

ANNEXURE – 4 to Board's Report

BUSINESS RESPONSIBILITY REPORT

Section A: General Information about the Company

1.	Corporate Identity Number (CIN) of the Company	L24110GJ1973PLC002247
2.	Name of the Company	Gujarat Alkalies and Chemicals Ltd.
3.	Registered Office address	P.O. : Petrochemicals : 391 346 Dist. : Vadodara (Gujarat)
4.	Website	www.gacl.com
5.	e-mail id	investor_relations@gacl.co.in cosec@gacl.co.in
6.	Financial Year reported	2018-19
7.	Sector(s) that the Company is engaged in (industrial activity code-wise)	Chemicals- NIC Code - 2411
8.	List three key products/services that the Company manufactures/ provides (as in balance sheet)	1. Caustic Soda Group 2. Hydrogen Peroxide 3. Chloromethanes Group
9.	Total number of locations where business activity is undertaken by the Company	
	i	Number of International Locations (Provide details of major 5)
	ii	Number of National Locations
10.	Markets served by the Company- Local/State/National/International	Across India, Africa, Europe, South Asia, Middle East, Australia, Russia, USA and Turkey etc.

Section B : Financial Details of the Company

Sr. No.	Particulars	Financial Year 2018-19 Standalone (Rs. in Crores)
1.	Paid up Capital (INR)	Rs.73.44
2.	Total Turnover (INR)	Rs.3,102.32
3.	Total Profit After Taxes (INR)	Rs. 689.65
4.	Total Spending on Corporate Social Responsibility (CSR)	Rs. 10.53
	As percentage of Profit After Tax (%)	The Company has spent 2.40% of the average net profits of last three years.
5.	List the activities in which expenditure in 4 above has been incurred.	
	A. Promotion of Education and related activities	
	B. Interventions for Special Children	
	C. Preventive Healthcare, Hygiene and Sanitation	
	D. Developmental activities at Dahej, Vagra Taluka	
	E. Promotion of Livelihood generation	
	F. Promotion of Art, Culture and Heritage	



Section C: Other Details

1. Does the Company have any Subsidiary Company / Companies?
Yes, the Company has one (01) Subsidiary Company, viz. GACL-NALCO Alkalies & Chemicals Pvt. Ltd.
2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)
The subsidiary company has yet not started its commercial operations. Therefore, there is no direct participation by the subsidiary in the BR initiatives of the Company, at present.
3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company ? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]
More than 60%.

Section D: BR Information

1. Details of Director/Directors responsible for BR

- a) Details of the Director / Director responsible for implementation of the BR policy / policies
 - DIN Number : 05323992
 - Name : Shri P K Gera, IAS
 - Designation : Managing Director
- b) Details of the BR head

Sr. No.	Particulars	Details
1.	DIN Number (if applicable)	05323992
2.	Name	Shri P K Gera, IAS
3.	Designation	Managing Director
4.	Telephone number	0265 – 2232801
5.	E-mail ID	md@gacl.co.in

2. Principle-wise (as per NVGs) BR Policy / Policies (Reply in Y/N)

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

- P1** Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.
- P2** Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
- P3** Businesses should promote the well-being of all employees.
- P4** Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
- P5** Businesses should respect and promote human rights.
- P6** Businesses should respect, protect, and make efforts to restore the environment.
- P7** Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.
- P8** Businesses should support inclusive growth and equitable development.
- P9** Businesses should engage with and provide value to their customers and consumers in a responsible manner.

Sr. No.	Questions	Business Ethics	Product Responsibility	Well-being of Employees	Stakeholder Engagement & CSR	Human Rights	Environment	Public Policy	CSR	Customer Relations
		P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	Do you have a policy / policies for....	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.	Does the policy conform to any national / international standards? If yes, specify?	Y	Y	Y	Y	Y	Y	Y	Y	Y
4.	Has the policy being approved by the Board? If yes, has it been signed by MD/owner/CEO/appropriate Board Director?	Y	Y	Y	Y	Y	Y	Y	Y	Y
5.	Does the company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y	Y	Y	Y
6.	Indicate the link for the policy to be viewed online?	http://gacl.com/upload_files/d4ddf_br_policy.pdf								
7.	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
8.	Does the company have in-house structure to implement the policy/policies.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.	Has the company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	Y	Y	Y	Y	Y	Y	Y	Y	Y

*The policies are based on National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs) and in consonance with the generally accepted principles and with the applicable regulatory requirements.



2a. If answer to Sr. No. 1 against any principle, is 'No', please explain why : (Tick up to 2 options)

Sr. No.	Questions	Business Ethics	Product Responsibility	Well-being of Employees	Stakeholder Engagement & CSR	Human Rights	Environment	Public Policy	CSR	Customer Relations
		P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	The Company has not understood the Principles	-	-	-	-	-	-	-	-	-
2.	The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles	-	-	-	-	-	-	-	-	-
3.	The Company does not have financial or manpower resources available for the task	-	-	-	-	-	-	-	-	-
4.	It is planned to be done within next 6 months	-	-	-	-	-	-	-	-	-
5.	It is planned to be done within the next 1 year	-	-	-	-	-	-	-	-	-
6.	Any other reason (please specify)	-	-	-	-	-	-	-	-	-

3. Governance related to BR

- Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year.
Annually.
- Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?
The Company publishes BRR as part of Annual Report and BRR is also available on the Website of the Company at : www.gacl.com

Section E: Principle-wise performance

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

- Does the policy relating to ethics, bribery and corruption cover only the company? Yes / No. Does it extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?
Yes, the Company has only one subsidiary viz., GACL-NALCO Alkalies & Chemicals Pvt. Ltd. (GNAL) and the said policy is applicable to the Subsidiary Company. So far as Suppliers/Contractors/NGOs/Others are concerned, the policy of the Company is applicable to the extent of their dealings with the Company.
- How many stakeholder complaints have been received in the past Financial Year and what percentage was satisfactorily resolved by the management?
During the Financial Year 2018-19, the Company had received 98 complaints from shareholders and all 98 (100%) complaints were satisfactorily resolved. The Company has not received any other Complaint from other Stakeholders.

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

- List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.
 - Caustic Soda Group
 - Sodium Chlorate
 - Chloromethanes Group

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional) :
- i. Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain?
 - Energy reduced per unit of NaOH Production - 79 KWH/MT.
 - Energy reduced per unit of CLM Production - 367 KWH/MT.
 - Energy reduced per unit of H2O2 Production - 29 KWH/MT.
 - ii. Reduction during usage by consumers (energy) has been achieved since the previous year?
 - Energy reduced per unit of NaOH Production - 79 KWH/MT.
 - Energy reduced per unit of CLM Production - 367 KWH/MT.
 - Energy reduced per unit of H2O2 Production - 29 KWH/MT.
3. Does the Company have procedures in place for sustainable sourcing (including transportation)?
- We have initiated some measures towards sustainable sourcing which impacts on social and environment aspects. In our endeavor of sustainable sourcing during our vendor meeting we had appealed our vendors to adopt sustainable sourcing in their business.
- i. If yes, what percentage of your inputs was sourced sustainably ?
 - Few major activities of sustainable sourcing are mentioned hereunder:-
 - Our Company has a policy of procurement which reflects sustainable sourcing taking into consideration economical aspect in procurement, environmental friendly processes and giving due weightage to social aspects.
 - One of the major raw material is Salt which is a natural product being produced from either sea water or from subsoil water by natural evaporation process in sun light. No chemical which may harm environment is used during manufacturing process. It is transported in bulk in vehicle and no packaging material is used. Considering environment friendly usage we have changed specifications of Salt from July, 2017 onwards and improved (washed) quality of Salt is being used at both the complexes. Due to uses of improved quality of Salt which is environment friendly chemical, consumption and sludge generation has also reduced considerably. We procure approx 7 Lakhs MT of Salt for both the complexes. We procure Salt from those manufacturers who have salt works nearby our Company and these comprises of very small to large manufacturers.
 - Packaging material is another example of sustainable sourcing. Packaging materials like carbouys, barrels, bags etc which are used for filling the finished product are procured from the nearby sources. These packaging materials are reused & recycled for manufacturing of other material which can be used for some other applications.
 - In procurement of other materials like Lime, Barium Carbonate, Alumina Tri Hydrate (ATH) & other raw materials/chemicals we do consider the aspect of sustainable sourcing.
 - We procure some of the materials from the MSME vendors to facilitate promotion and development of MSME.
 - For entire (100%) procurement of our Company we follow the procurement policy which is based on sustainable sourcing.

We procure 36,000 MT Potassium Chloride annually from M/s. Canpotex Ltd., Canada. Till August, 2017, this material was received at East Coast of India (Kakinada Port) and then it was transported by rail / road to Baroda Complex. We have reviewed logistics and to reduce inland transportation from August, 2017, material is being received at West Coast of India (Kandla Port). This has helped to reduce cost of procurement drastically besides there is considerable reduction in inland transportation vis-à-vis reduction in fuel consumption.
4. Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?
- If yes, what steps have been taken to improve their capacity and capability of local and small vendors ?
- Our Company gives due weightage in procurement of goods and services from local and small producers including communities surrounding their place of work.
 - We have been procuring entire requirement of Salt for Baroda and Dahej Complexes from the local suppliers situated at Dahej, Gandhar, Jambusar, Bhavnagar and Maliya-Morbi area etc. Many suppliers in these regions are small suppliers from whom we are procuring the material. We procure Salt from co-operative Society at Bhavnagar. Our Company has encouraged to improve quality of Salt by installing salt washery and many small producers have installed the same recently.



- To support small producers in their business and to generate employment we procure consumable and engineering items from them at competitive price and extend favourable payment term to them.
 - We also had facilitated them with a Stall in Vibrant Gujarat Trade Exhibition which benefitted some of our MSME vendors.
 - We had encouraged our MSME vendors to participate in seminar on GeM (Government E-Marketplace) which was arranged by District Industries Center at Bharuch & Baroda in two different events. This was attended by many of our vendors.
5. Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%).
- As a step further to its environment preservation philosophy and commitments, the Company has installed new RO Plant to recycle 40% liquid effluent stream and also recycled 53.7% catalyst for Hydrogen Peroxide Plant.

Principle 3 - Businesses should promote the well-being of all employees.

1. Please indicate the Total number of employees : 1467
(as on 31.03.2019)
2. Please indicate the Total number of employees hired on temporary / contractual / casual basis.
As on 31st March, 2019, total 855 persons were hired on temporary / contractual / casual basis and total 204 persons were hired on Contract (Management & Non Management), Trainees and Fixed Term Contract (FTC).
3. Please indicate the Number of permanent women employees.
As on 31st March, 2019, permanent women employees are 32.
4. Please indicate the number of permanent employees with disabilities.
As on 31st March, 2019, the number of permanent employees with disabilities are 06.
5. Do you have an employee association that is recognized by Management.
Yes, the Company has an employee association viz. "GAC Employees Union", which is recognized by the management.
6. What percentage of your permanent employees is members of this recognized employee association?
65.39%
7. Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last Financial Year and pending, as on the end of the Financial Year.

Sr. No.	Category	No of complaints filed during the Financial Year	No of complaints pending as on end of the Financial Year
1.	Child labour / forced labour / involuntary labour	NIL	NIL
2.	Sexual harassment	NIL	NIL
3.	Discriminatory employment	NIL	NIL

8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?
 - Permanent Employees : 75%
 - Permanent Women Employees : 100%
 - Casual/Temporary/Contractual Employees (FTC) : 100%
 - Employees with Disabilities : -

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

1. Has the Company mapped its internal and external stakeholders? Yes / No.
Yes.
2. Out of the above, has the Company identified the disadvantaged, vulnerable & marginalized stakeholders.
Yes.
3. Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders.

The Company has adopted Home for Mentally Deficient Children which is a government organization where orphans and destitute special children are kept. In addition to this, the Company is also supporting 31 Government Primary Schools of Vagra Taluka and Schools run by Nagar Prathamik Shikshan Samiti, in Vadodara Taluka. Moreover, the Company is also contributing financially to various hospitals which are providing treatment and medicines at a subsidized rate for marginalized and underprivileged people of the Society. In addition to this, livelihood generation activities for marginalized group of fisherman community and tribal students were also carried out.

Principle 5 - Businesses should respect and promote human rights.

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

The Policy on Human Rights is covering various stakeholders of the Company. The Company has a subsidiary named GACL-NALCO Alkalies & Chemicals Pvt. Ltd. to which the said Policy is applicable.

2. How many stakeholder complaints have been received in the past Financial Year and what percent was satisfactorily resolved by the management?

No complaint/s were received in the last Financial Year.

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

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

Yes. The policy on environment extends to the Joint Venture. The Company encourages its Suppliers / Contractors / NGOs / others to follow the same.

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

Yes, the hyperlink for webpage is as below:

<http://www.gacl.com/corporate.php?nv=4>

Initiatives taken by the Company:-

- i. Water conservation - GACL has commissioned wastewater recycling RO Plant for converting wastewater into reusable water. Daily 400 to 500 M³/Day of wastewater is treated and converted to reusable water which is recycled back in the plant. This has reduced consumption of fresh water by that much quantity.
- ii. The Company has at its Dahej Complex covered large area by development and maintenance of green belt, landscaping, flora and fauna, rain water harvesting and natural ponds. The Company has rolled out the construction of facility for recycling part of its liquid effluent stream, using ZLD principle in Dahej Complex. The Company has also undertaken water conservation by channelizing cooling tower water spillage, treated sewage and drip irrigation. Nearly 22,406 nos. of trees have been planted and also 18.71 acres green belt developed.
- iii. Huge green belt - GACL has 125171 MT² green cover area developed and maintained.
- iv. Rain water harvesting - Rain water harvesting is being done at our solid waste landfill site in surface area of 29 acres by way of groundwater recharge.
- v. Treatment of effluent - GACL is promoter and member of Vadodara Enviro Channel Limited (VECL) which is responsible for safely conveying treated liquid effluent from industries into estuary of river Mahi through 55 KM long channel.
- vi. Captive solid waste landfill site - GACL has own solid waste landfill site for safe disposal of hazardous waste.
- vii. Reduction in solid waste quantity by implementing Cleaner production - We have replaced use of raw salt with washed salt (having less impurities) for production of Caustic Soda. By using washed salt, solid waste generation has reduced by around 200 MT/Month.
- viii. GACL is using renewable sources of energy through 171.45 MW wind farm and the Company has commissioned 22.5 MW Solar Power Project to meet the Solar Renewable Purchase Obligation. Another 12.5 MW Solar Power Project will be commissioned soon.



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

Yes. Potential environmental risks are identified and assessed before any new project / expansion of existing plant by way of conducting Environmental Impact Assessment & preparing Environment Management Plan for the same.

4. Does the Company have any project related to Clean Development Mechanism? If Yes, whether any environmental compliance report is filed?

The Company is continuously implementing various Energy Conservation Schemes and has earned Escerts for Vadodara Plant under PAT (Platform, Achieved and Trade) Scheme introduced by Government of India which is under approval process.

The Company has already installed total Wind Power Capacity of 171.45 MW and the Company has also commissioned 22.5 MW Solar Power Project to meet the Solar Renewable Purchase Obligation. Another 12.5 MW Solar Power Project will be commissioned soon.

The production of Carbon Tetrachloride (CTC) comes under Ozone Depletion Substance (ODS) Rules, 2000 as per the guidelines of Montreal Protocol framed by Government of India, has been phased out while production of CTC only for feed stock application is continued.

In the field of Water conservation, the Company has commissioned daily 400 to 500 M3 of waste water recycling RO Plant for converting waste water into reusable water.

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

Yes, the Company has commissioned 22.5 MW Solar Power Project to meet the Solar Renewable Purchase Obligation.

6. Are the Emissions / Waste generated by the Company within the permissible limits given by GPCB / SPCB for the Financial Year being reported?

Yes, the emissions / Waste generated by the Company are within the limits prescribed by Gujarat Pollution Control Board (GPCB).

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

No show cause / legal notices received from GPCB / SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.

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

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

The Company is a Member of :

1. Alkali Manufactures Association of India, New Delhi
2. Indian Chemical Council, Mumbai
3. Gujarat Chemical Association, Ahmedabad
4. Society for Clean Environment, Vadodara
5. National Safety Council, Mumbai
6. Gujarat Safety Council, Vadodara
7. Federation of Gujarat Industries, Vadodara
8. Exim Club, Vadodara
9. CHEMEXCIL, Mumbai
10. Gujarat Employers' Organization, Vadodara
11. Bharuch Dist. Management Association
12. Dahej Industries Association

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

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

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

The Company has well defined CSR Policy which aims at inclusive growth and equitable development having its focus areas as follows :

- Education
- Special Children
- Healthcare, Hygiene and Sanitation
- Livelihood generation
- Art, Culture and Heritage

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

All the programmes / projects are undertaken by in-house team along with GACL's CSR arm, viz.: "GACL Education Society" and few projects through external agencies and government structures.

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

Yes. Impact Assessment is carried by officers of the GACL Education Society.

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

Company's direct contribution to community development projects and amount with details of the projects undertaken in the Financial Year 2018-19 are as under :

The Company had contributed Rs.11.20 Lakhs towards construction and refurbishment of Anganwadi in Vagra Taluka and Rs.49.5 Lakhs towards support to Government Primary Schools in various villages of Vagra Taluka under smart class project.

The Company had also contributed Rs.48.27 Lakhs towards support in sanitation infrastructure in Vagra Taluka of Bharuch District.

The Company had also contributed Rs.7.77 Lakhs towards awareness generation in Menstrual Health and Hygiene at Chhotaudepur and Vagra Taluka.

The Company had also contributed Rs.31.25 Lakhs in deepening of ponds at selected villages of Vadodara and Narmada Districts.

Hence, the Company had contributed total of Rs.98.49 Lakhs towards Community Development Activities.

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community?

Yes, by involving the parents of the children and principle and other teachers of the school in various activities conducted for the children. Regular meeting with parents and community gatekeepers is also undertaken to assess needs at various intervals. For developmental activities at Dahej of Vagra Taluka, respective Gram Panchayats and school authorities were involved for ensuring successful implementation and continuation of the project.

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

1. What percentage of customer complaints / consumer cases are pending as on the end of Financial Year.
NIL.
2. Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes / No / N.A. /Remarks (additional information)
Yes.



3. Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of Financial Year. An investigation was conducted by the Director General of the Competition Commission of India (CCI) against the Company, for alleged contravention of the provisions of Section 3(1) read with 3(3)(d) of the Competition Act, 2002, in respect of sales of chemical products to Delhi Jal Board. The Competition Commission of India (CCI) vide its order dated 05.10.2017 imposed penalty Rs.1.88 Crores on the company for impugned violations of provision of Competition Act, 2002. The Company had filed an Appeal before the NCLAT challenging the order of the CCI. The Hon'ble NCLAT through its order dated 04.12.2017 granted stay on the operation of the impugned order of the CCI subject to a deposit of 10% of the penalty amount. The Company has deposited 10% of the imposed penalty i.e., Rs.18.80 Lakhs as per the order of the NCLAT. The Delhi Jal Board has filed its Reply to the Appeal. The Company has also filed its Rejoinder to the Reply of the DJB. The Company believes that it had not indulged in any such activity.
4. Did your Company carry out any consumer survey / consumer satisfaction trends?
Yes.

ANNEXURE – 5 to Board's Report

PARTICULARS OF EMPLOYEES

DETAILS PERTAINING TO REMUNERATION AS REQUIRED UNDER SECTION 197(12) OF THE COMPANIES ACT, 2013 READ WITH RULE 5(1) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014.

- (i) The percentage increase in remuneration of each Director, Chief Financial Officer and Company Secretary during the Financial Year 2018-19, ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the Financial Year 2018-19 and the comparison of remuneration of each Key Managerial Personnel (KMP) against the performance of the Company are as under :

Sr. No.	Name of Director / KMP and Designation	Remuneration of Director / KMP for Financial Year 2018-19 (Rs. in Lakhs)	% increase in remuneration in the Financial Year 2018-19	Ratio of remuneration of each Director / to median remuneration of employees (on annualized basis)	Comparison of the remuneration of the KMP against the performance of the Company
1.	Shri P K Gera, IAS* Managing Director	33.67	13.29%	2.80 times	Profit Before Tax increased by 35.30% and Profit After Tax increased by 28.90% in Financial Year 2018-19.
2.	Dr. H B Patel* Executive Director (Finance) & CFO	43.93	13.48%	3.66 times	
3.	Shri Sanjay S Bhatt* Company Secretary & GM (Legal & CC)	36.76	29.12%	3.60 times	

* The remuneration of the Managing Director and other Key Managerial Personnel (Executive Director (Finance) and CFO and Company Secretary) during the Financial Year 2018-19 is not comparable with Financial Year 2017-18 due to following reasons:

1. The Remuneration of Shri P K Gera, IAS, Managing Director is paid as per pay revision implemented by Seventh Pay Commission.
2. The Cost to Company (CTC) for the Financial Year 2018-19 of Dr. H B Patel, Executive Director (Finance) & CFO and Shri S S Bhatt, Company Secretary & GM (Legal & CC) was Rs.40.30 Lakhs and Rs.29.68 Lakhs, respectively. The remunerations as stated above are not comparable due to release of variable incentive at higher performance rating, adhoc advance payment of variable incentive, benefit of new car policy and pay revision as per Company's policy, medical reimbursement as applicable to them etc.