

# UFLEX LIMITED

Division/Office: CORPORATE - SECRETARIAL

Corporate Office: A-107-108, Sector-IV, Distt. Gautam Budh Nagar, NOIDA - 201301, (U.P.), India

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UFLEX/SEC/2024/

27 August 2024

The National Stock Exchange of India Limited Exchange Plaza, 5th Floor Plot No. C/l, G-Block Bandra - Kurla Complex Bandra (E), Mumbai – 400051

The BSE Limited Corporate Relationships Department 1st Floor, New Trading Ring, Rotunda Building, P J Towers,

Dalal Street, Fort, Mumbai – 400 001

Scrip Code: UFLEX

**Scrip Code : 500148** 

Subject: Business Responsibility & Sustainability Report ("BRSR") for the Financial

Year 2023-24

Dear Sir(s),

Pursuant to Regulation 34(2)(f) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility & Sustainability Report ("BRSR"), which forms part of the Annual Report for the financial year 2023-24.

You are requested to kindly take the same on record(s).

Thanking you,

Yours faithfully, For UFLEX LIMITED,

Ritesh Chaudhry Sr. Vice President (Secretarial) & Company Secretary

Encl: As above



# **Business Responsibility & Sustainability Report**

### **Message from the Director**

Dear Stakeholders,

I am pleased to bring to you our Business Responsibility and Sustainability Report (BRSR) for the financial year 2023-24. For nearly 40 years, UFlex has been a leader in driving innovation across a wide range of industries. Our vision is clear: to be responsible stewards, fostering prosperity through diverse, cutting-edge solutions. Our unwavering commitment to excellence and continuous adaptation has been instrumental in our success, empowering businesses across various industries.

Our diverse portfolio showcases this dedication. From packaging films and flexible packaging to aseptic liquids, engineering marvels, innovative chemicals, high-precision printing cylinders, and even holographic technology, we cater to a broad spectrum of industries. This diversification strengthens our capabilities and allows us to collaborate across sectors. It's a holistic approach that addresses the evolving needs of our globalized world.

Sustainability isn't just an industry buzzword, it's at the core of who we are. We develop innovative solutions that are also environmentally responsible. This ethos guides our research and development across all sectors, creating a positive cycle that fuels sustainable innovation. By prioritizing Environmental, Social and Governance (ESG) factors in our decision-making, we generate lasting value for stakeholders and ensure sustainable growth.

Our commitment to sustainability goes beyond numbers. We prioritize employee safety and well-being, contribute positively to our communities, and develop solutions that minimize our environmental footprint. We're merging our purpose with digital innovation, not just for our own goals, but to empower like-minded individuals and organizations to join us in building a more sustainable future for everyone. In line with our net zero commitment, UFlex inked an agreement for the supply of renewable power for its packaging films plant in Karnataka. Innovation isn't just about what we do internally; it's about fostering collaboration. This collaborative approach creates a ripple effect of positive change, forging a more sustainable future for the entire world. We developed several innovative packaging technologies that improve agility of our customers while being environmentally sustainable. UFlex also recently showcased its innovative and sustainable printing and packaging solutions at DRUPA 2024.

In line with our focus on developing environment-friendly and sustainable products, UFlex's FlexiTubes are inherently produced using less plastic at source without compromising on product integrity, MVTR (Moisture Vapour Transmission Rate) and OTR (Oxygen Transmission Rate) properties and offer customized barrier solutions tailored to specific product requirements.

In collaboration with a leading non-profit - Say Earth, we have engaged with 13 schools and educated more than 4000 students on ecological balance and environmental sustainability. Committed to creating innovation-led, future-ready, and technology-driven sustainable packaging solutions, UFlex has always been a pioneer in implementing programs for community impact and has been passionately engaged in Corporate Social Responsibility (CSR) activities long before it became a statutory obligation.

Together, we've achieved remarkable milestones. Together, we have the potential to exert a substantial, positive influence on society and the environment. I am confident that by collaborating, we will leave a lasting legacy for generations to come.

Warm Regards,

### **Ashok Chaturvedi**

Chairman and Managing Director DIN: 00023452



### **SECTION A: GENERAL DISCLOSURES**

### I. Details of the listed entity

Sr. No.	Particulars	Company Details
1	Corporate Identity Number (CIN) of the listed entity	L74899DL1988PLC032166
2	Name of the listed entity	UFlex Limited
3	Year of incorporation	1988
4	Registered office address	305, 3rd Floor, Bhanot Corner Pamposh Enclave, Greater Kailash - I, New Delhi, India - 110048
5	Corporate address	A-108, Sector-IV, Noida - 201301
6	E-mail	secretarial@uflexltd.com
7	Telephone	0120 - 4012345
8	Website	www.uflexltd.com
9	Financial year for which reporting is being done	1st April 2023 to 31st March 2024
10	Name of the Stock Exchange(s) where shares are listed	<ul><li>a) BSE Limited</li><li>b) The National Stock</li><li>Exchange Limited</li></ul>
11	Paid-up Capital	72,21,14,860 INR
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Shadab Alam Corporate ESG Head Email: <u>shadab.alam@uflexltd.com</u> Tel.: 0120 6100121/ 0120 4002635
13	Reporting boundary - Are the disclosures under this report made on a standalonebasis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all theentities which form a part of its consolidated financial statements, taken together).	Disclosures under this report are made on standalone basis
14	Name of assurance provider	Intertek India Private Limited
15	Type of assurance obtained	Limited Assurance on BRSR Core Attributes

### **II. Products & Services**

### 16. Details of business activities

Sr. No.	Description of Main Activity	<b>Description of Business Activity</b>	% of Turnover of the Entity
1	Flexible Packaging	Flexible Packaging manufacturer and exporter, with a wide variety of products such as: Flexitubes, lids, confectionery foils, and other valueadded products	94%
2	Engineering Business	Manufacturing major for top-of-the-line packaging, printing and allied machines	6%



#### 17. Products/Services sold by the entity

Sr. No.	Product / Service	NIC Code	% of Total Turnover Contributed
1	Flexible Packaging Material	22209 - Manufacture of other plastics products n.e.c	94%

### **III. Operations**

#### 18. Number of locations where plants and/or operations/office of the entity are situated

Sr. No.	Number of Plants	Number of Offices	Total
National	11	5	16
International	0	0	0

#### 19. Markets served by the Entity

#### a. Number of Locations

Locations	Number
National (No. of States)	28 States and 8 Union territories
International (No. of Countries)	150 Countries

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

The contribution of exports as a percentage of total turnover of UFlex Limited on standalone basis is 7.10%.

#### c. A brief on types of customers

UFlex Limited, a leading Indian multinational, stands as a one-stop shop for diverse, high-quality flexible packaging solutions across various industries. Our offerings encompass a wide range, including packaging films, flexible packaging materials, holography, aseptic liquid packaging, chemicals, printing cylinders, and engineering products for packaging and printing machinery.

Our customers span across various sectors including FMCG (Food and Non-food), Pharmaceuticals, Building materials, Automobile and much more. UFlex offers packaging solutions for wide variety of products such as snack foods, candy & confectionery, sugar, rice & other cereals, beverages, tea & coffee, dessert mixes, noodles, wheat flour, soaps and detergents, shampoos & conditioners, vegetable oil, spices, marinates & pastes, cheese & dairy products, frozen food, sea food, meat, anti-fog, pet food, pharmaceuticals, garden fertilizers & plant nutrients, motor oil & lubricants, automotive & engineering components, etc.

UFlex provides packaging solutions to customers across 150 countries spanning USA, Canada, South America, UK, Europe, Africa, Middle East and South Asian countries. Major customers are P&G, PepsiCo, Nestle, Mars, Britannia, GSK, Agrotech Foods, Perfetti, Reckitt, Dabur, Haldiram, ITC, Amul, Mondelez, L'Oreal amongst others in India. Some of our international customers include Olde York (Canada), Hains (USA), Anita's (USA), Spectrum (UAE), Truda Foods (South Africa), Dijo Banking (Poland), etc.



### **IV.** Employees

### 20. Details at the end of the Financial Year:

### a. Employees and workers (including differently abled):

Sr.	Particulars	Total (A)	Male		Female	
No.			No. (B)	% (B / A)	No. (C)	% (C / A)
		EMPLOYE	ES			
1	Permanent (D)	3,031	2,859	94.3%	172	5.7%
2	Other than Permanent (E)	0	0	-	0	-
3	Total Employees (D + E)	3,031	2,859	94.3%	172	5.7%
		WORKER	RS .			
1	Permanent (F)	4,353	4342	99.7%	11	0.3%
2	Other than Permanent (G)	2,540	2423	95.4%	117	4.6%
3	Total Workers (F + G)	6,893	6,765	98.1%	128	1.9%

### b. Differently abled Employees and workers:

Sr.	Particulars	Total (A)	M	ale	Female	
No.			No. (B)	% (B / A)	No. (C)	% (C / A)
	DIFFER	NTLY ABLE	EMPLOYE	ES		'
1	Permanent (D)	16	14	88%	2	12%
2	Other than Permanent (E)	0	0	-	-	-
3	Total Employees (D + E)	16	14	88%	2	12%
	DIFFER	ENTLY ABLE	D WORKER	S		
1	Permanent (F)	10	10	100%	-	-
2	Other than Permanent (G)	3	3	100%	-	-
3	Total Workers (F + G)	13	13	100%	-	-

### 21. Participation/Inclusion/Representation of Women

Particulars	Total (A)	No. & Percentage of Females		
Particulars	Total (A)	No. (B)	% (B/A)	
Board of Directors	6	1	17%	
Key Management Personnel	3	-	-	

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

Particulars	FY 2023-24		FY 2022-23			FY 2021-22			
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	14%	32%	15%	16%	31%	17%	15%	34%	16%
Permanent Workers	14%	50%	14%	17%	50%	17%	13%	47%	13%



### V. Holding, Subsidiary and Associate Companies (including Joint Ventures)

### 23. Names of holding / subsidiary / associate companies / joint ventures

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	% share held by the listed entity	Does the entity indicate at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes / No)
1	Flex Middle East FZE	100%	No
2	Flex Americas S.A. de C.V.	100%	No
3	Flex P. Films (Egypt) S.A.E.	100%	No
4	Flex Films Europa Sp.zo.o	100%	No
5	Flex Films (USA) Inc.	100%	No
6	UFlex Europe Ltd.	100%	No
7	UFlex Packaging Inc.	100%	No
8	UPET Holdings Ltd.	100%	No
9	UPET (Singapore) Pte. Ltd.	100%	No
10	Flex Films Africa Pvt. Ltd.	100%	No
11	Flex Films Europa Korlatolt Felelossegu Tarsasag	100%	No
12	Flex Films Rus LLC	100%	No
13	LLC Flex Chemicals Pvt. Ltd.	100%	No
14	Flex Foils Bangladesh Pvt. Ltd	100%	No
15	Flex Specialty Chemicals Egypt S.A.E.	100%	No
16	Plasticfix Europa Spolka Z Ograniczona Odpowiedzialnoscia	100%	No
17	Flex Pet (Egypt) S.A.E.	100%	No
18	USC Holograms Pvt. Ltd.	68%	No
19	Flex Americas Brasil Ltda, Brazil	100%	No
20	UFlex Woven Bags, S.A. DE C.V., Mexico	100%	No
21	Flex Asepto Egypt.	100%	No
22	Flex Foods Limited	47.15%	No
23	Digicyl Pte. Ltd.	50%	No
24	Digicyl Ltd.	50%	No

### **VI. CSR Details**

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

(ii) Turnover (FY 2023-24): ₹6,610.23 Crore

(iii) Net worth (FY 2023-24): ₹3,043.63 Crore



### **VII. Transparency and Disclosures Compliances**

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

We prioritize actively listening to our stakeholder's concerns, whether about our projects, daily operations, or broader company actions. We thoroughly investigate each concern and strive to address it thoughtfully until the stakeholder is satisfied.

Looking ahead, we remain committed to open and transparent communication. We recognize the importance of hearing your voices and promptly addressing your concerns. We believe these principles are essential for our continued growth, success, and fostering strong, positive relationships with all stakeholders

Stakeholder	Grievance Redressal		FY 2023-2	4	FY 2022-23		
group from whom complaint is received	Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	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. The Company engages with communities through both formal and informal channels. All community grievances are received by the Team at the respective manufacturing sites and are addressed appropriately by local and corporate leadership teams.	-	-		-	-	
Investors (other than shareholders)	Yes. https://www.UFlexltd.com/ grievance-redressal.php	1	1	Issue resolved from the Company's end. Awaiting depository's action	-	-	
Shareholders	Yes. https://www.UFlexltd.com/ grievance-redressal.php	2	-	Issues resolved during the year.	-	-	
Employees and Workers	Yes. All employee & workers grievances are addressed appropriately through multiple channels. Issues are discussed at various plant level committees such as canteen committee, people council, among others.	-	-	-	-	-	
Customers	All customers grievances are addressed appropriately through multiple channels such as emails, phone calls or through site visits.	961	7	Unresolved complaints were received at the end of year and were resolved at the time of reporting	-	-	
Value Chain Partners	Yes, Purchase Orders and Contracts include a dispute resolution mechanism that requires meetings between the higher management teams of both parties to resolve any disputes.	-	-		-	-	



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

Sr.	Material issue	Indicate	Rationale for identifying	In case of risk,	Financial implications of
No.	identified	whether risk or opportunity	the risk /opportunity	approach to adapt ormitigate	therisk or opportunity
1	Environmental Impact	Risk and Opportunity	Risk: Poses risks such as environmental degradation, pollution, resource depletion and legal liability  Opportunity: Offers opportunities such as innovation, efficiency improvement, waste reduction and stakeholder engagement	Emphasizing rigorous adherence to environmental regulations and fostering awareness among value chain partners	Negative: Risk of operational failure or breakdown owing to impact of environment on the supply chain or the processes.  Positive: Opportunity to contribute to environment preservation and thereby gaining stakeholders' trust
2	Operational Efficiency and Sustainable Processes	Opportunity	Operational efficiency and sustainable processes drive cost savings, resource optimization, and environmental responsibility, ensuring a balance between productivity and long-term sustainability.	-	Positive: Enhanced saving via optimized processes, while contributing to environmental safeguarding.
3	Product Innovation and Design	Opportunity	Opportunity: Research and development on Biodegradable & Sustainable packaging along with technological advancements, present opportunities for quality improvement, efficiency enhancement and gaining a competitive advantage.	-	Positive: Improving the quality of products and customer satisfaction can expand market reach and increase market penetration
4	Disaster and risk management	Risk and Opportunity	Risk: Disaster and risk management entails addressing potential risks such as disruption, damage, and loss resulting from unforeseen events or emergencies.  Opportunity: This discipline also provides opportunities to foster resilience, facilitate effective recovery, and promote continuous learning from past incidents, leading to improved preparedness and mitigation strategies.	Strategizing disaster and risk response through conducting in-depth risk assessment checks; and conducting regular monitoring activities while engaging internal as well as external stakeholders	Negative: Possibility of encountering challenges that could lead to disruptions in the supply chain or manufacturing process, ultimately impacting production  Positive: Enhancing safety protocols and implementing rigorous reviews can effectively mitigate potential disruptions and thereby reduce loss possibility
5	Employee Relation and safety	Opportunity	Cultivating strong employee relations and safety fosters a positive work environment, boosts morale, enhances workplace safety measures, reduce accidents, and ensure a motivated and engaged workforce, leading to a more efficient and resilient organization	-	By enhancing operational efficiency, minimizing employee absences and turnover rates, fostering a culture of engagement and satisfaction, reducing healthcare expenditures, attracting and retaining top-tier professionals, and bolstering brand reputation
6	Community Relation and CSR	Opportunity	Community engagement and CSR initiatives present opportunities for community goodwill, positive community impact, and alignment with stakeholders' expectation and vision	-	Promoting social cause and working with the community helps gather market trust and expand with collaborative support.



Sr. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt ormitigate	Financial implications of therisk or opportunity
7	Business Ethics & Integrity	Risk and Opportunity	Risk: Business ethics and integrity pose potential risks including ethical breaches, reputational damage, and legal liability.  Opportunity: Embracing business ethics and integrity offers opportunities for ethical leadership, stakeholder trust, and social responsibility.	Emphasizing the importance of rigorous policy adherence, efficient implementation, regular internal or external reviews, and comprehensive audits takes precedence.	Negative: Escalating levels of regulatory scrutiny bring forth the possibility of setbacks, including potential penalties or fines, increasing the risk of failure  Positive: Capitalizing on the expanding market acceptance of ethical business and unlock new possibilities and foster exponential growth
8	Disclosure	Opportunity	By disclosing relevant and reliable information about our activities and performance, we seize opportunities to build trust, foster accountability, and enhance our reputation among stakeholders and the public.	-	Positive: Transparent practices play a crucial role in shaping a favorable public image and fostering trust with investors and stakeholders.

### **SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs.	Y	Υ	Y	Υ	Υ	Y	Y	Y	Υ
	b. Has the policy been approved by the Board?	Υ	Υ	Y	Υ	Υ	Υ	Υ	Υ	Υ
	c. Web Link of the Policies, if available	Our poli	icies can	oe found	at https	://www.L	FlexItd.c	com/poli	cies.php	
2	Whether the entity has translated the policy into procedures.	Y	Υ	Y	Υ	Υ	Υ	Y	Υ	Υ
3	Do the enlisted policies extend to your value chain partners?	contract requires policies	e compa ts with v s them to that we all their o	endors a comply follow ar	nd part with all nd expec	ners, the relevant	compan laws, re	ny includ egulation	les a clauns, and c	use that ompany
4	Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	certifica	1000 rtification is Packag 22000:20 Plus Certi 81884364 2000:201	h as: 5 5 n of macl ing Mate 18 certifi fication 10 (BRC)	nines by rials Issu cations	QSA Intel le 6			s, standa	rds and
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<ul><li>initiative</li><li>Trans</li><li>Net-z</li><li>Enha</li><li>mate</li></ul>	committe es: sition to g ero emiss ncing circ rials and duction o	reen ene sion targe cularity b products	ergy sour et to be a by incorp	ces aligned w orating m	ith SBTi nore recy	cled con	tent into	our raw



Sr. No.		isclos	ure Qu	estion	S			P1	P2	P3	P4	F	P5	P6	P7		28	P9
6	Performance of the commitments, goal reasons in case the	s and t	argets a	along-v				Progres targets Agreem Project further UFlex I	in lir ent (P Plasti recyclo nas se	ne with PA) to so c Fix- Co ed. t up pl	SBTi. ource re ollection astic w	UFlex enewak n of PE aste re	has a ole pov ET bot ecyclir	also si wer for tles ar	gned a Dharw e in pro	a Pow ad pla ogress	er Pur nt. and sa	chase ame is
Gove	rnance, leadership	and ov	ersight	t						· '								
7	responsibility repor	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements				Provided a	nt the b	peginnir	ng of thi	s repo	rt.							
8		nest authority responsible for and oversight of the Business			E	ihri Ashok mail ID: <u>s</u> hone no.	ecreta	rial@uf	lexltd.c		nagin	g Direc	ctor					
9	Does the entity had Director responsible related issues	le for d	ecision	makin	g on su	ıstainab	ility h	es, we haded by esponsib elated iss	our W e for s	hole Tir trategiz	ne Direc ing and	tor an makir	d has t ng dec	wo ind	lepend on CSR	ent dir and S	ectors ustain	that is
							1	. Mr. Jeev	araj Pi	llai – Ch	nairman							
							2	2. Mr. Paresh Nath Sharma										
							3	3. Mrs. Rashmi Verma										
							n a te	additional natters du is Stakeho o oversee of the orga	uring tl olders' the in	heir me Relatio pleme	etings. \ nship C	Ve hav	e othe	r Boar nd Risk	d comr Mana	nittees gemen	as we t Comi	ll suci mitte
10	Details of Review of	NGRB	Cs by th	ne Com	npany:													
Subj	ect for Review							en by Dir ommittee		Frequ	ency ( <i>A</i> )	nnual	ly/ Ha	lf year	ly/ Qu	arterly	// Any	
		P1	P2	Р3	P4	P5	P6 P	7 P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
abov	ormance against e policies and w up action	devel to ma If any	opmen ake sure action rtunitie	ts and they s needs	period still app to be t	ically re oly to the aken to	views tl e preser handle	informed he policient scenari the risks s, the boa	s o. or	As and	d when	require	ed					
statu of rel princ rectif	pliance with tory requirements evance to the iples, and ication of any non- pliances	proce	_	r comp	•	togethei with all				As and	d when	require	ed					
	as the entity	P	1	F	22	P3	8	P4	P	5	P6		P	7	P	8	F	9
of the polic agen provi	ed out independent ssment/ evaluation e working of its ies by an external cy? (Yes/No). If yes, ide the name of cy	part of evalu crucia ensur	of the a ation c al role i	ssessm onduc n enha obust a	nent, th ted has incing t and wel	e worki yielded he effec l-inform	ngs of a I valuab ctivenes ned poli	endent as Il policies Ie insight s of UFlex cy frame	were s and o	evaluat compre cies. Th	ed by a hensive is activi	group recom ty dem	of trai mend ionstra	ned ex ations ates UF	ternal a , which lex's co	nssesso have p ommiti	ors. The played ment to	e a o



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

Not applicable as all the principles are covered under existing policies.

Questions	P1	P2	Р3	P4	P5	P6	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	-	-	-	-	-	-	-	-	-

### **SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE.

#### **Essential indicators**

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	1	Familiarization programs for the Board of Directors/ KMPs of the Company is done	67%
Key Managerial Personnel	3	periodically covering various areas pertaining to the Vision/Mission/Values, business, strategy, risks, operations, regulations, code of business conduct and ethics, economy and environmental, social, and governance parameters, business products, and people initiatives. These training programs encompass all the NGBRC principles. In addition, frequent updates are presented to all the Board members/ KMPs to apprise them of developments in the company, key regulatory changes, risks, compliances, and legal cases.	100%
		Impact- Develop a thorough and comprehensive understanding of the significance of ESG issues. Integrate ESG principles into your decision-making processes and enhance stakeholder engagement to lead in sustainability.	
Employees other than BoD and KMPs	239	Various trainings were undertaken during the year such as Prohibition of Insider Trading, Prevention of Sexual Harassment at the Workplace, Information and Cyber Security Awareness, Code of Conduct, Know Your Customer guidelines, and ESG. Other trainings included induction programs for new recruits, leadership training, digitalization	89%



Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
		and cyber security, modules on soft skills and communication, excel, programs on mental and physical well-being, among several others covering all the NGRBC principles.	
		We also took several initiatives for the overall development and upskilling of our employees. These included training programs such as TTT (Train the Trainer), ASPIRE and NexGen Manager for middle management, and RISE for junior management.	
		Impact- It plays a crucial role in cultivating a culture of sustainability, responsibility, and ethical behaviour within a company, resulting in a positive impact on stakeholders.	
Workers	646	Health & Safety training programmes - The training provided covers essential workplace safety measures, hygiene practices, and first-aid procedures.	100%
		Impact- By learning to identify hazards, maintain a clean environment, and respond to emergencies, workers can significantly reduce accidents, improve overall health, and potentially save lives.	

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

Particulars	NGRBC Principle	Regulatory / enforcement agencies / judicial institutions	Amount (in ₹)	Brief of Case	Has an appeal been preferred?	
MONETARY						
Penalty/Fine						
Settlement	Nil	Nil	0	Nil	Not Applicable	
Compounding Fee						
NON- MONETARY						
Imprisonment	NI:I	Nil	0	NI:I	Not Applicable	
Punishment	Nil	NII	0	Nil	Not Applicable	

# 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?

Yes. At UFlex, we uphold unwavering standards of integrity, transparency, and ethical conduct across every facet of our operations. In alignment with this steadfast commitment, we have formulated and enacted the Anti-Corruption Policy to proactively prevent and combat corruption in all its forms. This policy extends its reach to encompass all individuals within the UFlex Limited ecosystem, including employees, contractors, suppliers, and any other business partners.



The policy addresses various forms of potential bribery or corrupt practices, such as Fee payments, Offers of employment, Charitable contributions and sponsorships, Gifts & Hospitality, Political donations, etc.

Our policy on Anti-Bribery and Anti-Corruption can be found at https://www.UFlexltd.com/pdf/Policies/BRSP/2023/UFlex\_ABAC\_Policy.pdf

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

Particulars	FY 2023-24	FY 2022-23
Directors	0	0
KMP	0	0
Employees	0	0
Workers	0	0

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

Particulars	FY 20	23-24	FY 2022-23		
	Numbers	Remark	Numbers	Remark	
Complaints received in relation to issues of Conflict of Interest of the Directors	0	Nil	0	Nil	
Complaints received in relation to issues of Conflict of Interest of the KMPs	0	Nil	0	Nil	

7. Provide details of any corrective action taken or underway on issues related to fines/ penalties/ action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest:

Not Appliable

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

Particulars	FY 2023-24	FY 2022-23
Number of days of Accounts Payables	76.33	89.03

### 9. Open-ness of business

Parameter	Metrics	FY 2023-24	FY 2022-23
	Purchases from trading houses as % of total purchases	14%	8%
Concentration of Purchases	Number of trading houses where purchases are made from	123	123
	Purchases from top 10 trading houses as % of total purchases from trading houses	46%	69%
	Sales to dealers / distributors as % of total sales	15%	11%
Concentration of Sales	Number of dealers / distributors to whom sales are made	360	154
	Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	37%	48%



Parameter	Metrics	FY 2023-24	FY 2022-23
	Purchases (Purchases with related parties / Total Purchases)	9.2%	8.3%
	Sales (Sales to related parties/ Total Sales)	7.8%	6.3%
Share of RPTs in	Loans & advances (Loans & advances given to related parties / Total loans & advances)	53%	50%
	Investments (Investments in related parties / Total Investments made)	0%	0%

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

### **Leadership indicators**

# 1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of training and awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes		
1	Water management, human rights violations, anti-corruption and bribery, data security, and health and safety—which includes NGRBC Principles 1, 2, 3, 5, and 6—are among the topics addressed.	59.93%		

#### 2. Processes to manage conflict of interests

At UFlex, we take great pride in our commitment to excellent governance standards, which is evident in our actions and achievements. Our proactive approach in managing potential conflicts of interest underscores our dedication to upholding transparency and trust within our organization. We have created a culture of accountability that allows us to address any potential issues promptly and efficiently, ensuring our operations remain aligned with our values and standards. This accomplishment serves as a testament to our unwavering commitment to maintaining an open, transparent, and accountable organization that prioritizes the best interests of all our stakeholders.

As per the Code of Conduct of our company, the Directors and Key Management Personnel should be scrupulous in avoiding 'conflicts of interest' with the Company. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the Chairman of the Company and a prior written approval should be obtained.

Additionally, we have a whistleblower policy in place that allows us to report any violations of the company's code of conduct and ethics as well as any suspected violations of any legislation that the company is subject to. Both the Code of Conduct and the Whistle Blower Policy can be accessed at our website <a href="https://www.UFlexItd.com/policies.php">https://www.UFlexItd.com/policies.php</a>



# PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

### **Essential Indicators**

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

Particulars	FY 2023-24	FY 2022-23	Details of improvements in environmental and social Impacts
R&D	100%	100%	UFlex's commitment to sustainability and innovation is evident in our initiatives, which encompass a wide range of projects and collaborations aimed at enhancing recyclability, reducing environmental impact, and promoting renewable energy.
			We are pushing the boundaries of Sustainable R&D by modifying pouching machines. These adjustments are focused on several areas:
			• Material reduction: Optimizing pouch designs and film usage to minimize material waste.
			• Energy efficiency: Implementing modifications that reduce the machine's energy consumption while maintaining production output.
			• Recyclable materials: Adapting the machines to handle and seal recyclable pouch materials, promoting a more circular packaging lifecycle.
			By implementing these sustainable practices through pouching machine modifications, UFlex has achieved significant environmental benefits throughout the packaging value chain.
			Here are some of our other key accomplishments and ongoing projects:
			1. Foil Replacement Films: We've developed a new type of film designed to replace foil in packaging. This innovation enhances the recyclability of our products.
			2. High-Transparency, High-Barrier Film: We've created a high-transparency, high-barrier film with enhanced Oxygen Transmission Rate (OTR) and Water Vapor Transmission Rate (WVTR) properties. This development supports ecofriendly food packaging and contributes to a reduced carbon footprint.
			3. Recyclable BOPET Film: We have developed a recyclable BOPET film that use water as a solvent, a first for the globe. This accomplishment demonstrates our dedication to developing recyclable and sustainable products.
			4. R&D Investment: Recognizing the importance of research and development, we have made significant investments in our R&D facilities. This enhances our capabilities and reduces our reliance on external sources for innovation and product development.



Particulars	FY 2023-24	FY 2022-23	Details of improvements in environmental and social Impacts
			5. Film Recycling and Biodegradable Alternatives: We have developed biodegradable products and are actively exploring opportunities in film recycling. This research is part of our commitment to reducing waste and promoting sustainability in our industry.
			6. Collaborations with Research Institutes: We are actively collaborating with research institutes for additional green initiatives.
			These collaborations enable us to expand our knowledge, foster innovation, and accelerate our sustainability efforts. These initiatives reflect UFlex's unwavering commitment to sustainability and responsible business practices. We continue to explore and implement innovative strategies to enhance our products, reduce the environmental impact, and contribute positively to the global sustainability landscape.
Capex	7.87%	-	UFlex is committed to sustainable manufacturing practices and has implemented several key initiatives through CAPEX investments:
			1. Environmentally Friendly Plating: We've switched to Alkaline Copper Plating, eliminating hazardous heavy metals (like Nickel) from entering the environment via air and water pollution.
			2. Employee Well-being and Automation: We've introduced a new, fully automated slim plating line from K Walter, reducing employee fatigue and strain.
			3. Resource Efficiency: New automation and instrumentation technology has boasted a 10% reduction in chemical and water consumption.
			4. Automation for Safety and Quality: We've upgraded the etching process from manual to automated, minimizing employee exposure to hazardous chemicals. Additionally, a new, energy-efficient master lab machine will improve product quality, benefiting both UFlex and its customers.
			We have also invested in a new renewable energy project at our Dharwad manufacturing unit. These CAPEX initiatives demonstrate UFlex's dedication to creating a sustainable future through eco-friendly practices, employee well-being, and resource conservation.

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

Yes, at UFlex we're deeply committed to implementing sustainable sourcing practices across our business segments. We understand that minimizing the environmental footprint and contributing to a healthier planet is a need of the hour. Thus, increasing local sourcing is one of our main strategies. We view it has a great social impact in addition to aiding local economies flourish and cutting transportation-related emissions, which proves beneficial for the environment. Whenever feasible, we place a high priority on obtaining raw materials locally, making sure that our operations respect social responsibility and the environment.



Our commitment goes further. We're fortifying our sourcing practices with the implementation of a new "Sustainable Supply Chain and Responsible Sourcing" policy. This policy provides a clear framework for aligning our entire supply chain with our sustainability and responsible business goals.

We have defined a clear process to assess the sustainability of our suppliers. As a first step, we share our "Sustainable Supply Chain and Responsible Sourcing" policy with the suppliers and communicate our expectations from them. We have also sensitized our suppliers on the need for sustainable practices across the value chain and discussed the latest ESG trends. We have outlined a precise procedure for evaluating our suppliers' sustainability.

By prioritizing sustainable sourcing, we aim to achieve four key objectives:

- 1. Building a resilient supply chain: Sustainable practices make our supply chain less vulnerable to disruptions.
- 2. Reducing our environmental footprint: Local sourcing and responsible practices minimize our environmental impact.
- 3. Making a positive impact: We're committed to creating a positive impact on the communities where we operate and the planet as a whole.
- 4. Our vision is to be a leader in sustainable sourcing within our industry, setting a benchmark for responsible practices.

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

Not available. We are in process of accessing and mapping our suppliers to various social and environmental standards such as SA 8000, ISO 14001, OHSAS 18001 or relevant labels like Rainforest Alliance, Rugmark, RSPO, etc.

### 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the

Plastics (including packaging)	UFlex is primarily into providing packaging solutions to industrial customers. Since UFlex is a business-to-business (B2B) entity with its products sold as packaging material to other entities such as FMCG, we do not have any products to reclaim at the end of life. Majority of our plastic packaging products are sold to registered Brand Owners. Nevertheless, UFlex is registered as a Producer in Central Pollution Control Board (CPCB) portal and follows the Extended Producer Responsibility (EPR) obligation in compliance with the Plastic Waste Management Rules, 2016 (PWM) for plastic waste generated during manufacturing process (pre-consumer plastic waste) and through unregistered customers.
	At the operational sites of UFlex, we have implemented robust mechanisms and procedures for efficient handling of waste. This includes recycling, reusing, and proper disposal of waste. We have already installed recycling plants at Noida, Jammu, and Malanpur for end-of-life treatment of plastic waste. All the procedures are carried out in strict compliance with regulatory standards, ensuring the safety of our environment and our workforce. UFlex has also implemented an enzyme-based recycling technology at its Malanpur facility to separate all the components (PE, Foil, Paper) of laminate waste and reuse to manufacture other products. We have installed Pyrolysis units at Jammu and Noida as well to convert mixed plastic waste into fuel.
E-waste	None of the UFlex's product fall under this category. Further, UFlex disposes all the E-waste generated within the operations through authorized vendors.
Hazardous waste	None of the UFlex's product fall under this category. Further, the hazardous waste generated in our operations is disposed through authorized waste processors.
Other waste	From our Cylinder business unit, main products are Roto gravure cylinder and Flexo plates used for printing. The cylinders sold to customers can be recycled at our facility. We have a product recycling policy in which all customers intending to reuse the product can send it back to us for reuse.



Most of the machines manufactured by our Engineering business unit have longer lifespan. Since the machines are made up of metals, they are sold as scrap and go for recycling at the end of life.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities?

As per Plastic Waste Management Rules, 2016 (As amended), UFlex Limited comes under the obligation of Extended Producers Responsibility. All our units / plants are registered with respective Pollution Control Boards and are in compliance with these regulations.

### **Leadership Indicators**

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link
22209	Biodegradable Packaging Film using Enzymatic Masterbatch for the Indian Subcontinent	0%	Cradle to Grave	No	Not Communicated

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

No

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total number			
	2023-24	2022-23		
Recycled plastic content	1.08%	Not tracked for the previous year		

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

The Company does not have any specific product to reclaim at the end of life. For plastic packaging, the responsibility of end-of-life treatment of sold products lies with the brand owners since they are introducing the plastic packaging along with their products into the market.

		FY 2023-24		FY 2022-23			
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed	
Plastics (including packaging)	NA	NA	NA	NA	NA	NA	
E-waste	NA	NA	NA	NA	NA	NA	
Hazardous waste	NA	NA	NA	NA	NA	NA	
Other waste	NA	NA	NA	NA	NA	NA	



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

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

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

### **Essential Indicators**

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

Category		% of employees covered by											
	Total	Health Ir	surance	Accident	Insurance	Maternity Benefits		Paternit	y Benefits	Day care	facilities		
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)	
Permanent	employees												
Male	2,859	2,859	100%	2,859	100%	0	0	0	0%	2,859	100%		
Female	172	172	100%	172	100%	172	100%	0	0	172	100%		
Total	3,031	3,031	100%	3,031	100%	172	6%	0	0%	3,031	100%		
Other than	Permanent	employees											
Male	0	0	-	0	-	0	-	0	-	0	-		
Female	0	0	-	0	-	0	-	0	-	0	-		
Total	0	0	-	0	-	0	-	0	_	0	_		

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

Category		% of employees covered by										
1	Total (A)	Health Ir	surance	nce Accident Insurance		Maternity Benefits		Paternity Benefits		Day care facilities		
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	%(E/A)	No. (F)	% (F/A)	
				I	Permanent	workers						
Male	4,342	4,342	100%	4,342	100%	0	0	0	0%	4342	100%	
Female	11	11	100%	11	100%	11	100%	0	0%	11	100%	
Total	4,353	4,353	100%	4,353	100%	11	0.3%	0	0%	4353	100%	
				Other	than Perm	anent work	ers					
Male	2,423	2,423	100%	0	0%	0	0%	0	0%	0	0%	
Female	117	117	100%	0	0%	0	0%	0	0%	0	0%	
Total	2,540	2,540	100%	0	0%	0	0%	0	0%	0	0%	

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent)

Particulars	2023-24	2022-23
Cost incurred on well-being measures as a % of total revenue of the company	0.18%	0.16%

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.



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

Particulars		2023-24		2022-23			
	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	72%	93%	Yes	85%	90%	Yes	
Gratuity	100%	100%	Yes	100%	100%	Yes	
ESI	0.3%	42%	Yes	26%	45%	Yes	

#### 3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, the facilities are available at our premises/offices.

### 4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016?

Yes, UFlex has a policy on Equal Opportunity. As per the policy, UFlex considers everyone equal and does not discriminate against on the basis of religion, caste, creed, color, race, gender, age, nationality, disability or any other category stated by the Law.

We provide fair and equal opportunity to eligible persons including those with disabilities subject to our job requirements and merit. This policy is applicable to all our employees and workers across all levels in the organization.

The policy can be found at

https://www.UFlexltd.com/pdf/Policies/BRSP/2023/UFlex\_Equal\_Opportunity\_Policy.pdf

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

	Permanent e	employees	Permanent workers		
	Return to work rate Retention rate		Return to work rate	<b>Retention rate</b>	
Male	NA	NA	NA	NA	
Female	100%	75%	NA	NA	
Total	100%	75%	NA	NA	

# 6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?

Permanent workers	Yes	Yes, UFlex has grievance redressal mechanisms for employees and workers. The procedure is defined below:  Step 1: Informal Resolution:  Employees are encouraged to first discuss any grievances with their
Other than permanent workers	Yes	immediate supervisor, who will work collaboratively to find a solution aligned with company guidelines.
		Step 2: Human Resources Intervention:  If the issue is not resolved at the supervisor level, employees can approach the Human Resources department for further escalation. The HR team will
Permanent employees	Yes	actively engage to reach a satisfactory resolution within the framework of organizational policies.
		Step 3: Formal Grievance Procedure:  Employees may register a formal complaint with the business head
Other than permanent employees	Yes	concerned if the dispute is not resolved. If, in certain instances, a definitive settlement is not reached, the head of business can establish a committee to deal with the issue in detail.



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

Category		FY 2023-24			FY 2022-23	
	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 employee	3,031	0	0%	2,830	0	0%
Male	2,859	0	0%	2,661	0	0%
Female	172	0	0%	169	0	0%
Total permanent workers	4,353	0	0%	4,364	0	0%
Male	4,342	0	0%	4,349	0	0%
Female	11	0	0%	15	0	0%

<sup>\*</sup> Data for FY 2022-23 is corrected

### 8. Details of training given to employees and workers:

Category			2023-24			2022-23				
	Total (A)	On Healthy and safety measures		On skill upgradation		Total (D)	On Healthy and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
					Employees					
Male	2,859	890	31%	1,954	68%	2,661	1,784	67%	1,872	70%
Female	172	27	16%	59	34%	169	26	15%	29	17%
Total	3,031	917	30%	2,013	66%	2,830	1,810	64%	1,901	67%
					Workers					
Male	6,765	3,578	53%	2,930	43%	7,302	2,831	39%	3,437	47%
Female	128	36	28%	29	23%	30	1	3%	1	3%
Total	6,893	3,614	52%	2,959	43%	4,364	2,832	39%	3,438	47%

<sup>\*</sup> Data for FY 2022-23 is corrected

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

Category		2023-24			2022-23	
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
			Employees			
Male	2,859	2,859	100%	2,661	2,661	100%
Female	172	172	100%	169	169	100%
Total	3,031	3,031	100%	2,830	2,830	100%
			Workers			
Male	6,765	4,342	64%	7,302	4,349	100%
Female	128	11	9%	30	15	100%
Total	6,893	4,353	63%	7,332	4,364	100%

<sup>\*</sup> Data for FY 2022-23 is corrected



### 10. Health and safety management system

# a. Whether an occupational health and safety management system has been implemented by the entity?

Yes. All of our locations have an occupational health and safety management system in place. Through a comprehensive Environment, Health & Safety policy, the company lays down its commitment to safe and healthy working conditions. The policy can be accessed at <a href="https://www.UFlexItd.com/policies.php">https://www.UFlexItd.com/policies.php</a>

We have implemented a robust Occupational Health and Safety Management System that spans across all our operational units, offices, and business segments. UFlex is ISO 45001 certified which covers the Health and Safety hazards with a commitment to continually improve our health and safety performance and prevention of injuries and ill health. The company is committed to conduct its operations in a responsible manner to safeguard our employees, the environment & community.

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

UFlex has a comprehensive approach to identify work-related hazards and assess risks in order to maintain a safe working environment. Our multifaceted process incorporates periodic safety audits, inspections, and Hazard Identification and Risk Assessment (HIRA) techniques.

Our advanced safety management system allows us to identify potential workplace risks and hazards, enabling us to implement preventive measures and avoid incidents. One of our key tools in maintaining safety is our near miss reporting format. This format encourages employees to report any potential incidents within our premises, allowing us to conduct thorough investigations, determine causes, and implement corrective actions. This not only aids in reducing workplace accidents, but also fosters a culture of safety consciousness within the company. Additionally, we have Environmental, Health, and Safety (EHS) Manual and Standard Operating Procedures (SOPs) in place to guide our operations and ensure the safety of our employees and workers. The primary goal of this control is to create a safe workplace free from events and harm, as well as to give training and an awareness program on important workplace risks by using the techniques listed below.:

- 1. Hazard Identification and Risk Assessment (HIRA) is used for routine and non-routine activities, conducted yearly or as required by any process change.
- 2. Safety Audits by CFT (Cross Functional Teams) members are carried out periodically to identify hazards and the corresponding risks.
- 3. Hazard and Operability Study (HAZOP) is used for identifying hazards related to chemical processes.

UFlex has a comprehensive Environment, Health, and Safety (EHS) Policy. The health and safety guidelines are applicable and followed across all operations. Some of the key processes for identifying work-related hazards and assessing risks on a routine and non-routine basis are given below:

- Pre-start safety review (PSSR) is used and followed for new processes and post any changes/modification activities.
- 2. A work permit system is there in place to control non-routine job hazards and implement control measures against hazards.
- 3. Management of change (MOC) is implemented and followed for all changes including Man, Machine, and Material.

# c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks

Yes. At UFlex, we have established a comprehensive safety framework across all our business segments to ensure that our workers can promptly report work-related hazards and take necessary steps to safeguard themselves.

1. **Direct Reporting:** Workers can directly report any hazards or risks to their supervisors or the designated safety officer. This allows for immediate action and helps to minimize potential harm.



- 2. **Incident Forms:** We have a system in place where workers can document potential hazards through incident forms. This helps us keep a recorded track of all reported hazards and allows us to carry out a thorough investigation.
- 3. **Safety Committee Meetings:** Regular safety committee meetings provide a platform for workers to report work-related hazards and discuss mitigation plans. These meetings encourage open dialogue and collective problem-solving.
- 4. **Safety Observation Register:** We maintain a safety observation register, allowing workers to document and report any unsafe conditions or acts. This proactive approach aims to prevent minor issues from escalating into major accidents.
- 5. **Incident Management System:** Our incident management system enables workers to report incidents in a specified format, ensuring standardized and efficient documentation.
- 6. Regular Plant Rounds: Regular interaction with shop floor workers during daily plant rounds provides opportunities to address any work-related hazards and concerns directly. These multiple channels of communication foster a proactive reporting culture and contribute significantly to the safety and wellbeing of our workforce.

At UFlex, we remain committed to maintaining a safe working environment and ensuring the welfare of our workers.

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

Yes. In the ever-evolving terrain of the manufacturing sector, we acknowledge the utmost significance of prioritizing the health and well-being of our workforce. Our commitment is reflected in the provision of a comprehensive benefits package for our employees, encompassing offerings such as Group Medical Coverage, Group Personal Accidental policies, and Group Term Plan. To ensure a prompt response to any unforeseen incidents, we've established well-equipped medical centres with trained medical practitioners within the manufacturing units. This centre provides immediate first aid and houses essential medical facilities such as vital signs monitoring equipment, emergency medications, and treatment areas.

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

Safety Incident/Number	Category	2023-24	2022-23
Lost Time Injury Frequency Rate (LTIFR)	Employees	0	9.53
Lost Time Injury Frequency Rate (LTIFR)	Workers	0.51	0.53
Total recordable work-related injuries	Employees	0	25
Total recordable work-related injuries	Workers	5	4
Number of fatalities from work-related injuries	Employees	0	0
Number of fatalities from work-related injuries	Workers	0	0
Number of High-Consequences work-related injuries	Employees	0	1
Number of High-Consequences work-related injuries	Workers	0	0

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

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

At UFlex, we remain committed to maintaining a safe working environment and ensuring the welfare of our workforce. We have a dedicated Health and Safety department that actively develops and implements comprehensive safety policies and Standard Operating Procedures (SOPs) to address potential hazards in the



workplace. These policies and procedures are clearly communicated through regular safety awareness programs. The reach of these programs is extensive, ensuring all employees, regardless of position or department, are equipped with the necessary knowledge and skills to work safely. Additionally, we provide clear Do's and Don'ts guidelines that serve as a quick reference for safe work practices. This multi-pronged approach fosters a culture of safety awareness and empowers employees to take responsibility for their own well-being and the well-being of their colleagues. Below are some of the measures implemented to ensure a safe and health workplace:

- 1. Implementation of health and safety management system based on ISO 45001 the International Standard for Occupational Health and Safety.
- 2. Performing various internal and external studies like 'HIRA', 'HAZOP', chemical risk assessment, fire risk assessment, manual material handling assessments, monitoring for noise and ambient air quality, workplace illumination, etc. to identify potential health & safety related risks and take corrective measures.
- 3. Periodic training of employees on various health & safety practices including handling hazardous chemicals and equipment. All employees and workers are trained in safety aspects which include First-aid, Firefighting, Onsite Emergency Plan, Work permit system, HIRA, HAZOP, etc.
- 4. Dedicated training centre is also created to impart education to employees on health and safety related hazards, safety tools and measures.
- 5. Periodic meetings with all operations for identifying & assessing work-related hazards.
- 6. Periodic safety inspections to identify the gaps in safety management systems, safety processes for identifying work-related hazards and assessment of risks on routine and non-routine basis.
- 7. Moving parts of machinery are equipped with machine guarding.
- 8. Speed restriction of all vehicular movements, installation of safety alarms, interlocks to eliminate hazard related to moving parts, Installation of earth rite and static charge dissipater for flammable chemical handling location, etc. are the other safety measures implemented.
- 9. Doctor Consultation (FMO) is provided to all employees and workers on health-related input.
- 10. Various other awareness sessions that include Safety leadership and accountability, Contractor Safety Management, Fire Detection Protection System Management, Departmental toolbox sessions, etc. are also conducted.

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

	2023-24			2022-23		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working conditions	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

#### 14. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
<b>Health &amp; Safety Practices</b>	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.

At UFlex, all safety related incidents are thoroughly investigated and learnings from the investigations are shared across the organization for deployment of corrective actions to stop recurrence of such incidents. Effectiveness of corrective actions deployment are checked during safety audits.

Significant risks/concerns arising from assessment of Health and Safety practices are addressed through elimination of manual job by use of technology/digitization, safety capability building, monitoring and supervision. Some of the preventive measures and predictive actions implemented during the reporting period are given below:

#### **Preventive Measures:**

- 1. Departmental 'On the Job' training for safety awareness.
- 2. Daily Toolbox talks in all departments.
- 3. Awareness through classroom training.
- 4. Periodic fire drills & mock drills.
- 5. Effective implementation of safety PPE matrix.

#### **Leadership Indicators**

1. Does the entity extend any life insurance or any compensatory package in the event of death of employees?

Employees	In the contemporary, fast-paced world, prioritizing the well-being of our employees stands as a cornerstone at UFlex. Understanding the pivotal role of comprehensive benefits in safeguarding the health and financial security of our workforce, we are committed to enhancing our employee benefits package. A noteworthy inclusion in this endeavour is the introduction of term insurance plans, offering substantial financial support to the families of our employees in the unfortunate event of their demise.
Workers	Same benefits as above are provided to all permanent workers.

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

Ensuring the timely deposit of statutory dues by our value chain partners is paramount for maintaining compliance and minimizing risks. At UFlex, we explicitly articulate these expectations in our contractual agreements, establishing a clear obligation for our value chain partners to fulfil all statutory requirements and deposit dues punctually. Rigorous audits and inspections of the financial records of our value chain partners are regularly undertaken to conduct a comprehensive examination of their statutory payments. Additionally, we actively promote the use of electronic payment methods for statutory dues to facilitate seamless tracking and verification processes. Each year, our internal HR Audit, known as 'Heartbeat,' diligently verifies all challan payments and ensures timely completion of all value chain partners' obligations.

3. Provide the number of employees / workers having suffered high consequence work-related injury / ill-health/fatalities (as reported inQ11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no of affe employees/wor		are rehabilitate suitable employ family members h	No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment		
	2023-24	2022-23	2023-24	2022-23		
Employees	0	1	0	0		
Workers	0	0	0	0		



4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endingsresulting from retirement or termination of employment?

While we don't offer outplacement services, we prioritize employee retention. We recognize the value of experienced professionals and strive to create a fulfilling work environment that encourages long-term commitment. For many key positions, we offer extensions beyond the typical retirement age, ensuring a smooth knowledge transfer and maintaining valuable expertise within our team. The HR department provides resources for career planning, mentorship opportunities, and skill development initiatives to support ongoing employability. The HR department takes departure interviews, pre-retirement planning, and severance reimbursements into account when handling career exits. But ultimately, it's up to the worker. These initiatives guarantee career-long assistance to the staff, promoting a happy workplace and seamless transfers.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done) assessed
Health & Safety practices	59.93%
Working conditions	59.93%

Provide details of any corrective actions taken or underway to address significant risks / concerns
arising from assessments of health and safety practices and working conditions of value chain
partners.

UFlex is committed to ensuring the health and safety of our value chain partners by promptly addressing any health and safety incidents. We work diligently with our partners to enhance their business practices and foster a healthy and secure workplace environment. Through close collaboration and consistently striving for improvement, we aim to uphold our commitment to ensuring utmost safety and promoting responsible business practices. Audit of suppliers are carried out on need basis and recommendations on best practices of safety are shared with suppliers. Similarly on monthly basis, best practices of EHS are shared with customers through newsletter. Training programmes on periodic basis have been arranged for suppliers, transporters & customers with emphasis on EHS practices.

Some of the initiatives implemented for value chain partners are:

- 1. Conducting training programs to contractors on regular basis.
- 2. Issuing gate pass only post completion of safety training by safety team.
- 3. Any violation is recorded and is handled with a laid down procedure.
- 4. Contractor employees are rewarded as well for adherence to safety norms.
- 5. Safety training is mandatory for all blue-collar employees.
- 6. Conducting regular safety committee meetings.

# PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

### **Essential Indicators**

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

At UFlex, we recognize the importance of the stakeholders who could be affected or have an impact on the operations, output, services, and performance of our company. By assessing their influence over our organization and the effects of our operations on them, we give the most importance to recognizing and organizing key stakeholders. To formalize and strengthen our engagement with stakeholders, we have implemented a comprehensive "Stakeholder Engagement" policy. This policy serves as a guiding framework for our interactions and ensures that we engage with our stakeholders in a meaningful and transparent manner. Key elements of our Stakeholder Engagement policy include:



- 1. **Identification and Prioritization:** We undertake a thorough process of identifying and prioritizing stakeholders based on their relevance, influence, and potential impact on our organization and business.
- 2. **Engagement Mechanisms:** We have established various mechanisms for engaging with stakeholders, such as regular meetings, surveys, consultations, and feedback mechanisms. These enable us to gather valuable insights, address concerns, and incorporate stakeholder perspectives into our decision-making processes.
- 3. **Transparency and Communication:** We prioritize transparency in our communication with stakeholders, providing them with accurate and timely information about our activities, performance, and impacts. We actively seek to foster open and honest dialogue to build trust and mutual understanding.
- 4. **Continuous Improvement:** We are committed to continuously improving our stakeholder engagement practices. We regularly evaluate and review our approaches, taking into account stakeholder feedback and evolving best practices.

# 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	Channels of communications	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investor/ Shareholders	No	Yearly General Assembly, shareholder gatherings, yearly financial statement, quarterly performance updates, press releases, corporate website, electronic correspondence, Stock Exchange (SE) notifications, in-person meetings/teleconferences.	Ongoing	Analysis of stock prices, dividend payouts, potential risks and challenges, competitive positioning, and financial robustness, growth prospects.
Government	No	Engagements with local/state/ national government officials and ministries, participation in conferences, dissemination of press releases	Ongoing	Advocacy for policies, disclosure of business information
Value Chain Partner	No	Discussions, electronic correspondence, gatherings, communication, and collaborative meetings	Ongoing	Achievement and sustainability, establishing brand presence, fostering transparent dialogue.
Employees & Workers	No	Intranet platform, electronic communication, survey software, town hall sessions, and in-person meetings	Ongoing	Training and development, opportunities for professional growth, well-being initiatives, recognition of employees, maintaining work-life balance
Local Communities	No	Gatherings, involvement facilitated by the corporate social responsibility implementation division	Ongoing	Dialogue on community development aspects, raising awareness, ensuring safety and security, addressing grievances.

NOTE: Although we have indicated 'no' above, acknowledging that these stakeholders are not entirely vulnerable or marginalized, we are actively committed to uplifting the segments of these groups through various CSR programs such as school workshops, rejuvenation of ponds, etc.



### **Leadership Indicators**

1. Provide the processes for consultation between stakeholders and the Boardone conomic, environmental, and social topic or if consultation is delegated, how is feedback from such consultations provided to the Board.

UFlex is deeply committed to promoting sustainable practices across its value chain, guided by a robust governance framework anchored in ethics, integrity, and transparency. In reviewing the company's sustainability strategy and action plan, we prioritize the integration of economic, environmental, and social considerations.

Key to this endeavour is our comprehensive stakeholder engagement process. We recognize the importance of understanding and addressing the needs of our stakeholders, both internal and external. Through regular interactions, we actively seek feedback to ensure alignment with their interests and to address any emerging issues proactively.

We define stakeholders broadly as those who may be impacted by our business operations or have influence on our growth prospects. External stakeholders focus on the products, services, and impacts delivered by the company, while internal stakeholders prioritize well-being, health, and a positive working environment.

The Board of Directors plays a central role in overseeing the implementation of our Environmental, Social, and Governance (ESG) initiatives and assessing performance in these areas. This oversight is facilitated through various board committees, with the Stakeholder Engagement committee and Risk Management Committee taking a lead role. This committee collaborates with other relevant committees to establish a continuous feedback loop with stakeholders.

Regular reporting mechanisms ensure that feedback from stakeholders reaches the senior leadership, who in turn presents it to the Board during various meetings, including board committee sessions. This process enables the Board to stay informed, responsive, and accountable in its decision-making regarding economic, environmental, and social matters.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No)

Yes, stakeholder consultation is integral to supporting the identification and management of environmental and social topics within our company. We employ a dedicated stakeholder engagement process aimed at soliciting inputs from stakeholders to inform our policies and activities in these areas. Inputs received from stakeholders are carefully considered and integrated into the formulation of policies and activities within our entity. These inputs serve as valuable insights that guide our decision-making processes towards more sustainable practices and responsible business conduct.

Moreover, we conduct materiality exercises wherein various stakeholder concerns are identified and prioritized. These concerns are then converted into tangible targets, and we implement a range of initiatives aimed at achieving these targets effectively. To ensure effective oversight and coordination, a top-down approach has been established at the Board, corporate, and unit levels. This structure enables us to oversee stakeholder consultation, identify material issues, and develop action plans accordingly.

Furthermore, the results of our stakeholder consultation process, and the actions taken in response are communicated transparently through our Annual Integrated Report. This communication serves as a demonstration of our unwavering commitment to sustainable practices and responsible business conduct.

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

Not Applicable.



#### PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

### **Essential Indicators**

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

		2023-24		2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
		Employe	es			
Permanent Employees	3,031	2,782	92%	2,830	1,395	49%
Other than permanent	0	0	0%	0	0	0%
Total employees	3,031	2,782	92%	2,830	1,395	49%
		Workers	5			
Permanent workers	4,353	2670	61%	4,364	2,962	68%
Other than permanent	2,540	1020	40%	2,968	0	0%
Total workers	6,893	3690	54%	7,332	2,962	40%

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

Category		2023-24				2022-23				
	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)
				Emplo	yees					
Permanent Employees	3,031	0	0%	3,031	100%	2,830	0	0%	2,830	100%
Male	2,859	0	0%	2,859	100%	2,661	0	0%	2,661	100%
Female	172	0	0%	172	100%	169	0	0%	169	100%
Other than Permanent Employees	0	0	-	0	-	0	0	-	0	-
Male	0	0	-	0	-	0	0	-	0	-
Female	0	0	-	0	-	0	0	-	0	-
				Work	ers					
Permanent Workers	4,353	260	6%	4,093	94%	4,364	260	6%	4,104	94%
Male	4,342	260	6%	4,082	94%	4,349	260	6%	4,089	94%
Female	11	0	0%	11	100%	15	0	0%	15	100%
Other than Permanent Workers	2,540	2,540	100%	0	0%	2,968	2,968	100%	0	0%
Male	2,423	2,423	100%	0	0%	2,953	2,953	100%	0	0%
Female	117	117	100%	0	0%	15	15	100%	0	0%

### 3. Details of remuneration/salary/wages

#### a. Median remuneration / wages:

		Male	Female		
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/wages of respective category	
Board of Directors (BOD)	5	INR 15,00,000	1	INR 7,50,000 (*)	
Key Managerial Personnel (KMP)	3	INR 3,51,18,917 (#)	0	NA	
Employees other than BOD and KMP	2859	INR 7,32,952	172	INR 5,79,658	
Workers	4342	INR 3,31,814	11	INR 2,16,440	

<sup>\*</sup> Remuneration (Sitting Fee) of two independent Woman Directors exists during the FY 2023-24 at different times have been clubbed together for disclosure.

<sup>#</sup> Remuneration of two Company Secretaries exists during the FY 2023-24 at different times have been clubbed together for disclosure.



#### b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	2023-24	2022-23
Gross wages paid to females as % of total wages	3.66%	3.65%

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

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

Human rights issues are systematically addressed at every organizational level within our company. Our dedicated team of trained professionals is equipped to handle these concerns, ensuring a thorough and effective redressal process. If a resolution is not achieved by the Plant HR, the matter is promptly escalated to the corporate HR for further investigation and resolution. We are committed to upholding human rights standards and fostering a culture of accountability throughout our organization. We also uphold a policy encouraging respect and promotion of human rights.

UFlex is also committed to fostering a work environment free from sexual harassment. As mandated by the POSH Act (Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013), we have established an Internal Complaints Committee (ICC) to address any such concerns raised by our employees.

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

UFlex encourages all stakeholders, including employees, suppliers, contractors, and local communities, to report any concerns or grievances related to human rights violations. The Company investigates all reported incidents promptly and take appropriate corrective actions.

Stakeholders can raise concerns or report violations through the direct communication with the Human Resources department or the Legal and Compliance team.

Each human rights issue that surfaces is diligently handled by the HR representative at every plant. Additionally, the Learning and Development department has devised a comprehensive module to educate employees on these matters. This module is accessible to every employee, providing them with valuable insights and knowledge to reinforce their understanding of human rights.

Further, UFlex has a Whistle Blower policy in place which encourages employees to report any violation of applicable law and the Company's code of conduct. Any suspected violations can be reported to immediate supervisor or to the HR Head.

#### 6. Number of Complaints on the following made by employees and workers in the previous financial year

		2023-24			2022-23		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks	
Sexual Harassment	0	0	-	0	0	-	
Discrimination at workplace	0	0	-	2	0	Successfully Resolved	
Child Labour	0	0	-	0	0	-	
Forced Labour/Involuntary Labour	0	0	-	0	0	-	
Wages	0	0	-	0	0	-	
Other Human rights related issues	0	0	-	0	0	-	



# 7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

	2023-24	2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees /workers	0%	0%
Complaints on POSH upheld	0	0

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

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

UFlex is committed to protecting the confidentiality of individuals who report concerns in good faith and prohibits any form of retaliation against them.

UFlex has zero tolerance for sexual harassment. UFlex has instituted a centralized Internal Complaints Committee (ICC) under the POSH (Prevention of Sexual Harassment) Act to address any complaints raised by employees. Each complaint is promptly forwarded to this committee for thorough and impartial resolution. Comprised of an external legal member to ensure unbiased judgment, the committee diligently investigates cases and implements appropriate measures such as disciplinary actions or resolutions. The ICC plays a crucial role in maintaining a respectful work environment. It empowers employees to speak up against sexual harassment and discourages such behaviour. By providing a clear internal mechanism for addressing complaints, the ICC ensures timely resolution of any complaints raised and reduces potential distress for the complainant.

Further, as guided by our Whistle Blower policy, retaliation is not tolerated at UFlex. No one may take any adverse action against any employee for complaining about, reporting, or participating in or assisting in the investigation of, a reasonably suspected violation of any law or the Company's Code of Conduct and Ethics. The Company takes notice of such retaliation seriously. Incidents of retaliation against any employee reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against persons(s) found responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting employees may also be subject to civil, criminal, and administrative penalties.

A session on Company's code of conduct and whistle blower policy is included as part of induction program for all new joiners. Time to time, awareness sessions on Prevention of Sexual Harassment and Human Rights are conducted by the HR department to sensitize the workforce across the Company.

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

At UFlex, the commitment to upholding human rights is ingrained within our code of conduct for internal employees. Additionally, for our value chain partners, adherence to human rights standards is an important component of the contractual agreements.

#### 10. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutoryauthorities or third parties)			
Child labour				
Forced/involuntary labour	4000/			
Sexual harassment	100%			
Discrimination at workplace				
Wages				



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

Not applicable

### **Leadership Indicators**

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

Though there have been no complaints with regard to human rights violation, UFlex undertakes to:

- 1. Comply with applicable legislation in force, promote diversity, inclusion and equal opportunities, protect against sexual and gender-based harassment.
- 2. Ensure safety in the workplace and prevent occupational risks, foster professional development and training to promote equal opportunities.
- 3. Promote respect for and compliance with human rights by participating in initiatives and projects promoted by public and/or private bodies, Contribute, directly and indirectly, to social development and the Sustainable Development Goals

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

UFlex takes its commitment to human rights seriously and conducts comprehensive due diligence across various aspects of its operations. Here's an outline of the scope and coverage of this commitment:

### 1. Labor Standards and Practices:

**Compliance with Labor Laws:** We regularly review and ensure adherence to all applicable labour laws across our locations. This includes minimum wage, working hours, overtime regulations, and leave entitlements as per ILO (International Labour Organizations) standards.

**Non-discrimination in Hiring:** UFlex prohibits any bias based on gender, physical disability, or any other protected characteristic during the recruitment process. We strive to create a diverse and inclusive workforce.

**Elimination of Child Labor:** UFlex has a zero-tolerance policy towards child labour. We verify employee ages through proper documentation and actively participate in initiatives to combat child labour practices.

### 2. Workplace Environment:

**Prevention of Sexual Harassment:** UFlex has a robust Internal Complaints Committee (ICC) established under the POSH Act, providing a safe space for employees to report sexual harassment. We offer training programs to raise awareness and foster a culture of respect.

*Grievance Redressal Mechanism:* We have a well-defined grievance redressal process to address employee concerns effectively. This ensures all voices are heard, and issues are resolved promptly and fairly.

**Health & Safety at Work:** UFlex prioritizes employee well-being with a comprehensive health and safety program. We conduct risk assessments, implement safety protocols, and provide training to minimize workplace hazards and injuries.

**Whistleblower Protection:** UFlex has a clear whistleblower policy that encourages employees to report any suspected wrongdoing or unethical behaviour without fear of retaliation. We provide anonymous reporting channels to protect whistleblowers.

#### 3. Supply Chain Management:

**Supplier Screening:** UFlex integrates human rights considerations into supplier selection. We conduct screening procedures to assess potential suppliers' adherence to labour standards and human rights principles. This helps ensure ethical practices throughout our supply chain.



# 3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, our premises/offices are accessible to differently abled visitors.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	
Discrimination at workplace	59.93%
Child labour	33.33 //
Forced/involuntary labour	
Wages	

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

While no significant risks or concerns were found in our assessments, we are actively enhancing our methods for evaluating the value chain.

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

#### **Essential Indicators**

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

Parameter	FY 2023-24	FY 2022-23*			
From renewable sources					
Total electricity consumption (A)	0	0			
Total fuel consumption (B)	61 GJ	67 GJ			
Energy consumption through other sources (C)	0	0			
Total energy consumed from renewable sources (A+B+C)	61 GJ	67 GJ			
From non-renewable sources					
Total electricity consumption (D)	9,10,223 GJ	8,22,820 GJ			
Total fuel consumption (E)	6,99,744 GJ	7,15,198 GJ			
Energy consumption through other sources (F)	0	0			
Total energy consumed from non-renewable sources (D+E+F)	16,09,967 GJ	15,38,018 GJ			
Total energy consumed (A+B+C+D+E+F)	16,10,028 GJ	15,38,085 GJ			
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.0000243566 GJ/ rupee of turnover	0.0000226893 GJ/ rupee of turnover			
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.000545588 GJ/ rupee of turnover	0.0005030225 GJ/ rupee of turnover			

<sup>\*</sup> Data for FY 2022-23 is corrected

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

Yes, Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.



# 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?

No, we do not have any facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

Parameter	2023-24	2022-23*
Water withdrawal by source (in kilolitres	s)	
(i) Surface water withdrawal	0	0
(ii) Groundwater withdrawal	6,29,372.6	5,53,014
(iii) Third party water withdrawal	1,37,801	1,45,577
(iv) Seawater / desalinated water withdrawal	0	0
(v) Other withdrawal	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	7,67,173.61	6,98,591
Total volume of water consumption (in kilolitres)	7,43,179.08	6,72,248.1
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.0000112429 KL/rupee of turnover	0.0000099168 kL/rupee of turnover
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.00025184 kL/rupee of turnover	0.000219855 kL/rupee of turnover

<sup>\*</sup> Data for FY 2022-23 is corrected

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

Yes, Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

### 4. Provide the following details related to water discharged (in kilolitres):

	FY 2023-24	FY 2022-23
(i) To Surface water	23,994.53	26,342.9
- No treatment	1,717	1,650
- With Secondary treatment	6,674.03	7,050.4
- With Tertiary treatment	15,603.5	17,642.5
(ii) To Groundwater	-	-
- No treatment	-	-
- With Secondary treatment	-	-
With Tertiary treatment	-	-
(iii)-To Seawater	-	-
- No treatment	-	-
- With Secondary treatment	-	-
With Tertiary treatment	-	-
(iv) Sent to third parties	-	-
- No treatment	-	-
- With Secondary treatment	-	-
With Tertiary treatment	-	-



	FY 2023-24	FY 2022-23
(v) Others	-	-
- No treatment	-	-
- With Secondary treatment	-	-
With Tertiary treatment	-	-
Total water discharged	23,994.53	26,342.9

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

Yes, Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

#### 5. Has the entity implemented a mechanism for Zero Liquid Discharge?

Our manufacturing facilities have Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP). Treated wastewater is utilized for toilet flushing and gardening. Besides ETP and STP, seven out of twelve manufacturing facilities are equipped with zero liquid discharge (ZLD) systems. Post ETP and STP, we have installed Membrane Bio-Reactor (MBR) and Reverse Osmosis (RO) plant. Membrane Bio-Reactors (MBRs) produce cleaner water, taking up less space and working more efficiently. This allows for water reuse and reducing reliance on freshwater sources. RO permeate is used to produce DM water required for the process. RO reject water is evaporated in a multiple effect evaporator (MEE) followed by Agitated Thin Film Dryer (ATFD) through which solids are recovered. Recovered solids are disposed of as hazardous waste through authorized vendors.

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

Parameter	Please specify FY unit	FY 2023-24	FY 2022-23*
NOx	Micrograms Per Cubic Meter	49.72	52.24
SOx	Micrograms Per Cubic Meter	15.64	15.59
Particulate matter (PM)	Micrograms Per Cubic Meter	35.76	27.18

<sup>\*</sup>Reporting methodology changed for FY 2022-23.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? No

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

Parameter	Unit	2023-24	2022-23*
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	MT CO2e	57,647.79	53,975.65
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	MT CO2e	1,81,033.24	1,63,421.04
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MT CO2e/ crore rupee of turnover	0.0000036108	0.000003207
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	MT CO2e/ crore rupee of turnover	0.0000808815	0.0000710984

<sup>\*</sup> Data for FY 2022-23 is corrected

NOTE: Biogenic emission for FY 2023-24 is 185.05 KG CO2e.



#### Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

Yes, Intertek India Private Limited has carried out Limited Assurance of the data and information (BRSR Core attributes) provided in the report.

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

Yes, the Company has undertaken projects across various business segments to reduce greenhouse gas (GHG) emissions.

The Company is aligned to emissions management strategy with the global goals of minimizing carbon footprint and mitigating climate change risks. In line with our commitment to setting Net-zero targets, we converted all our Thermopacks, Boilers, and Gensets to run on PNG (Piped Natural Gas). Further to that, we focus to reduce the GHG emissions through various energy efficiency initiatives such as installation of Variable Frequency Drives (VFDs), energy efficient motors, BEE star rated office equipment, LED lighting, etc.

We have also signed a Power Purchase Agreement (PPA) to buy 2.73 crores kWh of solar based power annually.

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

Parameter	2023-24	2022-23*
Total Waste generated (in metric	tonnes)	
Plastic waste (A)	10,490.64	8,613.27
E-waste (B)	20.75	20.09
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	66.94	74.81
Battery waste (E)	20.69	11.51
Radioactive waste (F)	0	0
Other Hazardous Waste(G)	1,891.18	2,060.67
Other Non-hazardous Waste(H)	18,681.95	21,504.27
Total (A+B+C+D+E+F+G+H)	31,172.15	32,284.62
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0000004716 MT/ rupee of turnover	0.0000004763 MT/ rupee of turnover
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.000010563 MT/ rupee of turnover	0.000010559 MT/ rupee of turnover
For each category of waste generated, total waste recovered to recovery operations (in metric to	<u> </u>	ising or other
Category of waste		
(i) Recycled	26,022.41	27,144.9
(ii) Re-used	2,606.36	2,622.96
(iii) Other recovery operations	81.28	21.96
Total	28,710.05	29,789.82
For each category of waste generated, total waste disposed b	y nature of disposal m	ethod (in MT)
Category of waste		
(i) Incineration	718	606.21
(ii) Landfilling	298.11	240.08
(iii) Other disposal operations	1,445.99	1,648.51
Total	2,462.1	2,494.8

<sup>\*</sup> Data for FY 2022-23 is corrected



## Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

Yes, Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

At UFlex, we believe that waste management is a crucial part of our commitment to sustainability. Therefore, we have initiated several measures in our operations to ensure waste minimization, segregation of waste at the source, and recycling. Company is committed to reduce its waste footprint.

We have implemented Standard Operating Procedure for waste management compliant with ISO 14001:2015.

Various measures were taken for waste reduction across our operations, such as,

- 1. Reduction in water consumption, which resulted in reduction in effluent
- 2. Moisture reduction in ETP sludge thus reducing hazardous waste.
- 3. Change over to alkaline based copper plating instead of Nickel plating

To further support this commitment, we follow all compliances as per Hazardous Waste Rules 2016 for storage and disposal of hazardous waste. All the hazardous waste generated is collected and disposed of through authorized agencies under the Pollution Control Board (PCB). Well defined SOP for Waste Management covering aspect like segregation, collection, storage, and disposal of each type of waste is implemented. 100% of the hazardous and toxic waste is discarded as per the regulatory rules. Awareness training is given to employees and workers involved in Waste management. The company is focused for reduction of hazardous waste through process optimization, introduction of new technologies and practicing 3-R (Reduce, Reuse, Recycle) principles for creation of opportunities for waste minimization. Our company continually explores opportunities to optimize processes and adopt new technologies to further reduce hazardous waste generation. UFlex aims to achieve Zero Waste to Landfill. The major waste stream by volume includes Plastic wastes (Printed, Unprinted and MLP). We have implemented plastic waste recycling and pyrolysis units within our facilities through which we recycle the plastic waste or recover the energy.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format

Not Applicable

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financialyear

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency	Results communicated in public domain	Relevant web link
Manufacturing of Inks, Coatings, Adhesives, and Specialty Chemicals at Plot No. 1779, Sector 32, Yamuna Expressway, Gautam Budh Nagar, Uttar Pradesh	EC23B02UP17057	26/12/2022	Yes	Yes	-

Note: The Environmental Clearnce (EC) was received on 06/05/2023



13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Yes, all the facilities are in compliance with the applicable environmental regulations.

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non- compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any		
	Not Applicable					

### **Leadership Indicators**

1. For each facility / plant located in areas of water stress, provide the following information.

(i) Name of the area	(ii) Nature of operations
Noida, Gautam Budh Nagar, Uttar Pradesh	Manufacturing of Flexible Packaging solutions and machinery, cylinders, holography, and chemicals

	Unit	2023-24	2022-23
(i) Surface water withdrawal	kL	0	0
(ii) Groundwater withdrawal	kL	3,90,215.61	4,04,712
(iii) Third party water withdrawal	kL	10,410	9,014
(iv) Seawater / desalinated waterwithdrawal	kL	0	0
(v) Other withdrawal	kL	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	kL	4,00,625.61	4,13,726
Total volume of water consumption (in kilolitres)	kL	3,92,397.11	4,04,575

For each facility / plant located in areas of water stress, provide the water withdrawal and consumption

	Unit	2023-24	2022-23
Water intensity per rupee of turnover (Total water consumption/Revenue from operations)	kL/rupee of turnover	0.000005936	0.0000059681

For each facility / plant located in areas of water stress, provide the water discharge by destination and level of treatment

	Unit	2023-24	2022-23
(i) To Surface water	kL	8,228.50	9,151.50
- No treatment	kL	1,717.00	1,650.00
- With treatment	kL	6,511.50	7,501.50
(ii) To Groundwater	kL	0	0
- No treatment	kL	0	0
- With treatment	kL	0	0
(iii) To Seawater	kL	0	0
- No treatment	kL	0	0



	Unit	2023-24	2022-23
- With treatment	kL	0	0
(iv) Sent to third parties	kL	0	0
- No treatment	kL	0	0
- With treatment	kL	0	0
(v) Others	kL	0	0
- No treatment	kL	0	0
- With treatment	kL	0	0
Total water discharged	kL	8,228.5	9,151.5

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

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

Parameter	Unit	2023-24	2022-23
Total Scope 3 emissions	MT CO2e	13,88,204.82	-
Total Scope 3 emissions per rupee of	MT CO2e /rupee of	0.0000210008	-
turnover	turnover		

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?

No

No

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas alongwith prevention and remediation activities.

Not Applicable

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format.

Several energy efficient measures were implemented such as installation of VFDs, energy efficient motors, LED lighting, etc. to reduce energy consumption.

Further optimization of machine running hours through PLC and SCADA automation and reducing heat losses and cycle time reduction in process through innovative technology and process improvements led to resource efficiency and to further reduction of our environmental footprint.

UFlex's chemical unit has adopted water ponds. Rejuvenation and periodic maintenance of these ponds resulted in rainwater harvesting of 73,260 kL during the reporting period.

5. Does the entity have a business continuity and disaster management plan?

Yes, UFlex has "Onsite Emergency plan & Disaster Control" measure in place, focusing on business continuity to address disruptive events like floods, earthquakes, explosions, fire, cyber-attacks, acts of terror, etc. The practices have been developed through best practices learnt from other organizations with mature Business Continuity Management practices and reference to ISO22301 standard on Business Continuity Management System.

We also have a Business Continuity and Disaster Management Policy (BCDMP) in place to ensure business operations can continue after a disruption. The policy covers all employees and focuses on identifying risks, assigning roles, and communication plans. It also includes data recovery, training exercises, and regular



reviews to keep the plan effective. This policy helps UFlex resume operations quickly and protect its employees and property in case of a disaster.

The policy can be accessed at https://www.uflexltd.com/pdf/Policies/BRSP/2023/UFlex\_BCDM.pdf.

- 6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?
  - Not Applicable
- 7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts

59.93%

# PRINCIPLE 7 BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN AMANNER THAT IS RESPONSIBLE AND TRANSPARENT

#### **Essential Indicators**

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

Nine

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.

	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations	link of the document (If available)
1.	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National	-
2.	PHD Chamber of Commerce and Industry (PHDCCI)	National	-
3.	Federation of Indian Chambers of Commerce & Industry (FICCI)	National	-
4.	Confederation of Indian Industry (CII)	National	-
5.	Organization of Pharmaceutical Producers of India (OPPI)	National	-
6.	India Flexible Packaging and Folding Carton Manufacturers Association (IFCA)	National	-
7.	PlastIndia	National	-
8.	All India Printing Ink Manufacturers Association (AIPIMA)	National	-
9.	Alliance to End Plastic Waste (AEPW)	International	-

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

Throughout the reporting period, UFlex did not engage in any incidents of anti-competitive behaviour. We firmly uphold the principles of fair competition and conduct our business in accordance with legal and ethical practices. Our commitment to maintaining a competitive and fair market environment is rooted in our dedication to the best interests of our customers and stakeholders. We prioritize the delivery of high-quality products and services while ensuring compliance with all relevant laws, regulations, and industry standards. At UFlex, we believe that fair competition is essential for driving innovation, fostering customer choice, and promoting economic growth.



We strive to create a level playing field where all market participants can compete based on merit, quality, and customer value. By adhering to principles of fair competition, we demonstrate our commitment to integrity, transparency, and ethical conduct. We actively monitor and assess our business practices to ensure compliance with competition laws and regulations, and we continuously strive to improve our processes to uphold the highest standards of fairness and legality. UFlex remains dedicated to promoting healthy competition, safeguarding consumer interests, and contributing to the overall development and well-being of the markets in which we operate. We firmly believe that a competitive and fair market environment benefits all stakeholders and fosters sustainable growth.

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

### **Leadership Indicators**

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

Public policy advocated	Method resorted for such advocacy	Whether information available in public domain?	Frequency of Review by Board	Web Link, if available
BIS - The EPR stipulates use of recycle content in packaging films further determining the methodology to test the recycle content	Collection, analysis of data, summarizing and presenting it to ministry	Yes	As and when required	-
Antidumping duty of various products affecting domestic index Aluminium foils	Collection, Analysis of data, summarizing and presenting it to ministry	Yes	As and when required	-
Proposing BIS to make standard for recycling Multi-layer Plastic (MLP)	Collection, Analysis of data, summarizing and presenting it to ministry	Yes	As and when required	-

## PRINCIPLE 8 BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

### **Essential Indicators**

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

We have not done any Social Impact Assessment.

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

Not Applicable

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

UFlex believes that community is an important stakeholder and therefore is committed for the welfare of the communities around our operations. At UFlex, we actively engage with our community members through our Corporate Social Responsibility (CSR) initiatives, either directly or in collaboration with our NGO partners. Our engagement is guided by our CSR policy, which outlines our commitment to making a positive impact on the



communities we serve.

Through periodic in-person engagements with community leaders and members, we aim to foster open and constructive dialogue. These interactions provide us with valuable insights and help us identify, discuss, and address the issues that are important to the community in mutual agreement with the concerned stakeholders. By maintaining regular communication and building relationships with community leaders and members, we establish a foundation of trust and collaboration. This enables us to better understand their needs and aspirations, align our CSR initiatives accordingly, and work together to achieve sustainable and meaningful outcomes.

UFlex's CSR initiatives are designed to create a positive social impact and address the specific challenges faced by the communities we engage with. We actively seek to contribute to the development and well-being of these communities through initiatives that promote education, healthcare, livelihood opportunities, environmental sustainability, and more.

We believe that engaging with our community members directly, as well as through our NGO partners, allows us to collectively identify and address their concerns and contribute to their overall progress. At UFlex, we remain committed to engaging with our community members, promoting dialogue, and collaboratively working towards sustainable solutions. By actively involving our stakeholders, we strive to make a positive and lasting difference in the communities where we operate.

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

	2023-24	2022-23
% of materials sourced from MSMEs/ small producers	5.88%	The company sources input material from MSMEs/ small producers and local districts but
% of materials sourced directly from India	66.18%	does not currently measure the share as per the given bifurcation

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

5. Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanentor non-permanent / on contract basis) in the following locations, as % of total wage cost

	2023-24	2022-23
Rural	0	0
Semi-urban	0	0
Urban	100%	100%
Metropolitan	0	0

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

#### **Leadership Indicators**

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments

Not Applicable

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

We have not implemented any CSR project in aspirational districts.

3. a. Do you have a preferential procurement policy where you give preference to purchase from supplie'rs comprising marginalized/vulnerable groups?

No, UFlex does not distinguish its suppliers based on caste, creed, colour, race, religion, gender, etc. We



choose our suppliers based on quality, delivery, cost, and sustainable practices.

- **b.** From which marginalized / vulnerable groups do you procure? Not Applicable
- c. What percentage of total procurement (by value) does it constitute?

  Not Applicable
- 4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge

Intellectual Property based on traditional knowledge	Owned/ Acquired	Benefit shared	Basis of calculating benefit share
Grant of Indian Patent No.380091: Process of Manufacturing Biodegradable pet chips (D-57)	Yes, Owned	No	NA
Grant of Indian Patent No.419283 (Easy tear PET) (D-53)- Title: Easy to tear flexible packaging laminate.	Yes, Owned	No	NA
Grant of South African Patent No.2021/07593 (Granules Coating) (D-56 ZA)	Yes, Owned	No	NA
Title: converting non-biodegradable polymeric granules and components to biodegradable by surface coating.	Yes, Owned	No	NA
Decision to grant European patent No.3969631 (window pouch) (Our Ref: D-58 EP) Title: Pouch having transparent window with anti-counterfeiting feature	Yes, Owned	No	NA
Grant of Indian patent No.517271 (Our Ref. D-61 in) Title: Large quantity bag having anti-counterfeiting feature.	Yes, Owned	No	NA
Grant of Indonesian patent No. IDP000091161 (Our ref. D-58 ID), Title: A flexible package having security against counterfeiting.	Yes, Owned	No	NA
Grant of Indian patent No.515558 (Our ref. D-58 in), Title: A flexible package having security against counterfeiting	Yes, Owned	No	NA
Grant of Indian patent No.432191 (Single fruit MAP Pack) - Flexible package for packing individual fruit or vegetable.	Yes, Owned	No	NA
Grant of Indian patent No.445139 (Printing with Tactile and Glitter Effect on Flexible substrate) – An apparatus and process for printing with tactile and glitter effect on Flexible substrate and Printed substrate thereof.	Yes, Owned	No	NA



Intellectual Property based on traditional knowledge	Owned/ Acquired	Benefit shared	Basis of calculating benefit share
Method of making water resistant Flexible package from a web of polymeric woven fabric and a water-resistant package thereof. Validity: September 23, 2035.	Yes, Owned	No	NA
Grant of Indonesian patent No. IDP000090031 (Pet. Chips) (Our Ref. D-57 ID), Title: Process of manufacturing biodegradable pet. Chips,	Yes, Owned	No	NA
Grant of Indian Design No.372201-001 Window pouch (Right): Certificate Serial No.169920 dt.16.5.24 Title: Pouch with security feature on metallized or translucent or opaque strip.	Yes, Owned	No	NA

# 5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Not Applicable

### 6. Details of beneficiaries of CSR Projects

CSR Project	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalized groups
Running and Maintaining Animal & Bird Hospital (Ongoing Project FY 2022-23, completed in FY 2023-24)	550	100%
Waste Water Treatment Project (Ongoing Project FY 2022-23, completed in FY 2023-24)	500	100%
Woman Empowerment (Ongoing Project FY 2023-24)	45	100%
Child Education (Ongoing Project FY 2023-24)	105	100%
Running and Maintaining Animal & Bird Hospital (Ongoing Project FY 2023-24)	250	100%
Waste Water Treatment Project (Ongoing Project FY 2023-24)	50	100%
Setting up Open Air Gyms at Lucknow	5000	5%
Educating underprivileged meritorious students at Noida	10	100%
Promoting Education at Lucknow	4500	45%
Promoting Heath Care and Preventive Health Care at Ghaziabad	600	10%
Promoting Heath Care and Preventive Health Care at Delhi & Haryana	1100	5%
Promoting rural Sports/ Nationally Recognized Sports at Noida	80	100%



Environment Sustainability at Noida	50	100%
Waterbody Restoration – Rejuvenation of Pond at Ghaziabad	3949	29%
Awareness Programs on Sustainability and Plastic Waste Management at Noida	4600	28%

## PRINCIPLE 9 BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

### **Essential Indicators**

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

UFlex responds to their customer complaints with utmost importance and believes that it needs to be agile, transparent, and solution-oriented to resolve them efficiently and satisfactorily. Multiple approaches are followed across our businesses in handling customer complaints. In our Aseptic Liquid Packaging business segment, we have implemented a Customer Complaint Management System (CCMS) in accordance with ISO 22000-2018 requirements. This system ensures compliance with industry standards. Through the CCMS, we are able to efficiently manage and resolve customer complaints, providing timely and effective solutions.

Our Holography business has a clearly defined SOP in place for resolving consumer complaints. Tracking and handling of consumer complaints are done through an online platform. Through the sales portal, an online acknowledgement is delivered to the customer within 24 hours after the complaint. The QC staff analyses complaints and, if required, conducts client visits to address issues with supporting documentation.

Customers contact the salesperson with any concerns they may have via Call, WhatsApp, email, or SMS. In order to continue logging complaints in the Oracle CCMS portal, the sales representative gathers information and provides it to the sales coordinator (Cloud waste Data Management system). Depending on the nature of the complaint, it is forwarded to the appropriate administrator for additional root cause investigation. Final closing remarks are sent by email to the appropriate stakeholder.

The marketing manager at our packaging business receives complaints from customers via phone, email, fax, or in-person. If the complaint is determined to be commercial, the Head of Department and the customer will be consulted in order to settle it. In the event that the complaint is technical, the specifics are recorded in the "Customer Complaint Ledger." Within 48 hours of the complaints being received through CIR, the HOD (Technical Services) is notified. All upcoming activities pertaining to the issue, such as visit reports, CNRs, root cause analyses, remedial actions, etc., are linked to this complaint number (CIR no.)

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

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

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

		2023-24		2022-23		
	Received during the year	Pending resolution at endof year	Remarks	Received during the year	Pending resolution at endof year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-



Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	961	7	7 nos. of pending complaints were received at the end of FY (after 15 <sup>th</sup> March 2024) and hence were resolved in April 2024. All these complaints were regarding product quality issues	0	0	-

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

	Number	Reason for recall
Voluntary recalls	4	Wrong Side Metallized dispatched.  Also, as a part of QMS we do the Mock recall once in Year, to demonstrate the forward and backward traceability system.
Forced recalls	269	Quality issues such as Wrinkles, Optical Density, Treatment, Winding, Roll Damage, and COF

### 5. Does the entity have a framework/policy on cyber security and risks related to data privacy?

Yes.

At UFlex, we have established a comprehensive framework and policy on cyber security and data privacy risks. This framework serves as a guiding principle for our organization's approach to protecting sensitive information, ensuring data privacy, and mitigating cyber threats.

Our cyber security framework addresses various aspects of information security, including data collection, data sharing, access controls, network security, and incident response. It encompasses industry best practices and compliance requirements to create a secure digital environment for our stakeholders.

The policy associated with our cyber security framework outlines our commitment to safeguarding information assets and protecting the privacy of our stakeholders. It establishes clear guidelines and responsibilities for employees, contractors, and partners in handling sensitive information. To ensure the effectiveness of our cyber security measures, we regularly assess and update our systems, processes, and technologies. We invest in robust infrastructure, implement strong access controls, and employ advanced threat detection and prevention mechanisms.

Employee training and awareness play a crucial role in our cyber security efforts. We provide comprehensive training programs to educate our workforce about their roles and responsibilities in maintaining a secure digital environment. This includes training on best practices for data privacy, safe use of technology, and recognizing and reporting potential cyber threats.

By implementing this comprehensive framework and policy, we demonstrate our commitment to proactively addressing cyber security risks and safeguarding the integrity, confidentiality, and availability of information assets. We continually monitor and enhance our cyber security measures to adapt to evolving threats and protect the interests of our stakeholders.

UFlex remains dedicated to maintaining a secure digital environment, protecting sensitive information, and upholding the highest standards of cyber security and data privacy. We understand the critical importance of safeguarding information assets and remain vigilant in the face of emerging cyber threats.

Policy Weblink: <a href="https://www.uflexltd.com/policies.php">https://www.uflexltd.com/policies.php</a>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services, cyber security and data privacy of customers, re-occurrence of instances of product recalls, penalty / action taken by regulatory authorities onsafety of products / services.



During the reporting period, UFlex did not receive any consumer complaints related to data privacy, advertising, cyber-security, delivery of essential services, restrictive trade practices, or unfair trade practices. This positive track record reflects our commitment to maintaining high standards and meeting consumer expectations.

We aim to increase security awareness by disseminating security information and delivering training on various issues to our employees. For example: To avoid the theft of personal and sensitive information, the phishing detection and e-mail security solutions are in place.

At UFlex, we prioritize the protection of customer data privacy and strictly adhere to applicable data protection regulations. We are committed to transparent advertising practices, providing accurate and reliable information to our customers.

Cyber-security is a top priority for us, and we have robust measures in place to safeguard customer data and prevent any unauthorized access or breaches. Our dedicated team continuously monitors and updates our cyber-security protocols to ensure the highest level of protection. By prioritizing data privacy, transparent advertising, robust cyber-security, reliable service delivery, fair trade practices, and avoiding restrictive trade practices, UFlex aims to build trust with our consumers and ensure their satisfaction.

We remain dedicated to upholding these principles, continuously improving our practices, and responding promptly and effectively to any consumer concerns that may arise. At UFlex, we strive to meet and exceed customer expectations, maintaining high standards of integrity and customer satisfaction.

Some preventive steps that we have taken to ensure data privacy and cyber security to our customers:

- 1. DMARC Email Server Security solution for Phishing email protection
- 2. USB access restricted in end user PC
- 3. Sending regular Security awareness Mailers to educate the employees
- 4. Created Cyber Security training module in LMS
- 5. Conducted Vulnerability assessment of Data centre devices
- 6. Web Application risk discovery tool established to take remediation action

### 7. Provide the following information relating to data breaches

a. Number of instances of data breaches	0
b. Percentage of data breaches involving personally identifiable information of customers	0
c. Impact, if any, of the data breaches	Not applicable

NOTE: Intertek India Private Limited has carried out Limited Assurance of the data and information provided in the report.

### **Leadership Indicators**

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

Details of the products offered by UFlex can be found at the Company website - www.uflexltd.com

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

UFlex offers vertically integrated packaging solutions tailored to the particular requirements and specifications of industrial clients. Before using them, we show the safety hazards. Customers receive checklists as well as product information and brochures. There are also visits by customer service representatives. For food safety, we have both ISO 22000 and BRCGS certifications. Customers and third-party certification bodies periodically audit us. Products are labelled with their hazards on each container. Every customer receives a Material



Safety Data Sheet (MSDS) detailing product safety and application precautions. Customers are also given details in accordance with government regulations, such as EPR certification, MSME status, and a certificate of recyclability. Any queries or concerns are addressed by key account managers as and when they arise.

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

Every process has a communication matrix in place, and a suitable system has been established for notifying clients of any potential interruption or discontinuance of essential services. Individual account managers promptly send forth emailers to customers in the event of disruptions triggered by man-made or natural calamities. Customers receive any notices from the government or corporation about interruptions to products and services via email (if any). Notifications of service interruptions or discontinuations are given to our clients via mail or phone.

4. Does the entity display product information on the product over and above what is mandated as per local laws?

We follow all applicable product labelling requirements and display pertinent information as required by law, it is mandatory to print the PWM registration number on our Finished Goods as per the law. The same has been complied with stringently.

We manufacture packaging materials as per customer requirements; hence product information rules do not apply to the Company. However, the marking and labelling requirements under the Plastic Waste Management Rules are applicable to the packaging solutions manufactured by us and we comply with them in alignment without respective customers.

Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole?

Yes.