

DIRECTORS REPORT

ANNEXURE 3 TO THE BOARD'S REPORT

BUSINESS RESPONSIBILITY REPORT 2020-2021

[Regulation 34 (2) (f) of SEBI Listing Regulations, 2015]

Introduction

The Business Responsibility Report FY 2020-21 of Punjab Chemicals and Crop Protection Limited (PCCPL) adheres to the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business, as advised by the Ministry of Corporate Affairs (MCA), Government of India.

PCCPL follows the highest standards of corporate governance principles and best practices by adopting the Corporate Governance Policies and Code of Conduct. These policies recommend a set of systems and processes driven by the fundamental principles of transparency, accountability, compliances, disclosure, ethical conduct, and the responsibility to encourage the interests of all stakeholders. The policies and the code are assessed periodically to ensure their relevance, effectiveness, and responsiveness to the requirements of our stakeholders.

Our Business Responsibility Report forms our responses to questions on our practices and performance on crucial principles defined by Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, covering topics across governance, environment, and stakeholder relationships.

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate Identity Number (CIN) of the Company:	L24231PB1975PLC047063
2. Name of the Company :	Punjab Chemicals and Crop Protection Limited
3. Registered address :	Milestone-18, Ambala-Kalka Road, Village & Post office Bhankharpur, Derabassi, District SAS Nagar (Mohali) -140201
4. Website:	www.punjabchemicals.com
E-mail id:	info@punjabchemicals.com
5. Financial Year reported:	2020-2021
6. Sector(s) that the Company is engaged in (industrial activity code-wise)	Chemicals (Performance Chemicals) 20119, 20211
	As per National Industrial Classification - Ministry of Statistics and Programme Implementation.
7. List three key products/services that the Company manufactures/provides (as in balance sheet)	The Company principally manufactures 'Performance Chemicals' comprising of Agrotechnicals, API's, Pharmaceutical Intermediates, Phosphorous Derivatives and Speciality Chemicals.
8. Total number of locations where business activity is undertaken by the Company	
(a) Number of International Locations (Provide details of major 5)	SD Agchem (Europe) NV N.A. (Subsidiary Company 100%) 2 (87) Uitbreiding straat 84/B32600, Berchem(Antwerp) Belgium
(b) Number of National Locations:	Derabassi, Punjab Lalru, Punjab Pune, Maharashtra Mumbai, Maharashtra
9. Markets served by the Company - Local/State/ National/International:	PCCPL serves Local / State / National and International markets, including Europe, Japan and UK.

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SECTION B: FINANCIAL DETAILS OF THE COMPANY

1. Paid up Capital (Rs. in Crore) :	12.26
2. Total Turnover (Rs. in Crore) :	676.41
3. Total profit after taxes (Rs. in Crore) :	50.54
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%) :	Total spend on CSR during financial year 2020-2021 is Rs. 49.90 lakh (including Rs. 3.60 lakh of last year) which is in compliance of Section 135 read with Schedule VII of the Companies Act, 2013. The 2% of the average profit for the last three years Rs. 44.98 lakh.
5. List of activities in which expenditure in 4 above has been incurred:	
	<ul style="list-style-type: none"> • Education by improving infrastructure of schools • Healthcare • Animal Husbandry

SECTION C: OTHER DETAILS

1. Does the Company have any Subsidiary Company/Companies?	Yes. As on 31st March 2021, the Company has one 100% overseas subsidiary in the name of 'SD Agchem (Europe) NV' based in Belgium.
2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent Company? If yes, then indicate the number of such Subsidiary Company(s)	The overseas Subsidiary of the Company is based in Belgium. The Company encourages its subsidiary to participate in the business responsibility initiatives to the extent possible. The scale of operations in the subsidiary is very less with no permanent employees, therefore there is very limited scope to participate in BR initiatives.
3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]	In most of the cases, BR initiatives are carried out by PCCPL directly. The Company does not mandate its suppliers and distributors to participate in the business responsibility initiatives, but it encourages them to support the Company's BR initiatives, to the best extent feasible.

SECTION D: BUSINESS RESPONSIBILITY (BR) INFORMATION

1. Details of Director/Directors responsible for BR													
(a) Details of the Director/Directors responsible for implementation of the BR policy/policies:													
	<table border="1"> <thead> <tr> <th>Particular</th> <th colspan="2">Details of Directors</th> </tr> </thead> <tbody> <tr> <td>DIN Number</td> <td>00015621</td> <td>00063569</td> </tr> <tr> <td>Name of Director</td> <td>Shalil Shashikumar Shroff</td> <td>Avtar Singh</td> </tr> <tr> <td>Designation</td> <td>Managing Director</td> <td>Director (Operations & Business Development)</td> </tr> </tbody> </table>	Particular	Details of Directors		DIN Number	00015621	00063569	Name of Director	Shalil Shashikumar Shroff	Avtar Singh	Designation	Managing Director	Director (Operations & Business Development)
Particular	Details of Directors												
DIN Number	00015621	00063569											
Name of Director	Shalil Shashikumar Shroff	Avtar Singh											
Designation	Managing Director	Director (Operations & Business Development)											
(b) Details of the BR head:													
	<table border="1"> <tbody> <tr> <td>Name of BR head</td> <td>Vinod Kumar Gupta</td> </tr> <tr> <td>Designation</td> <td>Chief Executive Officer</td> </tr> <tr> <td>Telephone Number</td> <td>01762- 280086, 522250</td> </tr> <tr> <td>Email ID</td> <td>info@punjabchemicals.com</td> </tr> </tbody> </table>	Name of BR head	Vinod Kumar Gupta	Designation	Chief Executive Officer	Telephone Number	01762- 280086, 522250	Email ID	info@punjabchemicals.com				
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2. Principle-wise (as per NVGs) BR Policy/policies:

The National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These are as follows:

P1 Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.

P2 Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

P3 Businesses should promote the wellbeing of all employees.

P4 Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

P5 Businesses should respect and promote human rights.

P6 Business should respect, protect, and make efforts to restore the environment.

P7 Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.

P8 Businesses should support inclusive growth and equitable development.

P9 Businesses should engage with and provide value to their customers and consumers in a responsible manner.

(a) Details of compliance (Reply in Y/N)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	Do you have a policy/ policies for	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.	Does the policy conform to any national / international standards? If yes, specify? (50 words)	Yes. The policies are based on the "National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business" released by the Ministry of Corporate Affairs, Government of India.								
4.	Has the policy being approved by the Board? If yes, has it been signed by MD/ owner / CEO/ appropriate Board Director?	Yes. The Business Responsibility Policy covering all the nine Principles / Policies is approved by the Board in their meeting held on June 29, 2020 and signed by the Managing Director.								
5.	Does the Company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	The Company does not have any specific committee to oversee the implementation of the Policy. The Executive Directors oversee the implementation. Furthermore, Mr. Vinod Gupta, CEO of the Company, has been entrusted to implement the Policy with his team.								
6.	Indicate the link for the policy to be viewed online?	The Policies of the Company are available on the website of the Company at the below-mentioned link: https://www.punjabchemicals.com/wp-content/uploads/2020/07/Business-Responsibility-Policy.pdf								
7.	Has the policy been formally communicated to all relevant internal and external stakeholders?	The BR policies are communicated through this report. However BR Policies are available on the website of the Company.								

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8.	Does the Company have in-house structure to implement the policy/policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	The Company has not carried out independent evaluation of the working. However, the Board evaluates the implementation on the basis of internal report of the Functional Heads. The Policy relating to Environment, Health and Safety apart from internal audits are also evaluated by external ISO audit agencies.								

(b) If answer to the question at serial number 1 against any principle, is "No", please explain why: (Tick up to 2 options)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	The Company has not understood the Principles.	Not applicable								
2.	The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles.									
3.	The Company does not have financial or manpower resources available for the task.									
4.	It is planned to be done within next 6 months.									
5.	It is planned to be done within the next 1 year.									
6.	Any other reason (please specify)									

3. Governance related to BR:

a. Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year.

The Board of Directors assess the performance of the Business Responsibility on an Annual basis. It approves an annual operating plan which is executed by the CEO and his team. Every quarter the CEO and the team review the progress with the Board.

b. Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

The Business Responsibility Report forms part of the Directors' Report / Annual Report. The Business Responsibility Report can be accessed at the website of the Company i.e. www.punjabchemicals.com.

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.

The Company firmly believe in ethical corporate operations. The culture of ethical corporate citizenship is an established foundation of the Company.

The Management and Employees of the Company are committed to operate its business ethically in a manner such that all stakeholders i.e. investors, creditors, distributors, customers, employees, and even competitors, the governments and society at large are dealt in a fair manner.

The core value of PCCPL's ethical policy and practices are trustworthiness, respect for all stakeholders, integrity and fair play.

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The measurement of ethical behaviour revolves around

- a. Fairness to all stakeholders;
- b. Transparency in all business dealings;
- c. Understanding and discharging societal responsibility keeping the core values in play;
- d. Long term thinking;
- e. Follow every law of the land in spirit as well as the letter; and
- f. besides above, it is also expected from every member of the Board and Senior management including the functional heads:
 1. Not to involve in related party transactions.
 2. Not take directorship in competitor's Company.
 3. To adhere to the provisions of the Code of Conduct of the Company.

1. Does the policy relating to ethics, bribery and corruption cover only the Company? Yes/ No. Does it extend to the Group/ Joint Ventures/ Suppliers/Contractors/NGOs /Others?

The Company's code of conduct and policy on Ethics, Transparency and Accountability covers the policy on bribery and anti-corruption and is applicable to its business associates, subsidiary, suppliers, contractors, NGOs and other entities, which are directly dealing with the Company in business operations.

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

During the year under review, the Company did not receive any such complaint.

Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

The Company acts responsibly to provide products with proper safety and as per approved regulatory norms.

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/ or opportunities.

We are manufacturing Performance Chemicals having products which incorporate positive environmental attributes. The Company strives to embed the principles of sustainability across various stages of product or service life-cycle and also aims to have a positive social impact through its operations.

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):

- (a) Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain?
- (b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

The Company manufactures a wide range of Performance Chemicals. As the product mix and volumes vary from time to time, it is difficult to ascertain any reduction achieved product wise. However the Energy Conservation Annexure in the Directors Report gives broad information on this subject.

3. Does the Company have procedures in place for sustainable sourcing (including transportation)?

Yes

(a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

The Company adopts the sustainable sourcing of almost all materials and responsible transportation in the normal course of business. However, in the exceptional circumstances the sources are changed after taking all precautions. The Company has formulated a standard operating procedure to approve vendors of all materials for procurement based on their sustainability. The Company pursues its business activities safely and sustainably. All work practices, procedures and production endeavours to comply with the standards of Safety, Health, and Environment as per industry norms, Government and relevant statutory bodies.

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4. Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

Yes. We prefer the local service providers for items used in routine manufacturing activities provided they are available. The procurement team, with the help of the technical team, interact with local producers and service providers to avail their services wherever possible. The team also guides the local vendors and the service providers of the actual requirement and ways to improve the quality of goods, services and their capability. The Company believes in uplifting the local economy in the vicinity of its operations by, procuring as many items as possible from small vendors.

Over last one year, the Company has developed local sources for 6 critical raw materials and continues to work with other producers to develop products locally.

5. Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

The Company believes in waste minimisation and has practices in place to recycle products, wherever possible. This is a part of the drive for process efficiency and product stewardship. The recycling of waste and products of various quality is more than 10%. This reduces the generation of wastes and pollution. The Company also has a system for recovering NOX gases for maintaining a clean environment and efficiency. The two sites of the Company are Zero Liquid Discharge and the same is being complied with in line with Punjab Pollution Control Board guidelines.

Principle 3: Businesses should promote the wellbeing of all employees.

The Company believe in wellbeing of its employees. Therefore, many schemes for their welfare have been implemented.

As on 31st March, 2021:

1. Total number of permanent employees.

Total number of employees as on 31st March 2021 - 1,176

2. Total number of employees hired on temporary/contractual/casual basis.

During the year 2020-21, PCCPL hired 597 employees on contractual basis. The Company does not hire employees on temporary or casual basis. However, the Company awards jobs and works contracts to contractors at its various projects as per requirement of the project or work. The number of workers with contractors varies from time to time.

3. Number of permanent women employees.

Number of permanent women employees as on 31st March 2021 - 50

4. Number of permanent employees with disabilities.

Number of permanent employees with disabilities as on 31st March 2021 - Nil

5. Employee association that is recognized by the management.

PCCPL Workers' Union and Alpha Drug India Workers Union

6. Percentage of permanent employees as members of this recognized employee association?

PCCPL Workers' Union : 74%

Alpha Drug India Workers Union : 72%

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7. Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.

S. No.	Category	No. of complaints filed during the financial year	No. of complaints pending as on the end of the financial year
1	Child labour/forced labour/involuntary labour	NIL	NIL
2	Sexual harassment	NIL	NIL
3	Discriminatory Employment	NIL	NIL

8. Percentage of employees given safety & skill up-gradation training in the last year?

The Company has adopted a detailed annual plan for training of all level of employees (Corporate and project site). Additionally, training on specific knowledge areas for relevant discipline is also arranged as per the requirement.

Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

The Company has identified suppliers, customers, employees, local community and investors as its key stakeholders. The Company engages periodically with these stakeholders to understand their problems and mitigate them as far as possible.

1. Has the Company mapped its internal and external stakeholders?

The Company has mapped its internal and external stakeholders as follows;

- External Stakeholders : Community, Consumers, Customers, , Government, lenders, NGOs .
- Internal Stakeholders : Employees and Shareholders

2. Out of the above, has the Company identified the disadvantaged, vulnerable & marginalized stakeholders?

Whenever any such stakeholder is noticed, the required help is provided in the best possible way. For Community stakeholders, the wellbeing of the marginalized people is taken care under the CSR policy by providing medical facility; improvement in infrastructure of schools; public utilities and meeting other requirements. For the welfare of employees , various schemes have been introduced for raising their standard of living; providing assistance to improve education; and taking care of emergency needs.

3. Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders? If so, provide details thereof, in about 50 words or so.

The initiatives undertaken by the Company for the disadvantaged, vulnerable stakeholders are elaborated in the Annexure - II of the Directors' Report (CSR) and point no 2 above.

Principle 5: Businesses should respect and promote human rights.

The Company respects and promotes human rights for all individuals. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by business activities before or if they occur through human rights due diligence and mitigation processes.

1. Does the policy of the Company on human rights cover only the Company or extend to the Group/ Joint ventures /Suppliers / Contractors /NGOs / Others?

There are other policies like Whistle Blower and Sexual Harassment Policy which deals with the issue of protecting the rights of all the employees working in any business division. Through interaction with external bodies the Company has safeguard in place to protect the human rights of external stakeholders in true spirit.

PCCPL discourages dealing with any business partners who are not serious in protection of Human Rights and have non-compliance at their end. At PCCPL employability of Child labour or forced labour is strictly prohibited.

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2. How many stakeholder complaints with respect to Human Rights have been received in the past financial year and what percent was satisfactorily resolved by the management?

No complaint was received regarding violation of human rights during the financial year 2020-21.

Principle 6: Business should respect, protect, and make efforts to restore the environment.

The Company values the long-term benefits of adhering to environmental best practices and is committed to respect, protect, and make efforts to respect the environment.

1. Does the policy related to Principle 6 cover only the Company or extends to the Group/Joint Ventures / Suppliers / Contractors / NGOs / others.

The Policy related to Principle 6 covers Company and applicable stakeholders.

2. Does the Company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc.? Y/N. If yes, please give hyperlink for webpage etc.

The Company tries to adopt renewable energy and energy efficiency measures in its operations wherever possible, plant trees and take other initiatives to protect and save the environment.

3. Does the Company identify and assess potential environmental risks? Y/N

Yes, the Company identifies potential risks and has assessed their potential impacts & probability of occurrence, identified mitigation measures and delegated responsibilities to mitigate potential environmental risks.

The Company is serious and aware of healthy environment. The efforts to reduce air pollution by minimizing ash / dust particles in air and foul smell of chemicals and safety issues of the units is a continuous process. Moreover, the plants are regularly monitored by the concerned Pollution Control Department. There is always a risk of fire, explosions and air pollution. The Company has taken possible safety measures and follow necessary parameters for the safety of plant, people and its surroundings. Safety audits are conducted in routine by internal as well as external teams. The storage and safety aspects are regularly monitored. The head of the department of safety holds regular meetings and brief the people concerned so that they remain vigilant and alert. Proper safety systems are installed to minimize the after effects of any mis-happening in the premises and proper safety kits and training is given to employees. The Company stresses that not only inside of the plants but the surroundings should also remain safe and clean for the inhabitants.

4. Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?

Yes, the Company constantly endeavours to improve its environmental performance and reduction of emission from its existing facilities. For the new products under development the Company ensures minimal impact by optimising the process parameters & controlling emissions.

The Company has not registered any projects under the Clean Development Mechanism.

5. Has the Company undertaken any other initiatives on - clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.

The Company has taken various initiatives on conservation of energy and technology absorption, which is a part of the Directors' Report.

6. Are the Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?

Yes. The emissions/waste generated by the Company for Financial Year 2020-2021 are within permissible limits given by Central and State Pollution Control Boards.

7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.

As on March 31, 2021 there were no pending show cause or legal notices received from CPCB or SPCB, to the best of the Company's knowledge and understanding.

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Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.

The Company operates with consistent, balanced and transparent approach with various regulatory authorities and social organisations as and when required. The Company also engages with industry bodies and associations to influence public and regulatory policy in a responsible manner as and when required.

1. Is your Company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:

Yes. The Company is a member of Indian Chemical Council besides other business association such as PHD Chambers, Derabassi Industries Association, Lalru Industries Association, Chemxcil and Pharmexcil.

2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

The Company supports the initiatives taken by above associations in their endeavour to advance or improve public good, wherever applicable.

Principle 8: Businesses should support inclusive growth and equitable development.

The Company's affirmative policies, which comply with Government of India guidelines promote diversity, equity and recognise people on their merits and skill sets irrespective of their race, caste, religion, colour, ancestry, marital status, gender, age, and nationality.

Furthermore, the Company also has a well-structured CSR and Sustainability Policy. In view of the same, the Company has various social development projects, which are aimed at promoting healthcare, providing sanitation, and creating livelihood for the people especially those belonging to the disadvantaged sections of the society.

1. Does the Company have specified programmes/ initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.

Yes. The Company has three strategic CSR themes - Education, Public Utilities and implements multiple projects close to its operations under each of these themes.

2. Are the programmes/projects undertaken through inhouse team/own foundation/external NGO/ government structures/any other organization?

The Company has adopted a collaborative approach to CSR and the in house team works with local organisations to assess the best utilisation of the available funds.

3. Have you done any impact assessment of your initiative?

Yes, the improvement in infrastructure of few schools and eye operations of many local habitats speaks for itself for the impact on society and on the public of those areas.

4. What is your Company's direct contribution to community development projects- Amount in Rs. and the details of the projects undertaken?

The Company undertakes Community Development Projects under the CSR Policy. The details have been given in the Annual Report.

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so?

The Company ensures that the initiatives undertaken under the aegis of CSR are thoughtfully selected, well-executed and accepted and valued by the intended beneficiaries.

Ownership and participation by the community is encouraged in the initiatives to ensure self-sustenance of the initiatives in the long-run.

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Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.

PCCPL is committed to engage with and provide value to their customers and consumers in a responsible manner.

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.

No consumer cases are pending.

2. Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A./ Remarks (additional information)

Yes, the Company adheres to all the applicable statutory laws regarding product labelling and displays relevant information on product label.

3. Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

There have been no cases relating to unfair trade practices, irresponsible advertising and/or anti-competitive behaviour against the Company during the last five years and as at the end of Financial Year 2020-2021.

4. Did your Company carry out any consumer survey/ consumer satisfaction trends?

No surveys has been carried out because the Company deals in the B2B segment and does not deal directly with consumers. The consumers of the Company are established businesses who have a feedback and review system. The Company has not received any complaints regarding its' product in last one year.

For and on behalf of the Board of Directors

MUKESH DAHYABHAI PATEL
(DIN:00009605)
Chairman

Place: Baroda
Date: May 27 2021