

BUSINESS RESPONSIBILITY REPORT

[As per Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

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| 1 | Corporate Identity Number (CIN) of the Company | : | L24200MH1960PLC011807 |
| 2 | Name of the Company | : | EXCEL INDUSTRIES LIMITED |
| 3 | Registered Address | : | 184-87, S.V. Road, Jogeshwari West, Mumbai-400102 |
| 4 | Website | : | www.excelind.co.in |
| 5 | E-mail -Id | : | surendra.singhvi@excelind.com |
| 6 | Financial Year reported | : | April 1, 2020 to March 31, 2021 |
| 7 | Sector(s) that the Company is engaged in (industrial activity code-wise) | : | Chemicals NIC code: 20119 Environment & Biotech NIC code: 3821 |
| 8 | The key products/services that the Company manufactures/provides (as per Balance sheet) | : | Diethyl ThioPhosphoryl Chloride |
| 9 | Total number of locations where business activity is undertaken by the Company | : | Number of International Locations - NIL Number of National Locations -6 |
| 10 | Markets served by the Company | : | National and International |

SECTION B: FINANCIAL DETAILS OF THE COMPANY

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| 1 | Paid up Capital (INR) | : | 6,28,53,460 |
| 2 | Total Turnover (INR) | : | 74,946.60 lakhs |
| 3 | Profit After Tax (INR) | : | 7018.95 lakhs |
| 4 | Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%) | : | Company's total spending on CSR for the Financial Year 2020-21 is ` 296.31 Lakhs which is 2.01% of average profit of the last three years. |
| 5 | List of activities in which expenditure in 4 above has been incurred:- | | A. Conservation of Natural Resources B. Rural Development <ul style="list-style-type: none"> • Agriculture • Community Development • Animal Welfare C. Promotion of Education D. Others <ul style="list-style-type: none"> • Preventive Health Care • Women Empowerment • Environmental Sustainability |

SECTION C: OTHER DETAILS

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| 1 | Does the Company have any Subsidiary Company/ Companies? | : | Yes. The Company has two wholly owned subsidiaries. |
| 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 subsidiary companies participate in the BR initiatives of the Company by following the basic principles and practices of the Parent Company, to the extent applicable. |
| 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? | : | The Company encourages its Business Associates to support Company's BR initiatives, to the extent feasible. |

SECTION D: BR INFORMATION**1. Details of Director/Directors responsible for Business Responsibility**

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| A | Details of the Director/ Directors responsible for implementation of the BR policy/policies | a | DIN Number | : | 00033693 |
| | | b | Name | : | Hrishit A Shroff |
| | | c | Designation | : | Executive Director |
| B | Details of the BR head | a | Name | : | Surendra K. Singhvi |
| | | b | Designation | : | Company Secretary |
| | | c | Email ID | : | surendra.singhvi@excelind.com |

2. Principle-wise(as per National Voluntary Guidelines(NVGs))Business Responsibility(BR)Policy/policies

At Excel Industries Limited, the Business Responsibility is guided by "National Voluntary Guidelines (NVGs) on Social, Environmental and Economic Responsibilities of Business" released by the Ministry of Corporate Affairs, which articulates nine principles as below.

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| 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 well-being 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 Compliances

| s. no. | Question(s) | 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? | Yes | | | | | | | | |
| 3 | Does the policy conform to any national / international standards? If yes, specify? | Most of the policies are aligned to National Guidelines on Responsible Business Conduct (NGRBC) issued by Ministry of Corporate Affairs and some other standards such as Responsible Care principles. | | | | | | | | |
| 4 | Has the policy being approved by the Board? If yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director? | Policies are approved by the Board of Directors and signed by the Executive Chairman of the Company. | | | | | | | | |
| 5 | Does the Company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy? | The Board from time to time oversee the implementation of respective policies. The Functional Heads are authorized to oversee the implementation thereof. | | | | | | | | |
| 6 | Indicate the link for the policy to be viewed online? | The policies are placed on the website of the Company can be viewed on http://www.excelind.co.in/companyPolicies.html | | | | | | | | |
| 7 | Has the policy been formally communicated to all relevant internal and external stakeholders? | All the policies have been communicated to all relevant internal and external stakeholders of the Company. The policies for all relevant stakeholders are available on Company's website http://www.excelind.co.in/companyPolicies.html | | | | | | | | |
| 8 | Does the Company have in-house structure to implement the policy/ policies? | Yes, the Company has necessary structure in place to implement the policies. | | | | | | | | |
| 9 | Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies? | Yes, the Company provides redressal mechanism for all kinds of grievances. | | | | | | | | |
| 10 | Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency? | The Policy relating to Environment, Health and Safety are evaluated by internal as well as external ISO audit agencies. Other policies are evaluated internally or by respective Committee. | | | | | | | | |

3. Governance related to BR

- a. Q. 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

Ans. The Executive Chairman, The Managing Director, the Executive Director, CEO, and CS review the Business Responsibility performance of the Company during the Annual review meetings. Besides, the CSR Committee of the Board reviews the social performance of the Company on regular basis.

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

Ans. The Business Responsibility Report forms part of the Directors' Report. The Report can be viewed on the website of the Company at www.excelind.co.in.

SECTION E: PRINCIPLE WISE PERFORMANCE

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

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| 1 | Does the policy relating to ethics, bribery and corruption cover only the company? Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/ NGOs/Others? | <p>The Company strives to adhere to the highest standards of integrity and behavior and ensure compliance and adherence to law and internal policies through its compliance systems.</p> <p>The Board of Directors of the Company has also adopted a Code of Conduct ('Çode') which applies to the Board Members, Key Managerial Personnel and other employees in the category "General Manager and above" of the Company. The Company obtains an annual confirmation of compliance with the Code from the Directors, Key Managerial Personnel and the Senior Management employees every year.</p> |
| 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. | The Company has not received any complaint from any stakeholders relating to ethics, bribery and corruption during the Financial Year 2020-21. |

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

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| 1 | List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities. | <p>(a) Lonzacure P25i.</p> <p>(b) Phenyl Hydrazine.</p> <p>(c) O',O', Dimethyl thiophosphoryl Chloride (DMTC).</p> |
| 2 | For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional): | Lote site of the Company has achieved the status of Zero Liquid Discharge (ZLD). Roha site has installed MEE, RO and conservation of water is in progress. Electricity procurement through open access system allows us to get Electricity generated from renewable resources. Sustainable processes developed by R&D are helping the Company in reduction of waste in various facets. |
| | a. Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain? | Use of bigger tankers for larger volumes, use of jumbo bags etc, are aimed at decreasing Carbon dioxide emissions. Use of Pressure Swing technology for distillation of imported ethanol, consumes lesser energy as compared to traditional distillation process. |
| | b. Reduction during usage by consumers (energy, water) has been achieved since the previous year? | |
| 3 | Does the Company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably? | <p>Yes.</p> <p>Company select suppliers keeping in mind the sustainability aspect. The Company has dedicated fleets for Transportation.</p> |

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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. Local vendors provide us Product labels, shipping marks, Special marks and printing on packaging goods etc. They also supply us with printed TREM Cards, MSDS, which are required for each sample / shipment. They also provide us EIP (Emergency Information Panel) labels for each tanker, truck and export shipment. Similarly, local vendors have been developed for wood packaging, stretch wrapping for export and pharma customers, carpentry, fabrication, ISO container lining, coal transport or contract labor etc. Every individual is provided safety trainings before entry at site. |
| 5 | Does the Company have a mechanism to recycle products and waste? | With the help of our in-house R&D team, we are producing products like 30% HCl, NaHS, KHSO ₄ , Ortho Phosphoric acid, Low grade Sulphur from various waste streams, which are either consumed in-house at our various sites or sold in the market. Ammonium Sulfate is the next byproduct in pipeline. |

Principle 3 : Businesses should promote the wellbeing of all employees

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| 1 | Total number of Employees | 1015 |
| 2 | Total number of employees hired on temporary/ contractual/ casual basis | 828 |
| 3 | Number of permanent women employees. | 32 |
| 4 | Number of permanent employees with disabilities | 2 |
| 5 | Do you have an employee association that is recognized by management | We do not have an Employee Association. However, the Company has recognized union at Roha, Lote and Mumbai |
| 6 | What percentage of your permanent employees is members of this recognized employee association? | NA, Union percentage is 52% to the strength of staff worker. |
| 7 | Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last Financial Year and pending, as at the end of the Financial Year. | |

| s. no. | Category | No. of Complaints filed during the Financial Year | No. of Complaints pending as at the end of Financial Year |
|--------|---|---|---|
| 1 | Child Labour / Forced Labour / Involuntary Labour | Nil | Nil |
| 2 | Sexual Harassment | Nil | Nil |
| 3 | Discriminatory Employment | Nil | Nil |

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

| s. no. | Employees Category | Employees imparted safety training | Employees imparted skill up-gradation training |
|--------|--|------------------------------------|--|
| a. | Permanent Employees | 901 | 692 |
| b. | Permanent Women Employees | 32 | 26 |
| c. | Casual/Temporary/Contractual Employees | 637 | 160 |
| d. | Employees with Disabilities | 2 | 2 |

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

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| 1 | Have the Company mapped its internal and external stakeholders? | The Company has mapped its internal and external stakeholders. They are community, consumers, customers, employees, Government, lenders, NGOs and the Shareholders. |
| 2 | Out of the above, has the Company identified the disadvantaged, vulnerable & marginalized stakeholders? | The Company has identified poor, women and children as marginalized and disadvantaged groups through needs assessment and engagement with local communities in and around the Company's manufacturing sites under its Corporate Social Responsibility (CSR) initiatives. The Company has undertaken various programs under its CSR Policy in the areas of health, education and livelihood for such marginalized and disadvantaged groups. |
| 3 | Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders | The initiatives undertaken by the Company for the disadvantaged, vulnerable and marginalized stakeholders are elaborated in Principle 8 and in the Annexure-II of the Directors' Report. |

Principle 5 : Businesses should respect and promote human rights

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| 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? | The Company follows its policy on Human Rights which are applicable to the Company, its Subsidiary and Contractors. |
| 2 | How many stakeholder complaints have been received in the past Financial Year and what percent was satisfactorily resolved by the management? | The Company has not received any stakeholder complaints in the Financial Year 2020-21 related to Human Rights. |

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

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| 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 adopting low-carbon technologies, is being monitored continuously. Water conservation, ZLD, procurement of electricity from renewable resources, recycling and optimization of raw materials is a norm followed at all our sites. This extends to all the Group companies and stakeholders. |
| 2 | Does the Company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? If yes, please give hyper link for web page etc. | Yes, through implementation of the principles of Responsible Care and regular training from various agencies for reducing the carbon footprint, the company is aiming to address issues related to climate change, global warming etc. |
| 3 | Does the Company identify and assess potential environmental risks? | Yes. The R&D has been providing continual insights to developing process which are cleaner, greener and more sustainable. Also, the Risk Management Committee regularly identify and assess the potential environmental risks. |

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| 4 | Does the Company have any project related to Clean Development Mechanism? If Yes, whether any environmental compliance report is filed? | Yes, the Company constantly endeavors in improving its environmental performance / GHG reduction for its existing & new products by optimizing the process parameters and also monitoring emissions. State pollution control Board has provided good ratings to our production units after survey. |
| 5 | Has the Company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. If yes, please give hyperlink for web page etc. | The Company has adopted many ideas for green initiatives and resource efficiency improvements. Specific measures are isolation & recycle of byproducts from waste streams, procurement of renewable electricity through open access, installation of motion sensitive lights in offices and acoustic generators etc. |
| 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 and wastes generated by manufacturing facilities of the Company are within the permissible limits given by SPCB. |
| 7 | Number of show cause / legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as at the end of Financial Year. | There were no pending show cause / legal notices received from Central and State Pollution Control Boards at the end of Financial year 2020-21. |

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

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| 1 | Is the Company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with. | As on March 31, 2021, your Company is a member of the following trade associations: i. FICCI - Federation of Indian Chambers of Commerce and Industry ii. BCCI - Bombay Chamber of Commerce and Industry iii. ICC - Indian chemical council |
| 2 | Have you advocated/lobbied through above associations for the advancement or improvement of public good? 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 endeavor for the advancement or improvement of public good. |

Principle 8 : Businesses should support inclusive growth and equitable development

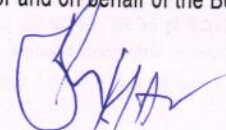
| | | |
|---|---|--|
| 1 | Does the Company have specified programs/initiatives/projects in pursuit of the policy related to Principle 8? | The Company takes up program/ initiatives/ projects in pursuit of the principle of inclusive growth and equitable development in pursuance of its Corporate Social Responsibility ('CSR') Policy. Detailed information about the specified program and initiatives undertaken during the Financial Year 2020-21 in pursuit of the CSR Policy has been given in Annexure-II to the Directors' Report. |
| 2 | Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/ any other organization? | The programs/projects are undertaken through Implementing Agency, Shri Vivekanand Research & Training Institute (SVRTI) Foundation. |

| | | |
|---|---|---|
| 3 | Have you done any impact assessment of your initiative? | The CSR programs and their impacts/ outcomes are monitored and reviewed by the CSR Committee of the Directors and the management periodically to understand the impact of these programs. |
| 4 | What is your Company's direct contribution to community development projects. | During the Financial Year 2020-21, the Company spent ` 296.31 Lakhs on various CSR initiatives, detailed in Annexure - II to the Directors' Report. |
| 5 | Have you taken steps to ensure that this community development initiative is successfully adopted by the community? | Implementation of the CSR programs/ projects by the community is ensured through meetings, site visits, obtaining periodic progress reports from Implementing Agency. |

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

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| 1 | What percentage of customer complaints/consumer cases are pending as on the end of Financial Year. | There were no complaints pending as at the end of the Financial year. |
| 2 | Does the Company display product information on the product label, over and above what is mandated as per local laws? | Yes, the Company adheres to all the applicable statutory laws regarding product labeling 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 behavior during the last five years and pending as at end of Financial Year. | There have been no cases relating to unfair trade practices, irresponsible advertising and/or anti-competitive behavior against the Company during the last five years and as at the end of Financial Year 2020-21. |
| 4 | Did the Company carry out any consumer survey/ consumer satisfaction trends? | The Company interacts periodically with its customers and channel partners to obtain feedback on the product quality, adherence to delivery schedules and service levels. The feedback so obtained is reviewed internally and appropriate improvement actions are finalized and implemented. |

For and on behalf of the Board



ASHWIN C. SHROFF

Executive Chairman

DIN: 00019952

Date: 13th August, 2021

Place: Mumbai