotec Pharma Lab also has a Whistle-Blower Policy and associated mechanisms to redress grievances of all stakeholders, including employees. The link to the Policy is available on Symbiotec's website and accessible to everybody at https://www.symbiotec.in/wp-content/uploads/2024/07/7.0MECHANISM-AND-WHISTLE-BLOWER-POLICY.pdf https://www.symbiotec.in/wp-content/uploads/2024/07/6.0GRIEVANCE-HANDLING-POLICY.pdf

6. Membership of employees and worker in association(s) or Unions recognized by the listed entity.

	FY2023-24			FY2022-23		
	Total Employees/ Workers in respective category (A)	No. of Employees / Workers in respective category who are part of association or union (B)	% (B/A)	Total Employees/ Workers in respective category (D)	No. of Employees / Workers in respective category who are part of association or union (C)	% (D/C)

Total permanent employees						
Male						
Female						
Others	Not applicable – We do not have any union at Symbiotec But our Employees are free to form union					
Total permanent workers						
Male						
Female						
Others				-	-	-

We do not have any union of workmen. We recognize and respect the right of our employees to freedom of association and their rights to collective bargaining (incl. labor unions). The employment of a worker is not contingent upon the condition that such worker joins or not a union or be forced to relinquish trade union membership. Furthermore, union membership shall not be the cause for the dismissal of, or otherwise prejudice against, a worker.

We respect freedom of association and the right to collective bargaining in accordance with the local laws, enabling employees to join unions and voluntary negotiate. We are committed to cooperating with the employees' representatives' organizations and to having a meaningful and constructive relationship with trade unions at local and national level we engage in social dialogue at every level and if required shall enter into bi partite agreements that advance the right of workers.

8.0 Details of training given to employees and workers:

Category	FY2023-24			FY2022-23		
	Total Number	On health and safety measures (%)	On skill upgradation (%)	upgradation measures (%)	On health and safety Total Number (%)	On skill safety (%)

Permanent Employees

Male	1297	1297	100	1264	1264	100
Female	45	45	100	52	52	100
Others			100			100
Total	1342	1342	100	1316	1316	100

Permanent Workers

Male	256	256	100	225	225	100
Female	0	0	100	0	0	100
Others	0	0	100	0	0	100
Total	256	256	100	225	225	100

Symbiotec places great importance on continual development of human resources at all levels and takes responsibility for the professional development and career growth of all its employees. Future skills & competencies aligned with the long- term strategies of the organization are given equal focus, along with the skills/competencies required at the present time. Key focus areas of the organization's training interventions are:

- Core foundational knowledge including Safety, Business Ethics, good manufacturing practices.
- Functional/technical skills
- Business leadership Skills – Recently introduced for training of leadership team on various important topics

Considering the varying needs of different sets of workforces, a multi-dimensional approach has been taken which is manifested through various frameworks & processes deployed in Symbiote's training & development ecosystem. Some key processes for different categories of workforce are listed below:

New Recruits: New recruits are provided with three days induction training includes safety training , Ethics, GMP and skilled based trainings.

Permanent employees (including Permanent Workers): Initially training need identification (TNI) is done and based on TNI an annual training calendar is prepared for employees and trainings are imparted by qualified trainers in classroom. Symbiotec has also invested in e-learning modules that supplement the instructor led training programs . Employees can get themselves familiar with e-modules and standard operating procedures.

Contract Workers: Training & assessment through structured programs encompassing critical inputs on Safety and Functional skills and Reskilling opportunities through on the job training, tool box talk and quarterly training. We provide training to contractual employees using audio- visual safety movies and class room trainings on quarterly basis.

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

Category	FY2023-24			FY2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C) (D/C)	No. (D)	%
Permanent Employees						
Male	1297	1297	100	1264	1264	100
Female	45	45	100	52	52	100
Others ¹			100			100
Total	1342	1342	100	1316	1316	100
Permanent Workers						
Male	256	256	100	225	225	100
Female	0	0	100	0	0	100
Others ¹	0	0	100			
Total	256	256	100	225	225	100

Career progression and career development systems are in place for all permanent employees and workers at all locations. Performance and career development reviews are undertaken to review the skill level of each worker and is essential in their career progression and development. Such reviews are at an individual level and performance review mechanisms is in place. The annual salary incitement for Permanent employees and workers is also based on the performance parameters of Productivity, Profitability and Safety. We pay every worker adequate compensation for the work he/she performed. It is sufficient to meet the worker's basic needs and their families within the working hours set by national law. We provide equal pay for equal work and do not tolerate any discrimination related to origin, nationality, religion, race, gender, disability, or age. We comply with the national legal standards and the rules of the Madhya Pradesh state government.

The detail of promotions / career upgradation during the financial year 2023-2024 is given below :

	UOM	Rau Site	SEZ Site	Total
Nos of Promotions	Nos	93	51	144
Percentage of employees promotes	%	17.19%	6.36%	10.7 %
Nos of Female Employees promoted	NO	15	2	17
Percentage of females in promotion	%	16.1%	3.9%	11.8%

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 of such system?**

Yes, Symbiotec has implemented an occupational health and safety management system. The system is based on the ISO 45001 and is designed to ensure that the Company meets its legal obligations and provides a safe and healthy working environment for its employees. The certification of the system is done by TUV-Nord.

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

Symbiotec places the highest emphasis on Health & Safety and has implemented various measures to ensure that Safety is a priority in all its operations.

Assessment of work related hazards starts from R & D where on development and transfer of process in to production modules a detailed study HAZOP is conducted .The Company has introduced a Recalibrated Risk Matrix to improve its hazard identification and risk assessment

process and has implemented an Environment, Health, and Safety (EHS) risk management framework to assess risks associated with all routine and non routine activities. The framework also captures the top organizational risks related to EHS, and outlines strategies to address them.

Symbiotec's commitment to safety is demonstrated through its continuous efforts to enhance its safety culture and reduce risks through strategic interventions. The Company employs several proactive safety tools to ensure a safe working environment for its employees. These tools include:

Site Gemba by leadership team, regular inspections, Audits, Management of change, Contractor's safety management, departmental and site safety committees and their monthly meetings, Shift surveillance of the workplace to identify potential hazards and unsafe practices by senior executives of the Company. Elimination of Commonly Accepted Unsafe Practices, which targets practices that are commonly accepted but pose a risk to employees' safety.

Review of the safety management system by top management on quarterly basis

Job safety analysis is another tool used by Symbiotec to identify potential risks that may result in accidents and take measures to eliminate them. The critical permits to work are followed by Job Safety Analysis. To control the hazards arising from non-routine activities, Symbiotec has an effective permit to work system which meets the requirements of national and international standards.

To enable smooth functioning of safety management system, Symbiotec has developed an EHS dashboard where employees can report unsafe act, conditions and near miss incidents. All the EHS procedures and material safety data sheets, safety manuals are available on EHS dashboard and every employee has access to this EHS portal. Incident reporting and effective CAPA management is also conducted using this dashboard.

Any change in the existing system is addressed through change management system which is routed through the site safety and environment head for assessment, all the recommended actions are ensured for closure.

C) Whether you have processes for workers to report the work related hazards and to remove themselves from such risks:

Yes, all employees can report incidents and near-misses through EHS Dashboard which is an IT platform to enable prompt reporting, investigation and learning. Symbiotec follows a reporting and investigation process to identify the root cause of any incidents and to implement corrective and preventive measures to prevent recurrence of similar incidents. The reporting and investigation process is aligned with the incident investigation procedures outlined in the Symbiotec's Incident Management System.

Symbiotec also has a safety office at every site and a 24 x 7 safety surveillance by safety officers where employees can raise their safety concerns anonymously. The raised concerns are

addressed promptly by the relevant departments and a feedback mechanism is in place to ensure that the employees are informed of the outcome of the raised concerns. In addition to these reporting mechanisms, Symbiotec also conducts regular safety audits, safety assessments and safety walk-downs to identify and address any safety risks in the workplace. These audits and assessments are performed by internal safety auditors and external safety experts, and the findings are used to improve the safety management system. Every department has a safety committee, the head of the department and safety manager are the members of these committees. The monthly departmental safety committee meetings take place religiously which is documented. Here all the workers and employees can openly discuss work-related hazards and corrective and preventive actions are taken in the meeting.

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

Yes, Symbiotec prioritizes the health and well-being of its employees and workers. The Company provides access to non- occupational medical and healthcare services, such as hospitals, dispensaries, and health insurance, at their respective locations. We are providing medical consultation and treatment to workmen, employees and their families on discounted rates by tie ups with various renowned hospitals. Also ,employees can avail free medical assistance to themselves and their families via free OPD services at a multi-specialty hospitals and a eye care hospital. Symbiotec's comprehensive approach to employee health and well-being underscores its commitment to creating a safe and healthy workplace environment.

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

Safety Incident/Number	Category	FY2022-23	FY2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.74	0.77
Total recordable work-related injuries	Employees	5	4
	Workers	15	20
Severity rate (Man days lost due to LTI cases (per one million-person hours worked)	Employees	0	0
	Workers	4448.6	122.7
No. of fatalities	Employees	0	0
	Workers	1	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	1	1

Before the sustainability reporting period of April-2023 to March 2024, a fatal incident occurred at SEZ site of Symbiotec on 25th February 2023. Where a permanent employee Mr. Govind who was working for last ten years in the same area had met with a heart attack and then as a result of the unbalancing or the trauma caused by the heart attack he fell down from platform to nearby tank and we lost an important and experienced colleague. He was rescued and sent to hospital where he was reported dead. Further the employees who were involved in rescue activity were also kept under observation for some time. Being a responsible citizen Symbiotec extended immediate financial support of Rs 15 lac to the family of victim, Symbiotec understands that this incident was unfortunate and should not have happened. Therefore, to avoid recurrence of such types of incidents has taken robust corrective and preventive actions and completed them. For detail of CAPAs please refer section 15 below. The incident was reported to the government bodies like Directorate of Industrial Safety and Health, Police station & district administration.

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

Symbiotec's goal is to achieve 'Zero Harm' target . It has enunciated safety policies that provide clear direction, created a sound safety governance structure, established robust management & reporting systems and training and communication mechanisms, along with well-defined performance measures and indicators, to track its Safety & Health performance.

Symbiotec has also launched the Safety culture transformation program reiterating its commitment towards Safety Excellence.

Safety & Health of the workforce is fundamental to the creation of sustained business value at Symbiotec and trust in it as a preferred employer. The Company is committed to providing a safe & healthy environment to the workforce and addressing impacts by investing in achieving its safety vision of 'Zero Harm'.

a) Build (Safety) leadership capability at all levels

- Implementation of past fatal and red risk recommendations across the organization.
- Influence behavior through deployment of Reward & Recognition as well as consequence management system.
- Leveraging deployment of digital interventions for risk reduction across all locations of Symbiotec.
- Safety Gemba by leadership
- Safety review by leadership

b) Improve competency and capability for hazard identification & risk management.

- Training need identification, preparation of training calendar, imparting training.

- Self-e-learning modules and standard operating procedures.
- Periodic training of contractual employees and daily toolbox talk.
- Conducting hazards identification and risk assessment for all planned and unplanned activities. Conducting Job safety analysis.

c) Formulation of procedures and training

- Preparation of more than 50 procedures for occupational health and safety
- Identification of high-risk activities and preparation of procedures to control them.

d) Improvement in Process Safety Management

- Formation of internal cross functional teams at sites.
- Hiring of external experts and training of cross functional team.
- Start of HAZOPS and wetted by experts.
- Refresher training of internal

e) Implementation of Industrial Hygiene

'Symbiotec has established a comprehensive industrial hygiene program across the sites. This includes qualitative and quantitative exposure assessment. Based on the recommendation controls are provided to protect workers from adverse effect of product and chemicals. All the new equipment are being procured considering containment like isolators. Across the sites company has provided supplied air respirators and PAPR(Powered air purified respirators) having protection factor 1000, which is the best and provide a high degree of protection to employees and workmen.

f) Ensure contractor safety risk management.

- Daily assessment of and toolbox talk for contractors.
- Upgrading skills of contract workmen and development of program on Contractor Safety Management across locations.
- Periodic training of contractual employees.
- Contractors' safety committees,
- Reward and recognition.

g) Safety Audits, Inspections

- Preparation of Audit and Inspection plan, Schedule.
- Conduct audit, identification of nonconformance and area for improvement.
- Follow ups and closure of observations.

h) Management Review

Symbiotec has a governance mechanism for safety management. For that a quarterly review of safety key performance indicators is done with top management. Adequate support and resources are provided by top management to meet the safety objectives. Also big decisions are taken in management review meeting for continual improvement.

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

	FY2023-24		FY2022-23	
	Filed during the year	Pending resolution at the end of year	Filed during the year	Pending resolution at the end of year
Working Conditions	509	172	27	7
Health & Safety	509	172	27	7

All the complaints from workmen and employees related to working conditions and Health and safety are clubbed.

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 % Plants were assessed for compliance of Health and Safety practices against ISO 45001 -2018 Standards
Working Conditions	

1.5 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:

- All safety incidents and near-misses are investigated, and risk mitigation is done through the incident classification, reporting & investigation safety standard. All Opportunities for Improvement identified during internal and external assessments are captured and addressed.

- One of our employees got heart attack and as a result he fell down in to the ETP tank where he was working. We investigated the incident in detail, decided a comprehensive CAPAs and closed them: Following is the detail of CAPAs.

No	ACTION		Status
1.1	Corrective Action	Review the Job Description of Helper, Operator and Supervisors, define these roles appropriately.	Closed
1.2	Corrective Action	Identify TNI for all Symbiotec employees covering helpers, operators, supervisors and managers. This should include training on Emergency rescue as well.	Closed
1.3	Corrective Action	Revise existing SOP on trainings & capability building and develop implementation Plan.	Closed
1.4	Corrective Action	Identify Non-routine tasks across all operations covering Utilities (ETP, Boiler, DGs, Electrical, Chillers, compressors /AHUs), WH & Manufacturing operations.	Closed
1.5	Corrective Action	Perform HIRA on these activities & define safety controls basis HIRA	Closed
1.6	Corrective Action	Define or Revise relevant SOPs basis non-routine tasks & their HIRA.	Closed
1.7	Corrective Action	Define the need of JSA with high-risk jobs under PTW system.	Closed
1.8	Corrective Action	To discuss with occupational physician which tests are related to heart are required and get approval.	Closed
1.9	Corrective Action	To harmonize existing SOP on occupational health checkup in consultation with occupational health physician.	Closed
1.10	Corrective Action	Start monitoring of additional test parameters in annual medical examination like ESG, complete blood profile, SGPT, Creatinine etc.	Closed
1.11	Preventive Actions	To provide surveillance cameras in ETP area.	Closed
1.12	Preventive Actions	Provide nets around the tanks.	Closed
1.13	Preventive Actions	To provide lifelines for open tanks in ETP area.	Closed
1.14	Preventive Actions	Display of hazards and cautions shall be provided at all the identified tanks.	Closed
2.1	Corrective Action	Define SAFETY training for all employees & contractors on the importance of following safety rules with focus on - Hazard & Risk identification and importance of their controls i.e. Engg. /SOPs /PTW /PPEs and possibility of legal/disciplinary action in case of rule violation.	Closed

2.2	Corrective Action	Prepare the training implementation Plan.	Closed
2.3	Corrective Action	Impart training.	Closed
2.4	Preventive Actions	To Prepare and roll out safety culture transformation program (BBS) at Symbiotec with key features like: - Leadership engagement to perform Shop-floor rounds/visits with focus on safety. - formation of dept. safety committees - Reward & Recognition Policy - Effective communication on incidents & alerts - Departmental Safety committee and meetings to include supervisors and workmen. - Reporting of near misses , unsafe act & unsafe conditions by all the employees including supervisors. - Preparation of training module on effective interaction on the shop floor. - Make it the part of annual training calendar -Training of all the Supervisors on effective interaction on the shop floor.	Closed
2.5	Preventive Actions	Define timelines for achieving key milestones under EHS Culture transformation program (BBS program)	Closed
2.6	Preventive Actions	BBS tracker to be used to review BBS program & check improvements in safety culture at bi-monthly frequency with Sr. leadership.	Closed
2.7	Corrective Action	Cleaning of all the ETP tanks by third party using vacuum pumps and tankers / In house vacuum transfer mechanism.	Closed
2.8	Corrective Action	Installation of covers /Net (made of steel roads) on all the clarifiers	Closed
3.1	Preventive Actions	Identification of areas in ETP having slip/ trip/ fall hazards and provide controls like railing, grills & covers.	Closed
3.2	Preventive Actions	Identification of similar hazards (other than ETP) across the site and prepare action plan.	Closed

Leadership Indicators

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

Employees – Yes

Workers – Yes

In case of a death or a permanent/temporary disablement of any employee or permanent worker, various Company has various social security schemes are in place to

ensure the continuity of the same standard of living of the employee and family :

- Workmen compensation policy
- Term life insurance
- Group personal insurance policy.
- Coverage under Employees State Insurance Corporation
- Mediclaim policy (Optional for employees, initiated by company)

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners:

The contract between Symbiotec and its suppliers incorporates statutory provisions including payment and deduction of statutory dues such as Goods and Services Tax. The suppliers are responsible for adherence to various statutes required for their operations, whilst Symbiotec is responsible as a principal employer.

Symbiotec has a well-established procedure to ensure compliance of all statutory provisions of suppliers who operate in our premises, including ensuring payments and wellbeing of suppliers' workers. Symbiotec's HR Department drives compliance of payment of statutory dues of the suppliers' workers in our premises. The suppliers are mandated to pay all statutory dues to their employees (such as Provident Fund, Employee State Insurance etc.) within the stipulated time and such payments are verified by the members of HR team. Non-compliance attracts actions required under law and penalties.

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:

Before the sustainability reporting period of April-2023 to March 2024, a fatal incident occurred at SEZ site of Symbiotec on 25th February 2023. Where a permanent employee Mr. Govind who was working for last ten years in the same area had met with a heart attack and then as a result of the unbalancing or the trauma caused by the heart attack he fell down from platform to nearby tank and we lost an important and experienced colleague. He was rescued and sent to hospital where he was reported dead. Further the employees who were involved in rescue activity were also kept under observation for some time. Being a responsible citizen Symbiotec extended immediate financial support of Rs 15 lac to the family of victim, Symbiotec understands that this incident was unfortunate and should not have happened. Therefore, to avoid recurrence of such types of incidents has taken robust corrective and preventive actions and completed them. For detail of CAPAs please refer section 15 below. The incident was reported to

the government bodies like Directorate of Industrial Safety and Health, Police station & district administration.

Total No. of affected employees/ workers			No of employees and workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY2023-24	FY2022- 23	FY2023-24	FY2022- 23
Employees	0	0	0	0
Workers	0	2	0	1

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. Symbiotec does not provide any transitional assistance program.

5. Details on assessment of value chain partners:

All value chain partners are assessed periodically on their health & safety practices and working conditions. Adhering to the requirement of ISO14001 & ISO 45001 certifications is encouraged through implementation of internal standards and third-party assessments.

Symbiotec has it's supplier's code of conduct and which are shared with the suppliers and their consent to abide by the codes is taken back.

Furthermore, under the Sustainable Procurement Program Symbiotec Group has developed a detailed process to evaluate suppliers on Environment, Labor and Human rights and ethics. The assessment is based on a checklist. The suppliers of labor and contractors are being assessed on compliance at sites by site HR department.

Symbiotec has a vendor qualification process, the company makes assessment that the suppliers have the potential to perform and run the business on the same basis as Symbiotec. If the Suppliers do not perform as per the required standard, they may be

temporarily suspended or withdrawn from the companies' vendor list. Symbiotec also works with suppliers to ensure they understand our requirements and to enhance suppliers' capabilities by providing training, advice and supports.

A summary of value chain partners assessed by Symbiotec is provided below:

	% of value chain partners (by value of business done with such partners) that were assessed
Health & Safety practices	66 %
Working Conditions	66 %

We have taken objectives to make assessment of 100 % key suppliers.

1. 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:

We have not observed any significant risks/concerns arising from assessments of health and safety practices from our key suppliers.

Symbiotec has an agreement with suppliers which is called as 'Quality Technical Agreement' under this agreement any change in process, site, equipment and any business interruption in any shall be informed by supplier to Symbiotec.

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:

The Company is continually working towards making the stakeholder engagement framework more focused and structured year on year to identify challenges material for long term sustainable business of the Company. The stakeholder engagement framework is based upon established long-term relationships with key stakeholders such as investors, customers, suppliers, vendors, employees, local communities and regulatory bodies. The material challenges are identified, prioritized and integrated within the overall business

strategy to make business sustainable in the longer run. For requirements of identification of stakeholders, we are following clause 4.2 of ISO 45001:2018 & ISO14001:2015 Standards. Presently Symbiotec is not following any specific standards for Stakeholder engagement but in future it shall follow AA1000 Stakeholder Engagement Standard for guidance on identifying and engagement with stakeholders.

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

Sr No	Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Ye/No)	Channel of Communication	Frequency	Purpose and scope of engagement including key topics and concerns raised during such engagement.
1	Investors	No	One to one meeting	As and when required	Transparent and effective communication of business performance, Addressing investor's queries and concerns, providing insight into the Company's corporate strategy and business environment.
2	Community	Yes	One to one meeting	As and when required	In case of any grievance, issues
3	Representatives of Employees and workers	No	Safety committee meetings	Monthly & Quarterly	Issues related to health, safety, working conditions. Status of OHS management system
4	Suppliers	No	No formal Communication channel except e mail and PO Conditions	As and when required	Sharing of code of conduct. Compliance of Environmental, Labor and human rights and legal aspects
			Meeting with contractors	Six Months	Review of contractor's performance w.r.t legal and safety compliance
5	Customers	No	Visit and Audit	Need based	Product/ service quality and safety
			Review Meetings	Monthly	Product/ service quality and safety Improvement
6	Regulatory Authorities	NO	Ongoing meetings and dialogues	On a regular basis	Regulatory compliance
			Participation in formal and informal consultation processes		Sound corporate governance
7	Industry	No	Pharmaceutical	On a regular	Responsible Corporate Citizenship

	Bodies, Associations & International standard setting organizations		Export Promotion Council	basis	
8	Media and Industry Bodies	No	One-to-one interaction with senior management	As and when required	Sustainability initiatives Enhancing Corporate Reputation
9	Employees and Workers	Yes, persons with disability and Affirmative action's community	Safety committees,	Monthly and quarterly	Caring and empowering work environment. Health and Safety
			One to one communication with HR	As and when required	Grievance resolution

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:

Symbiotec has delegated the consultation between the stakeholders and the Board on economic, environmental, and social topics to the e Managing Director (MD) of the Company. The MD and the senior leadership team (KMPs) of Symbiotec regularly update the Board relevant issues. These updates are provided during the Board meetings and separate meetings.

Symbiotec has put in place various processes which ensure feedback from key stakeholders are received by the management and presented to the Board and Board committees in their meetings. Some examples of forums to receive feedback from various stakeholder groups are listed below:

A. Stakeholder: Employees

Symbiotec operates in a very transparent and open atmosphere where every employee has easy access to HR and top management also. The HR department has an periodic review mechanism and the outcome of the review meeting is communicated to the Managing director.

To manage our Sustainability impact, we have a series of established committees. The Staff Network is an open forum where everyone in our business is able and actively encouraged to raise suggestions and voice opinions. We shall have sustainability champions responsible for defining the objectives and actions aligned to the three pillars of People, Planet & Influence.

In turn, the Staff Network and sustainability champions will report to the Secretary of ESG committee who shall put forward the inputs to ESG Committee. This ESG committee will report to the Managing Director who is responsible for giving feed back to the Board during meeting.

B. Stakeholder: Community

Symbiotec also engages deeply with the community on social and environmental topics. There is no formal routing program in place but as and when required Symbiotec's representatives meet with community. Some key examples of the comprehensive engagement with the community are listed below:

Almost Rs 41.5 lac spent on education through CSR. Development of Schools and Aaganwadi Centers by providing the infrastructure i.e., Tables, Chairs, Boundary Wall, Repair and Reconstruction of Toilets, Painting, Drinking water and other basic needs. Contribution towards cost of running the Dialysis Unit in Phase 2 of Madhav Srishti, - project of Shri Guruji Sewa Nyas, Indore. Contribution towards Environment protection by taking part in the initiative by Indore Municipal Corporation or other organization. Spent CSR funds for countering COVID-19 in accordance with the recent circulars issued by MCA time to time. Provided machines, tools and technology and other instruments to the needful hospital to combat COVID-19. Contributed of Rs. 25 Lakhsto Madhav Shristi – COVID Wellness Centre, 108 bed exclusively for COVID Patients - Project of Shri Guruji Sewa Nyas, Indore. Spent CSR fund on Cancer hospital and dialysis facility.

C . Stakeholder: Customers, Suppliers and Channel Partners

Symbiotec works with strategic suppliers and customers for strategic partnerships for value discovery and creation in line with the long-term strategic objectives of the Company. Monthly business planning meetings capturing details of the market, trends, projected performance and likely impact of any foreseeable change are conducted at apex level. In addition, customer feedback is captured immediately, and the action taken across product, delivery, commercials, relationship, new product development, technical support, etc. is shared with MD.

D. Investors, Lenders and Shareholders

The MD and CFO of the Company hold regular interactions with the investor and lender communities, including earnings calls, analyst meets and over one-to-one meetings.

- 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:

Yes. Symbiotec relies on the outcome of the stakeholder's consultation, including those identified during the Materiality Exercise, to identify its key policies and activities on environmental and social topics. Following on from the Materiality Exercise, for all the identified areas, Symbiotec has identified and adopted ambitious targets. Based on the inputs received from stakeholders, one of the strategic objectives identified by Symbiotec is " Wellbeing and Wellness of Employees'. Symbiotec has also put in initiatives to achieve these targets, which have been articulated in various sections of the current Business Responsibility and Sustainability Report.

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

The Corporate Social Responsibility (CSR) of the Board has an oversight on CSR initiatives. At Symbiotec our operations are in the Madhya Pradesh which have a large indigenous population, and accordingly the community amongst which we operate can be considered to be vulnerable/marginalized stakeholder group.

The value proposition of Symbiotec engagement with the community is to enable lasting betterment in the well-being of communities in the operating region through regional development models prioritizing the excluded and those proximate to business operations. Symbiotec is actively supporting communities through initiatives encompassing public health, education, nurturing sporting talent.

Principle 5

BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

ESSENTIAL INDICATORS

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

All our employees and workers are provided training on the Symbiotec Code of Conduct, Prevention on Sexual Harassment, Bribery and Anti-corruption, Child labor and human rights at the time of joining and refresher training on once in a year.

Category	FY2023-24			FY2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (A)	No. of employees/ workers covered (B)	% (B/A)
Permanent Employees	916	916	100	498+356=854	854	100
Permanent Workers	426	426	100	298+153=451	451	100

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

100% of employees and workers of Symbiotec are paid more than or equal to the minimum wage.

Category	FY2022-23			FY2022-24		
	Total (A)	Equal to or more than Minimum Wage		Total (A)	Equal to or more than Minimum Wage	
		No. (B)	% (B / A)		No. (B)	% (B / A)

Employees and workers

Permanent						
Male	1297	1297	100	1264	1264	100
Female	45	45	100	41	41	100
Others						100
Other than Permanent						
Male	267	267	100	216	216	100
Female	0	0	0	0	0	100

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

Category	Number	Male	Female	
		Median remuneration (Rs)	Number	Median Remuneration (Rs)
Board of Directors (BoD)	4	Out of four three directors are nominee directors and do not withdraw any salary	NIL	Not Applicable
Key Managerial Personnel	3	22084504	NIL	Not Applicable
Employees & Permanent Workers (other than BoD and KMP listed above)	1290	664890	47	666400

B) Gross wages paid to females as % of total wages paid by the entity, in the following format

	FY 2023-2024	FY 2022-2023
Gross wages paid to female employees as percentage of total wages	3.3%	3.90%

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

Symbiotec has Child Labor and Human Right's policy in place. Which is available at <https://www.symbiotec.in/wp-content/uploads/2024/07/4.0CHILD-LABOUR-AND-HUMAN-RIGHT-POLICY.pdf>

The compliance of this policy is ensured by Site HR department at site. Sites has grievance handling committee in place to handle human right's issues along with employee's grievances. During the reporting period Symbiotec do not have any Apex Human Rights Committee to oversee human rights commitments and act as the focal point for addressing human rights impacts or issues.

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

Symbiotec believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty,

integrity and ethical behavior. Towards this end, the Company has adopted the Symbiotec's Code of Conduct, which lays down the principles and standards that should govern the actions of the Company and its employees. Any actual or potential violation of the Code, howsoever insignificant or perceived as such, is a matter of serious concern for the Company.

Symbiotec is committed to providing a safe and positive work environment. The Company complies with ISO45001:2018 & ISO 14001:2015 standards and has put in place a corporate governance model with defined roles and responsibilities at the corporate, the management level as well as at the employee level.

Symbiotec Pharmalab has grievance redressal mechanisms for addressing complaints and grievances of employees and workers, as below:

Symbiotec Pharmalab has a dedicated one-stop solution for all employee issues across all the sites. We have a policy on grievance handling and in compliance to this policy every site its own grievance handling committee. The tenure of the committee is one year. On the joining of new employee he is made aware of this policy whereas for existing old employees refresher training is being provided once in a year and record are kept. The aggrieved employee must first submit his grievance in writing to Site HR Head. Grievances must be submitted within 30 calendar days following the date employee first knew or should have known of the grievance. Site HR Head records the grievance in 'Grievance Register' and forward the grievance application to Grievance Redressal Committee. The Grievance Redressal Committee conducts investigation and set the grievance of the employee. The Grievance Redressal Committee complete its proceedings within thirty days on receipt of a written application by or on behalf of the aggrieved party. The employee who is not satisfied with the decision of the Grievance Redressal Committee may prefer an appeal to the Chief Human Resource Officer (CHRO) against the decision of Grievance Redressal Committee. The Chief Human Resource Officer (CHRO) within 30 working days from the date of receipt of such appeal, dispose off the same and send a copy of his decision to the concerned employee.

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

	FY2023-24		FY2022-23	
	Filed during the year	Pending resolution at the end of year	Filed during the year	Pending resolution at the end of year
Sexual Harassment	0	0	0	0
Discrimination at workplace	0	0	0	0
Child Labor	0	0	0	0
Forced labor/Involuntary Labor	0	0	0	0
Wages	7	3	0	0
Other human rights related issues	Nil	Nil	Nil	Nil

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

Symbiotec seeks to encourage its employees, customers, suppliers, and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of Symbiotec Code of Conduct, policies or law and accordingly has put in place mechanisms to prevent adverse consequences to the complainant, as below:

- As part of Whistle-blower Policy and Prevention of Sexual Harassment Policy, Symbiotec is committed to the protection of identity of the complainant and all such matters are dealt in strict confidence, with appropriate measures taken to maintain such confidentiality.
- As part of its Code of Conduct, the Company does not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person is subject to disciplinary action.
- Under the Prevention of Sexual Harassment Policy, any employee may lodge a complaint of sexual harassment against any other employee to the chairperson or to any member of the relevant complaints committee. All complaints have to be sent in writing and are dealt with in strict confidence by the committee members. After having heard both the complainant and accused, the complaints committee

thoroughly investigates (including meeting the complainant, enquiry into all evidence, meeting all witnesses, consultation with experts) the complaint and makes a report of its findings. This report is submitted to the relevant Management Team. The Company also ensures that any employee who is a part of the investigations is not victimized or subjected to any unfavorable treatment.

- Under the Whistle-blower Policy, complete protection is given to Whistle-blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like, including any direct or indirect use of authority to obstruct the Whistle-blower's right to continue to perform his/her duties and functions, including making further disclosures.
- The Company takes steps to minimize difficulties for the Whistle-blower because of making the disclosure. Thus, if the Whistle-blower is required to give evidence in criminal or disciplinary proceedings, the Company arranges for the Whistle-blower to receive advice about the procedure.
- The identity of the Whistle-blower is kept confidential to the extent possible and permitted under law. While discouraging retaliation against anyone reporting legitimate concerns, Symbiotec's Policy also provides for disciplinary action in case the complaint registered is found to be frivolous or false or made with a mischievous intention.
- Regular awareness and training sessions are conducted to ensure that the employees are fully aware of various aspects of sexual harassment and of the redressal mechanism.

8. Do human rights requirements form part of your business agreements and contracts?

- Yes, human rights requirements form part of our business agreements and contracts. The terms of contract or purchase order copies submitted to vendors include compliance to Environment and Human Right's requirements, and it is mandatory for all vendor partners to comply with such requirements. Symbiotec's sustainable procurement program covers various aspects of human rights such as child labor, forced or compulsory labor, health & safety, freedom of association, non-discrimination, disciplinary practices, security practices, working hours, compensation practices, supply chain practices and management systems.
- Symbiotec has the Supplier's Code of Conduct in place and At Symbiotec we expect all business associates and value chain partners to adhere to the principles of the our Code of Conduct. Symbiotec has specific clauses of the Code of Conduct included in all its business agreements and contracts/purchase orders, including clauses on human rights.

Our Supplier's Code of Conduct can be accessed at <https://www.symbiotec.in/wp-content/uploads/2024/07/12.0SULLPIERS-COC.pdf>.

Also Symbiotec's Code of Conduct can be found on link <https://www.symbiotec.in/wp-content/uploads/2024/07/5.0CODE-OF-CONDUCT.pdf>

- Furthermore, Symbiotec's sustainable procurement program encourages supply chain partners to share the same commitment and expect them to integrate the sustainability principles of Symbiotec (Fair business practices, Health & Safety, Human Rights and Environment management) in all their business decision-making. The Policy states that business partners will be assessed on the sustainability principles and the assessment is given due consideration during evaluation and contract approvals, both for new as well as existing partners.

9. Assessment for the year:

Human Rights issues	% of plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labor	100% of Symbiotec's plants and offices are assessed for compliance on key Human Rights issues by internal teams of the Company, as part of the regular ongoing reviews by the senior leadership team of the Company.
Forced/Involuntary Labor	
Sexual Harassment	
Discrimination at workplace	
Wages	
Others	

10. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 9 above:

There were no significant risk or concerns identified during FY2023-24. However, being a responsible company, we ensure continuous monitoring and capability building of our value chain partners. Some key initiatives taken by Symbiotec are listed below:

Symbiotec has a system for meetings with contractors for building capabilities thus helping them achieve the required level of readiness in the areas of fair business practices, health and safety, human rights and environmental management.

Declaration of adherence to the Symbiotec's Code of Conduct from the value chain partners as part of all contracts/purchase orders. Vendor contracts shall be terminated in case of non-adherence to the Code of Conduct is noticed.

Symbiotec conducts assessment of its upstream and downstream business partners as per the Sustainable Procurement Program.

Leadership Indicators

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

Some key processes that have been adopted over the last several years with an objective, amongst others, to address human rights grievances and complaints, are as

below:

- Statutory rights of Contract Employees are addressed through a grievance redressal mechanism, where contractual employees report their concerns through HR department.
- In FY2023-24, the Prevention of Sexual Harassment Policy has been modified taking into consideration various necessary aspects.
- Training modules for contractors are prepared and training shall be conducted to make them aware about the statutory rights of Contract Employees and ensure they abide by the requirements.
- Vendors are made to sign the Symbiotec Code of Conduct as part of their initial vendor registration.
- Symbiotec procures its goods and services responsibly, whilst aligning to the core values and Code of Conduct.

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

So far, no due diligence program for human rights issues is in place. Symbiotec shall form an internal committee for Human Rights due-diligence and the process is under planning for FY2024-25.

For the upcoming due-diligence exercise, the following 10 Human Rights issues have been identified:

1	Child labor	7	Right to clean air and water
2	Forced/involuntary labor	8	Right to Privacy
3	Fair wages	9	Rights of Indigenous persons
4	Equal opportunity	10	Rights of Persons with Disabilities
5	Health & Safety	-	-
6	Non-harassment	-	-

Symbiotec has also identified the following 6 human rights stake holders

1	Symbiotec Employees
2	Contractual workforce
3	Community
4	Customers
5	Employees of value chain partner
6	Family members of Employees

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?

Symbiotec has taken steps to ensure compliance with the Rights of Persons with Disability Act, 2016 (RPwD Act) across its sites and locations. Our plant and office premises are adapted for easy movement of differently abled visitors and employees and the requisite infrastructure, including ramps, elevators and disabled friendly washrooms, have been installed at the key premises of Symbiotec.

4. Details on assessment of value chain partners.

Human Rights issues	% of value chain partners (by value of business done with such partners) that were assessed
Child Labor	Symbiotec obtains declarations from all the value chain partners regarding compliance of its code of conduct. Under Sustainable procurement program, the assessment of the value chain partners for four Sustainability principles of Fair Business practices, Health & Safety, Human Rights and Environment Management has been conducted. 66 % of Critical suppliers were assessed under sustainable procurement program. Details of the Sustainable Procurement Policy _ https://www.symbiotec.in/wp-content/uploads/2024/07/11.0PROCUREMENT-POLICY.pdf
Forced/Involuntary Labor	
Sexual Harassment	
Discrimination at workplace	
Wages	
Others	

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

Symbiotec did not identify any significant risks/concerns arising from its value chain partners. However, Symbiotec has developed monitoring mechanisms and undertaken several initiatives to build the capabilities of its value chain partners in order to minimize

the risk of potential human rights issues in the value chain, as follows:

Symbiotec is extending training and capability building to the business partners and thus is helping them achieve the required level of readiness in the areas of Fair Business Practices, Health & Safety, Human Rights and Environmental Management.

Symbiotec obtains a declaration of adherence to the Code of Conduct from its value chain partners as part of all contracts/purchase orders. Vendor contracts shall be terminated in case of non-adherence to the Code of Conduct (following due process).

Symbiotec conducts assessment of its upstream and downstream business partners as per the Responsible Supply Chain Policy and initiates corrective actions

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

ESSENTIAL INDICATORS

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

Parameter	Unit of measurement	FY2023-24	FY2022-23
Total electricity consumption (A)	Giga Joules	165571	151606
Total fuel consumption (B)	Giga Joules	199899	185548
Energy consumption through other sources (C)	Giga Joules	0	0
Total energy consumption (A+B+C)	Giga Joules	365470	337153
Energy intensity per rupee of turnover	Joule per rupee of turnover	0.0000561	0.0000622

Company's turn over during financial year 2022-2023 was 542 Cr whereas that of year 2023-2024 is 651.6 Cr. There is a decrease of 9.8 % in energy intensity per rupee turn over. Symbiotec has initiated several measures to increase the energy efficiency of its operations. The steps taken or impact on conservation of energy:

- provided VFD's in brine plant circulation pumps to control RPM for increase lifespan of equipment and energy saving.
- Installation of Solar Street lighting.
- Replacement of CFL PLL lamps with 18W LED PLL lamps
- Zero loss auto drain valve installed in compressed air to avoid air losses and energy saving.
- Modification in Chilled water plants stopped few pumps.

- Recovery of steam condensate and re-used in boiler
- Installation of 396 CFM for Instrument air, Atlas Copco make Screw compressor against Reciprocating compressor.
- Installation of 300KVAR APFC panel to maintain power factor to unity .
- Installation of Energy efficient chiller.
- Energy Audits.

In order to utilize alternative sources of energy Symbiotec has installed Bio briquette-based boilers at it's all the sites. The company is going to use green energy (Solar + Wind) by 75 % . for that contractor signed with M/S Continumm for 1.25 Mega Watt (Hybrid - Solar and Wind Energy).

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:

As PAT mechanism comes from the provisions of the Energy Conservation Act, 2001 which also empowers the Central Government to notify energy intensive industries as listed out in the Schedule to the Act, as Designated Consumers (DCs), Pharmaceutical Industries are not energy intensive and not covered by PAT. Hence this provision is not applicable to us.

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

		FY2023-24	FY2022-23
Water Withdrawal by Source			
(i) Surface water	KL	0	0
(ii) Groundwater	KL	0	0
(iii) Third party water	KL	197663+36493= 234156	31175+ 177929= 209104
(iv) Seawater / desalinated water used in process	KL	0	0
(v) Others	KL	0	0
Total volume of water withdrawal (i + ii + iii + iv + v)	KL	234156	209104
Total volume of water consumption	KL	234156	209104

Water intensity per rupee of turnover	Litres per rupee of turnover	0.0359 Lt/Rs	0.0386 Rs/Lt
Seawater used in cooling	KL	0	0
Total volume of water withdrawal	KL	234156	209104
Water intensity: Total fresh water drawn of product manufactured	KL	234156	209104

4. Provide the following details related to water discharged:

Total effluent generation during 2022-2023 was 107003 KL whereas that during period 2023-2024 was 97924 KL. Therefore there is net reduction of 8.5 % in effluent generation. Because Symbiotec has zero liquid discharge facility , all the effluent was treated inhouse and utilized internally.

Parameter	FY 2023-2024	FY 2022-2023
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0

- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	Our facilities are zero liquid discharge facility	

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

Hundred percent (100 %) sites of Symbiotec are Zero liquid discharge facilities. The state of art ETPs have Chemical, Biological and tertiary treatment processes and have following infrastructure in place:

- Pre-Electrocoagulation (EC) with Dissolved Air Flotation (DAF) treatment prior to Biological treatment to reduce the load of suspended solids.
- Biological treatment (Activated sludge process) in aeration tanks.
- Post Electrocoagulation (EC) with Dissolved Air Flotation (DAF) treatment prior to RO treatment to reduce the load of suspended solids.
- Reverse osmosis system used for filtration of ETP treated water
- MEME and Multi effect evaporator.
- ATFD, Screw Press & Mono belt and Paddle dryer.
- ETP treated water is recycled and reused.

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

Parameter	FY2023-24	FY2022-23
Unit		
Stack NOx	0.208	0.196
Stack Sox MT /Year	0.171	0.143
Particulate matter (PM)	0.090	0.095

Clean air to breathe is a basic human right, and Symbiotec is committed to maintaining the quality of air in its operating areas. Symbiotec strives to reduce the negative impact of its operations on the quality of air through maintenance and upgradation of its Air Pollution Control Equipment.

Our continuous efforts for reducing stack emission load have resulted reduction of pollutants in significant quantity. We have replaced all our furnace oil-based boilers with that of biomass-based boilers.

Symbiotec has the following hardware/infrastructure for Environmental Care, including the air pollution control devices for maintaining shop floor environment as well as to reduce the impact of gaseous emissions from vents and stacks.

We have installed bio briquette boilers which is provided with dust collector and bag filters. All the boiler stacks and DGS Stacks of adequate height (more than 30 meters) provided for effective dispersion of the air pollutants in the atmosphere. At identified places scrubbers installed in manufacturing area to eliminate pollutants and emissions from process areas. Condensers and Heat exchangers are provided to control solvent emissions/losses from manufacturing processes. Where practicable, liquids are handled in closed systems to eliminate any chances of fugitive emissions. Wherever possible solvents/liquids are charged mechanically using DCS and PLC systems in the closed loop to avoid solvent losses thus eliminating chances of air pollution also due to fugitive emissions. Breather Valves on storage tanks and process equipment are given to arrest fugitive emissions. The storage tanks of low boiling solvents like Methylene chloride are equipped with chilled water utility to avoid fugitive losses. Tanks are insulated and vent condensers shall be provided as enhanced control. Solvent recovery systems is attached with double stage cold water/ chilled water/chilled brine condensers to control solvent vapour emissions. Additionally, closed loop auto heating cut-off system in solvent recovery columns to arrest fugitive emissions of solvents. Where process is under vacuum, traps are provided in the vacuum line to trap emissions. Powder rooms are provided with air handling units having pre, Micro vee and HEPA filters and dust collectors to eliminate any possibility for escape of dust into Environment.

Symbiotec is regularly monitoring stack and ambient monitoring in environment through MP Pollution control board approved laboratories.

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

<i>Parameter</i>	<i>Unit</i>	<i>FY 2023-2024 (Current Financial Year)</i>	<i>FY 2022-2023 (Previous Financial Year)</i>
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)	<i>Metric tons of CO₂ equivalent</i>	741.7	516
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs,	<i>Metric ton of CO₂ equivalent</i>	32704	29944

SF6, NF3, if available)			
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MT/rupees	0.00014	0.00015
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted	-	-	-

Total turnover for the year 2022-2023 was 542 Cr whereas the same for year 2023-2024 is 651.6 Cr. Intensity of CO2 emissions (MT) / Rupees has decreased around 2 %

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

Symbiotic has undertaken a project to use hybrid energy (wind and solar) at its Rau unit. In order to reduce greenhouse gas emissions Symbiotec has installed bio briquette boilers which is provided with dust collector and bag filters. All the boiler stacks and DGS Stacks of adequate height (more than 30 meters) provided for effective dispersion of the air pollutants in the atmosphere. At identified places scrubbers installed in manufacturing area to eliminate pollutants and emissions from process areas. Symbiotec has switched to CFC free gases and using clean environment friendly gases in chillers.

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

Disposal of Waste

Parameter	FY2023-2024	FY2022-2023
Total Waste generated (in metric tons)		
Plastic waste (A)	206.567	176.088
E-waste (B)	0.348	0.458
Bio-medical waste (C)	7.638	3.58
Construction and demolition waste (D)	0	0
Battery waste (E) Nos	471	291

Radioactive waste (F)	0	0
Internal Scrap (G)	0	0
Other Hazardous waste (H) MT	1013.739	950.581
Other Non-hazardous waste generated (I).	373.745	439.755
Total (A+B + C + D + E + F + G + H +I)	2073.037	1861.462
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	580.66	616.301
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total	580.66	616.301
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration MT	7.638	3.58
(ii) Landfilling	161.648	192.37
(iii) Other disposal operations	852.091	758.211
Total	1021.377	954.161

Generation of Hazardous Waste

Plant	SEZ		RAU	
Financial Year	2022-23	2023-24	2022-23	2023-24
ETP Sludge (35.3)	624.965	510.36	194.049	154.189
Spent Carbon (28.3)	14.685	39.708	2.418	2.617
Process Residue & Waste (28.1)	175	165.607	0.951	0.225
Distillation Residue (20.3)	23.855	39.921	3.229	5.659
Date Expired products (28.5)	0	0.579	0.287	0.278
Off specification Products (28.5)	0	0.235	NA	NA
Spent Carbon or Filter media	0	0	0.04	0
Used Oil (5.1)	1.03	1.35	0	0.54

Total Hazardous Waste Generation	839.535	757.76	200.974	163.508
Increase or Decrease (%) from previous Year	9.74% decrease		18.64 % decrease	

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:

Symbiotec in the 'Zero Waste' philosophy through the use of the 3R (Reduce, Reuse & Recycle) principles of circular economy. For that Symbiotec has various procedures on waste management:

- Hazardous waste collection and disposal procedure
- Non-Hazardous waste collection and disposal procedure
- Biomedical waste management procedure
- Electronic waste management Procedure

All the sites of Symbiotec has waste storage areas, like hazardous waste, non hazardous waste, Electronic waste and bio medical waste. As per the standard operating procedures waste all the waste is segregated, stored at a dedicated place and labelled.

- All the hazardous waste from SEZ site is sent for cement industries as an alternative fuel, whereas from Rau site it is being sent to MPPCB approved TSDF for incineration and deep burial. The annual report is submitted to MP Pollution control board in Form-4
- The electronic waste is sent to MPPCB authorized recyclers and the annual report is submitted to MP Pollution control board in Form-3
- All the nonhazardous waste like liners etc. are sent for MPPCB authorized recyclers for re cycling.
- The solvent after distillation is sent to MPPCB authorized recyclers for further use in paints etc.
- The MS and SS scrap is also sent for recycling.
- Bio medical waste generated from laboratories is sent to MPPCB approved contractor M/S Hoswin

Strategy to reduce waste :

- At our SEZ site Sludge generation quantity was huge i.e.~ 3000kg/day and had obnoxious odour, handling and storage was a concern. The cost of land filling of sludge was very high i.e. Rs 12/Kg of sludge.

- The challenge was- High water content of sludge (40 to 50 %) which could not be used as alternative fuel by cement industries. How to reduce water content of sludge.
- We established contacts with various environmental consultants and we hired a pilot plant from M/S Transcend Cleantech (Pune) for trials. After successful trials we procured a screw press and paddle dryer for our SEZ plant. Total cost for infrastructure was ~2.5 Cr.
- We were able to reduce 37% sludge volumes i.e. 1.9 mt from 3.0 mt. (Reduction in w/c up to 5-7%). We explored a cement industry (J.K Laxmi Cement), situated about 520 kilo meters from our site, in Rajasthan state and started to dispose sludge.

Change in Hazardous Process and Chemicals: At SEZ site, the manufacturing of one of the products PGN was involved in use of Hydrogen and this dangerous process called as Hydrogenation. We modified and changed the process and removed hydrogen from the process.

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.
1	Rau- Indore	Manufacturing of Active Pharmaceutical Ingredient	Yes, all the conditions being complied. Actions against one point i.e. providing rain water harvesting is under planning.
2	Pithampur- Distt Dhar	Manufacturing of Active Pharmaceutical Ingredient	Yes, all the conditions being complied.

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	Results communicated in public domain (Yes / No)	Relevant Web link

			(Yes / No)		
Not Applicable as there was no Project in the current Financial year					

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
Company is complying with all 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. There was no violation found during visit by statutory / regulatory authorities.				

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:

- Name of the area
- Nature of operations
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-2024	FY 2022-2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	234156	209114
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others		
<i>Total volume of water withdrawal (in kiloliters)</i>	234156	209114
Total volume of water consumption (in kiloliters)	234156	209114
Water intensity per rupee of turnover	0.0000386	0.0000359

(Water consumed / turnover)	KL/Rupee	KL/Rupee
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kiloliters)		
(i) Into Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment		
Total water discharged (in kiloliters)	0	0

Total effluent generation during 2022-2023 was 107003 KL whereas that during period 2023-2024 was 97924 KL. Therefore there is net reduction of 8.5 % in effluent generation. Because Symbiotec has zero liquid discharge facility, all the effluent was treated inhouse and utilized internally.

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, Assessment carried out internally. For water consumption, water intensity per rupee turnover is reduced by 6.85%. We have zero liquid discharge facilities in place all the treated water is consumed inside the premises.

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

<i>Parameter</i>	<i>Unit</i>	<i>FY 2023-2024</i>	<i>FY 2022-2023</i>
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)	<i>Metric tons of CO₂ equivalent</i>	Symbiotec is not monitoring Scope-3 Emissions	
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (<i>optional</i>) – the relevant metric may be selected by the entity			

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.

IMPACTS DURING OPERATION PHASE

A) Land Environment

The anticipated pollution to soil environment due to plant activities is as follows:

Changes in soil texture due to settling of air borne dust or due to wash off solid particulates by surface or groundwater. This will lead to change in porosity, permeability & other such physical characteristics of soil of the area.

Changes in soil chemistry due to addition of foreign materials from polluted air and water due to plant activities in the area.

Mitigation Measures

Proper mitigative measures like use of efficient pollution control systems, proper stack height and use of topsoil in plantation results in no significant impact on soil of the project site. All the manufacturing areas have impervious flooring and tanks have linings. Overflow protection provided in the tanks. Soil samples being collected and tested at regular intervals from the nearby areas. This will help in mitigation of any harmful impact on soil due to the project activity, if any.

Solid/Hazardous Waste

During the operation phase, the solid waste will be generated from the primary and secondary operations of ETP in the form of ETP sludge.

Worst case scenario for hazardous waste

Considering the manufacturing process and the chemicals and solvents being used, most of the solvents and chemicals will be used and consumed in the product formation. There is no question for the left out of the chemicals and solvents in the reaction chamber as per the stoichiometry of chemical reaction.

Mitigation Measures

Isolated facility as an ZLD where Sludge will be isolated and dried through screw press and sludge dryers. Dried sludge has some calorific value hence it is being sent to cement industry as alternative fuel (fro SEZ site whereas the same from RAU site is being sent to TSDF for disposal

B) Air Environment

During operation phase, air emissions both gaseous and fugitive will be on account of process emissions from stacks/ D.G. sets, transportation of materials.

Incremental Ground Level Concentrations

The mathematical Model ISCST-3, 1996 was used for predicting the GLCs, which is entirely in line with the requirement of central pollution control board.

The cumulative concentration levels (Ambient + cumulative incremental) revealed that the concentration levels for PM, SO₂ and NO_x likely to be encountered in the operation of the project are respectively occurring at a distance of about 2 km, 2 km, 2 km in the East and ESE directions with a concentration levels (cumulative) of 73.0 µg/m³, 16.96 µg/m³ and 28.9 µg/m³ respectively which is well within the NAAQS levels prescribed by CPCB. Hence it is inferred that considering cumulative concentration levels, the pollution load exerted due to proposed project will be insignificant.

Worst case scenario and measures for air emission

In case, during the process of manufacturing of the product, if emission (mostly volatile organic compounds) are taking place in the reaction chamber or failure of reactions due to unmanaged stoichiometry of the reactions or due to sudden shut down of electricity and failure of the reaction, in such cases the VOCs will be directed to the condensers and no emissions will be allowed to let out from the vent.

Mitigation Measures

- **Dust Generation during Storage & Handling**

Processing like dispensing and charging is done in dedicated areas having air handling units and dust collectors are in place. Workers are given supplied air respirators having protection factors 1000.

- **Evaporation Loss from Storage Tanks**

All the storage tanks are provided with proper exhausts/vents and breather valves.

- **Loading & Unloading of Materials**

The loading and unloading of materials from tankers may lead to fugitive emissions. To avoid the same, the materials transfer will be done through fixed piping connections through pumps and tanks are provided with proper exhausts/vents and breather valves.

Impact Due to Odor

Spillage of waste and chemicals etc. leading to air pollution and hazards to neighborhoods – plants, trees, human, animals etc.

Mitigation Measures

All the necessary procedures like handling of chemicals, handling of spillage are in place

- Green area covering 33% of the total project area, around the plant boundary as dust preventive barrier and help to reduce odour.

- **Odour Control System:** All operations will be carried out in closed system, in powder processing area HVAC system. The vents of the batch reactors are connected with scrubbers to avoid every possibility of odour escaping into atmosphere.

B) Water Environment

Water required for the project will be supplied by Madhya Pradesh Audyogik Kendra Vikas Nigam (Indore) Ltd. through pipeline network. No sub surface withdrawal of water involved in the project activities.

Wastewater Generation

Wastewater: The wastewater generated from the existing plants containing pollutants in the form of degraded chemicals in wastewater is generated from the project. The industrial waste is treated in ETP having ZLD. Symbiotec is reusing the treated effluent in order to reduce the fresh water requirement.

Domestic wastewater: Domestic effluent will be treated in Aeration Tank. After treatment of wastewater will be used for gardening.

C) Biological Environment

As there are no potential sources of impacts, no impact on terrestrial biological environment is envisaged during the operational phase. Based on study conducted for ecology in the study area, no rare or endangered flora/fauna were recorded in the study area except Saras Crane

which is Vulnerable species as per IUCN and Indian Peafowl is Schedule I Species as per WPA 1972 is reported in buffer zone of study area. The company is within the notified SEZ area and the proposed expansion is in the existing plant premises which will not involve destruction of any forest land. Thus, there will not be adverse impact of flora, fauna, loss of habitats such as vegetation and nearby water bodies.

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:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Reduction in quantity of hazardous waste: At SEZ Site ETP sludge generation quantity was huge i.e. approx. 3000kg/day. Sludge had obnoxious odour; storage & handling was a concern. Another challenge was High water content of sludge (40 to 50 %) after mono belt press. Because this it could not be used as alternative fuel by cement industries.	After successful trials we conducted some modifications in existing systems & installed screw press and paddle dryer.	We were able to reduce 37% sludge volumes i.e. from 3.0 MT/Day to 1.9 MT/Day. Water content of sludge reduced from 40-50% to 5-7%. Calorific value of sludge increased from 2000 -2400 k.cal/kg to 4000-4200 k.cal/kg. Started to send it to cement industry

Symbiotec is working on continuous process flow chemistry for its products. Some trials have been taken in pilot plant. This will reduce emissions, waste and improve the quality of the product.

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

Yes, Symbiotec has a business continuity plan in place. The purpose of this document is to provide a broad set of guidelines for ways to continue our line of business and remain undeterred from our vision of providing a secure source of supply to our customers despite any contingencies. It is intended to provide information on:

- How to handle the likely types of failure to ensure business continuity.
- The recommended action dependent on the duration of the interruption.
- How to identify when a matter progresses from a business interruption to a disaster recovery situation. The scope of this document covers all the significant points of failure of the Supply Chain within the control of the Symbiotec group of companies. This document covers the effect of these failures on three Critical Business Processes (CBP): Production, Planning and Execution, Quality Management, Distribution, IT System, Ethics, Legal and reputation, People and property. After conducting risk assessment the various scenarios have been prioritized and plan is prepared for high risk, medium risk and low risk scenarios.

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.

Symbiotec is in the process of collaborating with its suppliers and making assessments of suppliers. So far there has been no significant adverse impact arising from the value chain of Symbiotec.

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

Symbiotec has categorized its suppliers into critical and non-critical suppliers. Initially Symbiotec is doing assessment for its critical suppliers. So far out of 150 critical suppliers about 100 suppliers have been assessed on environmental impacts.

Principle 7 BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

ESSENTIAL INDICATORS

1.

a) **Number of affiliations with trade and industry chambers/ associations:**

Symbiotec has 01 affiliations with trade and industry chambers/ associations. Additionally,

a) **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:**

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/ associations (State/National)
1	Pharmaceutical Export Promotion Council	National
2	NA	NA
3	NA	NA
4	NA	NA
5	NA	NA
6	NA	NA
7	NA	NA
8	NA	NA
9	NA	NA
10	NA	NA

b) **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**

None- As Not Applicable

LEADERSHIP INDICATORS

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

S.N O	Public Policy Advocated	Method resorted for such advocacy	Whether information available	Frequency of review by board (Annually / Half Yearly /Quarterly / Others please specify)	Web Link if Available
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So far we have not undertaken any activity of influencing decision-makers to affect the outcome of public policies i.e. public policy advocacy.

Principle 8

BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT.

ESSENTIAL INDICATORS

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

Name and briefdetails of project	SIA Notification No.	Date of notificatio n	Whether conducted by independent external agency (Yes / No)	Results communicated in publicdomain (Yes / No)	Relevant Web link
Not Applicable for this reporting period					

2. 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)
Not Applicable as project does not involve any activity that can lead to R & R						

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

Yes, Symbiotec has grievance redressal mechanisms in place to address grievances of all key stakeholder groups across all the sites.

Symbiotec's team members regularly interact with the community members and speak with individuals and groups within the communities, as well as with various stakeholders, to ensure that the grievances are resolved.

Our Corporate Social Responsibility activities also lead to our engagement with the local communities.

Complaints can be done in written or on line on line to Whistle officer or Company Secretary of Symbiotec Pharmalab through e mail. Our vigil mechanism and whistle blower policy is available on our website at: <https://www.symbiotec.in/wp-content/uploads/2024/07/7.0MECHANISM-AND-WHISTLE-BLOWER-POLICY.pdf>

Whistle Officer Anil Satwani (Managing Director) Symbiotec Pharmalab Private Limited 385/2, Pigdambar, Near Mashal Hotel, Rau, Indore – 453331, India E-Mail: a.satwani@symbiotec.in	Salil Jain (Company Secretary) Symbiotec Pharmalab Private Limited 385/2, Pigdambar, Near Mashal Hotel, Rau, Indore – 453331, India E-Mail: grievance@symbiotec.in
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4. Percentage of input material (inputs to total inputs by value) sourced from suppliers

Particulars	FY2023-24	FY202-23
Directly sourced from Micro, Small and Medium Enterprises/small producers	--	--
Sourced directly from within India	19%	25%

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

6.

Location	FY _____ Current Financial Year	FY _____ Previous Financial Year
Rural	100% of employees and workers of Symbiotec are paid more than or equal to the minimum wage	
Semi Urban		
Urban		
Metropolitan		

We operate in Pithampur Industrial area and Rau which are adjacent to Indore. We are an Equal Opportunity Employer and discourage discrimination while employment. This ensures that all qualified applicants will receive equal consideration for employment without regard to color, national origin, religion, sex, pregnancy, marital status, sexual orientation, gender identity/expression, age, disability, genetic information, state or local protected class. However, many employees are from Indore and nearby villages. A hundred percent of our employees and workers are paid more than or equal to the minimum wage.

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
NOT APPLICABLE	

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

Sl. No.	State	Aspirational District	Amount Spent (₹)
1	Madhya Pradesh	Indore	2,32,66,839
2	Madhya Pradesh	Dhar	450000
3	Maharashtra	Pune	10,00000
		Total	2,47,16,839

3.(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

No- We have sustainable procurement program in place but this program does not contain preferences to purchase from suppliers comprising of marginalized/vulnerable groups like women, people from disabilities, aged, schedule tribes.

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

We do not have established details that we are purchasing from marginalized / vulnerable groups.

C) . What percentage of total procurement (by value) does it constitute?

Not applicable as we are not purchasing from 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.

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

7. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Education	Could not be determined	4154347
2	Education- Dada Shyam Foundation (First Instalment)	Could not be determined	450000
3	Shed fabrication work -Goshala shed	Could not be determined	225000
4	Health – Dialysis Unit (SGSN)- II & III instalment	Could not be determined	900000
5	Health – Cancer Facility -SGSN-II Instalment	Could not be determined	957492
6	Health – Cancer Facility -SGSN-III & IV Instalment	Could not be determined	17100000
7	Chair donation to MY Hospital	Could not be determined	130001
	TOTAL		24716839

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.

Because Symbiotec is involved in the manufacturing of life saving drugs, the complaints from customers are being taken care by quality assurance department. The Quality Assurance department has an established procedure to handle market complaints.

The market team informs the complaint to QA head of respective site through e mail or telephone. The communication through e mail is considered as initial information. QA head logs the complaint in one working day from the receipt of the complaint. QA checks previous complaint from same batch or for similar complaint in the last 12 months from the other batches of product manufactured at site, this shall be the part of investigation. QA gives classification to the complaint as Critical, Major and Minor complaint based on it's risk assessment SOP. QA forms a cross functional team for investigation and the team uses various tools like 5-why analysis, fish bone, Control chart, scatter diagram, FMEA diagram etc. to find out root cause. After risk assessment and Impact Assessment corrective and preventive actions are taken and conclusion is drawn. Investigation is completed within 30 working days and investigation report is communicated to customer. After getting a response from the customer, the investigation report is closed.

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 Product	-
Safe and responsible usage	-
Recycling and safe disposal	-

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

	FY2023-24			FY2022-23		
	Received during the year	Pending at the end of the year	Remarks	Received during the year	Pending at the end of the year	Remarks
Data Privacy	0	0	NIL	0	0	NIL
Advertising	0	0		0	0	
Cyber security	0	0		0	0	
Essential services delivery	0	0		0	0	
Restrictive trade practices	0	0		0	0	
Unfair trade practices	0	0		0	0	
Product and service related complaints	19	02		15	0	

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

	Number	Reasons for recall
Voluntary recalls	0	NA
Forced recalls	0	NA

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, Symbiotec has a comprehensive policy on data privacy. Symbiotec's Privacy Policy explains how Symbiotec may collect, use, store, disclose or otherwise process personal data. Web link for information security policy is <https://www.symbiotec.in/wp-content/uploads/2024/07/8.0INFORMATION-SECURITY-POLICY.pdf>

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.

There has been no such instance which occurred during 2023-2024

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches
- b. Percentage of data breaches involving personally identifiable information of customers
- c. Impact, if any, of the data breaches

No such case during the year 2023-2024

LEADERSHIP INDICATORS

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

Symbiotec has dedicated sections on it's websites where detailed information on products is provided, web link - <https://www.symbiotec.in/products/>

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

Symbiotec is involved in the B2B business type, and our API is the main ingredient of formulation industries. The requirements of cGMP are more stringent pharma industries as compared to APIs. Our customers follow PSCI principles and conduct our audits based on these principles. Material safety data sheet has all the required information about the product. We provide Material Safety Data Sheet of the product to our customers. Additionally, on the product label all the necessary information is provided.

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

Yes, the mechanism is in place and it is the part of our business continuity plan. The Business Continuity Team comprises a group of managers or their delegates that can assess the impact of the failure on the business and implement contingency measures appropriate to the local situation with a focus on the Business Continuity Plan. In case of

business interruption marketing head shall discuss with managing director and president operations and notify to customers. Whereas head public relations / designee

shall inform statutory authorities like the pollution control board, Commissioner SEZ, DISH, local administration as applicable

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, we provide all the necessary information related to product on it's labels. Being the API manufacturing company, we follow all the applicable regulations like requirements of The Indian Food and Drugs Administration, ICH Q7-A Guidelines, 21- CFR which is the US code of federal regulations. All these regulations are very stringent w.r.t. labelling and information to be provided on product labels.

Customer satisfaction survey: Symbiotec has not conducted any Customer's Satisfaction Survey during the reporting period.