



Business Responsibility & Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the listed entity	L51100MH2016PLC284727
2.	Name of the listed entity	Flair Writing Industries Limited (hereafter referred to as 'Flair', 'The Company', or 'We')
3.	Year of incorporation	2016
4.	Registered office address	63 B/C, Government Industrial Estate, Charkop, Kandivali West, Mumbai, Maharashtra, India, 400067
5.	Corporate address	63 B/C, Government Industrial Estate, Charkop, Kandivali West, Mumbai, Maharashtra, India, 400067
6.	E-mail	cs@flairpens.com
7.	Telephone	+91 22 42030405
8.	Website	www.flairworld.in
9.	Financial year for which reporting is being done	2023-24
10.	Name of the Stock Exchange(s) where shares are listed	i. BSE Ltd. ii. National Stock Exchange of India Limited
11.	Paid-up capital	₹ 52,69,76,890
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Mr. Vishal Kishor Chanda Tel: +91 22 42030228 E-mail: investors@flairpens.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	Standalone basis
14.	Name of assurance provider	NA
15.	Type of assurance obtained	NA

II. Products/services

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

S. No.	Description of main activity	Description of business activity	% of turnover of the entity
1.	Manufacturing and trading	Manufacturing and trading of consumer products viz. stationery and colour products used for scholastic and art purpose.	100

17. Products/services sold by the entity (accounting for 90% of the entity's turnover)

S. No.	Product/service	NIC Code	% of total turnover contributed
1.	Consumer products (Stationary items, including fine arts & hobby products, scholastic products, markers, technical instruments, and adhesives, among others)	32901	81%
		32909	19%
		47613	-

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III. Operations
18. Number of locations where plants and/or operations/offices of the entity are situated

Location	Number of plants	Number of offices	Total
National	9	1	10
International	NIL	NIL	NIL

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)	95

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

The contribution of exports to our total turnover is 19% of our overall revenue.

c. A brief on types of customers

In India, our products are distributed extensively through a nationwide network that includes super-stockists, distributors, direct dealers, wholesalers, and retailers. We also leverage modern retail outlets and e-commerce platforms to reach consumers effectively. Additionally, we offer customised corporate gifting solutions tailored to meet the specific needs of our corporate clientele.

As of March 31, 2024, the Company held the leading position in the writing instruments segment in India, supported by a robust network comprising approximately 150 super-stockists, 8,000+ distributors and dealers, and about 3,30,000+ wholesalers and retailers. Our Flair Sporty division serves as the Mumbai region's primary super-stockist.

Internationally, our products are distributed through 68 specialised distributors catering to distinct regions or countries. We currently market our products in 95 countries globally. Furthermore, we manufacture writing instruments as an OEM for export and domestic markets, collaborating with selected international firms.

This extensive customer base reflects our strong market presence and our commitment to meeting the diverse needs of consumers and corporate clients alike, across various sectors and geographies

IV. Employees
20. Details as at the end of financial year
a. Employees and workers (including differently abled)

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	1,346	1,305	96.95	41	42.29
2.	Other than permanent (E)	51	44	86.27	7	8.11
3.	Total employees (D + E)	1,397	1,349	96.56	48	49.71
Workers						
4.	Permanent (F)	3,965	1,128	28.45	2,837	71.55
5.	Other than permanent (G)	929	640	68.89	289	31.11
6.	Total workers (F + G)	4,894	1,768	36.13	3,126	63.87



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b. Differently abled employees and workers

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled employees						
1.	Permanent (D)	2	2	100	0	0
2.	Other than permanent (E)	0	0	NA	0	NA
3.	Total differently abled workers (D + E)	2	2	100	0	0
Differently abled workers						
4.	Permanent (F)	3	3	100	0	0
5.	Other than permanent (G)	0	0	NA	0	NA
6.	Total differently abled workers (F + G)	3	3	100	0	0

21. Participation/inclusion/representation of women

	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors	10	1	10%
Key Management Personnel	2	0	0%

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	2023-24 (Turnover rate in current FY) (in %)			2022-23 (Turnover rate in previous FY) (in %)			2021-22 (Turnover rate in the year prior to the previous FY) (in %)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
	Permanent employees	6.17	13.91	20.08	20.41	25.05	45	14.84	15.95
Permanent workers	18.07	6.77	24.84	19.62	9.52	29.14	59	32.71	91.71

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

23. (a) Names of holding/subsidiary/associate companies/joint ventures

Sr. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Flair Writing Equipments Private Limited (FWEPL)	Subsidiary	100	No
2	Flair Cyrosil Industries Private Limited (FCIPL)	Subsidiary	90	No

VI. CSR details

24.

- Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- Turnover (in ₹): ₹ 9,18,66,26,506
- Net worth (in ₹): ₹ 8,89,17,06,769

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VII. Transparency and disclosures compliances
25. Complaints/grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct

Stakeholder group from whom complaint was received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide a weblink to the grievance redress policy)	2023-24 (Current financial year)			2022-23 (Previous financial year)		
		Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks	Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks
Communities	No	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes, https://www.flairworld.in/investor-relation.aspx	0	0	NA	0	0	NA
Shareholders	Yes, The Securities and Exchange Board of India Complaints Redress System https://scores.gov.in/scores/Welcome.html , investors@flairpens.com	709	0	NA	0	0	NA
Employees and workers	Yes, https://www.flairworld.in/investor-relation.aspx	0	0	NA	0	0	NA
Customers	Yes, https://flairpens.com/contact-us.html	0	0	NA	0	0	NA
Value chain partners	No	0	0	NA	0	0	NA
Other (please specify)	Yes, https://flairpens.com/contact-us.html	0	0	NA	0	0	NA

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

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, and approach to adapt or mitigate the risk along with its financial implications, as per the following format

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
1	Sustainable Sourcing	O	Ensuring that paper, ink, and other materials used in stationery products are responsibly sourced to minimise environmental impact, deforestation, and support ethical practices.	NA	Positive Reducing environmental impact and supporting ethical practices can enhance brand reputation and potentially attract more customers, leading to increased sales and long-term cost savings through more efficient resource use.
2	Product Packaging	R	Product packaging materials can increase waste generation and non-biodegradable packaging can create long-term environmental problems	Applying reduce-reuse-recycle strategy	Negative Non-biodegradable packaging increases waste management costs and regulatory burdens, while also potentially harming brand reputation due to environmental concerns, leading to higher operational costs and potential fines.
3	Health & Safety	R	Manufacturing units are prone to health-related hazards which can have long term impacts on health of employees and workers.	Ensuring proper health and safety protocols are being adhered to.	Negative Poor health and safety conditions can lead to higher medical costs, legal fees, and productivity losses due to employee absenteeism, affecting overall operational efficiency and increasing financial liabilities.
4	Waste Management	R	Waste generated from offices and plants like plastic, water, ink, and leftovers among others, will lead to increase in environmental pollution, resource depletion, landfill accumulation, ecosystem disruption, sustainability challenge.	Implemented waste management policy to reduce waste and promote circular economy and opting eco-friendly options wherever possible.	Negative Ineffective waste management results in higher disposal costs, increased regulatory compliance expenses, and potential fines, alongside damaging the Company's environmental image, all of which can negatively impact financial performance.
5	Energy Management	O	Implementing measures to optimise energy use in manufacturing processes to reduce greenhouse gas emissions and energy costs	NA	Positive Efficient energy use reduces utility costs and greenhouse gas emissions, leading to cost savings and potential benefits from energy efficiency incentives, which improves overall financial performance and supports environmental goals.

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Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
6	Supply Chain Management	0	Monitoring and improving transparency in the supply chain can save costs, time and ensure fast & efficient distribution processes, including transportation and logistics optimisation.	NA	Positive Enhanced transparency and efficiency in the supply chain reduce operational costs, minimise delays, and optimise logistics, resulting in cost savings and improved profitability through more streamlined processes.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Sr. No.	Disclosure questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes										
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Weblink of the policies, if available	https://www.flairworld.in/investor-relation.aspx								
2	Whether the entity has translated the policy into procedures. (Ye/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	No	No	No	No	No	No	No	No
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.	-	-	-	-	-	ISO 14001 : 2015	-	-	ISO 9001 : 2015, IS 9873 : PART I : 2019
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	We are complying with all the applicable laws and regulations. In addition to this, we are in the process of developing a roadmap towards becoming a more sustainable organisation.								
6	Performance of the entity against the specific commitments, goals and targets alongwith reasons in case the same are not met.	NA								
Governance, leadership and oversight										
7	Statement by the director responsible for the business responsibility report, highlighting ESG-related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) Refer to the Managing Director's Message on page no. 26-27 of the annual report.									



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Sr. No.	Disclosure questions	P	P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9	
8	Details of the highest authority responsible for implementing and overseeing the Business Responsibility Policy(ies).	Mr. Vimalchand Jugraj Rathod, Managing Director (DIN: 00123007)									
9	Does the entity have a specified Committee of the Board/Director responsible for decision-making on sustainability related issues? (Yes/No). If yes, provide details.	<p>The Risk Management Committee is responsible to periodically review environmental, social and governance (ESG)/sustainability matters pertaining to the Company, including initiatives and reporting. The composition of committee is mentioned below:</p> <ol style="list-style-type: none"> Mr. Vimalchand Jugraj Rathod (DIN: 00123007) - Chairman Mr. Punit Saxena (DIN: 01057161) – Member Mr. Manoj Vinod Lalwani (DIN: 10077949) – Member 									

10 Details of review of NGRBCs by the Company:

Subject for review	Indicate whether the review was undertaken by Director/Committee of the Board/any other Committee	Frequency (annually/half yearly/quarterly/any other – please specify)																	
		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against the above policies and follow-up action	The policies of the Company are reviewed by department heads/directors/board committees, wherever applicable	Periodically or on-a-need basis																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Status of compliance with all applicable statutory requirements is reviewed by the Board	Quarterly																	

11 Has the entity carried out an independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9

The procedures and compliances pertaining to the working of the Company's policies are also evaluated by the internal auditors and Secretarial Auditor of the Company from time to time.

12 If the answer to question (1) above is 'No' i.e. not all principles are covered by a policy, reasons to be stated

Questions	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9
The entity does not consider the Principles material to its business (Yes/No)	NA								
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)									

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SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorised as 'Essential' and 'Leadership'. While the essential indicators are expected to be disclosed by every entity mandated to file this report, the leadership indicators may be voluntarily disclosed by entities that aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators
1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year

Segment	Total no of training and awareness programmes held	Topics/principles covered under the training and impact	% age of persons in respective category covered by the awareness programme
Board of Directors	Nil	NA	NA
Key Managerial Personnel			
Employees other than BOD & KMPs			
Workers			

While no formal training and awareness programmes were conducted during the financial year, we have been actively planning and developing a comprehensive training strategy to be implemented in the upcoming year. This strategy will ensure that all employees, from the Board of Directors to our workers, receive thorough training on key principles, including ethical leadership, corporate governance, workplace ethics, health and safety protocols, and environmental sustainability.

2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (In ₹)	Brief of the case	Has an appeal been preferred (Yes/No)
Penalty/Fine			Nil		
Settlement					
Compounding Fee					

Non-monetary			
NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred (Yes/No)
Imprisonment	NA	NA	NA
Punishment	NA	NA	NA

3. Of the instances disclosed in Question 2 above, details of the appeal/revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
	NA



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4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes. We have an anti-corruption and anti-bribery policy that reinforces our commitment to ethical business practices worldwide. We strictly adhere to all relevant laws and regulations, prohibiting any form of bribery, kickbacks, or facilitation payments. We have clear guidelines on gifts and hospitality to ensure transparency and prevent improper influence. Employees are encouraged to report any concerns confidentially and without fear of retaliation. Comprehensive training ensures that everyone understands and complies with our policy. The Audit Committee oversees investigations, and non-compliance may lead to disciplinary measures. We regularly review our policy to stay current and uphold our high ethical standards Company-wide.

The Policy can be accessed at the following weblink-

https://flairworld.in/DataFiles/CorporateGovernance/CorporatePolicies/Corporatepolicy_Anti_Bribery_and_Corruption_Policy.pdf

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Directors	NA	NA
KMPs	NA	NA
Employees	NA	NA
Workers	NA	NA

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NA	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NA	NA

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

Not Applicable

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
No. of days of accounts payable	31	29

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9. Openness of business.

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	2023-24 (Current financial year)	2022-23 (Previous financial year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	NA	NA
	b. Number of dealers/distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	NA	NA
Share of RPTs in	a. Purchases (Purchases with related parties/Total Purchases)	3.29%	2.19%
	b. Sales (Sales to related parties/Total Sales)	1.48%	1.05%
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	99.66%	99.32%
	d. Investments (Investments in related parties/Total Investments made)	100.00%	100.00%

Leadership Indicators
1. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same.

Yes. We have processes in place to manage conflict of interests involving members of the Board and employees. The policy requires Directors and employees to avoid and disclose any actual or perceived conflict of interest that may arise from personal interests conflicting with the Company's interests. They are obligated to disclose all contractual interests, whether direct or indirect, that could result in any financial benefit for themselves, their relatives, or associates. This disclosure ensures transparency and allows the Company to assess and manage potential conflicts appropriately. The policy underscores the importance of prioritising the Company's interests in all business dealings.

The Policy can be accessed at the following with :

https://www.flairworld.in/DataFiles/CorporateGovernance/CorporatePolicies/Corporatpolicy_Code_of_Conduct_of_Board_Members_KMP_SMP.pdf

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.

	2023-24 (Current financial year)	2022-23 (Previous financial year)	Details of improvements in environmental and social impacts
R&D	NA	NA	NA
Capex	NA	NA	NA



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

No

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

NA

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) Other waste.

Manufacturers are obligated to collect e-waste generated during their manufacturing operations and to submit annual and quarterly returns in a designated format through the portal created by the Central Pollution Control Board (PCB).

The EPA is instituted to safeguard and improve the environment, empowering the Central Government to take necessary or expedient actions to preserve and enhance environmental quality while preventing, managing, and mitigating environmental pollution. We adhere to all pertinent safety, environmental, and other applicable laws.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes, the E-Waste Rules establish an extended producer responsibility framework, mandating entities to register on an online portal devised by the Central Pollution Control Board. Manufacturers are tasked with gathering e-waste generated during production and submitting annual and quarterly returns in a specified format via the Central PCB's portal.

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 an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No) If yes, provide the weblink
NA					

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.

Name of the Product/Service	Description of the risk/concern	Action/Taken
NA		

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 reused input material to total material	
	2023-24 (Current financial year)	2022-23 (Previous financial year)
Plastic (Reused)	3,07,917	4,27,742
Plastic (Recycled)	43,743	1,32,081

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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:

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Reused	Recycle	Safely Disposed	Reused	Recycle	Safely Disposed
Plastics (including packaging)						
E-waste						
Others - Bio-medical waste						
Others - Construction and demolition waste						
Others - Battery waste						NA
Others - Radioactive waste						
Hazardous waste						
Other non-hazardous waste						
Total						

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 the respective category
	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 (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	1,305	1,176	90.11	1,176	90.11	0	0.00	0	0.00	0	0.00
Female	41	19	46.34	19	46.34	41	100.00	0	0.00	0	0.00
Total	1,346	1,195	88.78	1,195	88.78	41	3.05	0	0.00	0	0.00
Other than permanent employees											
Male	44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Female	7	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	51	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	1,128	209	18.53	1,128	100.00	0	0.00	0	0.00	0	0.00
Female	2,837	507	17.87	2,837	100.00	2,837	100.00	0	0.00	0	0.00
Total	3,965	716	18.06	3,965	100.00	2,837	71.55	0	0.00	0	0.00
Other than permanent workers											
Male	640	627	97.97	627	97.97	0	0.00	0	0.00	0	0.00
Female	289	289	100.00	289	100.00	289	100.00	0	0.00	0	0.00
Total	929	916	98.60	916	98.60	289	31.11	0	0.00	0	0.00

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format –

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Cost incurred on well- being measures as a % of total revenue of the Company	0.12%	0.12%

Note: This includes attire expenses, group mediclaim, labour welfare, bus rental, medical expenses, mess facilities, housing allowances, and overall staff welfare.

2. Details of retirement benefits, for current financial year and previous financial year

Benefits	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with 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 authority (Y/N/N.A.)
PF	88.89%	97.53%	Y	86.77%	96.11%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	1.49%	21.24%	Y	1.64%	5.57%	Y
Others – please specify	-	-	-	-	-	-

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? If not, whether any steps are being taken by the entity in this regard.

Yes. The premises and offices of the Company are accessible to differently abled employees and workers.

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

Yes, we uphold a comprehensive equal opportunity policy. Our Code of Conduct mandates that directors and employees actively promote and enhance equal opportunities for all genders, work to prevent and address sexual harassment in the workplace, and strive to implement the best employment practices. This policy also encompasses providing equal opportunities for individuals with disabilities, in line with the Rights of Persons with Disabilities Act, 2016.

The Code of Conduct can be accessed at: <https://www.flairworld.in/investor-relation.aspx#tab5>

Business Responsibility & Sustainability Report (Contd.)

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

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

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, there is a mechanism in place to receive and redress grievances for the following categories of employees and workers through email communication as per the established process.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

7. Membership of employees and workers in association(s) or unions recognised by the listed entity:

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total employees/workers in the respective category (A)	No. of employees/workers in the respective category who are part of association(s) or union (B)	% (B/A)	Total employees/workers in the respective category (C)	No. of employees/workers in the respective category who are part of association(s) or union (D)	% (D/C)
Total Permanent Employees	1,346	0	0.00	1,217	0	0.00
Male	1,305	0	0.00	1,179	0	0.00
Female	41	0	0.00	38	0	0.00
Total Permanent Workers	3,965	0	0.00	4,037	0	0.00
Male	1,128	0	0.00	1,171	0	0.00
Female	2,837	0	0.00	2,866	0	0.00

8. Details of training given to employees and workers:

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	1,349	89	6.60	63	4.67	1,179	68	5.77	47	3.99
Female	48	7	14.58	5	10.42	38	5	13.16	4	10.53
Total	1,397	96	6.87	68	4.87	1,217	73	6.00	51	4.19
Workers										
Male	1,768	536	30.32	153	8.65	1,933	503	26.02	131	6.78
Female	3,126	902	28.85	421	13.47	3,172	940	29.63	397	12.52
Total	4,894	1,438	29.38	574	11.73	5,105	1,443	28.27	528	10.34

Business Responsibility & Sustainability Report (Contd.)

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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1,349	775	57.45	1,179	534	45.29
Female	48	29	60.42	38	27	71.05
Total	1,397	804	57.55	1,217	561	46.10
Workers						
Male	1,768	906	51.24	1,933	594	30.73
Female	3,126	2,548	81.51	3,172	1,785	56.27
Total	4,894	3,454	70.58	5,105	2,379	46.60

10. Health and safety management system:

a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage of such system?

Yes, an occupational health and safety management system has been implemented by the entity. We have established various internal committees, such as the Worker Welfare Committee (WWC), Health and Safety Committee (HSC), and Sexual Harassment Committee (SHC), which convene quarterly and maintain thorough records. Our system complies with the Indian Factories Act of 1948, the GDD Factory Rules of 1985, the Gujarat Factory Rules of 1963, and adheres to standards such as ISO 9001:2015 and the Social Accountability 8000 (SA8000@:2014) Standard.

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

To identify work-related hazards and assess risks on a routine and non-routine basis, we have implemented several key processes. We conduct regular inspections and document certifications for all internal vehicles, including forklifts, chain-pullies, small tempos used for local material transportation and lifts. To identify health hazards and exposures to excessive noise and air pollution, we perform tests and maintain certifications such as Noise, Lux, and water testing. Incident investigations are carried out for any workplace incidents, including injuries and illnesses, with two dedicated first aid rooms available to provide initial medical assistance before referring individuals to the Sharda Medical Health Care Centre. Hazard identification and risk assessment processes are followed to identify work-related hazards and risks, including daily plant rounds to identify unsafe acts and conditions. We also hold quarterly safety committee meetings with workers and conduct third-party safety audits periodically.

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

Yes, we have established processes for workers to report work-related hazards and to avoid such risks. Our code of conduct empowers employees to report any incidents that adversely affect the environment, health, or safety to management. Additionally, workers are encouraged to discuss work-related hazards directly with their respective Heads of Departments (HODs) and can request corrective actions to address these concerns.

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

Yes, employees and workers have access to non-occupational medical and healthcare services. On-site medical facilities are available for minor health issues and emergencies. Additionally, through the organisation's insurance coverage (such as Group Insurance and ESIC), employees and workers can access medical services at a network of hospitals nationwide.

Business Responsibility & Sustainability Report (Contd.)

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

Safety Incident/Number	Category	2023-24	2022-23
		(Current financial year)	(Previous financial year)
Lost Time Injury Frequency Rate (LTIFR) (per one million person-hours worked)	Employees	0	0
	Workers	0.20	0
Total recordable work-related injuries	Employees	0	0
	Workers	2	0
No. of fatalities	Employees	0	0
	Workers	0	0
High-consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

To ensure a safe and healthy workplace, we have implemented the following measures:

- Follow a comprehensive hazard identification and risk assessment processes to identify work-related hazards and risks
- Conduct daily plant rounds to identify and address unsafe acts and conditions
- Hold quarterly safety committee meetings with workers to discuss and improve safety measures
- Ensure all employees wear appropriate protective equipment and clothing
- Instituted a health and safety policy to promote a safe working environment

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

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	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	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working conditions	100%

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

We take corrective actions for safety-related incidents and significant risks seriously. When an incident occurs, we immediately convene a 'Meeting Call' with all departmental heads and local management, including plant heads and the AGM, to collaboratively find practical solutions.

Additionally, we hold regular meetings 2-3 times per month with all concerned Heads of Departments (HODs) and local management to discuss any ongoing issues and ensure that health and safety concerns are promptly and effectively addressed.

Business Responsibility & Sustainability Report (Contd.)

Leadership Indicators

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

(A) Employees - No

(B) Workers - No

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

Not Applicable

3. Provide the number of employees/workers having suffered high consequence work-related injury/ill-health/fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	2023-24 (Current financial year)	2022-23 (Previous financial year)	2023-24 (Current financial year)	2022-23 (Previous financial year)
Employees	NA	NA	NA	NA
Workers				

4. Does the entity provide transition assistance programmes to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No)

NA

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	NA
Working conditions	NA

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

We implement measures to mitigate accident risks at our manufacturing sites, such as conducting regular fire and first aid training for our staff. Additionally, we enforce a health and safety policy to ensure a secure workplace, mandating the use of suitable protective gear by all employees.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all their stakeholders.**Essential Indicators**

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

At Flair, we identify key stakeholders by mapping potential groups, analysing their interests and impact, and engaging them through regular feedback. The key stakeholders that we have identified include-

- Investors
- Community
- Suppliers
- Customers
- Regulatory Authorities
- Employees and workers

Business Responsibility & Sustainability Report (Contd.)

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 & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/Quarterly/ others – please specify)	Purpose and scope of engagement, including key topics and concerns raised during such engagement
Investors	No	General meetings, investor and analysts meet, earnings calls	Quarterly, annually, as and when required	Transparent and effective communication, addressing investor queries and concerns
Community	Yes	In person meeting with people and through calls	As and when required	Addressing community problems.
Suppliers	No	Through calls, letters, e-mails, visits	On timely basis weekly/monthly/quarterly/annual	Routine orders and payment related affairs, quality checks, communication and updates on business plans
Customers	No	E-mails, customer care calls	Need based/annual/bi-annual	Product/service quality and safety, other queries
Regulatory authorities	No	Letters, personal visits	Regular basis	Regulatory compliance, transparent disclosures
Employees and workers	No	Calls, e-mails, notice board	Regular basis	Health and safety, grievance redressal, skill development and growth, work-related

Leadership Indicators
1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

NA

2. Whether stakeholder consultation is used to support identifying and managing environmental and social topics (Yes/No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

NA

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

NA

PRINCIPLE 5: Businesses should provide goods and services in a manner that is sustainable and safe
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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
Employees						
Permanent	1,346	22	1.63	1,217	25	2.05
Other than permanent	51	0	0.00	34	0	0.00
Total employees	1,397	22	1.57	1,251	25	2.00



Business Responsibility & Sustainability Report (Contd.)

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Workers						
Permanent	3,965	72	1.82	4,037	85	2.11
Other than permanent	929	0	0.00	1,068	0	0.00
Total workers	4,894	72	1.47	5,105	85	1.67

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

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	1,346	0	0.00	1,346	100.00	1,217	0	0	1,217	100
Male	1,305	0	0.00	1,305	100.00	1,179	0	0	1,179	100
Female	41	0	0.00	41	100.00	38	0	0	38	100
Other than permanent	51	0	0.00	51	100.00	34	29	85.29	5	14.71
Male	44	0	0.00	44	100.00	28	24	85.71	4	14.29
Female	7	0	0.00	7	100.00	6	5	83.33	1	16.67
Workers										
Permanent	3,965	3,748	94.53	217	5.47	4,037	2,931	72.60	1,106	27.40
Male	1,128	991	87.85	137	12.15	1,172	284	24.23	888	75.77
Female	2,837	2,757	97.18	80	2.82	2,865	2,647	92.39	218	7.61
Other than permanent	929	749	80.62	180	19.38	1,068	837	78.37	231	21.63
Male	640	537	83.91	103	16.09	762	617	80.97	145	19.03
Female	289	212	73.36	77	26.64	306	220	71.90	86	28.10

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

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/wages of the respective category (in ₹)	Number	Median remuneration/ salary/wages of the respective category (in ₹)
Board of Directors (BoD)	5	5,51,800	0	0
Key Managerial Personnel	2	2,75,875	0	0
Employees other than BoD and KMPs	1,300	27,438	41	38,200
Workers	1,128	14,404	2,837	11,752

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Gross wages paid to females as % of total wages	60%	59.43%

Business Responsibility & Sustainability Report (Contd.)

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

Yes. The human resource department is responsible for addressing human rights impacts or issues caused or contributed to by the business.

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

Employees are encouraged to first address any issues or grievances with their immediate supervisor. If the concern is not resolved satisfactorily at this level, the employee has the option to escalate the matter further. This can involve bringing the issue to the attention of the Head of the Department (HOD) for additional oversight and potential resolution. Additionally, the employee can seek assistance from the Human Resources (HR) department, which can provide further support and facilitate a more comprehensive resolution process. This escalation process ensures that employees have multiple avenues to seek redress and ensures that their concerns are addressed in a structured and supportive manner.

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

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child labour	0	0	NA	0	0	NA
Forced labour/Involuntary labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
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	NA	NA
Complaints on POSH upheld	NA	NA

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

At Flair, we have established a robust Whistle Blower Policy to ensure ethical conduct and transparency. Our policy allows directors, employees, customers, and vendors to report concerns regarding unethical behaviour, fraud, or violations of our code of conduct. You can report these concerns confidentially to the Chairman of the Audit Committee or via email. We guarantee protection against victimisation for whistleblowers and ensure thorough investigation and appropriate action on reported concerns.

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

No

Business Responsibility & Sustainability Report (Contd.)

10. Assessments for the year:

	% of your plants and offices that were assessed (by the entity or statutory authorities or third parties)
Child labour	For the year, assessments related to human rights issues have not been conducted at our plants and offices. However, we remain committed to upholding high standards in these areas and are continuously evaluating our approach to ensure compliance with all relevant regulations and best practices.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

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

NA

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

NA

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

NA

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. The premises and offices of the Company 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	NA
Discrimination at workplace	
Child labour	
Forced labour/Involuntary labour	
Wages	
Others – Please specify	

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

NA

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	2023-24 (Current financial year)	2022-23 (Previous financial year)
From renewable sources		
Total electricity consumption (A)	NA	NA
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
Total energy consumed from renewable sources (A+B+C)	NA	NA

Business Responsibility & Sustainability Report (Contd.)

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
From non-renewable sources		
Total electricity consumption (D) (in GJ)	35,684.66	37,958.53
Total fuel consumption (E) (in GJ)	751.34	210.09
Energy consumption through other sources (F) (in GJ)	NA	NA
Total energy consumed from non-renewable sources (D+E+F) (in GJ)	36,436.00	38,168.62
Total energy consumed (A+B+C+D+E+F) (in GJ)	36,436.00	38,168.62
Energy intensity per rupee of turnover (Total energy consumption/Revenue from operations in ₹ million)	3.97	4.22
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations in ₹ million adjusted for PPP)	1.09	1.14
Energy intensity in terms of physical output (Total energy consumed/product in portfolio)	47.32	54.60
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, the name of the external agency. - No

2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

NA

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

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	NA	NA
(ii) Groundwater	18,750.10	19,794.3
(iii) Third party water	126.00	152
(iv) Seawater/desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	18,921.72	19,992.90
Total volume of water consumption (in kilolitres)	15,474.10	14,837.3
Water intensity per rupee of turnover (Water consumed in KL/Revenue from operations in ₹ million)	1.68	1.64
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption in KL/Revenue from operations in ₹ million adjusted for PPP)	0.46	0.44
Water intensity in terms of physical output (KL/Product in portfolio)	20.10	21.23
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, the name of the external agency. - No

Business Responsibility & Sustainability Report (Contd.)

4. Provide the following details related to water discharged:

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To surface water	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(ii) To groundwater	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	3,402	5,109
(iii) To seawater	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(v) Others	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
Total water discharged (in kilolitres)	3,402	5,109

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, name of the external agency. - No

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

Yes, we have implemented mechanisms for Zero Liquid Discharge at two of our facilities. Our Daman and Valsad locations are equipped with sewage treatment plants (50 KLD at Daman and 100 KLD at Valsad) to treat domestic waste. The treated water from these plants is reused for toilet flushing and gardening.

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

Parameter	Please specify unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
NOx	mg/m ³	25.74	29.64
SOx	mg/m ³	29.64	20.27
Particulate matter (PM)	mg/m ³	44.11	89.02
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	PPM	2	0
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

Note: This includes data from the manufacturing facility at Valsad only.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, the name of the external agency. - Eco-Clean consulting services, Surat

Business Responsibility & Sustainability Report (Contd.)

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

Parameter	Unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	54.67	14.75
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	7,136.93	7,591.71
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	MTCO ₂ e/₹ in million	0.78	0.84
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)	MTCO ₂ e/₹ in million adjusted for PPP	0.22	0.23
Total Scope 1 and Scope 2 emission intensity in terms of physical output	MTCO ₂ e/Product in portfolio	9.34	10.88
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	NA	NA	NA

Note: The increase in Scope 1 emission during 2023-24 is due to the inclusion of emissions caused by the consumption of fuel in Company-owned vehicles. The data for the same from 2022-23 is unavailable.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, the name of the external agency. - No

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

NA

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

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)-Lumps	43.154	34.08
Plastic waste (A)- PVC Scrap	119.58	93.878
E-waste (B)	NA	NA
Bio-medical waste (C)	NA	NA
Construction and demolition waste (D)	NA	NA
Battery waste (E)	NA	NA
Radioactive waste (F)	NA	NA
Other hazardous waste. Please specify, if any. (G)- DG Oil	0.000162	NA
Other non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	NA	NA
Total (A+B + C + D + E + F + G + H)	162.73	127.96



Business Responsibility & Sustainability Report (Contd.)

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Waste intensity per rupee of turnover (Total waste generated in tonnes/Revenue from operations in ₹ million)	0.02	0.01
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated in tonnes/Revenue from operations in ₹ million adjusted for PPP)	0.005	0.004
Waste intensity in terms of physical output (Tonnes/Product in Portfolio)	0.21	0.18
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	NA	NA
(ii) Re-used	NA	NA
(iii) Other recovery operations	NA	NA
Total	NA	NA
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	NA	NA
(ii) Landfilling	NA	NA
(iii) Other disposal operations	NA	NA
Total	NA	NA

Note: This includes data from the manufacturing facility at Dehradun only.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, the name of the external agency. - No

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.

Our waste management practices are designed to ensure effective and environmentally responsible handling. We manage plastics (including packaging) through an outsourced agency and address hazardous waste, such as DG oil, with a registered vendor. Paper waste and torn cartons are handled by a local vendor. Additionally, we have implemented strategies to reduce the use of hazardous and toxic chemicals by adopting eco-friendly alternatives and enforcing strict safety protocols. This comprehensive approach helps us manage waste responsibly while minimising our environmental impact.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
			NA

Business Responsibility & Sustainability Report (Contd.)

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

Name and brief details of project	EIA notification no.	Date	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
NA					

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. We are compliant with all applicable laws and regulations in India.

S. No.	Specify the law/regulation/guidelines which were 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
NA				

Leadership Indicators
1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

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

(i) **Name of the area** - Dehradun, Valsad, Daman

(ii) **Nature of operations** - Manufacturing

(iii) **Water withdrawal, consumption and discharge in the following format:**

Parameter	FY 2023-24 (Current financial year)	FY 2022-23 (Previous financial year)
Water withdrawal by source (in kilolitres)		
(i) Surface water		
(ii) Groundwater	18,640.90	19,669.5
(iii) Third-party water	126.00	152.00
(iv) Seawater/Desalinated water	0.00	0.00
(v) Others	45.62	46.60
Total volume of water withdrawal (in kilolitres)	18,812.52	19,868.10
Total volume of water consumption (in kilolitres)	15,364.90	14,712.5
Water intensity per rupee of turnover (Water consumed/turnover)	1.67	1.63
Water intensity (optional) – the entity may select the relevant metric	NA	NA
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into surface water	NA	NA
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
(ii) Into groundwater	NA	NA
No treatment	NA	NA
With treatment – please specify the level of treatment	3,402	5,109
(iii) Into seawater	NA	NA
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA



Business Responsibility & Sustainability Report (Contd.)

Parameter	FY 2023-24 (Current financial year)	FY 2022-23 (Previous financial year)
(iv) Sent to third-parties	NA	NA
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
(v) Others	NA	NA
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
Total water discharged (in kilolitres)	3,402	5,109

Note: Indicate if any independent assessment/evaluation/assurance carried out by an external agency? (Y/N) If yes, the name of the external agency.

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

Parameter	Unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)		NA	
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (optional) – the entity may select the relevant metric			

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, the name of the external agency. - No

3. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

NA

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

Sr. No	Initiative undertaken	Details of the initiative (weblink, if any, may be provided along with summary)	Outcome of the initiative
			NA

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

Yes, we have a comprehensive business continuity and disaster management plan in place. We conduct regular mock drills to practice disaster management, including the use of safety equipment like fire extinguishers, sand buckets, hose reels, and alarm systems. Our team is thoroughly educated on emergency procedures, including evacuation plans and first aid. We ensure that employees receive regular training on these procedures. Additionally, we perform regular inspections and tests of our safety equipment and emergency locations to ensure they are always ready for immediate activation.

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.

NA

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

NA

Business Responsibility & Sustainability Report (Contd.)

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators

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

3

- b. **List the top 10 trade and industry chambers/associations (determined based on the total members of such body) the entity is a member of/affiliated to.**

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1.	Writing Instruments Manufacturers Organisation	National
2.	The Plastics Export Promotion Council (PLEXCONCIL)	National
3.	The All-India Exporters Chamber	National

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**

Name of authority	Brief of the case	Corrective action taken
NA		

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of review by board (annually/half yearly/quarterly/ Others – please specify)	Weblink, if available
NA					

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development.

Essential Indicators

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

Name and brief details of the project	SIA notification no.	Date of notification	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
NA					

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

Name of the project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the financial year (in ₹)
NA					

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

NA

Business Responsibility & Sustainability Report (Contd.)

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Directly sourced from MSMEs/small producers	76.75%	71.44%
Sourced directly from within India	76.75%	71.44%

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

Location	2023-24 (Current financial year)	2022-23 (Previous financial year)
Rural	NA	NA
Semi-Urban	4.98%	5.26%
Urban	94.11%	93.54%
Metropolitan	0.91%	1.20%

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above)

Details of negative social impact identified	Corrective action taken
NA	NA

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

S. No.	State	Aspirational district	Amount spent (in ₹)
		NA	

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

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

(c) What percentage of total procurement (by value) does it constitute? NA

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge

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

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

Name of authority	Brief of the Case	Corrective action taken
	NA	

6. Details of beneficiaries of CSR Projects

With a total CSR expenditure of ₹ 1,40,47,583, our initiatives have benefitted several groups. The E-Shiksha project improved digital learning for students, while the Anganwadi initiative enhanced facilities for senior citizens. School Development and School Building projects upgraded educational infrastructure, providing better learning environments for students. These efforts collectively support both educational advancement and senior citizen welfare in our community.

Business Responsibility & Sustainability Report (Contd.)

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.

At Flair, we prioritise customer feedback on product quality and services. Our dedicated Customer Support Desk, reachable via telephone or email at: consumercare@flairpens.com, handles all queries and complaints. We have a robust process for addressing feedback, involving personal visits or calls from our quality team, thorough investigations, root cause analyses, and corrective actions.

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

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

3. Number of consumer complaints in respect of the following

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	NA	Nil	Nil	NA
Advertising	Nil	Nil	NA	Nil	Nil	NA
Cybersecurity	Nil	Nil	NA	Nil	Nil	NA
Delivery of essential services	NA	NA	The Company does not provide any essential services.	NA	NA	The Company does not provide any essential services.
Restrictive Trade Practices	Nil	Nil	NA	Nil	Nil	NA
Unfair Trade Practices	Nil	Nil	NA	Nil	Nil	NA
Other	Nil	Nil	NA	Nil	Nil	NA

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

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

5. Does the entity have a framework/policy on cybersecurity and risks related to data privacy? (Yes/No) If available, provide a weblink to the policy.

Currently, we do not have a specific framework or policy on cybersecurity and data privacy. However, we are committed to continually improving our practices and are planning the development of such policies in the future.

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

Not Applicable



Business Responsibility & Sustainability Report (Contd.)

7. Provide the following information relating to data breaches:

- a. **Number of instances of data breaches along with impact** - Nil
- b. **Percentage of data breaches involving personally identifiable information of customers** - NA
- c. **Impact, if any, of the data breaches** - NA

Leadership Indicators

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

Information about our products can be accessed through the Company's official website and all major e-commerce platforms. These channels provide comprehensive details about the range of products offered by us.

On the Company's website, the details can be accessed at: <https://www.flairworld.in/our-brands.html>

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

Not Applicable

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

Not Applicable

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable)

If yes, provide details in brief.

No

5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

No

Annexure VII

INFORMATION UNDER SECTION 134(3)(M) OF THE COMPANIES ACT, 2013 READ WITH RULE 8(3) OF THE COMPANIES (ACCOUNTS) RULES, 2014.

A. CONSERVATION OF ENERGY:

Your Company has always considered energy and natural resources conservation as a focus area.

Your Company ensures strict compliance with all the statutory requirements and has taken several sustainable steps voluntarily to contribute towards better environment like use of natural lighting and natural ventilation. Your company conducts education and awareness programs for its employees focused on energy conservation.

Your company prioritises the development of sustainable supply chains through the implementation of green logistics practices aimed at minimising resource consumption, environmental degradation, and pollution throughout the storage, transportation, and packaging processes. Additionally, the Company has made significant strides in adopting alternative energy sources. This includes various energy conservation measures and initiatives undertaken throughout the year.

Measures to promote energy saving: The Company implements strict controls to monitor daily energy consumption and ensures optimal utilisation to minimise waste. It regularly monitors energy parameters like maximum demand, power factor, load factor, and Time of Day tariff utilisation. Inefficient equipment is replaced with the latest energy-efficient technology, and equipment undergoes regular upgrades. Your company promotes energy conservation through the following actions:

1. Replacing old electronics with energy-efficient 5-star rated products.
2. Installing LED lights and fixtures in new and some existing manufacturing areas.
3. Installed solar panels at our factories located in Daman.
4. Introducing upgraded servo-based power-saving molding machines.
5. Conducting regular retrofit processes to boost productivity.
6. Performing routine maintenance on all equipment for better efficiency.
7. Continuously improving operational methods to optimise energy usage.

B. TECHNOLOGY ABSORPTION:

- i. the efforts made towards technology absorption – Nil
- ii. the benefits derived like product improvement, cost reduction, product development or import substitution

- Self-reliance on new products, product development, improved production process for better productivity, import substitution and cost reduction attempts are made for sourcing of material and components for cost effectiveness. The input cost has been reduced and in some cases the quality has improved.

- iii. Imported Technology (Imported During the Last 3 Years) – Your Company uses high-quality machines and moulds imported from countries such as Germany, South Korea, China, Spain and Switzerland, in addition to machines and moulds procured from within India, which enables us to engage in high precision manufacturing.

Your Company has also introduced automatic and semi-automatic assembly and packing machines used for manufacturing and assembly of pens and endeavors to control our manufacturing processes through increasing backward integration through the manufacturing of certain components in-house.

- iv. Expenditure on Research and Development- During the financial year, no expenditure on research and development including capital expenditure was incurred.

C. FOREIGN EXCHANGE EARNING & OUTGO:

During the financial year, the foreign exchange earned in terms of actual inflows was ₹ 1,580.28 million as against ₹ 1,877.13 million in the previous year and foreign exchange outgo in terms of actual outflows was ₹ 1,454.52 million as against ₹ 1,648.08 million in the previous year.

ACKNOWLEDGEMENT

The Directors thank the Company's customers, vendors, bankers and investors for their continuous support. The Directors also thank the Government of India, Governments of various states in India, Governments of various countries and concerned Government departments and agencies for their co-operation.

Your Directors also wish to place on record their deep appreciation for the services rendered by staff and workers of the Company at all levels and for dedication to their work and loyalty.

On behalf of the Board of Directors

Khubilal Jugraj Rathod

Chairman & Whole-Time Director

DIN: 00122867

Place: Mumbai

Date: July 30, 2024