

ANNEXURE - VIII
BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT
FINANCIAL YEAR 2022-23

Section A: General Disclosure

I. Company details:

S.No.	Questions	Responses
1.	Corporate Identity Number (CIN)	L22121TN1979PLC007799
2.	Name of the Company	TAMILNADU NEWSPRINT and PAPERS LIMITED
3.	Year of incorporation	16 th April 1979
4.	Registered Office Address	67, Mount Road, Guindy, Chennai, TN, 600032, India
5.	Corporate Address	67, Mount Road, Guindy, Chennai, TN, 600032, India
6.	E-mail	investor_grievances@tnpl.co.in
7.	Telephone	044-22354417
8.	Website	www.tnpl.com
9.	Financial year for which reporting is being done	01-Apr-22 to 31-Mar-23
10.	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange (NSE) & BSE
11.	Paid-up Capital	Rs. 69,21,06,000
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Tmt Anuradha Ponraj, Company Secretary, anuradha.p@tnpl.co.in, 044-22354417
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone

II. Product and Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing of Writing and Printing Paper	The company's main operations include the manufacturing and sales of Writing and Printing Paper.	71%
2.	Manufacturing of Packaging Board	The company specializes in the production and sales of Packaging Board.	26%
3.	Manufacturing of Cement	Production and sales of Cement.	2%

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1)	Writing and Printing Paper	17093	71%
2)	Packaging Board	17016	26%
3)	Cement	23941	2%

III Operations

16.	Number of locations where plants and/or operations/offices of the entity are situated	Location	Number of plants	Number of offices	Total
		National	3	8	11
		International	Nil	Nil	Nil
17.	Markets served by the entity:				
	a. Number of locations	Locations	Number		
		National (No. of States)	20 States & 4 Union Territories		
		International (No. of Countries)	35 Countries		
b. What is the contribution of exports as a percentage of the total turnover of the entity?	12%				
c. A brief on types of customers	<p>The company's product offerings include paper, paperboard, and cement, catering to both domestic and international markets. Its customer base is diverse, encompassing dealers, government entities, government undertakings, educational institutions, and direct customers. These products have wide-ranging applications, serving areas such as printing and writing paper, packaging boards, and construction-grade cement.</p> <p>In the realm of paper and board, the company's key customers come from various sectors, including textiles, publishing, food, pharmaceuticals, education, and manufacturing. On the other hand, cement customers comprise construction contractors, builders, traders, and the public, showcasing the company's extensive market reach across diverse industries.</p>				

IV Employees**18. Details as at the end of Financial Year – 2022-2023**

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)	858	784	91%	74	9%
2)	Other than Permanent (E)	15	14	93%	1	7%
3)	Total employees (D + E)	873	798	91%	75	9%
WORKERS						
1)	Permanent (F)	1530	1456	95%	74	5%
2)	Other than Permanent (G)	9	6	67%	3	33%
3)	Total workers (F + G)	1539	1462	95%	77	5%

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1)	Permanent (D)	4	4	100%	0	0%
2)	Other than Permanent (E)	0	0	0%	0	0%
3)	Total employees (D + E)	4	4	100%	0	0%
DIFFERENTLY ABLED WORKERS						
1)	Permanent (F)	11	11	100%	0	0%
2)	Other than Permanent (G)	0	0	0%	0	0%
3)	Total workers (F + G)	11	11	100%	0	0%

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	1	11%
Key Management Personnel	3	2	67%

20. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years):

	FY23			FY22			FY21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	2.63%	0.21%	2.84%	4.64%	0.00%	4.64%	4.81%	0.08%	4.89%
Permanent Workers	2.00%	0.09%	2.09%	2.94%	0.00%	2.94%	2.02%	0.05%	2.07%

V. Holding, subsidiary, and associate companies (including joint ventures)

21. Names of holding/subsidiary / associate companies / joint ventures

Nil

VI. CSR Details

22. CSR details

Whether CSR is applicable as per Section 135 of Companies Act, 2013:	Yes
(ii) Turnover (in ₹)	51172191344
(iii) Net worth (in ₹)	19441063000

TNPL, is committed to community welfare, guided by the Companies Act, 2013, and Companies (Corporate Social Responsibility Policy) Rules, 2014. Their comprehensive CSR Policy aims for sustainable development and ethical practices through community engagement. This commitment is further exemplified by the establishment of TNPL Arakkodai Trust in 2007, which facilitates holistic development in neighbouring areas, focusing on citizen well-being and social progress. The impact spans sectors such as Education and Sports, Healthcare, Quality of Life, Environmental Development, and Culture and Heritage. This involves initiatives ranging from education enhancement and healthcare support to environmental conservation and cultural preservation. Aligned with stakeholder consultations. TNPL annually develops a CSR Rolling Perspective to ensure impactful utilization of their CSR Budget, amounting to at least 2% of the average profit from the preceding 3 years. The company's CSR group oversees implementation, reporting, social audits, and progress monitoring, ensuring the policy's positive impact on the community.

VII. Transparency and disclosures compliances

23. Complaints/Grievances on any of the principles (Principles 1 to 9)

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY-23			FY-22		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes, www.tnpl.com	2	Nil	-	3	Nil	-
Investors		Nil	Nil	-	Nil	Nil	-
Shareholders		6	Nil	-	2	Nil	-
Employees and workers		3	Nil	-	Nil	Nil	-
Customers		27	Nil	-	24	Nil	-
Value Chain Partners		Nil	Nil	-	Nil	Nil	-

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1)	Health & Safety	Risk	Identifying health & safety as a risk in TNPL is based on several factors. The machinery and equipment used in product (paper, cement) production can stand physical hazards if not properly operated or maintained. In addition, exposure to dust, chemicals and noise can lead to long term health issues. Heavy machinery can increase the potential for accidents.	Implementing Health & Safety Plan which mitigates risks and hazards associated with heavy machinery. Awareness programs and training to employees to use personal protective equipment and conduct safe work practices, emergency response plan along with contractor worker permit system	Negative Implications: Workplace accidents and injuries lead to an increase in insured costs such as compensation paid to employees, medical costs, damage to plant or equipment, legal fines. It also has uninsured costs like production delays of down time.
2)	Business Ethics	Risk	TNPL is in the paper Board and cement industries which stems from the potential for environmental and social disquiets. Ethical considerations arise when profits are prioritized over sustainable practices, transparency and fair treatment of workers, responsible waste management are important ethical aspects. Failure to address these issues can result in reputational damage and loss of stakeholder trust and cause disruption in business.	TNPL has a Code of Conduct and Whistle Blower Mechanism Policy which mentions clear lines of responsibility and accountability within the company.	Negative Implications: Unethical Business practices can lead to financial consequences such as legal penalties and fines. It can also cause lower sales and potential loss in investors.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3)	Employee Development	Opportunity	A skilled and trained employee improves operational efficiency which increases productivity. Effective employee development in regards with training improves employee satisfaction and offers a higher retention rate. Employee development also encourages creativity within the organization leading to new product ideas and processes.	Providing training to employees to enhance their skills and knowledge. Engaging with employees and giving opportunities to have innovative ideas which helps the company and employees in constant growth	Positive Implications: Investing in employees have respective financial implications such as higher quality work, employee satisfaction, higher retention rate adhering to compliances.
4)	Regulatory Issue and Compliance	Risk	Regulatory issues and Non-compliance set significant risk to business due to legal penalties and fines, reputational damage, disruption in operation, lawsuits, impacts on investors, loss of trust in stakeholders also long-term consequences causes regulatory scrutiny which is a challenging for company to regain the loss.	To ensure regulatory compliance TNPL implements robust framework of relevant compliance monitoring system	Negative Implications: Non-compliance causes legal costs involving fines and penalties. Regulatory issues require changes to procedures and systems leading production delays
5)	Energy Efficiency	Opportunity	Energy efficiency is a significant opportunity for TNPL as it reduces cost and environmental impact. The optimized equipment decreases energy consumption. Also, enhanced energy efficiency configures with sustainability goals, reducing GHG emissions and resource depletion.	To ensure efficiency an approach of Energy Saving Assessment, Energy Audit, Key Initiatives to Energy Management systems is considered. Along with focus on renewable source of energy is an approach to efficient energy	Positive Implications: Energy efficiency leads to reduced energy consumption contributing to lower operational costs. Investment in energy saving initiatives leads to long term savings. Also, efficient energy helps to meet regulatory requirements.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6)	Water Stewardship	Opportunity	Effective Water Stewardship and efficiency can reduce water utilized in TNPL's cement and paper industry. As consumption of water is the primary material in TNPL, responsible water management aligns with sustainable water balance, lowering water pollution for both the company and communities. Water Stewardship can also boost the organization's reputation and customers.	Implementing Water Stewardship has comprehensive approach which includes: Effluent Treatment-to ensure it is treated to meet environmental standards before being discharged. Reuse of water leads to overall reduction in water consumption.	<p>Positive Implications:</p> <p>Water Stewardship contributed to cost savings as reduced water consumption directly leads to lower treatment costs, wastewater treatments plants provide water for reuse. Meeting Regulatory Compliances avoids fines which block financial setbacks for the company. Positive water stewardship can establish good relations among local communities too.</p>
7)	Availability of Raw Material	Risk	Wood pulp is a major raw material in the paper industry which is solely dependent on natural resources like wood fiber. If these are depleted or over utilized, it can result in scarcity of the raw material. This risk is profound in the regions where there is an increased demand for certification and stricter environmental regulations which limit access to raw materials and cause impact of the supply chain. Dependency on imported coal is another risk as coal has volatile prices which causes higher procurement costs.	To mitigate this risk, TNPL has a plantation strategy incepted to achieve self-reliance in pulpwood. Acres of plantation which as a source to wood pulp is set in motion for socially acceptable and environmentally compatible raw material. The Company is striving to use more renewable energy sources to relegate the dependency on coal.	<p>Negative Implications:</p> <p>Shortage of raw material leads to an increase in procurement costs and affects productivity. Delays or disruption is supply of raw material potentially cause higher prices and change in customer preferences.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8)	Climate Change	Risk	Altered climate patterns can impact forestation leading to changes in tree growth, reduced wood quantity potentially causing scarcity in raw material. Climate changes like floods or delays in monsoon causes disruption in supply chain leading to delays in production. Climate related changes in energy availability impacts paper and cement production	Implementing forest management for continuous supply raw materials, investing in energy efficiency systems, waste reduction plants contribute as risk mitigating approach while maintaining its operational readiness.	Negative Implication: Increased climate related risks cause delays in supply chain operations (disrupt transportation network) which inevitably increases the cost. Companies not addressing climate change face reputational damage leading to decrease in sales and loss of trust in stakeholders.

Section B: Management and process disclosures

S. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Policy and management processes									
1)	a. Whether your entity’s policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	All the policies are available at www.tnpl.com								
2)	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3)	Do the enlisted policies extend to your value chain partners? (Yes / No)	Policies are extended to value chain partners to the extent required.								

4) Name of the national and international codes / certifications/labels / standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.

TNPL has obtained certifications for its Integrated Management Systems, encompassing Quality (ISO 9001:2015), Environment (ISO 14001:2015), and Energy Management (ISO 50001:2018). Additionally, the company has achieved compliance with the new ISO 45001:2018 standard for Occupational Safety and Health Management, as well as ISO 22000:2018 certification for its Food Safety Management System. Moreover, TNPL has been awarded the Forest Stewardship Council (FSC) Chain of Custody (COC) and Forest Stewardship Council’s Forest Management (FSC-FM) Certification. The certification can be assessed in company’s website at www.tnpl.com.

5)	Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Target SEC for TNPL under PAT Cycle VII is 0.5010 TOE/MT of paper for the Target Year 2024-25.
6)	Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.	PAT – VII Cycle: Commenced in the year 2022-23 and covering the FY 2022-23, 2023-24 and 2024-25. The baseline Specific Energy Consumption (SEC) for TNPL is set at 0.5174 TOE/MT of paper. The Target SEC for TNPL is 0.5010 TOE/MT of paper. The target will be assessed in the year 2024-25.
Governance, Leadership, and Oversight		

7) Statement by the director responsible for the business responsibility report, highlighting ESG-related challenges, targets, and achievements

Over the past fifty years, the importance of sustainability has grown significantly due to the increasing global population and higher per capita resource consumption on our planet. This has led to the emergence of sustainability science as a field that bridges different disciplines. Inclusive and sustainable development has become a top priority for nations and industries alike. TNPL stands out as an excellent example of an organization that efficiently uses natural resources, maintains environmental cleanliness, uses non-traditional raw materials and energy sources, and even converts waste from paper processes into cement. TNPL's dedication to sustainability positions it as a leader in guiding industries toward a more sustainable future.

TNPL is dedicated to efficient resource utilization and renewable energy generation through a circular economy model. The company is investing in Research and Development to enhance operational efficiency and minimize environmental impact. This development will yield cost savings in resource utilization while boosting overall operational effectiveness.

Acknowledging that engaged employees are crucial for sustained success, TNPL encourages collaboration to enhance well-being and satisfaction. The company offers diverse training opportunities to motivate employees at all levels, fostering a culture prioritizing health, safety, collaboration, inclusivity, continuous learning, and personal growth. TNPL recognizes its responsibility to uplift surrounding communities, investing in education, infrastructure, health facilities, and youth livelihoods.

Ongoing involvement and partnership with our stakeholders are crucial for our advancement and fulfilling our goal of safeguarding people and the environment. To establish a solid basis for our ESG strategy, we engaged with stakeholders to grasp significant matters for the Company and are actively dealing with them.

8)	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Dr M Sai Kumar, I.A.S., (Chairman and Managing Director) E-mail ID- cmdoffice@tnpl.co.in Telephone number-91 44 2773516 DIN: 03605028
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	Yes, The Chairman and Managing Director is the decision-making authority on sustainability issues. Further the Company has appointed Dr R Seenivasan, ED(O)- FAC responsible for making decisions on sustainability related issues.

10) Details of Review of the National Guidelines on Responsible Business Conduct (NGRBC)

Whether each policy is reviewed, if reviewed, the frequency of review for each of the policy (Annually/Half yearly/ quarterly/ Any other – please specify)

Subject for Review	Indicate whether review was undertaken by directors/ committee of the board/ any other committee									Frequency (annually/ half yearly/ quarterly/ any other-please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up actions.	As a practice, the company’s senior management assesses policy effectiveness when required, making necessary modifications, and putting them into action.									Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliance.	The Company is in compliance with the existing regulations as applicable and a statutory compliance certificate is submitted to the Board of Directors annually.																	

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.

The Company conducts periodic reviews with the Senior Management and Board committees. Further the Auditor (both Internal and External) review the implementation of the policies from time to time. No dedicated Business Responsibility Audit has been conducted.

12) If not, all Principles are covered by a policy, reasons to be stated:

Not Applicable.

Section C: Principle-wise performance disclosure

Principle 1 : Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable

1. Percentage coverage by training and awareness programmes 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 programs
Board of Director	3	The programmes comprised of: <ul style="list-style-type: none"> Analysis of annual Budget & CAPEX Export & domestic business Industry updates and development Business initiatives and plans/projects Products launched/market standing. Segment-wise performance CSR activities undertaken. Programmes covered principles 2, 3, 6 & 8.	100%
Key Managerial Personnel	3		100%

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 programs
Employees other than BoD and KMPs	27	The training covered upskilling and reskilling of employees on the following: <ul style="list-style-type: none"> • ESG aspects • Occupational Health and Safety • Prevention of Sexual Harassment • Human Rights • Consumer Safety • Cyber Security • Regulatory compliance • Code of Conduct • Leadership & Soft skills • Specific to department/business function Training covered principles 1, 2, 3, 5, 6 & 9.	40%
Workers	25	Training programmes covered: <ul style="list-style-type: none"> • Health and Safety Training • Code of Conduct • Prevention of Sexual Harassment • System and technical training • Behavioural & Managerial training Training covered Principles 1, 2, 3, 5 & 6.	25%

Furthermore, TNPL ensures comprehensive communication with its directors through plant visits, regular updates, and in-depth presentations covering regulatory changes such as amendments to the Companies Act, 2013, SEBI regulations, related party transactions, industry updates, energy initiatives, and more.

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year:

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

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.

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, TNPL has established a comprehensive 'Code of Conduct' to ensure ethics, transparency, and accountability in all aspects of its operations. Annually, Directors and Senior Management reaffirm their commitment to this Code of conduct. The ethical culture, nurtured by the leadership, extends throughout the entire organization. A robust vigil mechanism, supported by policies and codes of conduct, ensures transparency and integrity. The Whistle Blower Policy showcases the company's dedication to combating corruption, ensuring transparency, and protecting whistleblowers' anonymity. A vigilance administration enhances managerial effectiveness, meticulously reviewing received complaints under the supervision of competent authorities or the Chairman of audit committee.

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

	FY-23	FY-22
Directors	There have been no instances/cases involving disciplinary action taken by any law enforcement agency in charge of bribery/corruption against Directors/KMP/employees /workers.	
KMPs		
Employees		
Workers		

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

Details of complaints with regard to conflict of interest	FY-23	
	Number	Remark
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	
Number of complaints received in relation to issues of Conflict of Interest of the KMPs		

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.

No fines/penalties/actions are taken against the company or its employees by any regulators on corruption and conflict of interest.

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.

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

	FY-2023	FY-2022
R&D	0.08%	0.14%
Capex	3.81%	1.13%

Since its inception, the company has been at the forefront of adopting cutting-edge technologies. This includes practices like ECF bleaching, Oxygen delignification, integrated Chlorine dioxide production, Wash presses, Odour-free recovery boiler, Collection and Incineration of NCG (Non-Condensable Gases), and bio-gas production from bagasse wash effluent, alongside manufacturing pulp from wastepaper. The mill also contributes to sustainability by producing precipitated Calcium Carbonate to mitigate GHG emissions and crafting high-grade Cement from pulp and paper mill waste materials.

The cornerstone of TNPL's products is Bagasse, a by-product of the sugar cane industry. This resource, combined with sustainably sourced wood, serves as the primary raw material for paper and paper board production. Additionally, the company champions eco-friendliness by generating deinked pulp from waste paper collected from diverse sources. All raw materials used are procured from environmentally responsible sources.

During FY22, an RO-based pilot plant was employed to reclaim process water from pre-treated bleach plant effluent. This endeavour aimed to curtail treated effluent discharge and diminish raw water consumption by recycling bleach plant effluent. This initiative marked a substantial stride in optimizing resource utilization and enhancing wastewater management. Concurrently, in FY22, the replacement of filter bags ensured that suspended particulate matter levels remained compliant with CPCB norms, underscoring the commitment to environmental standards.

Moving to FY23, a notable achievement was the reduction of sand content in bagasse-derived final pulp. This achievement led to decreased rejection percentages during paper production, consequently streamlining rejection optimization and curtailing solid waste generation. Simultaneously in FY23, the installation of a flue gas line linking the Lime Sludge Drying System to the OMYA plant line elevated CO2 content. This strategic measure yielded a tangible reduction in CO2 emissions, underscoring a meaningful stride in environmental responsibility.

Furthermore, to offer an alternative to plastic products, efforts are directed at integrating Carry Bag Base Paper into the existing paper machine infrastructure. This innovation has the potential to replace disposable plastics in our daily lives.

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

Yes, "Sustainable Sourcing" lies at the heart of TNPL's environmental commitment. Launched in 2004, TNPL's Plantation initiative is grounded in the pursuit of self-sufficiency in pulpwood. Over 18 years, this endeavour has spread across an extensive 2,11,280-acre area, aiming to source economically viable, socially acceptable, and environmentally compatible pulpwood. This initiative encompasses several key objectives. It seeks to establish renewable plantations by transforming barren and degraded lands into thriving ecosystems, extending tree cover beyond natural forests.

TNPL's responsible sourcing extends beyond paper production, with pulpwood procurement, mechanized harvesting, and aid for cyclone-affected farmers showcasing the company's commitment to ethical and eco-conscious practices. The positive ecological impact of the plantation includes nurturing biodiversity and contributing to reforestation and water balance. With sustainable sourcing deeply ingrained, TNPL's Plantation Program stands as a symbol of holistic, environmentally sensitive practices in the paper industry.

Additionally, TNPL's main site demonstrates unwavering dedication to efficiency and sustainability, with 100% utilization of lime sludge and dry fly ash, as well as innovative approaches in the Soda Recovery Plant that maximize resource utilization. These practices exemplify TNPL's commitment to environmentally conscious operations.

b. If yes, what percentages of inputs were sourced sustainably?

100% (88% pulpwood)

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life:

<p>(a) Plastics (including packaging)</p>	<p>TNPL is committed to the proper disposal of plastic used for packaging its products, including Printing and Writing Paper, Paper Boards, and Cement. It follows the extended producer responsibility outlined in the plastic waste management rule of 2022. This responsibility is fulfilled through collaboration with a third-party contractor to ensure the safe disposal of plastic packaging waste at the end of its life cycle.</p>
<p>(b) E-waste</p>	<p>TNPL falls under the category of a Bulk consumer according to the E-waste management rules. The company's procedure for the disposal of E-waste involves identifying and disposing of E-waste through authorized recyclers. Following the amended E-waste management rule, TNPL ensures that E-Waste is disposed of only to recyclers possessing valid Extended Producer Responsibility (EPR) certificates.</p>

(c) Hazardous waste	<p>TNPL is a pioneer in the Indian Paper Industry, having established a cement manufacturing factory that converts mill waste such as lime sludge and fly ash into high-grade cement. These waste materials are used as raw materials in cement manufacturing, aligning with the company's solid waste management approach. Lime sludge and lime grits, categorized as hazardous waste, are safely incinerated along with raw materials for cement production at LSFM, TNPL Unit-1.</p> <p>Sodium hypochlorite solution, a hazardous by-product from the ClO2 Plant's safety mechanism, is unavoidable due to continuous venting of gases, absorbed by the Hypo system. Its continuous formation during ClO2 Plant's operation or shutdown is purchased by fabric and dyeing industries.</p>
(d) other waste	<p>The company effectively utilizes organic waste generated from the pulp mill process as a fuel, contributing to wealth generation from waste. This internal organic waste, including bagasse pith, wood dust, and pulpwood bark, is used in Power Boilers, resulting in the conservation of imported coal. TNPL's Unit-I generates Black liquor solid from hard wood pulp and chemical bagasse pulp plant, which is used in chemical recovery boilers for power and high-pressure steam production, further reducing the consumption of imported coal. Additionally, a state-of-the-art Bio-methanation plant in Unit I produces methane, contributing to reductions in furnace oil consumption and imported coal in the lime kiln and Power Boiler.</p>

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.

The Company's waste collection strategy is in alignment with the Extended Producer Responsibility (EPR) action plan set forth by the Central Pollution Control Board (CPCB), underscoring its commitment to EPR within its operational framework. EPR pertains to TNPL due to its utilization of various types of plastic, including flexible and multilayered plastic, for packaging its products like Printing and Writing Paper, Paper Boards, and Cement. To address this, TNPL has undertaken several activities in line with EPR requirements.

For the FY23, CPCB has established TNPL's EPR target at 1000MT/Annum. Subsequently, TNPL obtained an EPR certificate from CPCB under the category of Brand Owner during FY22, following the Plastic Waste Management Rule 2022.

To fulfil its EPR obligations as a Brand Owner, TNPL has engaged the services of M/s. GEM ENVIRO MANAGEMENT PVT LTD. Acting as intermediaries, they facilitate TNPL's connection with plastic waste recyclers in states where the company's products are sold. This strategic collaboration ensures TNPL's adherence to Extended Producer Responsibility principles, enhancing its contribution to responsible plastic waste management.

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

1.(a) Details of measures for the well-being of employees:

<p style="text-align: center;">% of employees covered by</p>											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	788	788	100%	788	100%	NA	NA	0	0%	0	0%
Female	74	74	100%	74	100%	74	100%	NA	NA	74	100%
Total	862	862	100%	862	100%	74	100%	0	0%	74	100%

Other than Permanent employees											
Male	14	14	100%	14	100%	NA	NA	0	0%	0	0%
Female	1	1	100%	1	100%	1	100%	0	0%	1	100%
Total	15	15	100%	15	100%	1	100%	0	0%	1	100%

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

% of workers covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	1467	1467	100%	1467	100%	NA	NA	0	0%	0	0%
Female	74	74	100%	74	100%	74	100%	0	0%	74	100%
Total	1541	1541	100%	1541	100%	74	100%	0	0%	74	100%
Other than Permanent workers											
Male	6	6	100%	6	100%	NA	NA	0	0%	0	0%
Female	3	3	100%	3	100%	3	100%	0	0%	3	100%
Total	9	9	100%	9	100%	3	100%	0	0%	3	100%

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

Benefits	FY_23			FY_22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N / N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N / N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	100%	100%	Yes	100%	100%	Yes

3. 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:

TNPL is committed to creating a more inclusive and convenient workplace for its entire staff. The company ensures that its facilities are accessible to differently abled employees, and the management consistently strives to enhance infrastructure to remove accessibility barriers. Given the nature of TNPL as a continuous process industry with year-round operations involving heavy machinery and hazardous chemicals, ensuring safety for everyone is a priority. As a result, disabled individuals have not been employed in the factory's operations. Nevertheless, the company offers adequate facilities to a small number of disabled individuals in non-operational roles.

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

Nil

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

Gender	Permanent employees		Permanent Workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-NA-			
Female				
Total				

6.

Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?	Yes/No	If yes, then give details of the mechanism in brief
Permanent Workers	Yes	Yes, whenever, the grievances raise, the same will be represented to the Management by the respective Registered / Recognised Trade Unions and it will be resolved at once. This apart, Occupier of the plant is conducting a weekly meeting with employees called "Evening with ED" to redress grievances of the employees. We are also having a "Grievance Redressal Committee" to address timely disposal of the grievances of the employees.
Other than Permanent Worker	Yes	
Permanent Employees	Yes	
Other than Permanent Employees	Yes	

7. Membership of employees and worker in association(s) or Unions recognised by the Company.

Category	FY23			FY22		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	862	0	0%	905	0	0%
Male	788	0	0%	833	0	0%
Female	74	0	0%	72	0	0%
Total Permanent Workers	1541	1541	100%	1488	1488	100%
Male	1467	1467	100%	1407	1407	100%
Female	74	74	100%	81	81	100%

8. Details of training given to employees and workers:

Category	FY23					FY22				
	On Health and safety measures			On Skill upgradation		On Health and safety measures			On Skill upgradation	
	Total (A)	No. (B)	% (B / A)	No. (C)	% (C / A)	Total (D)	No. (E)	% (E/D)	No. (F)	% (F/D)
Employees – Permanent										
Male	788	516	65%	557	71%	833	480	58%	327	39%
Female	74	50	67%	48	65%	72	38	53%	34	47%
Total	862	566	66%	605	70%	905	518	57%	361	40%

Category	FY23					FY22				
	On Health and safety measures			On Skill upgradation		On Health and safety measures			On Skill upgradation	
	Total (A)	No. (B)	% (B / A)	No. (C)	% (C / A)	Total (D)	No. (E)	% (E/D)	No. (F)	% (F/D)
Worker- Permanent										
Male	1467	803	55%	558	38%	1407	707	50%	581	41%
Female	74	45	61%	19	26%	81	30	37%	23	28%
Total	1541	848	55%	577	37%	1488	737	50%	604	41%

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

Category	FY 23			FY22		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees- Permanent						
Male	788	788	100%	833	833	100%
Female	74	74	100%	72	72	100%
Total	862	862	100%	905	905	100%
Worker- Permanent						
Male	1467	1467	100%	1407	1407	100%
Female	74	74	100%	81	81	100%
Total	1541	1541	100%	1488	1488	100%

10.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, the entity has implemented an occupational health and safety management system that comprehensively covers all aspects of the manufacturing unit's operations. This system aligns with the International Standards such as ISO 45001:2018, ensuring a robust approach to occupational health and safety management. This implementation extends its coverage to a remarkable 100%, encompassing both employees and workers within the organization.

Additionally, in accordance with ISO 9001:2015 and ISO 14001:2015 standards, the Integrated Management System has been effectively established and maintained. This following systematic approach are meticulously upheld throughout our mill.

1. Plant Safety Inspection
2. Accident Reporting, investigation, and prevention
3. Testing of equipment's, buildings, and tanks
4. Contract worker permit system
5. Testing and examination of lifting machines, wire ropes and lifting tackles.
6. Safety training.

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

TNPL has implemented a suite of safety protocols to consistently identify potential workplace hazards and assess associated risks, spanning both routine and non-routine scenarios. These measures encompass

the identification of hazards and comprehensive risk assessment, alongside effective risk management strategies. The company also emphasizes the planning and management of Occupational Health and Safety (OH&S) objectives. Additionally, TNPL employs a Hazard Identification and Risk Assessment (HIRA) process to further enhance its safety measures.

Moreover, TNPL fosters a culture of safety by encouraging the reporting of near misses, unsafe acts, and hazardous conditions to proactively prevent incidents. The enhancement of employee competency and behaviour through awareness training is a pivotal aspect. The EHS committee facilitates open communication, participation, and consultation to ensure comprehensive safety coverage. Continuous measurement, monitoring, and review processes uphold the effectiveness of safety initiatives. The establishment of robust fire detection, protection, and management systems further reinforces the commitment to safety. The company also places strong emphasis on accident and incident investigation, reporting, and learning, ensuring ongoing improvement in safety practices.

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

Yes, the company has established processes that empower workers to report work-related hazards and take steps to remove themselves from such risks. This includes the implementation of a Safety Committee, a reporting mechanism for Unsafe Acts and Unsafe Conditions, as well as a Near Miss Reporting system. The Safety Committee meetings are conducted regularly, every 3 months, where discussions encompass various safety topics such as fire safety, unsafe acts, violations, safety audit findings, and accidents. Suggestions for rectifying plant conditions are deliberated, and after thorough discussions, recommendations for corrective actions are proposed and documented. The responsibilities and actions for implementation are clearly recorded to ensure effective follow-through.

Additionally, the company has implemented a multi-faceted approach to hazard management and risk assessment. Through routine Safety Committee meetings, a streamlined process for reporting Unsafe Acts and Unsafe Conditions, and a dedicated Near Miss Reporting system, the company ensures that workers have effective channels to communicate potential hazards. Furthermore, the company places strong emphasis on hazard identification and risk assessment (HIRA) through comprehensive training programs, including Job Safety Assessment (JSA) training for the operational team. This demonstrates the company’s commitment to fostering a culture of safety and equipping workers with the tools and knowledge needed to mitigate risks effectively.

d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?

Yes, the employees and workers of TNPL have access to non-occupational medical and healthcare services. The company provides a 24/7 Occupational Health Centre and ensures the availability of first aid facilities for all employees, workers, and casual labourers.

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

Safety Incident / Number	Category	FY_23	FY_22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.258	0.113
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	7	3
No. of fatalities	Employees	0	0
	Workers	1	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

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

To ensure a safe and healthy work environment, TNPL has implemented comprehensive measures. These include the adoption of a clearly defined Occupational Health and Safety Policy and the provision of suitable

Personal Protective Equipment (PPE) for all employees. Regular training programs are conducted to enhance safety awareness among employees, covering aspects such as hazardous chemical handling, material handling, PPE usage, electrical safety, road safety, first aid, and fire-fighting. Prominent display of caution boards, posters, slogans, and safety guidelines contributes to promoting safety within the workplace.

The company organizes periodic medical checkups to identify occupational health hazards and has established a Safety Committee comprising representatives from both management and workers. These committees conduct regular meetings to discuss and implement safety improvements. In-depth investigations are conducted into accidents and incidents, leading to the implementation of preventive and corrective actions to prevent recurrence.

The safety protocols extend to safety audits, risk analysis, and testing of equipment as per statutory requirements. The organization conducts mock drills to enhance emergency preparedness, installs smoke detectors with warning alarms at critical areas, and ensures the presence of fire hydrant points throughout the premises. Fire extinguishers suitable for different fire types are strategically placed for quick response. Additionally, in coal mill fine coal storage bin, in case of CO level increase above the set point level the automatic carbon dioxide flooding system is available and operate automatically.

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

Number of Complaints on the following made by employees and workers:	FY-23			FY-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	335	0	All complaints were resolved satisfactorily	225	12	Most of the complaints were resolved satisfactorily, remaining comments are under process.
Health & Safety	78	4	Most of the complaints were resolved satisfactorily, remaining comments are under process.	32	4	Most of the complaints were resolved satisfactorily, remaining comments are under process.

14.

Assessments for the year:	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%

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

To address safety-related incidents and significant risk concerns, the company’s Safety team collaborates closely with relevant departments to conduct thorough reviews of accidents and incidents. Through the analysis of gathered data and comprehensive risk assessments, they formulate and implement procedures designed to prevent future occurrences. Management-level meetings are regularly convened to evaluate adherence to safety regulations, assess unsafe practices and conditions, and ensure an unwavering commitment to safety. This commitment includes providing comprehensive on-the-job training to both employees and casual labourers, ensuring that safety remains a top priority.

As part of the response to these safety concerns, the following corrective actions have been taken:

1. Installation of a sprinkler system atop the coal crusher and screen building to rapidly suppress fires.
2. Establishment of a fall arrester system for the unloading of loose bagasse at the bagasse yard, significantly enhancing worker safety.
3. Integration of an N2 quenching system into the Transformer of the 110KV switch yard, effectively managing potential risks.

These proactive measures and continual safety initiatives underscore the company’s dedicated approach to addressing safety incidents and mitigating concerns, fostering a secure and protected working environment for all employees.

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.

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

TNPL has recognized its crucial stakeholders based on their impact on its operations. These stakeholders encompass employees, customers, suppliers, government entities, and the broader community. The selection is determined by the scope of activities and organizational requirements. Stakeholder engagements like meetings and workshops enable meaningful discussions on societal, environmental, and regulatory concerns. These interactions enhance team capabilities, encourage collaborative actions, and foster trust.

The approach to engagement is mindful of the fact that every stakeholder group possesses its own distinctiveness and a unique array of priorities. Feedback gathered from such engagements validates the company’s performance and offers new perspectives on challenges and opportunities. This process ensures a holistic understanding of stakeholder expectations and the cultivation of mutual respect.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Notice Board, Email, SMS, In house Magazine Kagithamalar	Day to Day basis	<ul style="list-style-type: none"> • Training sessions • Performance appraisal • Annual reward and recognition
Investors	No	Newspaper, Website	Quarterly/ Annually	<ul style="list-style-type: none"> • Return on Equity • Business strategy • Long-term business performance • Goals and targets • Risk assessment and management
Society	No	Newspaper, Website, Community Meetings	Annually	<ul style="list-style-type: none"> • Infrastructure development • Education and Skill Development • Environment, Health & Safety
Customers	No	E-mail, Newspaper, Community Meetings,	Annually	<ul style="list-style-type: none"> • Product Quality • Customer Feedback • Business Development • Target Achievement • Quota completion • Increasing of sales in the paper market

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Dealers	No	E-mail, Newspaper, Community Meetings,	Annually	<ul style="list-style-type: none"> Target Achievement Quota completion Increasing of sales in the paper market
Suppliers	No	Newspaper, Website, Email	Day to Day basis	<ul style="list-style-type: none"> Compliance to rules and regulation

Principle 5: Businesses should respect and promote human rights:

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

Category	FY_23			FY_22		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	862	20	2%	888	17	2%
Other than permanent	15	0	0	17	4	24%
Total Employees	877	20	2%	905	21	2%
Workers						
Permanent	1541	80	5%	1482	20	1%
Other than permanent	9	0	0%	6	1	17%
Total Employees	1550	80	5%	1488	21	1%

2. Details of minimum wages paid to employees and workers -

Category	FY_23					FY_22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	862	0	0%	862	100%	905	0	0%	905	100%
Male	788	0	0%	788	100%	833	0	0%	833	100%
Female	74	0	0%	74	100%	72	0	0%	72	100%
Other than Permanent	15	0	0%	15	100%	17	0	0%	17	100%
Male	14	0	0%	14	100%	16	0	0%	16	100%
Female	1	0	0%	0	100%	1	0	0%	1	100%

Workers										
Permanent	1541	0	0%	1541	100%	1488	0	0%	1488	100%
Male	1467	0	0%	1467	100%	1407	0	0%	1407	100%
Female	74	0	0%	74	100%	81	0	0%	81	100%
Other than Permanent	9	0	0%	9	100%	6	0	0%	6	100%
Male	6	0	0%	6	100%	3	0	0%	3	100%
Female	3	0	0%	3	100%	3	0	0%	3	100%

3. Details of remuneration/salary/wages

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	8	435000	1	520000
Key Managerial Personnel (KMP)	1	2223886	2	2491242
Employees other than BoD and KMP (in Lacs)	878	1492309	76	1217012
Workers	1595	714712	83	631880

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes.

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

Yes, whenever grievances arise, they are promptly conveyed to Management through the respective Registered / Recognized Trade Unions for swift resolution. Additionally, the plant’s Occupier holds a weekly gathering known as “Evening with ED” to address employee concerns. To further facilitate effective grievance handling, a “Grievance Redressal Committee” is in place, ensuring timely attention to employee issues.

Notably, the majority of grievances are resolved on the spot, and thus far, there have been no instances of human rights issues. This commitment highlights our proactive and responsive approach, reflecting our dedication to fostering a fair and supportive workplace environment for all.

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

	FY_23		FY_22	
	Filed during the year	Pending resolution at the end of year	Filed during the year	Pending resolution at the end of year
Sexual Harassment	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil
Child Labour	Nil	Nil	Nil	Nil
Forced Labour/ Involuntary Labour	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil

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

To mitigate potential adverse outcomes for complainants in cases of discrimination and harassment, we have implemented mechanisms aligned with the POSH (Prevention of Sexual Harassment) Act. These measures include conducting necessary training programs to raise awareness among employees and contract workers. Additionally, in line with compliance requirements, we have set up an Internal Complaints Committee (ICC) following the guidelines of the POSH Act. These actions are designed to ensure a supportive environment and prevent any negative repercussions for individuals who come forward with complaints related to discrimination and harassment.

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

Yes, the Company ensures that suitable provisions are included in the contracts with suppliers and buyers of products and services before commencing business. These provisions ensure compliance with applicable Human Rights requirements, integrating them as essential aspects of our business operations.

9.

Assessments for the year:	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	100% of our plants were assessed by statutory authorities. The state regulatory and statutory bodies inspect our plants on periodic basis.
Forced/involuntary labor	
Sexual harassment	
Discrimination at workplace	
Wages	

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

As TNPL adheres to statutory regulations, no complaints have been lodged regarding these matters, and thus, there is no need for corrective actions.

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

1. Details of total energy consumption (in Joules or multiples) and energy intensity:

P6 E1- Energy	Unit	FY_23	FY_22
Total electricity consumption (A)	GJ	4,42,158	2,06,100
Total Fuel Consumption (B)	GJ	19,400,400	19,807,442
Energy Consumption from renewables (C)	GJ	11,052	11,664
Total Energy Consumption (A+B+C)	GJ	1,98,53,610	2,00,25,206
Energy intensity per production	GJ/tonne	24.72	23.10
Energy intensity per rupee of turnover (Total Energy Consumption/ Turnover in million INR)	GJ/million INR	3.83	4.98

<p>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</p>	<p>Yes, an independent assessment was conducted by an external agency. In June 2022, M/s Centre for Energy, Environment and Productivity, Chennai, performed an energy audit.</p>
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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

TNPL falls within the scope of the Perform, Achieve, and Trade (PAT) program, designed to promote energy efficiency in industries. The company has taken proactive steps to meet the program’s requirements and has obtained the necessary certifications, reaffirming its commitment to sustainability, and improving energy efficiency as per PAT program objectives.

Beginning with the PAT–II Cycle in the FY 2016-17, spanning from 2016-2019, TNPL established a baseline Specific Energy Consumption (SEC) of 0.7680 ToE/MT of paper in the reference year 2014-15. Aiming for a lower SEC of 0.7234 ToE/MT, TNPL remarkably achieved an even lower SEC of 0.6528 ToE/MT, exceeding its target. This accomplishment led to the issuance of 26,352 Energy Savings Certificates (EScerts), out of which 2,231 were successfully sold at a rate of Rs. 1840 per EScert by March 31, 2023.

In the subsequent PAT–V Cycle, commencing in the FY 2019-20, spanning from 2019-2022, TNPL remained committed. The baseline SEC was redefined based on the reference year 2017-18, set at 0.3991 ToE/MT of paper. TNPL set a new target SEC of 0.3761 ToE/MT and exceeded expectations once again.

Specifically, TNPL Unit II achieved an impressive SEC of 0.3566 ToE/MT, even lower than the targeted SEC. This accomplishment led to a recommendation of 2,766 EScerts for TNPL Unit II during the Monitoring and Verification audit process.

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

Water withdrawal by source (in kiloliters)	FY_23	FY_22
(i) Surface water (m3)	20,856,227	19,830,336
(ii) Groundwater (m3)	0	0
(iii) Third party water (m3)	0	0
(iv) Seawater / desalinated water (m3)	0	0
Total volume of water withdrawal (in m3) (i + ii + iii + iv + v)	20,856,227	19,830,336
Total volume of water consumption (in m3)	18,037,260	17,994,722
Water intensity per rupee of turnover (Water consumed in m3)/(turnover in million Rs)	3.48	4.48
Water intensity - Water consumed/ Production (m3/tonne of production)	22.45	20.76
<p>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</p>	<p>No independent assessment has been carried out by any external agency.</p>	

Additionally, TNPL has recycled 107,093 m³ of water for the FY 2022 and 123,977 m for the FY 2023.

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

Water stands as a cornerstone in pulp and paper manufacturing, playing a pivotal role throughout the paper production process. The usage of water spans multiple key areas, including raw material cleaning, pulp mills, showers on washers, paper formation, and boiler operations. At TNPL, the primary water source is fresh water drawn from the Cauvery River. By integrating cutting-edge technologies, TNPL has effectively harnessed water recycling in its operations.

Driven by a strong commitment to sustainability, TNPL actively seeks ways to lessen its reliance on freshwater intake. The company has a vision to potentially transition to Zero Liquid Discharge, harnessing modern innovations for this purpose. A noteworthy distinction is that TNPL pursues a minimum liquid discharge strategy rather than the conventional Zero Liquid Discharge.

With unwavering commitment, the company diligently complies with SPCB regulations, overseeing wastewater management with meticulous care. The outcome of this dedication is evident as treated effluent from the Effluent Treatment Plant finds purposeful use within the TNPL Effluent Water Lift Irrigation Society (TEWLIS), supporting on-land irrigation. This eco-conscious approach extends with the presence of a 20 KLD on-site sewage treatment plant, pivotal in the company's strategic blueprint. Here, treated sewage water serves a dual purpose - nurturing thriving plantations while effectively suppressing dust.

Unit I resonates TNPL's sustainability drive as treated wastewater irrigates 1650 acres, facilitated through the TEWLIS Scheme. Similarly, Unit II takes a green initiative, channelling all generated wastewater to irrigate the company's vast 650-acre land. This transformation is realized through the implementation of an advanced wastewater treatment plant.

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

Air Emissions (Other than GHG Emissions)	Unit	FY_23	FY_22
NOx	mg/Nm ³	92	109
SOx	mg/Nm ³	220	145
Particulate matter (PM)	mg/Nm ³	27	23
Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.	Yes, an independent assessment was conducted by an external agency. M/s Glens Innovation Labs, Chennai, performed an Ambient, Stack and Noise survey on monthly basis.		

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

Parameter	Please specify unit	FY_23	FY_22
Total Scope 1 emissions			
CO2	Metric tonnes of CO ₂ equivalent	1882143	1919251
CH4	Metric tonnes of CO ₂ equivalent	14137	13885
N2O	Metric tonnes of CO ₂ equivalent	9289	9441
Total	Metric tonnes of CO₂ equivalent	1905569	1942577

Total Scope 2 emissions			
Total	Metric tonnes of CO₂ equivalent	88309	40247
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent/ turnover in million INR	0.38	0.49
Total Scope 1 and Scope 2 emissions per tonne of production	Metric tonnes of CO ₂ equivalent/ tonne of production	2.48	2.29

7. Does the entity have any project related to reducing Green House Gas emission? If yes, then provide detail:

At TNPL, our commitment to environmental responsibility and carbon footprint reduction is evident through our pursuit of green energy generation and adoption of a circular economy approach. Here are the key points regarding energy reduction initiatives:

Green Energy Generation:

- TNPL has embraced renewable energy resources by establishing a 15 MW Wind Farms in Tirunelveli District in FY 1993-94. Over the years, capacity additions in four phases have increased the plant's capacity to 35.5 MW.
- Wind farms cover more than 1,100 acres, strategically located to harness seasonal winds during monsoon seasons.
- Low Tension (LT) Rooftop Solar Power Plants, with a 3 KW capacity, were installed in wind farms to reduce LT consumption bills.
- TNPL remains dedicated to a carbon-neutral mantra through the Clean Development Mechanism (CDM). The Company has recognized 1,90,920 Certified Emission Reductions for energy production without carbon emissions from wind farms.

Resource Utilization and Efficiency:

- Unused spaces among Wind Electric Generators are transformed into eucalyptus plantations, repurposing 2,300 Tons of EH pulpwood. This initiative supports carbon sequestration and sustainable forestry methods.
- TNPL employs an eco-friendly process where bagasse wash water is treated in a bio-methanation plant, producing biogas. This biogas replaces furnace oil in the lime kiln, curbing pollution. This pioneering Clean Development Project in the paper industry reduces approximately 45,000 MT of CO2 annually.
- Carbon emission reduction efforts are extended through the conversion of bagasse pith and wood dust into biofuel. This biofuel is utilized in the paper mill's boiler as an energy-efficient and safe alternative to fossil fuels.

Efficient Resource Planning:

- TNPL ingeniously repurposes flue gas from the cement mill to facilitate fuel drying in the coal mill and lime sludge drying, crucial for our paper mill's operation. This process also heats raw materials in TNPL's cement manufacturing, boosting efficiency and reducing energy consumption.
- Caustic waste is reused in the Soda Recovery Plant, facilitating power generation and reducing environmental impact.
- Utilizing the organic waste material, lignin, extracted as black liquor after wood and bagasse pulping,

TNPL repurposes it in the Soda Recovery Plant to generate steam. This steam is then employed in the turbo generator as an eco-friendly alternative to fossil fuels, resulting in cost-effective and sustainable power generation.

- Waste materials from the paper mill, such as lime sludge and fly ash, are reused to produce high-grade cement, minimizing waste and promoting sustainability.

These energy reduction initiatives reflect TNPL’s dedication to responsible energy practices, circular economy adoption, and sustainable resource utilization.

8. Provide details related to waste management by the entity:

	Unit	FY_23	FY_22
Total Waste Generated (in metric tonnes)			
Hazardous Waste:(A)			
Bio-medical waste (Incineration)	MT	0.125	0.117
Battery waste (RC)	MT	7	7
Used Oil (RC)	MT	81	85
ETP Primary Sludge (Waste pulp & paper sludge) (ORM)	MT	43445	53999
Lime Grit (RU)	MT	7872	3907
Used Glass Wool (LF)	MT	9	18
Lime Sludge- recycled in TNPL pulp and Paper plant (RC)	MT	174635	156515
Lime Sludge re used in Cement industry (RU)	MT	186939	106289
Copper and Copper alloys (RC)	MT	15	7
Total Hazardous Waste (A)	MT	413,003	320,827
Non-hazardous waste generated (B) :			
Discarded Thermocol (ORW)	MT	0	2
Cooling Tower PVC waste (ORW)	MT	0	4
Metal Scrap (MS, CS, SS, Alloys) (ORW)	MT	343	382
Scrap Electrical item (ORW)	MT	3	0
Used Tube Lights (LF)	MT	1	2
Deinking Sludge used for cement production (RU)	MT	1570	5564
Deinking Sludge (ORW)	MT	34007	35608
Waste Grease (RU)	MT	2	0
Fly Ash- Wet Condition (ORW)	MT	10547	2083
Bed Ash & Fly Ash (RU)	MT	54681	59933
Plastic scrap (Barrels, Cans, Hoses etc.) (RU)	MT	108	156
E-waste (RC)	MT	5	1
Plastic waste (RC)	MT	3922	7133
Pith (RU)	MT	170083	169267
MLSS (RU)	MT	3935	3100
Used FRP Sheets (ORW)	MT	2	3
Wood bark (ORW)	MT	1864	987
Hard Wood Fine Rejects (ORW)	MT	1342	1425
Waste paper (Core Pipe) (RC)	MT	116	545
Waste wood (Broken Pallets, Packing Boxes) (RC)	MT	293	315
Scrap Rubber items (RC)	MT	2	6
Wood Dust used(RU)	MT	11451	11815

	Unit	FY_23	FY_22
Wood & Bamboo Dust(RU)	MT	12395	11961
Total Non-Hazardous Waste (B)	MT	306,672	310,292
Total Waste(A+B)	MT	719,675	631,119
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	MT	179076	164614
(ii) Re-used	MT	449036	371992
(iii) Other recovery operations	MT	91553	94493
Total	MT	719,665	631,099
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)			
Category of waste			
(i) Incineration	MT	0.12	0.11
(ii) Landfilling	MT	10	20
(iii) Other disposal operations	MT	0	0
Total	MT	10	20
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		

9. 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.

To effectively manage waste, TNPL has implemented diverse measures. The Company tailors waste management strategies to different waste types.

- Plastic waste is co-processed in cement industries, while battery and E-waste are directed to authorized recyclers. Bio-medical waste is incinerated at an authorized TSDF.
- Hazardous waste, including spent oil, used glass wool, copper, and alloys, are sent to authorized recyclers. ETP primary sludge, lime sludge, lime grits, Deinking Sludge, and fly ash find purpose in cardboard manufacturing and TNPL's cement plant.
- Hazardous items like used FRP sheets, discarded thermacol, hard wood fine rejects, pith, wood dust, and wood bark are repurposed into alternative fuel in authorized pre-processing units.
- Additionally, Mixed Liquor Suspended Solids (MLSS) undergoes a process involving dewatering, solar drying, composting, and is utilized as manure in TNPL's plantation department.
- In Soda Recovery Plant, Foul Condensate stripping column was installed to reduce the sulphide carry over through Effluent water.

10. 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.

No, the entity does not have operations or offices in or around ecologically sensitive areas.

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

In the current financial year, the entity did not conduct any environmental impact assessments for its projects in compliance with applicable laws.

Nevertheless, TNPL is actively investing in Research and Development to leverage advanced technologies for improved efficiency and reduced environmental impact. Notably, TNPL's selection of Eucalyptus and Casuarina trees is rooted in their positive ecological influence, particularly in water-scarce regions. Through its R&D unit, TNPL develops water-efficient clones and disseminates new Eucalyptus varieties to farmers, contributing to substantial sapling planting efforts. The company's steadfast dedication to environmental preservation is evident through its creation of extensive green belts, lawns, and initiatives aimed at fostering positive local impact.

12. 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.

The Company is strictly complying with all applicable environmental law/ regulations/ guidelines in India.

Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.**1.a. Number of affiliations with trade and industry chambers/ associations.**

5 (Five)

b. 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)	Federation of Indian Export Organisations	Southern Region
2)	CAPEXIL	National
3)	CII	National
4)	IPMA	National
5)	Andhra Chambers of Commerce	State

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

The Company has not received any adverse orders from regulatory authorities.

Principle 8: Businesses should promote inclusive growth and equitable development.**1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

Nil - None of the Projects undertaken by the company in FY 2022-23 require Social Impact Assessments.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity.

Not Applicable.

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

In case a grievance pertains to the Company, the relevant department or function takes on the responsibility of addressing it and providing updates on its status. This approach ensures that matters are handled by those with the appropriate expertise. Employing a transparent procedure for handling grievances reassures the community that their concerns are treated seriously and that effective measures are taken to resolve them.

As part of its dedicated commitment to tackling community grievances, the Company leverages its well-established CSR initiatives. The CSR team actively collaborates with local residents and government bodies, actively seeking feedback on the efficacy of the Company's ESG endeavours and identifying areas where Company assistance is necessary. These insights are then integrated into the Company's CSR projects, subject to review and approval by either the CSR Committee or the Directors.

Moreover, the Company addresses grievances through various channels, including:

- a) Mudalvarin Mugavari
- b) RTI Petition
- c) Postal Complaints

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

	FY - 23	FY - 22
Directly sourced from MSMEs/ small producers	31%	26%
Sourced directly from within the district and neighboring districts	26%	27%

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

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

The complaints from dealers/customers are registered via dealer portal or ERP. As the complaint is received with the relevant documents, the samples are sent to the Marketing Department at Factory Marketing Complaint Cell. The complaint is validated and assigned to respective departments. The next step is to start the analysis/investigation of the complaint by Quality Check/ Finance Department. After the inspection, a report is released, and corrective action is taken by QC department. The report is analysed by Branch in Charge/ Regional in Charge. As approval is received the feedback is sent to customers with necessary arrangements with or without compensation based on approvals. This process is completed within 45 days for domestic complaints and 90 days for export complaints, with a 90-day window for reinvestigation or renegotiation of domestic complaints.

Moreover, customers have the option to utilize our <https://www.tnpl.com/grievance-redressal/platform> for addressing any grievances they may have.

2. Turnover of products/services as a percentage of turnover from all products/services that carry information about Environmental and social parameters relevant to the product, Safe and responsible usage, Recycling and/or safe disposal.

Not Applicable

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

	FY_23		FY_22	
	Received during the year	Pending resolution at end of year	Received during the year	Pending resolution at end of year
Data privacy	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil
Restrictive Trade Practices	Nil	Nil	Nil	Nil
Unfair Trade Practices	Nil	Nil	Nil	Nil
Others – Delivery of essential services	29	16	101	34
Others – Quality Issue	27	0	21	0

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

Details of instances of product recalls on account of safety issues:	Number	Reasons for recall
Voluntary recalls	Nil	NA
Forced recalls	Nil	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, TNPL has a privacy policy that outlines its practices regarding the confidentiality and disclosure of personal information. When collecting personal information, TNPL clearly indicates the purpose of collection and obtains written consent from the provider of the information. The policy allows individuals to review the information they have provided and emphasizes reasonable security practices to ensure the confidentiality and prevent unauthorized disclosure of personal information. The collected information is used solely for its intended purpose and is not retained beyond that purpose unless required by law or audit purposes. TNPL also has measures to protect personal information shared on its website and may share information with subsidiaries and business associates for the purpose of intended business.

The policy can be assessed at www.tnpl.com.

6. 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.

In response to the issues relating to above mentioned causes, TNPL took comprehensive corrective actions. We have undertaken a thorough root cause analysis which ensures that all complaints are resolved by accurate procedures of verifying the samples and providing customers with appropriate compensation as required. Also, all complaints are required to be closed within 90 days of periodic time. To minimize the error of delivery issues, TNPL dispatches timely, which helps to maintain transparency during the delivery process.

For FY 2022, re-occurrence of instances of product recalls are none. Considering for FY-23 the re-occurrence of instances of product recalls,

- (A) Insurance Claim - 16.6 MT's of materials were taken back as the truck got upside down during transit and the materials were brought to factory, out of it 2.3 MT's was dispatched to market after QC checking and balance quantity of 14.3 MT's was sold at salvage price as per the insurance terms and the actions were taken as per insurance claim and settlement process.
- (B) Product Recall - 19.7 MT's was received and was converted into Examination papers and got despatched.