BUSINESS RESPONSIBILITY REPORT

Section A: General Information about The Company

1	Corporate Identity Number (CIN) of the Company	L25200GJ1996PLC029134
2	Name of the Company	Astral Poly Technik Limited
3	Registered address	"Astral House", 207/1, B/h Rajpath Club, Off. S. G. Highway, Ahmedabad – 380059, Gujarat, India.
4	Website	www.astralpipes.com
5	E-mail	info@astralpipes.com
6	Financial year reported	2018-19
7	Sector(s) that the Company is engaged in (industrial activity code-wise)	Plastic Products, NIC Code-222.
8	List three key products/services that the Company manufactures/provides (as in balance sheet)	1. CPVC pipes. 2. PVC pipes. 3. CPVC/PVC fittings
9	Total number of locations where business activity is undertaken by the Company (as on 31st March, 2019)	No. of national locations: 28 (which includes 4 manufacturing units, 13 offices and 11 depots) No. of international locations : 1 Joint venture company in Kenya
10	Markets served by the Company	Local, State, National & International

Section B: Financial Details of The Company

1	Paid up Capital (INR)	₹ 11,98,06,565/-
2	Total Turnover (INR)	₹ 1,91,570 Lacs
3	Total profit after taxes (INR)	₹ 14,145 Lacs
4	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	₹ 220 Lacs during FY 2018-19 (1.55% of PAT)
5	List of activities in which expenditure in 4 above has been incurred:	Promoting healthcare through yoga, other healthcare activities for senior citizens and allied activities for public at large and contribution Bharat Ke Veer Corpus fund

Section C: Other Details

1. Does the Company have any Subsidiary Company/ Companies?

   The Company has 5 subsidiary companies (including 1 step down subsidiary) as on 31st March, 2019. However, Rex Polyextrusion Pvt. Ltd. was subsequently amalgamated with the Company vide NCLT order dated 2nd May, 2019.

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).

   Subsidiaries of the Company follow major business responsibility initiatives of parent company to the extent practicable.

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%].

   No other entity / entities participate in the BR initiatives of the Company.

Section D: BR Information

1. Details of Director/Directors responsible for BR:

(a) Details of the Directors/Director responsible for implementation of the BR policy/policies:

1. DIN: 00067112
2. Name: Mr. Sandeep Engineer
3. Designation: Managing Director

(b) Details of the BR head:

1. DIN : 00067276
2. Name: Mrs. Jagruti Engineer
3. Designation: Whole Time Director
4. Tele No.: 079-66212000
5. E-mail: brr@astralpipes.com

2. Principle-wise (as per NVGs) BR Policy/policies:

No	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2	Has the policy being formulated in consultation with the relevant stakeholders?	Yes	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes
3	Do you have a policy/ policies for	The policies are aligned with the principles of NVG guidelines								
4	Has the policy being formulated in consultation with the relevant stakeholders?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
5	Does the company have a specified committee of the Board / Director Official to oversee the implementation of the policy?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
6	Indicate the link for the policy to be viewed online?	https://www.astralpipes.com/uploads/investor_broucher/1538746346_275_l.pdf								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The BR policies have been communicated to Company's internal and external stakeholders through relevant contents on the website of the Company www.astralpipes.com.								
8	Does the company have in house structure to implement the policy / policies?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
10	Has the company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	No	No	No	No	No	No	No	No	No

3. Governance related to BR

(a) 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, 3-6months, Annually, More than 1 year.

The Company's Business Responsibility performance is assessed annually.

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

This report comprises the Company's second Business Responsibility Report as per the National Voluntary Guidelines on Social, Environmental and Economic Responsibility of Business (NVG). The Company currently does not publish a separate Sustainability Report. This Report is part of Annual report which is posted on the Company's website - www.astralpipes.com.

Section E : Principle-Wise Performance

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

1. 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?

The Company is committed to conduct its affairs in a fair, transparent and professional manner and maintaining good ethical standards, transparency and accountability in dealing with all its stakeholders. The Company has adopted Code of Conduct for all employees which covers policy on ethics, values and anti-corruption. Further, the Company has also adopted a separate Code of Conduct for its Directors and Senior Management which lays down the best corporate governance practices to be followed by the Board members and senior management personnel. In addition to this, the Company also has a Whistle Blower Policy and policy against sexual harassment at workplace. Internal Complaints Committee has been set up to address the complaints of sexual harassment at workplace.

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

Details relating to shareholders' complaints, received and resolved, are provided in Corporate Governance Report, which is a part of this Annual Report. However, there was no stakeholder complaint in the reporting period with regard to ethics, bribery, corruption and sexual harassment.

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

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/ or opportunities.

The Company is committed to conduct its business in an Eco-Friendly manner. The company ventures to maintain sustainability into the various stages of product

lifecycle. This includes acquiring correct raw material, manufacturing of products, damage free transportation of goods and proper disposals by consumers. The company's new product is PEX-a PRO. The Company introduced its new PEX- a PRO system based on the expansion ring technology (Shrink-Fit) which is meant for distribution of hot and cold water plumbing applications. This product is more eco-friendly due to use of PE material and also completely recyclable even after end of service life. PEX is the plastic with the best long term performance. Loss of properties with time is very slower than for the rest of other conventional materials. At the time of installation, no flammable solvent or electricity being used for joining.

2. **For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):**

   (a) **Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?**

   The Company is determined to set up facilities to provide goods in most efficient and fast way. All the production processes acquired by the company are energy efficient and Eco-friendly. For saving energy the company has started many operations in all plants to optimize the use of resources. To make sure that energy is being saved consistently, Company conducts Energy audits regularly at all plants by approved government agencies. Apart from this suggestions are also considered related to improvements and mandatory requirements. Most of the processes in plants are controlled with drive / PLC / VFD which are very efficient.

   (b) **Reduction during usage by consumers (energy, water) has been achieved since the previous year?**

   The Company gives periodic training to plumbers for installation of pipes and fittings which deals with various measures regarding Energy/Water consumption.

3. **Does the company have procedures in place for sustainable sourcing (including transportation)?**

Astral believes in both Long term / Short term contracts for acquiring Raw materials and other services. The company always seeks to establish long term relationship with its vendors and makes sure to include them in Company's growth. Substantial amount of our major raw material procurement within a range of 250 kms from factory premises. Astral, believes in acquiring components from local vendors without compromising on quality.

   (a) **If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.**

   Majority amount of our indigenous raw material and components are sourced within a range of 250 kms from the factory premises.

4. **Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?**

   (a) **If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**

   The Company is determined to procure all its packing material used to pack Pipes and Fitting material from local source within a range of 50 kms from the factory premises. Such suppliers are timely inspected by a team of company officials to work on their various compliances and to increase their capacity. Majority of our manpower is sourced from nearby places.

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 10%). Also, provide details thereof, in about 50 words or so.**

All the products Manufactured by the company are 100% recyclable. The waste we get during manufacturing process can be grounded easily and that product is blended with the Raw material. Thus there is no or very little waste which can not be reused and recycled.

Principle 3: Businesses should promote the wellbeing of all employees.

1. **Please indicate the Total number of employees.**

The Company has 1211 employees as on 31st March, 2019

2. **Please indicate the Total number of employees hired on temporary/contractual/casual basis.**

The Company has 2030 employees hired on temporary/ contractual/casual basis.

3. **Please indicate the Number of permanent women employees**

The Company has 56 women employees as on 31st March, 2019

4. **Please indicate the Number of permanent employees with disabilities**

The Company has 8 employees with disabilities as on 31st March, 2019

5. **Do you have an employee association that is recognized by management**

The Company does not have an employee association that is recognized by the management.

6. **What percentage of your permanent employees is members of this recognized employee association?**

Not applicable

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 ?**

There were no complaints of this nature during the financial year.

8. **What percentage of your under mentioned employees were given safety & skill upgradation training in the last year?**

   (a) Permanent Employees

   (b) Permanent Women Employees

   (c) Casual/Temporary/Contractual Employees

   (d) Employees with Disabilities

   The Company is committed in ensuring the well-being of all its employees, their safety and health. It considers employee wellbeing as imperative ingredient to achieve a sustained growth of the organization. The Company's training programs extend to all permanent and contractual employees. All employees, including women and differently abled, are given mandatory safety training on induction as well as the job skills related training through the Contractors and the Company.

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**

   The Company values the support of its stakeholders (i.e. distributors, dealers, suppliers, customers, other business associates and local community near to the premises) and respects the interests and concerns they have towards it. The Company believes that it has a responsibility to think and act beyond interest of shareholders to include all its stakeholders specially interest of weaker section of society. The Company has mapped major stakeholders which includes workers, employees, distributors, dealers, plumbers, investors, govt. agencies and local community.

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. If so, provide details thereof, in about 50 words or so.**

   The Company through various initiatives engage with disadvantaged, vulnerable and marginalized stakeholders specially workers, plumbers and local community. The Company is sensitive towards rights of stakeholders and ensures that the same are protected.

   Beyond manufacturing, the Company trains more than 85,000 plumbers every year in India. The Company believes this training equips them in making their future sustainable and at the same time, overall quality of plumbing improves in our country

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 Company believes in protecting the human rights of all individuals, recognising their need for respect and dignity and also promotes awareness of the importance of respecting human rights within its entire value chain by discouraging instances of abuse. The Company understands that human rights are inherent, universal, indivisible and inter-dependent in nature. The Company is committed to protect the rights of all internal and external stakeholders.

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

   No complaint was received by the Company from any stakeholder during past financial year.

Principle 6: Business 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.**

   The Company believes in setting high standards in the area of environmental responsibility and striving for performance that does not merely comply with regulations but reduces environmental impacts. The Company has adopted policy on Health, Safety and Environment and is applicable to the Company. The Policy is prominently displayed at the manufacturing units. The Policy is given to all visitors to the factory premises.

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.**

   The Company is continuously taking measures for developing new energy efficient systems which minimizes energy consumption and related emission reduction.

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

   The Company does from time to time identify and assess potential environmental risks. However, the process of the Company as of now does not involve emission of any material adversely affecting the environment.

4. **Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?**

   At present, the Company has not undertaken any project under clean development mechanism.

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.**

   As a part of promoting renewable energy, the Company installed 250 kva of solar power rooftop panels at Hosur (Tamil Nadu) plant of the Company. Project work on installation of 1 MW of solar power roof top panels is under process in Santej and Dholka plant of the company which reduces the energy consumption. Your Company is in the process of installing solar power roof top panels of 8 MW in remaining plant areas. For the purpose of animal welfare the CSR wing of the Company viz. Astral Charitable Trust and the company has donated to Earth Brigade Foundation/ Earthworks Conservation Foundation NGO registered u/s 8 of the Companies Act 2013 the amount of ₹ 5.83 Lacs for purchase and installation of one solar pump at Pench Tiger Reserve, Madhya Pradesh and two solar pump at Anechowkur and Kaimara, Karnataka for providing drinking water for wild animals in the forests.

6. **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?**

   Emissions/ waste generated by the Company are within the permissible limits prescribed by SPCBs.

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

   There is no show cause/legal notice received from SPCB by the Company during the year which is pending.

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 believes in engaging with industry bodies and associations to influence public and regulatory policy in a most responsible manner and advocating the best practices for the benefit of society at large. The Company is members of Gujarat Chamber of Commerce and Industry, Confederation of Indian Industry, Federation of Indian Export Organization and Indian Plumbing 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).**

   The Company from time to time makes representations to the associations concerning the areas of public good.

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 believes in conducting responsible business practices that emphasize on social and economic issues to achieve inclusive growth. It believes in equitable development, taking into account the interests of the business community, fairness in the treatment of employees, and sustainability in protecting and enhancing resources (human and others) in responding to an array of social and environmental needs.

   The Company is carrying out project for yoga, various healthcare activities for senior citizens and allied social service activities for public at large at Ahmedabad, Gujarat, India. The Company is undertaking the said project through Astral Charitable Trust and which has constructed multi-storied building in Ahmedabad for aforesaid purposes. Yoga activities for all age group of people, health care activities and awareness programs, blood donation camps and other allied activities are conducted by the said trust on an ongoing basis.

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

   The program is undertaken through a Charitable Trust viz. Astral Charitable Trust / Directly.

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

   No impact assessment is made at this stage.

4. **What is your company's direct contribution to community development projects/CSR amount in INR and the details of the projects undertaken.**

   The Company's monetary contribution to community development projects/ CSR in FY 2018-19 was ₹ 220 Lacs. Till date, the Company has contributed ₹ 1006 Lacs. Details of CSR initiatives undertaken by the Company are set out in the corporate social responsibility section of this Annual Report.

5. **Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.**

   Company's community development programs have sprung from the needs of the local community and public at large and hence adoption of the initiatives have become very smooth and successful.

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.**

   The Company is committed to continuously exceed customer expectations. Customer satisfaction is the key to our growth and success in this line of business. The Company strives hard to provide better products and greatest value to its customers. There are no customer complaints/consumer cases pending at the end of the financial year.

2. **Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/ N.A. /Remarks(additional information)**

   The Company displays all product information on the product label, which is mandatory and as may be required for the use of the products by the consumers.

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. If so, provide details thereof, in about 50 words or so.**

   There are no cases filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years.

4. **Did your company carry out any consumer survey/ consumer satisfaction trends?**

   The Company does from time to time carry our customer satisfaction surveys.