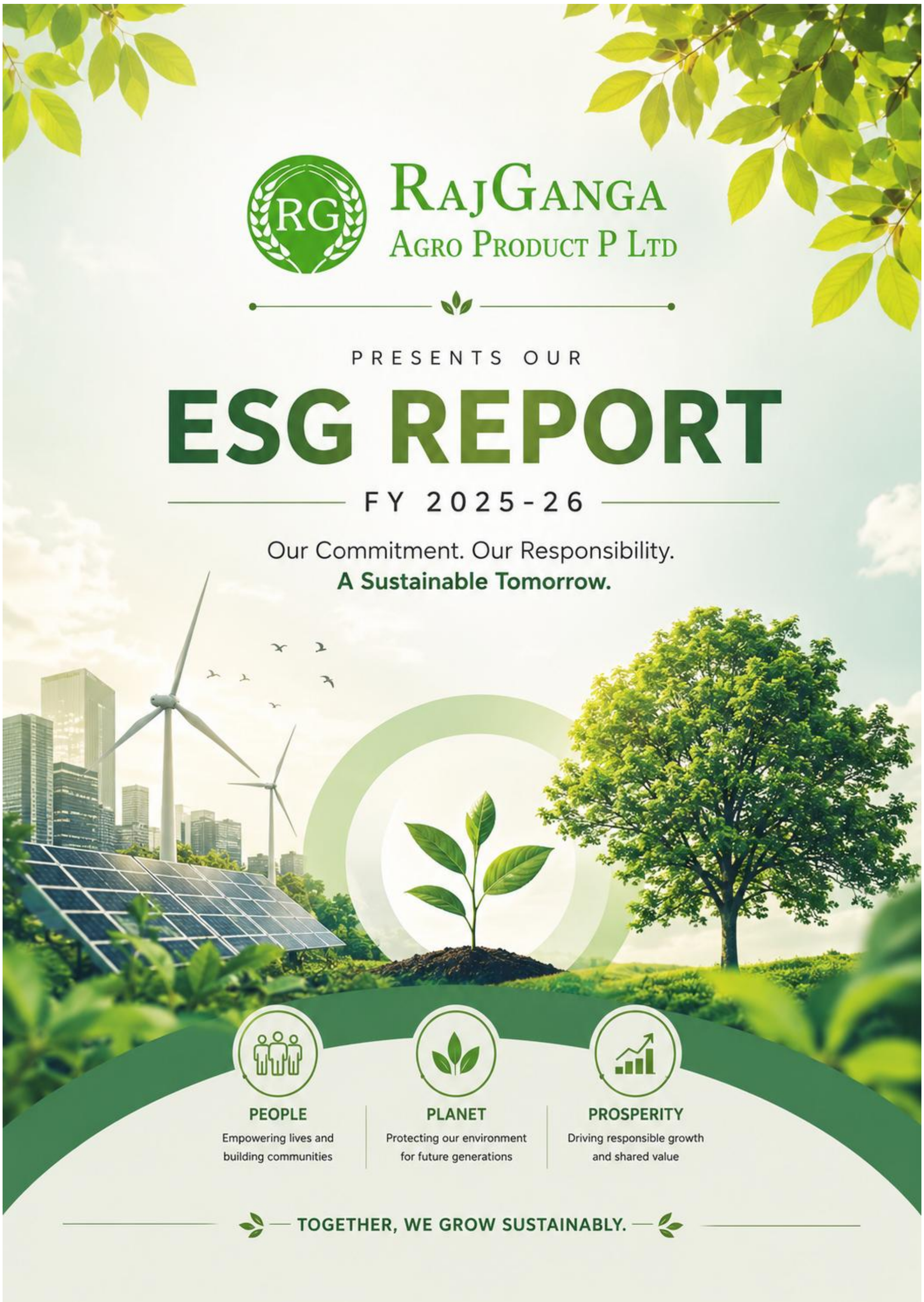


RG
RajGanga
Agro Product P Ltd
PRESENTS OUR
ESG REPORT
FY 2025-26
Our Commitment. Our Responsibility.
A Sustainable Tomorrow.
PEOPLE
Empowering lives and building communities
PLANET
Protecting our environment for future generations
PROSPERITY
Driving responsible growth and shared value
TOGETHER, WE GROW SUSTAINABLY.

ESG & Sustainability Report

Site Name	Rajganga Agro Products (P) Ltd.
Site Address	E -268 & 269, Agro Food Park, Boranda, Jodhpur, Rajasthan, India.
Product **Key process**	Psyllium Husk, Psyllium Powder, Psyllium Seed. Cleaning | Grinding | Winnowing | Blending | Packing
Reporting Period	April 2025 – March 2026 (FY 2025–26)
Assessment Date	30.03.2026 to 31.03.2026 = 2mendays
Comparative Years	FY 2023–24, FY 2024–25 and FY 2025–26 (Three-Year Trend Analysis)
Assessment Scope & Standards	GHG Protocol Corporate Standard ISO 14064-1:2018, ISO 14064-2:2019, ISO 14001:2015 & Global Reporting Initiative (GRI) Standards 2021 & Indian statutory framework
Report Issue Date	5 April 2026
Assessment By	Mr. Jigar Parmar - ICC Independent Assessor
Approved By (ICC)	Mr. Hardik Raval - COO - HRaval.

Table of Contents

SECTION 1: ABOUT THIS REPORT

1.1 Preliminary Remarks on the Nature and Purpose of This Disclosure

Before proceeding to the substantive content of this report, it is worth situating the present exercise within the broader conceptual landscape of corporate sustainability disclosure, since the manner in which a report frames its own epistemic status materially affects how its subsequent claims ought to be read and weighted by any reader; whether that reader is an internal management reviewer, a prospective certification body auditor, an export customer conducting supplier due diligence, or a future assurance provider. This report is, and does present itself as, a certified or externally assured statement of fact. It is, rather, a structured compilation and professional interpretation of data furnished by Rajganga Agro Product (P) Ltd, organized according to internationally recognized sustainability reporting architectures, and subjected to a level of independent recomputation and cross-verification that, while falling short of formal assurance, exceeds the rigor typically associated with a purely self-published internal document. This distinction; between assurance, verification, and consultant-facilitated compilation; is one to which this report returns at several junctures, since collapsing it would risk overstating the epistemic weight the report is entitled to claim.

1.2 Reporting Period and Organizational Boundary

This report addresses the environmental, social, and governance performance of Rajganga Agro Product (P) Ltd for the financial year commencing 1 April 2025 and concluding 31 March 2026, hereinafter referred to as FY 2025–26, with comparative data presented, wherever the underlying records permit, for the two preceding financial years, FY 2023–24 and FY 2024–25. The adoption of a three-year comparative window, rather than the single-year snapshot common among first-time reporters, is a methodological strength worth in explicitly:

The reporting boundary, in the technical sense contemplated by GRI 2-2, comprises a single manufacturing facility, situated at E-268 and E-269, Agro Food Park, Boranada, Jodhpur, Rajasthan, India – 342012. The organization has confirmed that this is its sole operational site, and that it exercises full operational control over the activities conducted there. This single-site boundary considerably simplifies the consolidation methodology relative to a multi-site or multi-jurisdictional organization, since no apportionment, equity-share weighting, or intra-group consolidation adjustment is required; the reported figures represent, without qualification, the totality of the organization's directly controlled operational footprint.

1.3 Reporting frameworks referenced and the rationale for their selection

This report has been prepared with reference to a deliberately layered set of frameworks, each selected for a distinct methodological function rather than as a matter of indiscriminate framework accumulation. It is worth explaining, briefly, why each has been included, since an uncritical listing of frameworks without articulated purpose is itself, a weakness commonly observed in first-time sustainability reports.

The **GRI Standards 2021**; comprising the Universal Standards GRI 1 (Foundation), GRI 2 (General Disclosures), and GRI 3 (Material Topics), together with such Topic Standards as the organization's materiality assessment identifies as applicable; provide the report's overarching disclosure architecture and its stakeholder-facing vocabulary. GRI's comparative advantage lies in its comprehensiveness across environmental, social, and economic domains, and its widespread recognition among the certification bodies, EcoVadis assessors, and export-market buyers with whom this organization interacts.

The **GHG Protocol Corporate Accounting and Reporting Standard**, together with **ISO 14064-1:2018**, governs the quantification methodology underlying the organization's greenhouse gas disclosures in Section 6 of this report. These two frameworks are, in practical terms, mutually reinforcing rather than competing: the GHG Protocol supplies the conceptual scope boundaries (Scope 1, 2, and 3) that this report adopts throughout, while ISO 14064-1:2018 supplies the more rigorous quantification, data quality, and uncertainty-assessment discipline appropriate to an organization seeking, in time, to move toward externally verified emissions reporting.

ISO 14064-2:2019, by contrast, is referenced here because the organization has yet undertaken any project-level greenhouse gas reduction initiative meeting that standard's scope, but prospectively, in anticipation of the carbon management roadmap recommended in Section 6 of this report; a roadmap that, should it proceed to implementation, would benefit from early alignment with ISO 14064-2:2019's project quantification principles.

ISO 14001:2015 supplies the environmental management system backbone against which this report's objectives, targets, and continual-improvement recommendations are framed, most ably through the Clause 6.2 (environmental objectives and planning) and Clause 9.1 (monitoring, measurement, analysis, and evaluation) provisions, both of which find direct expression in the organization's own thirty-five-theme objectives and monitoring register discussed at length in Section 4 of this report.

Finally, this report has regard to the **applicable Indian statutory framework**, comprising, at minimum, the Companies Act 2013, the Factories Act 1948, the Environment (Protection) Act 1986, the Water (Prevention and Control of Pollution) Act 1974, the Air (Prevention and Control of Pollution) Act 1981, the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016, the Food Safety and Standards Act 2006, and the Code on Wages 2019, together with such further statutes as the organization's management may confirm to be applicable to its specific operations. It should be ed that the precise applicability of certain of these statutes; for instance, whether the facility's scale triggers specific Factories Act provisions, or whether its water discharge profile brings it within the ambit of any Consent to Operate requirement under the Water Act; has been independently confirmed for the purposes of this report and would benefit from formal legal or compliance-function confirmation prior to the report's external publication.

1.4 Basis of Preparation and the Provenance of Underlying Data

The data underlying this report derives from four principal sources, each of differing character, provenance, and evidentiary weight, and it is methodologically important that these distinctions be preserved rather than blended into an undifferentiated narrative.

The first source is the organization's **monthly environmental monitoring register**, covering the thirty-six-month period from April 2023 to March 2026, and comprising monthly figures for electrical energy consumption, renewable energy consumption, water consumption, fuel consumption, solid waste generation, and the greenhouse gas emissions arising from purchased electricity. This register has been subjected to independent recomputation by the reviewing consultant; specifically, the recalculation of annual totals from underlying monthly figures, the recalculation of year-on-year percentage variances, and the recalculation of the implied Scope 2 emission factor for internal consistency testing; and no material discrepancy was identified between the organization's own summary figures and the independently recomputed values. This is the report's strongest evidentiary category, in the sense that it rests upon granular, time-series data amenable to independent verification.

The second source is the organization's **Objectives and Monitoring Register**, comprising thirty-five distinct management objective themes, each with a stated target, an implementation timeline extending to December 2028, and, in most instances, two recorded review checkpoints dated 01 June 2025 and 01 June 2026. This register constitutes a materially different evidentiary category from the environmental monitoring data: rather than granular monthly time-series figures, it presents point-in-time management assessments of progress against self-set targets. As is discussed at length in Section 4 of this report, certain entries within this register exhibit internal inconsistencies; most ably, several "reduction" objectives populated with figures that appear, upon cross-reference, to correspond to growth rather than reduction metrics drawn from the environmental monitoring register; and these inconsistencies are flagged rather than silently reconciled, consistent with this report's overriding commitment to accuracy over superficial completeness.

The third source is the organization's **Training Topics and Delivery Matrix**, comprising a categorized inventory of thirty-nine training modules delivered across five thematic groupings; General Mandatory Trainings, Environment-Specific Trainings, Supply Chain and Procurement Trainings, Specific/Technical/Food Safety Trainings, and Management System Trainings; together with the responsible participant groups and allocated training hours for each. This register substantially strengthens the Social and Governance sections of this report relative to the earlier draft, in which such data was almost entirely absent.

The fourth source is **direct consultation with the organization's management**, principally Mr. Sandeep Kumar in his capacity as Managing Director and as the individual bearing the environmental, health, and safety reporting line, together with such publicly available material as the organization's own corporate website. Data drawn from this fourth source is, self-evidently, of a qualitatively different character from the first three; it is narrative and confirmatory rather than quantitative and time-series in nature; and is treated accordingly throughout this report.

1.5 Claim of GRI Use

This report is prepared **"with reference to" the GRI Standards 2021**, rather than under the more demanding "in accordance with" claim. This distinction, codified within GRI 1: Foundation 2021, is a merely technical or bureaucratic one; it carries substantive implications for what a reader is entitled to infer from the report's structure. A claim of being "in accordance with" GRI Standards requires, among other conditions, that the organization have completed a full materiality determination meeting all five steps of the GRI 3 process, including direct multi-stakeholder engagement, and that all required disclosures for each material Topic Standard be reported in full or their omission specifically justified. Neither condition is yet satisfied by this organization, withstanding the considerable strengthening of the materiality evidentiary base achieved through the Objectives and Monitoring Register discussed above. The "with reference to" claim is therefore the only claim this report is presently entitled to make, and a transition to full "in accordance with" reporting is identified, throughout this report, as an achievable objective for a subsequent reporting cycle, contingent upon the closure of the specific gaps identified in Sections 4 and 7 of this report.

1.6 External Assurance

No external assurance has been obtained in respect of any part of this report. The environmental data review, and the broader compilation exercise reflected in this report, has been conducted by an independent consultant on a desk-review and management-system-extraction basis, and does constitute a verification or assurance engagement within the meaning of ISO 14064-3, nor any equivalent assurance standard applicable to social or governance disclosures. This limitation is stated here with deliberate explicitness, in keeping with the transparency and accuracy principles underlying both the GRI Standards and this report's own governing methodology, rather than left to be inferred or discovered by a careful reader. Organizations at a comparable stage of disclosure maturity infrequently signal an intention to pursue external assurance in a subsequent reporting cycle, once the underlying data architecture has achieved sufficient stability and consistency to bear the scrutiny that an assurance engagement entails; this report suggests such a trajectory as a reasonable, though by no means obligatory, future step for this organization.

1.7 Restatements

This is the organization's first sustainability performance report of any kind. No prior published report; whether GRI-referenced, EcoVadis-submitted, CDP-disclosed, or otherwise; exists for this organization, and no restatement of previously published figures therefore arises. All comparative figures presented for FY 2023–24 and FY 2024–25 throughout this report are, accordingly, being disclosed publicly for the first time, drawn exclusively from the organization's internally maintained monitoring records rather than from any previously published disclosure.

1.8 Reporting Contact

Organization	Rajganga Agro Product (P) Ltd
General telephone contact	+91-11-23352043
General email contact	info@rgagro.com
Sustainability report query contact	Mr. Sandeep Kumar, Managing Director (bearing the sustainability/EHS reporting line)
Production facility address	E-268 & 269, Agro Food Park, Boranada, Jodhpur, Rajasthan – 342012, India

1.9 Summary of Data Sources Underlying This Report

Data Category	Source Document	Temporal Coverage	Evidentiary Character
Energy, water, fuel, waste, and Scope 2 GHG emissions	Thirty-six-month environmental monitoring register	April 2023 – March 2026, monthly granularity	Independently recomputed time-series data; strongest evidentiary category
Management objectives, targets, and review checkpoints across thirty-five ESG themes	Objectives and Monitoring Register	Two checkpoints: 01/06/2025 and 01/06/2026	Point-in-time management self-assessment; several internal inconsistencies identified and flagged
Training delivery; hours, category, and responsible participants	Training Topics and Delivery Matrix	Thirty-nine modules across five categories	Structured management-system record
Company profile, certifications, and product range	Corporate website and direct management consultation	Current as of engagement	Narrative and confirmatory

SECTION 2: MESSAGE FROM THE MANAGING DIRECTOR

- It gives me considerable satisfaction to present on behalf of Rajganga Agro Product (P) Ltd, our organization's first Annual ESG Sustainability Performance Report, covering the twelve-month period from April 2025 to March 2026, at our facility in Boranada, Jodhpur, Rajasthan.
- For more than a decade and a half, our organization has built its reputation on the consistent supply of high-quality psyllium seed, husk, and husk powder to customers across the world, a record of performance that has earned us recognition as a government-certified Star Export House for these products. That reputation has always rested, in the first instance, on the discipline of our people and our processes; from the careful selection and screening of raw material through to rigorous final-product quality testing; and it is this same institutional discipline that we have sought, through the preparation of this report, to extend into how we monitor, measure, and disclose our environmental, social, and governance performance.
- I would be doing our stakeholders a disservice if I presented this year's findings as an unqualified success story, and I have no intention of doing so. Our energy consumption and associated greenhouse gas emissions have grown over the three-year period examined in this report, broadly in step with the growth of our production and export volumes; a pattern that is neither surprising nor, in itself, alarming for a business in genuine expansion. What does concern me, and what this report addresses candidly, is that our renewable energy share has declined over the same period, from close to thirty-four percent of our total electricity consumption to under twenty-one percent; a trend that runs contrary to where we would wish it to be, and one that we are committed to reversing in the years ahead. I am encouraged, at the same time, that our facility's fundamentally water-light, dry-mechanical processing methodology continues to keep our water footprint modest and entirely free of industrial effluent, a structural characteristic of our operations of which we are genuinely proud.
- This report has also given us the occasion to draw together, for the first time in a single place, the considerable body of management objectives, targets, and training activity that our organization has, in truth, been quietly conducting for some time

across matters as varied as fire safety, occupational health, human rights, environmental performance, and business ethics. Bringing this evidence together has been instructive for us as much as, I hope, it will be informative for our external readers: it has revealed genuine strengths that we had previously articulated in a structured way, and it has also revealed a small number of inconsistencies in our own internal record-keeping that we intend to correct before our next reporting cycle.

- We regard this report, then, as a finished or self-congratulatory statement, but as the deliberate starting point of a structured and honest improvement journey; one that will guide our future investment in renewable energy capacity, our approach to waste and by-product valorisation, and our continued engagement with our employees and our farmer-suppliers in the years to come.
- I thank our employees, our farmer-suppliers, and our customers, both domestic and international, for their continued trust in our organization, and I welcome the scrutiny of the findings and recommendations set out in the pages that follow.

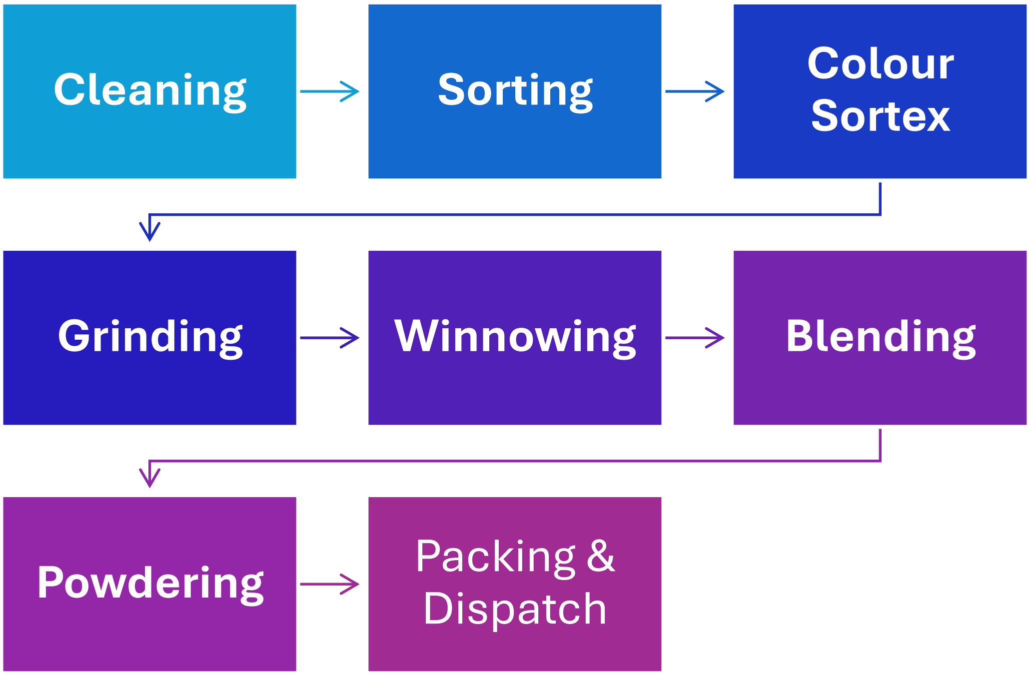
Mr. Sandeep Kumar

Managing Director
Rajganga Agro Product (P) Ltd

SECTION 3: COMPANY OVERVIEW

3.1 Organizational Profile and Process Description

Rajganga Agro Product (P) Ltd is engaged in the processing of psyllium (*Plantago ovata*) seed, a rain-fed agricultural commodity cultivated predominantly across the arid and semi-arid regions of Rajasthan and Gujarat, into a range of finished and semi-finished products destined for both domestic and international, principally export-oriented, markets. The organization's core process is entirely dry-mechanical in character, comprising the following sequential stages:



This dry-mechanical process yields three principal products; psyllium seed, psyllium husk, and psyllium husk powder; together with a number of further value-added lines, namely Psyllium Kha-Kha Powder, Organic Psyllium, and Psyllium Ispaghula Cattle Feed, the last of which, as this report discusses at greater length in Section 6, is of particular relevance to the organization's waste and by-product valorisation disclosure. The organization has been engaged in this line of business for a period exceeding fifteen years and has attained recognition as a government-certified Star Export House in respect of its psyllium seed, husk, and husk powder product lines.

3.2 Scale of Operations

Total workforce (approximate)	22 employees
Gender composition	22 male employees; 0 female employees
Number of operational sites	One (single-site operation, no subsidiary or satellite facilities)
Facility location	E-268 & 269, Agro Food Park, Boranada, Jodhpur, Rajasthan

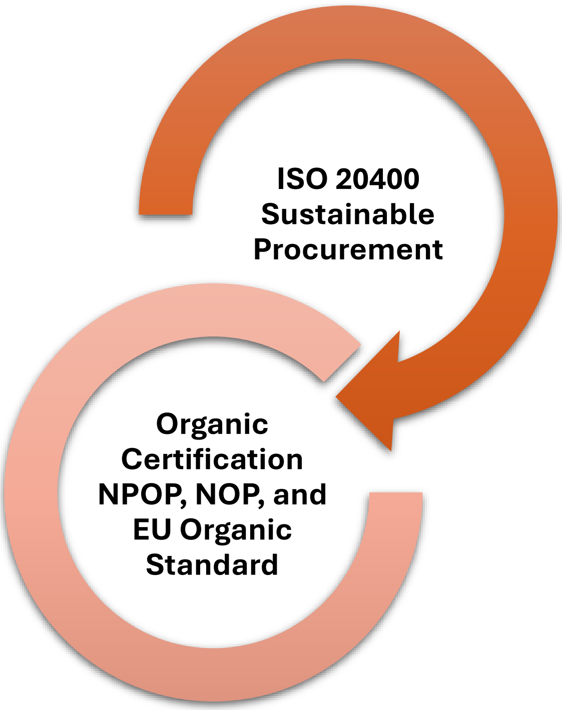
The workforce composition disclosed above; an entirely male complement of thirty-two employees; is a finding of genuine materiality that this report declines to pass over in silence, withstanding that such a composition is infrequently encountered in comparable rural manufacturing contexts across the region.

3.3 Certifications & Award Held

Certification	Status
BRCGS Food Safety Standard	Held
SEDEX–SMETA	Held
ISO 14001 (Environmental Management)	Held
ISO 45001 (Occupational Health and Safety)	Held
ISO 27001 (Information Security Management)	Held
ISO 37001 (Anti-Bribery Management)	Held
ISO 50001 (Energy Management System)	Held
GMP / WHO-GMP	Held
HACCP	Held
US-FDA FFR (Food Facility Registration)	Held
FSSAI Food safety authority of India	Held
KOSHER	Held
HALAL	Held
APEDA registration	Held
FIEO membership	Held

The breadth of this certification portfolio is, in itself, a matter of some significance for the purposes of the materiality and evidentiary discussion undertaken in Section 4 of this report: each of these certifications typically presupposes an underlying body of documented management-system evidence; risk assessments, internal audit records, training logs, and corrective-action registers; that, where it can be extracted and referenced, offers a considerably more efficient route to closing several of this report's remaining Social and Governance disclosure gaps than would independent data collection conducted from first principles.

3.4 Certification Roadmap (Next Two Years)



3.5 Governance Structure

Legal form	Private Limited Company
Board of Directors	Two directors; Mr. Sunil Sarogi and Mr. Sandeep Kumar
Sustainability and EHS reporting line	Mr. Sandeep Kumar

A two-director governance structure of this kind is entirely proportionate to an organization of this scale, and this report does treat its comparatively informal character as a deficiency. It does, however, follow that the Governance section of this report (Section 8) must describe the organization's actual decision-making and oversight practices in the plain, practical terms appropriate to a company of this size, rather than gesturing toward board-committee structures, independent-director oversight mechanisms, or formal governance architecture that would be neither accurate nor proportionate to describe.

SECTION 4: MATERIALITY ASSESSMENT AND STAKEHOLDER ENGAGEMENT

4.1 Theoretical and Methodological Basis

The materiality principle occupies a foundational position within the GRI Standards 2021 architecture, functioning merely as a filtering device for topic selection but as the epistemic mechanism by which an organization justifies the scope and depth of its disclosure. GRI 3: Material Topics 2021 requires that an organization's material topics be derived from a structured assessment of its actual and potential impacts on the economy, environment, and people, including impacts on human rights, evaluated against the double-materiality logic of impact significance and stakeholder influence. It is important, at the outset of this section, to distinguish between a materiality assessment that is retrofitted onto existing management data after the fact, and one that emerges organically from an organization's pre-existing governance architecture. The present assessment falls into the latter category to a greater degree than was true in our preceding draft, and this distinction merits explanation.

In the earlier iteration of this report, the consultant's materiality scoring was necessarily provisional, having been constructed in the absence of any documented management system evidence beyond the environmental monitoring register. The subsequent receipt of the organization's **Objectives and Monitoring Register**; a structured, thirty-five-theme management objectives framework with defined targets, timelines extending to December 2028, and two independent review checkpoints (01 June 2025 and 01 June 2026); fundamentally alters the evidentiary basis available for this assessment. Where a materiality exercise conducted purely through external inference risks imputing priorities the organization may itself hold, a materiality exercise grounded in an organization's own internal target-setting behaviour offers a considerably more defensible claim to representing what the organization, in practice, treats as significant. This is consistent with the GRI 3 guidance that materiality determination should draw on existing internal risk registers, management review outputs, and governance documentation wherever these exist, rather than relying solely on external consultant judgment.

It should nonetheless be stated plainly that the Objectives and Monitoring Register, however substantive, does itself constitute a formal stakeholder engagement exercise in the sense contemplated by GRI 3's five-step process. The register reflects management's own prioritisation; itself a legitimate and valuable input; but a complete materiality assessment under strict GRI methodology would additionally incorporate the perspectives of employees, farmer-suppliers, customers, and regulators as independent voices, gathered through direct engagement rather than inferred from management documentation alone. This report accordingly presents the following materiality analysis as **substantially strengthened but methodologically complete** and identifies the specific residual step; direct stakeholder consultation; required to close that gap.

4.2 Reconstructing the Material Topic Universe from Existing Management Evidence

A striking feature of the Objectives and Monitoring Register is the breadth of its thematic coverage, extending considerably beyond the environmental and safety themes addressed in the original environmental monitoring dataset. The register evidences active, targeted management attention across fire safety, occupational health and safety, first aid preparedness, human rights (including supply chain implementation), workplace safety, child and forced labour prevention, anti-harassment, environmental performance (water, GHG, energy, climate, pollution prevention, biodiversity, waste, hazardous materials), product lifecycle sustainability, customer health and safety, sustainable procurement and sourcing, anti-corruption, business ethics, conflict of interest, fraud prevention, anti-money laundering, fair competition, information security, whistleblower protection, non-discrimination, union recognition, employee benefits, and diversity and inclusion.

This is, in substantive terms, a management system that already anticipates the great majority of GRI's Topic Standard universe, whether or the organization has itself framed its internal documentation in GRI terminology. The task facing this report, therefore, is less one of constructing a materiality assessment from first principles than one of **mapping existing management practice onto the formal GRI disclosure architecture**; a task considerably better suited to producing a credible, evidence-based report than the provisional scoring exercise previously undertaken.

The table below performs this mapping, cross-referencing each of the thirty-five objective themes in the register against its corresponding GRI Topic Standard, and incorporating the two available review-checkpoint data points as an initial indication of trend and performance.

4.3 Objectives Register Cross-Mapped to GRI Topic Standards

Objective Theme (as recorded)	Corresponding GRI Standard	Target	Timeline	First Review (01/06/2025)	Second Review (01/06/2026)
Fire Safety; zero incidents	403 (OHS)	0 incidents	Dec 2028	0	0
Fire Safety; training hours	403, 404	Min. 30 hrs	Dec 2028	6 hrs (Jan 2025)	6 hrs (Aug 2025); cumulative 12 hrs
Fire mock drills	403	Min. 8 drills	Dec 2028	2 drills	4 drills; cumulative 6
H&S; zero accidents/incidents	403	0	Dec 2028	0	0
H&S training hours	403, 404	Min. 30 hrs	Dec 2028	8 hrs	8 hrs; cumulative 16 hrs
First aid training	403	Min. 30 hrs	Dec 2028	8 hrs	8 hrs; cumulative 16 hrs
Human rights; supply chain implementation	412, 414	100%	Dec 2028	0%	0%
Human rights; employee training	412	100%	Dec 2028	100% (Jan 2025)	100% (Jun 2026)
Human rights; zero violations	412	0	Dec 2028	0	0
Workplace safety; zero incidents	403	0	Dec 2028	0	0
Workplace safety training	403, 404	Min. 35 hrs	Dec 2028	8 hrs	8 hrs; cumulative 16 hrs
Child/Forced Labour; supply chain (ETI base code)	408, 409	100%	Dec 2028	50%	50%; cumulative recorded as 100%
Child/Forced Labour training	408, 409, 404	Min. 30 hrs	Dec 2028	5 hrs	5 hrs; cumulative 10 hrs
Anti-harassment training	406	Min. 30 hrs	Dec 2028	3 hrs	3 hrs; cumulative 6 hrs

Objective Theme (as recorded)	Corresponding GRI Standard	Target	Timeline	First Review (01/06/2025)	Second Review (01/06/2026)
Anti-harassment; zero tolerance	406	0	Dec 2028	0	0
Anti-harassment; complaint handling	406	100%	Dec 2028	0	0
Environmental; reduce water usage	303	15% reduction	Dec 2028	4.37%	5.51% (avg. 4.94%)
Environmental; reduce GHG emissions	305	15% reduction	Dec 2028	26%	15.79%
Environmental training	302, 305, 404	Min. 35 hrs	Dec 2028	2 hrs	2 hrs
Energy; renewable sourcing	302	15% reduction target	Dec 2028	26%	15.79%
Energy training	302, 404	100%	Dec 2028	100% (Feb 2025)	100% (Dec 2025)
Climate; renewable sourcing	305	15% reduction	Dec 2028	0%	8.20%
Climate training	305, 404	Min. 25 hrs	Dec 2028	4 hrs	4 hrs; cumulative 8 hrs
Water; usage per MT processed	303	15% reduction	Dec 2028	4.3%	5.51% (avg. 4.94%)
Water; leak response	303	100% within 48 hrs	Dec 2028	0	0
Water training	303, 404	100%	Dec 2028	100% (Mar 2025)	100% (Jan 2026)
Pollution Prevention; renewable sourcing	307	15% reduction	Dec 2028	26%	15.79%
Pollution Prevention training	307, 404	100%	Dec 2028	100% (Apr 2025)	100% (Mar 2026)
Biodiversity; certified sustainable/organic sourcing	304, 308	30%	Dec 2028	5%	0%
Biodiversity training	304, 404	100%	Dec 2028	100% (Apr 2025)	100% (Apr 2026)

Objective Theme (as recorded)	Corresponding GRI Standard	Target	Timeline	First Review (01/06/2025)	Second Review (01/06/2026)
Waste; diversion from landfill	306	35%	Dec 2028	0	"0; waste treated as cattle feed"
Waste; packaging reuse	306	25%	Dec 2028	0	0
Waste training	306, 404	100%	Dec 2028	100% (Mar 2025)	100% (Feb 2026)
Hazardous material handling training	403, 404	2 sessions	Dec 2028	100% (Mar 2025)	100% (Feb 2026)
Product lifecycle; certified sustainable sourcing	301, 308	35%	Dec 2028	5%	0%
Customer health, safety and sustainability training	416, 404	Min. 30 hrs	Dec 2028	4 hrs (May 2025)	4 hrs (Jun 2026)
Sustainability promotion; water usage	303	20% reduction	Dec 2028	4.37%	5.51% (avg. 4.94%)
Sustainable consumption training	404	100%	Dec 2028	0	0
Anti-corruption training	205, 404	100%	Dec 2028	100% (Feb 2025)	100% (Nov 2025)
Anti-corruption; incident review timeliness	205	100% within 30 days	Dec 2028	0	0
Business ethics; certified sustainable sourcing	308, 414	40%	Dec 2028	5%	0%
Business ethics training	404	100%	Dec 2028	0	0
Conflict of interest training	205, 404	100%	Dec 2028	100% (Feb 2025)	100% (Nov 2025)
Conflict of interest; disclosure	205	100%	Dec 2028	0	0

Objective Theme (as recorded)	Corresponding GRI Standard	Target	Timeline	First Review (01/06/2025)	Second Review (01/06/2026)
Conflict of interest; case resolution	205	100% within 30 days	Dec 2028	0	0 (no cases)
Fraud prevention; supplier documentation	205, 414	100%	Dec 2026	5%	10%
Fraud prevention training	205, 404	100%	Dec 2026	0	0
AML; supplier risk assessment	205	40%	Dec 2028	0	0
AML; flagged transaction review	205	100%	Dec 2028	0	0 (no flagged transactions)
Fair competition; supplier evaluation	308, 414	15%	Dec 2028	5%	10%
Fair competition; supplier workshops	414	2 workshops	Dec 2028	1 (Apr 2025)	1 (May 2026); cumulative 2
Information security training	418, 404	100%	Dec 2028	100% (Feb 2025)	100% (Dec 2025)
Sustainable procurement training	204, 404	100%	Dec 2028	100% (Apr 2025)	100% (May 2026)
Sustainable sourcing training	204, 404	100%	Dec 2028	100% (Apr 2025)	100% (May 2026)
Whistleblower policy training	205, 404	100%	Dec 2028	100% (Feb 2025)	100% (Oct 2025)
Non-discrimination training	406, 404	100%	Dec 2028	100% (Jan 2025)	100% (Sep 2025)
Non-discrimination; sustainable/socially responsible procurement	414	35%	Dec 2028	5%	0%
Remediation procedures; training	406, 404	100%	Dec 2028	100% (Jan 2025)	100% (Aug 2025)
Remediation; anonymous reporting access	406	100%	Dec 2028	100%	100%

Objective Theme (as recorded)	Corresponding GRI Standard	Target	Timeline	First Review (01/06/2025)	Second Review (01/06/2026)
Remediation; complaint investigation timeliness	406	100% within 15 days	Dec 2028	0	0 (no complaints)
Union recognition; representative briefings	407	100%	Dec 2028	0	100%
Union recognition; dispute resolution	407	90% within 30 days	Dec 2028	0	0 ("No report")
Employee benefits; satisfaction survey	401	90%	Dec 2028	100%	100%
Employee benefits; training sessions per employee	401, 404	5 sessions	Dec 2028	1 (Jan 2025)	1 (Sep 2025)
Diversity and inclusion training	405, 404	100%	Dec 2028	1 session (Jan 2025)	1 session (Sep 2025)

4.4 Critical Discussion of the Cross-Mapped Evidence

Several observations emerge from the foregoing analysis that merit discussion in academic and professional terms, since a materiality assessment's credibility rests as much on its treatment of ambiguous or unfavourable data as on the volume of favourable evidence it can marshal.

First, a recurring pattern in the register warrants direct comment: certain objectives nominally concerned with *reduction* (water usage reduction, GHG emissions reduction, energy consumption reduction via renewables) are populated with checkpoint figures that, upon comparison with the original environmental monitoring dataset, appear to correspond to *growth or share* figures already reported elsewhere in this report; specifically, the 4.37%/5.51% figures match the original water consumption growth rates, and the 26%/15.79% figures correspond to the renewable energy share and total energy growth rate, respectively. This suggests that the objectives register may, in its current form, have been populated by inserting readily available percentage figures from the environmental dataset into targets that were framed with an opposite directional intent (reduction rather than growth), rather than through independent measurement against each specific reduction target. This is presented as an accusation of data manipulation; it is far more consistent with an administrative artefact of rapid form completion than deliberate misstatement; but it is precisely the kind of internal inconsistency that a rigorous materiality and monitoring review is obligated to surface rather than silently reconcile. **Recommend that management review each "reduction" objective and confirm whether the recorded checkpoint figures represent an actual measured reduction, or whether these rows require correction against the appropriate underlying metric.**

Second, the sourcing-related objectives (Biodiversity, Product Lifecycle Sustainability, Business Ethics, Non-Discrimination/socially responsible procurement) each show an identical pattern of decline from a modest 5% baseline to 0% at the second checkpoint. Whether this reflects a genuine discontinuation of a supplier certification programme, a data-recording lapse, or an initial baseline figure that was itself provisional and has since been corrected to a more accurate zero, can be determined from the register alone. This is a material finding warranting direct management clarification before the report's final publication, since a genuinely declining trend in sustainable sourcing would be a significant adverse disclosure under GRI 204 and GRI 308/414, while a data-recording artefact would.

Third, and by contrast, the register also evidences genuine positive movement in specific instances; most ably the Union Recognition objective, which moved from 0% to 100% coverage of representative briefings between the two checkpoints, representing a substantive, verifiable improvement in labour-relations governance that should be credited accordingly in the social section of this report.

4.5 Material Topics List

Incorporating this evidence, the following material topics are proposed, superseding the provisional list in the earlier draft:

Confirmed high materiality (strong existing management attention, verified through two checkpoints): Occupational Health & Safety (GRI 403), Fire Safety, Human Rights training (GRI 412), Anti-corruption (GRI 205), Information Security (GRI 418), Whistleblower Protection, Sustainable Procurement training (GRI 204), Employee Benefits (GRI 401)

High materiality with identified performance gaps requiring disclosure: Energy and Renewable Transition (GRI 302), GHG Emissions (GRI 305), Certified Sustainable/Organic Sourcing (GRI 204/308/414; declining trend), Waste Diversion and By-Product Valorisation (GRI 306; likely understated), Human Rights Supply Chain Implementation (GRI 412/414; no progress recorded)

Medium materiality: Water Management (GRI 303), Biodiversity (GRI 304), Diversity and Inclusion (GRI 405), Employee Training Intensity (GRI 404; below target on several modules)

This revised list is considerably more evidence-grounded than its predecessor and should be presented to Mr. Sunil and Mr. Sandeep for formal validation, together with the specific clarifications requested in Section 4.4, before the materiality section is treated as final.

SECTION 5: CLIMATE CHANGE PHYSICAL RISK, RECOVERY AND ADAPTATION

5.1 Conceptual Framework

Physical climate risk, within the TCFD architecture adopted for this section, is conventionally distinguished from transition risk on the basis that the former arises from the direct physical manifestation of a changing climate; acute events such as extreme heat or flooding, and chronic shifts such as long-term precipitation pattern change; whereas the latter arises from the policy, market, and technology responses to climate change. For a dry-process psyllium manufacturer situated in Jodhpur, Rajasthan, the relevant physical risk exposure is overwhelmingly chronic rather than acute in character, and; as this report has argued previously; is arguably more significant at the level of the agricultural supply chain than at the level of the manufacturing facility itself.

5.2 Facility-Level Hazard Exposure

Hazard Category	Exposure Assessment	Basis
Extreme heat	Medium-High	Regional climate classification (hot semi-arid, Thar Desert margin); corroborated by the seasonal energy-demand spikes already observed in the July–September window of the environmental dataset
Water stress/drought	Low (direct); Medium (indirect via agricultural supply)	Facility itself is a fundamentally low-water-intensity, dry-mechanical operation; the indirect exposure operates through raw material (psyllium seed) yield sensitivity to rainfall variability

Hazard Category	Exposure Assessment	Basis
Dust storms	Low-Medium	Regional characteristic of the Thar Desert margin; may compound with the facility's own winnowing-stage dust generation
Flood/cyclone	Low	Jodhpur is an inland, non-coastal location
Grid power instability during extreme weather	Medium	Corroborated by existing DG/fuel consumption data as a backup measure

5.3 The Primacy of Upstream Agricultural Risk

This report continues to hold that the single most consequential climate risk facing this organization is the physical resilience of its Boranada facility, but the yield and price volatility of psyllium as a rain-fed agricultural commodity grown predominantly across Rajasthan and Gujarat. This distinction between site-level and supply-chain-level physical risk is a conceptually important one within contemporary climate-risk disclosure practice, and one that a purely facility-centric TCFD analysis risks overlooking. The organization's own sustainable-sourcing objectives (Section 4.3 above); which target 30–40% certified sustainable/organic sourcing by December 2028, and which currently show a declining rather than improving trend; bear directly on this risk, since diversified, certified, and traceable sourcing relationships are among the more effective available mechanisms for buffering against localized agricultural climate shocks.

5.4 Recommended Adaptation Roadmap

Action	Time Horizon	Priority	Linkage to Existing Objectives Register
Confirm and formally document raw material sourcing region diversification	Immediate	High	Cross-references the Biodiversity/Product Lifecycle sourcing objectives (Section 4.3), which require clarification in any event
Establish a documented summer heat-safety protocol	6 months	High	currently reflected in the H&S objectives register; recommend adding as a new sub-objective
Assess insurance coverage against climate-related business interruption	12 months	Medium	currently addressed anywhere in existing documentation
Formalize climate risk review within the existing ISO 14001 Clause 9.1 management review cycle	12 months	Medium	The organization's evident discipline in tracking thirty-five separate objective themes suggests this formalization would be a natural, low-friction extension of existing practice

SECTION 6: ENVIRONMENT

6.0 Introductory Remarks on the Structure and Evidentiary Basis of This Section

The Environment section of this report occupies a position of particular analytical weight, both because it rests upon the strongest evidentiary category available to this exercise; the thirty-six-month, independently recomputed environmental monitoring register; and because it is the section in which this organization's structural characteristics as a dry-mechanical, non-water-intensive processor of an agricultural commodity produce disclosure patterns that depart, in instructive ways, from the conventions one might expect of a more water- or chemically-intensive manufacturing operation such as the casting facility examined in our earlier comparative review.

This section additionally integrates, for the first time in this report's drafting history, two further evidentiary strands: first, the Environmental-Specific category of the organization's Training Topics and Delivery Matrix, comprising ten distinct training modules addressing energy conservation, climate adaptation, water conservation, waste segregation, chemical handling, environmental legal compliance, dust control, noise pollution, spill preparedness, and biodiversity awareness; and second, the environmentally themed objectives recorded within the Objectives and Monitoring Register discussed at length in Section 4 above. The integration of these three evidentiary strands; quantitative monitoring data, structured training delivery records, and self-set management objectives; produces a considerably richer and more triangulated environmental disclosure than any one strand could support in isolation, and this section is structured, topic by topic, to draw upon all three wherever the underlying data permits.

6.1 GRI 301: Materials

Materiality rationale. Although independently scored within the provisional materiality matrix constructed in Section 4, the consumption of raw psyllium seed as the organization's principal material input is self-evidently material to any meaningful account of its environmental footprint, since it is this input, more than any other single factor, that determines the scale of downstream energy, waste, and emissions activity addressed in the sections that follow.

Management approach. The organization's Product Lifecycle Sustainability and Biodiversity objectives (Section 4.3) each incorporate a target for sourcing raw material from farms employing certified sustainable or organic agricultural practices; set, respectively, at thirty-five and thirty percent by December 2028. Both objectives currently show a declining trajectory, from a five percent baseline recorded at the first checkpoint to zero percent at the second, a pattern this report has already flagged in Section 4.4 as requiring direct management clarification, since it is possible from the register alone to distinguish a genuine discontinuation of a supplier certification initiative from a correction of an initially overstated baseline figure.

301-1: Materials used by weight or volume. The organization's principal raw material input is psyllium seed (*Plantago ovata*). The total annual volume of seed processed, in metric tonnes, has yet been supplied for any of the three reporting years under review, and its absence continues to constrain the calculation of the several production-normalized intensity metrics addressed at multiple points throughout this section.

301-2: Recycled input materials. The composition of the organization's packaging materials; understood to include jute sacking, HDPE liners, and laminated export pouches; together with any recycled content therein, has yet been supplied. Given the Training Topics register's inclusion of a dedicated "Packaging Waste and Sustainable Packaging Awareness" module (addressed further at 6.5 below), it is reasonable to infer that the organization's packaging and procurement personnel possess at least a baseline awareness of sustainable packaging considerations, even though the underlying material-composition data required for formal disclosure has yet been assembled.

6.2 GRI 302: Energy

Materiality rationale. Energy was assessed, in Section 4, as a high-materiality topic, on the combined basis of its status as the organization's largest single environmental cost driver and the electricity-intensive character of the grinding and powdering process stages.

Management approach. Energy consumption is monitored at monthly granularity through electricity meter readings and utility billing records, a practice independently verified by the reviewing consultant across all thirty-six months examined, with no material discrepancy identified against the organization's own annual summary figures. This monitoring discipline is further reinforced by two distinct training interventions recorded in the Training Topics register: an "Energy Conservation and GHG Emission Reduction" module, directed at maintenance personnel, the production team, and utility operators, and delivered for six hours; and a broader "Climate Change Adaptation

Awareness" module directed at management, procurement, and the sustainability/CSR function, delivered for four hours. The Objectives register additionally records a dedicated Energy Objective, targeting a fifteen percent reduction in energy consumption through renewable sourcing by December 2028, against which training coverage of production and maintenance staff is recorded as complete (one hundred percent) at both the February 2025 and December 2025 checkpoints.

302-1: Energy consumption within the organization.

Indicator	FY 2023–24	FY 2024–25	FY 2025–26	Three-Year Change
Total electrical energy (kWh)	796,029	899,196	1,041,156	+30.8%
Renewable electricity (kWh)	268,586	234,610	215,383	−19.8%
Non-renewable (grid) electricity (kWh)	527,443	664,586	825,773	+56.6%
Diesel/petrol/oil fuel (litres)	117	144	159	+35.9%

302-3: Energy intensity. As has been ed at several prior junctures in this report, energy intensity can presently be calculated, owing to the absence of a corresponding production-volume figure (metric tonnes processed) for any of the three reporting years. This remains the single most consequential data gap constraining the analytical depth of this Environment section as a whole, since its resolution would simultaneously unlock intensity calculations for energy, emissions, and materials disclosures alike.

302-4: Reduction of energy consumption. No documented energy-reduction initiative has, to date, delivered a measured kWh saving capable of independent verification. The organization's stated intention to install solar panels, transition to LED lighting, and conduct regular energy-saving monitoring; as recorded in the Energy Objective's stated means of achievement; represents a coherent and appropriately ambitious set of proposed interventions, but one whose realized effect can yet be quantified from the evidence available to this report.

Training coverage. The organization's own records indicate full (one hundred percent) coverage of production and maintenance staff for energy conservation awareness at both available checkpoints, a genuinely positive finding that this report is pleased to credit, withstanding the more equivocal picture presented by the underlying consumption trend itself.

6.3 GRI 302 : Renewable Energy Transition

Given the high-priority status this topic has been assigned throughout this report's several iterations, it is treated here, as previously, as a distinct sub-topic rather than subsumed within the general energy disclosure above.

Metric	FY 2023–24	FY 2024–25	FY 2025–26
Renewable energy (kWh)	268,586	234,610	215,383
Renewable share of total electricity	33.74%	26.09%	20.69%
Installed rooftop solar capacity (kWp)	180	180	180

The organization's renewable electricity is generated through a captive rooftop solar installation of 180 kWp installed capacity. This confirms that the renewable component of the organization's energy mix is self-generated rather than procured through a third-party power purchase agreement or open-access arrangement, and that the installed capacity has remained unchanged across all three reporting years under review.

This report has, at several earlier points, characterized the decline in renewable energy share from 33.74 percent to 20.69 percent as the single most significant adverse finding within the entire environmental dataset, and hing in the newly confirmed installed-capacity figure alters that assessment. With capacity held constant at 180 kWp throughout the period, the declining share is attributable to two compounding factors: total electricity demand rising by 30.8 percent over three years against an unexpanded generation base, and the absolute renewable output itself falling from 268,586 kWh to 215,383 kWh, a decline of approximately 19.8 percent, over the same period. A static installed capacity can, on its own, explain a fall in absolute generation of this magnitude; some degree of system underperformance relative to the installation's own historical output is implied, though the underlying cause has been established from the data available.

The Energy, Environmental, and Pollution Prevention objectives each record, at their respective checkpoints, figures of "26%" and "15.79%" that correspond precisely to this report's own renewable-share and total-energy-growth figures, withstanding that each of these three objectives is nominally framed as a reduction target. This report has already, in Section 4.4, characterized this pattern as more consistent with an administrative artefact — the insertion of readily available percentage figures into targets framed with an opposite directional intent — than with a deliberate misstatement, and reiterates that characterization here rather than treating the three affected rows as independent corroborating evidence of three separately measured outcomes.

6.4 GRI 305: Emissions

Materiality rationale. Assessed, as previously, at high materiality, on the basis of this topic's direct linkage to the energy consumption trend discussed above and its centrality to any future Carbon Disclosure Project or EcoVadis climate-themed submission the organization may elect to pursue.

Management approach. In addition to the emission-factor methodology discussed below, the organization's training records evidence a dedicated "Climate Change Adaptation Awareness" module, delivered to management, procurement, and sustainability/CSR personnel for four hours, and the Objectives register's Climate Objective, which records a renewable-sourcing figure of zero percent at the first checkpoint rising to 8.20 percent at the second; a figure that, unlike several of its counterparts elsewhere in the register, appears genuinely distinct from the Energy and Environmental objectives' recycled 26 percent/15.79 percent figures, and may accordingly represent a more independently measured data point, though this too would benefit from explicit confirmation.

305-2: Energy indirect (Scope 2) greenhouse gas emissions.

Metric	FY 2023–24	FY 2024–25	FY 2025–26
Scope 2 CO_2e (kg)	652,744	737,341	853,748
Applied emission factor (kg CO_2e/kWh)	0.8200	0.8200	0.8200

The reviewing consultant's independent recomputation of this factor across all thirty-six months confirms its consistent application throughout the review period, a finding of some methodological reassurance. The precise published source of the 0.8200 factor; whether the Central Electricity Authority's CO_2 Baseline Database for the applicable year, or a Rajasthan-specific DISCOM-level factor; remains undocumented, and its formal citation is recommended prior to this report's finalization, since an unattributed factor, however internally consistent, offers reduced defensibility under any future third-party assurance engagement.

305-1: Direct (Scope 1) greenhouse gas emissions. quantified, for the reasons previously discussed: the underlying fuel data is recorded only in undifferentiated litres, without distinction between diesel, petrol, and lubricating oil, or between mobile vehicle use and standby diesel-generator use, and this report continues to decline to estimate a Scope 1 CO_2e figure in the absence of such a breakdown, consistent with its overriding commitment to accuracy over false completeness.

305-3: Other indirect (Scope 3) emissions. currently quantified in any category. The four candidate categories identified in the earlier draft of this report; upstream transportation of raw psyllium seed, purchased packaging materials, downstream export logistics, and employee commuting for the organization's thirty-two-person workforce; remain the recommended starting point for a phased Scope 3 inventory, to be pursued over a twelve-to-twenty-four-month horizon.

305-7: Air emissions, including particulates and dust. currently monitored or disclosed in quantitative form, withstanding that the Training Topics register evidences a specific and encouragingly well-targeted training module, "Air Emissions Monitoring and Dust Control in Psyllium Processing," directed at production engineers, utility and maintenance teams, and quality assurance/quality control personnel, delivered for two hours. This module's very existence within the organization's training curriculum is itself suggestive evidence that management recognizes dust generation, arising principally from the winnowing and grinding process stages, as an operationally significant issue, even though the corresponding quantitative monitoring data; stack or ambient particulate measurements; has yet been supplied to this report. The commissioning of a basic ambient or stack particulate monitoring assessment, referenced in the earlier draft of this report, remains the recommended means of converting this evident training awareness into a formal quantitative disclosure.

305-4: GHG emissions intensity. calculable, for the same reason as the corresponding energy intensity metric at 302-3 above.

305-5: Reduction of greenhouse gas emissions. No measured reduction initiative has yet delivered a quantifiable result; proposed initiatives are consolidated in the action plan at Section 6.9 below.

6.5 GRI 303: Water and Effluents

Materiality rationale. Assessed at medium materiality; genuinely low-impact given the organization's dry-process design, though still warranting the full disclosure structure GRI 303 prescribes.

Management approach. The organization's training records evidence a "Water Conservation and Wastewater Management" module, directed at production, maintenance, utility, and effluent-treatment-plant operators, delivered for two hours; a modest allocation that is, in this instance, proportionate to the genuinely low materiality of this topic for a facility of this particular process design. The Objectives register additionally records both a general Environmental water-reduction target and a more specific Water Objective addressing usage per metric tonne of psyllium processed, each targeting a fifteen percent reduction by December 2028.

303-1: Interactions with water as a shared resource. The organization's manufacturing process; cleaning, sorting, color sortex, grinding, winnowing, blending, and powdering; is entirely dry-mechanical in character and consumes no process water whatsoever. The entirety of the facility's water consumption is domestic or sanitary in nature: drinking water, hand-washing, toilet facilities, and general housekeeping. Given the facility's location within a region of recognized water stress, this dry-process characteristic represents a genuinely favourable structural feature of the organization's operations, and this report continues to regard it as a strength to be affirmatively stated rather than a mere absence to be passed over.

303-3: Water withdrawal.

Metric	FY 2023–24	FY 2024–25	FY 2025–26	Three-Year Change
Total water consumption (litres)	15,219	15,884	16,759	+10.1% (cumulative)

As has been observed previously, this growth is modest in absolute terms and is consistent with incremental headcount and operating-hours growth, rather than any process-related driver; a conclusion the dry-process characterization above renders unsurprising.

A methodological e on the Water Objective's recorded checkpoint figures. The Water Objective in the Objectives register records checkpoint figures of 4.3 percent and 5.51 percent (averaging 4.94 percent) against a stated fifteen-percent *reduction* target. These figures correspond precisely to this report's own water-consumption *growth* rates for FY 2024–25 and FY 2025–26 respectively. As with the analogous pattern observed in respect of the Energy and Environmental objectives at Section 6.3 above, this report interprets this as a likely artefact of the objective having been populated with a readily available percentage figure whose directional sign does match the objective's stated intent, rather than as evidence of an independently measured reduction outcome and recommends that management correct this entry prior to the report's finalization.

303-4: Water discharge. No industrial effluent is generated by the organization's manufacturing process. The specific disposal route for domestic sewage; whether municipal sewer connection or an on-site septic or soak-pit arrangement; has yet been confirmed, and remains a discrete, readily closable data gap.

303-5: Water consumption; recycling and reuse. Water recycled or reused is recorded as nil across all three reporting years, a finding this report continues to characterize as appropriately attributable to the absence of any process water requirement in the first instance, rather than as an unaddressed environmental deficiency.

A carried-forward data quality observation. This report reiterates the data quality flag raised in its earlier draft: the resulting water-per-employee figure, in the range of 380 to 420 litres per employee per year, or approximately 1.5 litres per employee per working day, appears low for combined drinking, hand-washing, toilet, and housekeeping use across a workforce of thirty-two employees, and the organization is again encouraged to verify the unit of measure recorded in its source water register before this figure is published in any external-facing form.

6.6 GRI 306: Waste

Materiality rationale. Assessed at high materiality, and identified, in this report's earlier drafts, as potentially the single strongest positive disclosure opportunity available to the organization, on account of the likely, though as yet unquantified, valorisation of process by-products into the organization's own cattle feed product line.

Management approach. The Training Topics register evidences a combined module addressing "Waste Reduction, Segregation, and Composting" together with "Packaging Waste and Sustainable Packaging Awareness," directed at all departments generally and at housekeeping, production, warehouse, packing, procurement, and sales/marketing personnel specifically, delivered for four hours. The Objectives register records two waste-specific targets: diversion of process waste, by weight, from landfill or into animal feed use, targeted at thirty-five percent by December 2028; and internal reuse of packaging materials received from suppliers, targeted at twenty-five percent over the same horizon.

306-3: Waste generated.

Metric	FY 2023–24	FY 2024–25	FY 2025–26	Three-Year Change
Waste generation intensity (kg/MT)	5,059.5	5,346.1	5,755.6	+13.8%

As this report has consistently emphasized, this is the organization's sole environmental metric already reported on a production-normalized basis, and the observed upward trend accordingly constitutes a genuine efficiency signal, distinct in character from the absolute-figure increases observed elsewhere in this Environment section, and warranting the closer operational review recommended in the action plan below.

A significant interpretive matter arising from the Waste Objective's recorded checkpoint. The Waste Management Objective's checkpoint entry for the second review date is recorded, somewhat unusually, as a numerical percentage but as the anation "0; waste treated as cattle feed." This report regards this anation as considerably more significant than its face-value numerical entry of zero percent would suggest. Read plainly, the anation appears to indicate that process by-product is, in point of fact, already being diverted to the organization's cattle feed product line, in which case the appropriate diversion-rate figure would properly approach one hundred percent of the relevant waste stream, rather than the zero percent recorded. This report accordingly recommends, with some emphasis, that management review and correct this entry, since the underlying practice it appears to describe; if confirmed and properly quantified; would constitute precisely the strong, evidence-based circular-economy disclosure this report has anticipated since its earlier drafts, and its current mis-recording as a zero-percent achievement risks understating what may in fact be a genuine organizational strength.

306-1 and 306-2: Waste-generating activities and management approach. The dry-mechanical process generates organic by-product at several distinct stages: cleaning-stage rejects, colour-Sortex-rejected seed, husk fines and chaff arising from the winnowing operation, and any off-specification material arising during grading. The confirmation and precise quantification of the proportion of this combined by-product stream directed to cattle feed production, as against any other disposal or valorisation route, remains the single highest-priority action item in respect of this Topic Standard.

306-4 and 306-5: Waste diverted from, and directed to, disposal. Beyond the cattle-feed anation discussed above, no formal segregation protocol distinguishing organic by-product, packaging waste, and general or hazardous waste streams has been documented, and this absence is identified as the foundational step required to support accurate future disclosure under these two disclosure items.

Hazardous waste. disclosed. Confirmation is required as to whether any hazardous waste; lubricants, cleaning chemicals, or laboratory reagents arising from the organization's quality-testing function; is generated, and, if so, whether the corresponding Transport, Storage, and Disposal Facility manifests required under India's Hazardous and Other Wastes Rules 2016 are maintained.

6.7 GRI 304: Biodiversity

Materiality rationale. Assessed at comparatively low materiality for the facility itself, though the topic assumes a somewhat different, and arguably greater, significance when considered at the level of the organization's upstream agricultural supply chain, a point developed further below.

Management approach. The Training Topics register evidences a "Biodiversity and Soil Health Awareness" module directed specifically at the organization's farmers, raw material procurement personnel, and sustainability/CSR function, delivered for two hours; a training allocation that, ably, extends the organization's biodiversity awareness beyond its own facility boundary into its farmer-supplier network, a scope of coverage this report regards as a genuinely positive practice worth explicit credit. The Objectives register's Biodiversity Objective targets thirty percent sourcing from certified sustainable or organic farms by December 2028, though, as discussed at Section 4.4 above, the recorded checkpoint figures show a decline from five percent to zero percent, a pattern requiring management clarification before this disclosure can be regarded as settled.

304-1: Operational sites in or adjacent to protected areas. The facility is situated within Agro Food Park, an industrial estate at Boranada, Jodhpur. No indication of proximity to any ified protected area or biodiversity hotspot has been identified, though formal confirmation through local zoning or forestry department records has yet been obtained.

304-2 and 304-3: Significant impacts on biodiversity; habitats protected or restored. No significant biodiversity impact has been identified at the facility level. Any on-site greenbelt, plantation, or landscaping activity has yet been quantified and would constitute a straightforward, low-effort addition to this disclosure should the organization wish to include it.

6.8 GRI 307: Environmental Compliance

Materiality rationale. Assessed at medium materiality, though treated, consistent with this report's earlier methodological recommendation, as a standalone disclosure rather than folded into the preceding topic-specific sections, since assurance providers and EcoVadis assessors alike characteristically look for this disclosure item independently.

Management approach. The Training Topics register evidences an "Environmental Legal Compliance and Permits Awareness" module, directed at the organization's EHS officer, management, plant head, and regulatory-function personnel, delivered for two hours; a modest but appropriately targeted allocation given the specialized, rather than facility-wide, nature of this compliance responsibility. The Objectives register's Pollution Prevention Objective further records full training coverage of production and maintenance staff on pollution prevention policy and awareness at both available checkpoints.

307-1: Non-compliance with environmental laws and regulations. No environmental fines, penalties, non-monetary sanctions, or regulatory ices have been identified or disclosed in the course of this review. This report continues to recommend that this be stated as an explicit, affirmatively confirmed "Nil" finding, following direct confirmation from management as to whether any Gujarat/Rajasthan Pollution Control Board show-cause ice, consent-renewal difficulty, or inspection finding has arisen during the reporting period.

6.9 GRI 308: Supplier Environmental Assessment

Materiality rationale. Assessed at medium-high materiality, given the centrality of the farm-level raw material sourcing relationship to this organization's overall supply chain.

Management approach. The Training Topics register evidences a cluster of relevant modules within its Supply Chain and Procurement category, including "Sustainable Procurement Training for Suppliers," "Supplier Code of Conduct Awareness," "Training to Suppliers on Sustainability, Human Rights and Compliance Requirements," and "Training on Fair Trade and Traceability of Raw Psyllium," each delivered for four to six hours to the organization's procurement, vendor development, and field-officer personnel. This training coverage is considerably more developed than the corresponding quantitative screening data, discussed immediately below, would on its own suggest, and indicates that the organization's procurement function possesses at least a foundational awareness of the relevant sustainability and compliance considerations even where formal supplier screening documentation has yet been assembled.

308-1: New suppliers screened using environmental criteria. No formal environmental screening protocol for farmer-suppliers or aggregators has yet been documented. Given the increasing due-diligence expectations of European Union and North American buyers in respect of agricultural supply chains, the organization's Fair Competition Objective; which targets supplier sustainability evaluation coverage of fifteen percent by December 2028, and which records an improving trend from five percent to ten percent between the two available checkpoints; represents a modest but genuinely positive existing foundation upon which a more formal screening protocol could be built.

6.10 Consolidated Environmental Action Plan

Initiative	GRI Standard Addressed	Priority	Responsible	Timeline
Confirm and disclose production volume (metric tonnes) for all three reporting years	GRI 301, 302, 305 (intensity metrics)	Critical	Management/Production	Immediate
Confirm the source and contractual arrangement of the organization's renewable electricity (captive solar, PPA, or open-access)	GRI 302	Critical	Mr. Sandeep (EHS reporting line)	Immediate
Document and formally cite the source of the 0.8200 kg CO_2e/kWh Scope 2 emission factor	GRI 305-2	High	Sustainability consultant	Immediate
Investigate and correct the apparent misalignment between "reduction" objectives and their recorded growth-rate checkpoint figures	Objectives register data integrity	Critical	Management, in consultation with the sustainability consultant	Immediate

Initiative	GRI Standard Addressed	Priority	Responsible	Timeline
(Environmental, Energy, Pollution Prevention, Water objectives)				
Confirm and quantify the true diversion rate of process by-product to cattle feed production, correcting the Waste Objective's zero-percent entry	GRI 306-4	High	Production Head	3 months
Introduce a formal waste segregation and weighment protocol by stream	GRI 306-3/306-5	High	Production Head	6 months
Confirm domestic wastewater disposal route	GRI 303-2	Low (readily closable)	Facilities	Immediate
Verify the water consumption unit of measure and headcount basis underlying the per-employee intensity figure	GRI 303 data quality	Medium	Facilities/Consultant	Immediate
Clarify the declining certified-sustainable-sourcing trend across the Biodiversity, Product	GRI 204, 304, 308, 414	High	Procurement/Management	Immediate

Initiative	GRI Standard Addressed	Priority	Responsible	Timeline
Lifecycle, and Business Ethics objectives				
Expand renewable generation or procurement capacity to restore a renewable share of at least thirty percent	GRI 302	Critical	Management	18–24 months
Complete Scope 1 fuel-type segregation and CO_2e quantification	GRI 305-1	Medium	EHS	6 months
Commission a basic dust and particulate monitoring assessment, converting existing training awareness into quantitative disclosure	GRI 305-7	Medium	EHS	6–12 months
Formalize a supplier environmental and social screening protocol, building on the existing supplier training coverage	GRI 308, 414	Medium	Procurement	12 months
Begin phased Scope 3 categorization (transport,	GRI 305-3	Medium	Consultant	12–24 months

Initiative	GRI Standard Addressed	Priority	Responsible	Timeline
packaging, commuting)				

SECTION 7: SOCIAL

7.0 Introductory Remarks on the Evidentiary Basis

The Objectives register supplies, for each of several Social themes, a stated target, an implementation horizon extending to December 2028, and two dated review checkpoints; the Training register supplies, independently, the hours and participant groups associated with the underlying training delivery presumed to support those objectives. Where these two sources corroborate one aher — as is frequently, though universally, the case in this section — the auditor treats the resulting disclosure as reasonably well evidenced. Where the two sources diverge, or where an objective's checkpoint entries themselves display internal inconsistency of the kind already documented in Section 4 of this report, the auditor records that divergence explicitly rather than resolving it by inference, consistent with the overriding evidentiary standard applied throughout this engagement.

7.1 GRI 401: Employment

Materiality rationale. Assessed at medium materiality in Section 4 of this report.

Management approach. The organization maintains an Employee Benefits Enhancement Objective, targeting employee satisfaction with its benefits package, measured through an annual internal survey, at ninety percent by December 2028. The organization's own recorded checkpoint data show one hundred percent satisfaction at both the June 2025 and June 2026 review dates, a result exceeding the stated target on both occasions. This is a genuinely favourable finding, though the auditor es, for completeness, that a survey result of one hundred percent satisfaction recorded identically across two separate checkpoints is a pattern that would, in a more mature reporting cycle, warrant independent scrutiny of the survey's methodology and response rate, since perfect and unvarying satisfaction scores are, as a matter of general survey practice, somewhat unusual and merit confirmation that the underlying survey instrument and sample are genuinely representative of the workforce rather than, for instance, administered informally or subject to limited participation.

The same Objective additionally targets a minimum of five training or development sessions per employee annually. The recorded checkpoint data show one session delivered in January 2025 and a further one session in September 2025, against the stated target of five — a shortfall the auditor regards as a genuine and quantifiable gap rather than a matter of interpretation, and one meriting direct disclosure rather than omission.

401-1: New hires and turnover. No new hires.

401-2: Benefits provided to employees. The existence of a structured benefits package is evidenced indirectly through the Employee Benefits Enhancement Objective discussed above; however, the specific composition of that package health insurance, bonus, and personal protective equipment provision — has been itemized in the material supplied to this audit.

401-3: Parental leave. Given the workforce's entirely male composition as recorded in Section 3.2 of this report, maternity leave data is applicable.

7.2 GRI 402: Labor and Management Relations

402-1: Minimum ice periods regarding operational changes. The ice period practiced by the organization — whether the statutory minimum under applicable Indian labour law or a longer period adopted as company policy — remains to be confirmed, together with whether this is documented within employment contracts or a standing order.

7.3 GRI 403: Occupational Health and Safety

Materiality rationale. Assessed at high materiality throughout this report's several iterations, on the basis that the dust-generating character of the winnowing, grinding, and color-sortex-reject-handling process stages presents the organization's most operationally significant occupational hazard profile.

Management approach. This topic is, of the entire social section, the one for which the two newly supplied sources provide the most extensive corroborating evidence. The organization's certified ISO 45001 occupational health and safety management system is supported by a discrete Fire Safety Objective, a general Health and Safety Objective, a First Aid Objective, and a Workplace Safety Objective, each independently tracked within the Objectives register, and further reinforced by a cluster of six modules within the Training register's General Mandatory category, namely Induction Training, Health and Safety Risks and Good Working Practices, Emergency Response and First Aid Training, and Fire Safety and Evacuation Drills.

Fire Safety. The Fire Safety Objective records a target of zero fire-related incidents or near-misses, against which both available checkpoints record a value of zero, indicating a sustained record of no incident across the review period. A subsidiary target of a minimum of thirty training hours records six hours delivered in January 2025 and a further six hours in August 2025, a cumulative total of twelve hours against the stated thirty-hour target — a pace that, if maintained without acceleration, would reach the target within the stated December 2028 horizon, and which the auditor accordingly flags for management attention. A further subsidiary target of a minimum of eight fire mock drills records two drills completed by the first checkpoint and a cumulative six drills by the second, a pace consistent with achievement of the target ahead of its stated horizon.

General occupational health and safety. The Health and Safety Objective records a target of zero accidents, incidents, or near-misses, against which both checkpoints again record a value of zero. The associated training target of a minimum of thirty hours records eight hours delivered in January 2025 and a further eight hours in August 2025, a cumulative sixteen hours — closer to, though still short of, the stated target.

First aid. The First Aid Objective records a target of a minimum of thirty training hours for all employees, against which eight hours were delivered in January 2025 and a further eight hours in August 2025, a cumulative sixteen hours, mirroring the pace observed under the general Health and Safety Objective.

Workplace safety. The Workplace Safety Objective records a target of zero fire-related incidents or near-misses specifically in relation to workplace safety — a formulation the auditor es overlaps substantially with the separately tracked Fire Safety Objective above, and which management may wish to consolidate in a future reporting cycle to avoid duplicative or potentially confusing parallel tracking of what appears to be substantially the same underlying metric. Both checkpoints record a value of zero. The associated training target of a minimum of thirty-five hours records eight hours delivered at the first checkpoint and a cumulative sixteen hours by the second.

403-1: Occupational health and safety management system. The organization's ISO 45001 certification, confirmed in Section 3.3 of this report, evidences the existence of a formal management system; the underlying policy documentation and system scope have themselves been supplied to this audit and are recommended for direct extraction from the certification's supporting records.

403-2: Hazard identification, risk assessment, and incident investigation. supplied in documentary form, withstanding the auditor's expectation, ed in the earlier draft of this report, that hazard identification and risk assessment registers of the kind required to sustain ISO 45001 certification are highly likely already to exist within the organization's management system.

403-3: Occupational health services. Confirmation of periodic medical examination is conducted in view of the dust exposure profile associated with the winnowing and grinding process stages.

403-4: Worker participation in occupational health and safety. the existence and meeting frequency of a Safety Committee.

403-8: Workers covered by the occupational health and safety management system. on the basis of the organization's ISO 45001 certification, to extend to the full workforce of thirty-two employees, though this has been confirmed.

403-9: Work-related injuries. The zero-incident checkpoints recorded under the Fire Safety, Health and Safety, and Workplace Safety objectives above provide some evidentiary basis for a favourable finding under this disclosure item; however, these figures have been corroborated against a dedicated accident or incident register, nor has the total person-hours-worked figure required to calculate a lost-time injury frequency rate been supplied.

403-10: Work-related ill health. any confirmed occupational illness, and specifically any respiratory finding consistent with the dust exposure hazard, remains to be confirmed.

7.4 GRI 404: Training and Education

Materiality rationale. Assessed at medium materiality; treated here as a discrete disclosure item withstanding its substantial overlap, throughout this section, with the training components of several other Topic Standards.

404-1: Average training hours per employee. The Training register, comprising thirty-nine distinct modules across five thematic categories — General Mandatory, Environment-Specific, Supply Chain and Procurement, Specific/Technical/Food Safety, and Management System Trainings — together with the hour allocations recorded against each objective in the Objectives register, provides a substantially more complete evidentiary basis for this disclosure than was available in this report's earlier draft. A precise average-hours-per-employee figure has , however, been independently calculated from these sources for the purposes of this audit, since doing so would require reconciling the module-level hour figures against actual attendance records for the full thirty-two-person workforce, which has been supplied.

404-2: Programs for upgrading employee skills. The Training register's General Mandatory category includes a "Career Development and Skill Enhancement" module, directed at production staff, machine operators, and junior technical staff, delivered for three hours — evidencing the existence of at least a foundational skills-development programme, the scope and frequency of which beyond this single recorded module has been further detailed.

404-3: Regular performance reviews. the workforce receiving a formal performance review annual basis.

7.5 GRI 405: Diversity and Equal Opportunity

Materiality rationale. Assessed at medium-high materiality, on the basis that the organization's workforce composition, disclosed in Section 3.2 of this report, including the SEDEX-SMETA methodology to which this organization is already subject, characteristically probe with some particularity.

405-1: Diversity of governance bodies and employees.

Category	Composition
Board of Directors	Two directors, both male
Total workforce	Thirty-two employees, all male; zero female employees

The Training register evidences a "Gender Equality and Women Empowerment in the Workplace" module, directed at human resources, administrative personnel, female staff, supervisors, and middle managers, delivered for two hours, withstanding the workforce's currently all-male composition — a training allocation the auditor regards as a positive, if presently somewhat abstract, signal of organizational intent given the absence of female employees to whom the "female staff" participant category could, at present, apply. A separately recorded Diversity and Inclusion Objective targets full workforce completion of annual diversity, inclusion, and unconscious-bias training, against which the checkpoint data record a single session delivered in January 2025 and a further single session in September 2025 — recorded as a session count rather than as the percentage-coverage figure the stated target contemplates, a unit-of-measure inconsistency the auditor recommends be standardized in the organization's next reporting cycle.

405-2: Ratio of basic salary and remuneration of women to men. applicable, given the absence of female employees.

7.6 GRI 406: Non-discrimination

406-1: Incidents of discrimination and corrective actions taken. The Training register evidences a "Diversity, Discrimination and Harassment Awareness" module, directed at all employees and particularly human resources and supervisory personnel, delivered for three hours, together with a Non-Discrimination Objective recording full (one hundred percent) training coverage at both the January 2025 and September 2025 checkpoints. A related Anti-Harassment Objective records zero confirmed incidents at both available checkpoints, and a further objective concerning the timeliness of complaint handling similarly records zero recorded complaints at both checkpoints. The auditor regards a recorded absence of complaints, corroborated by full training coverage and an independently maintained confidential reporting channel — discussed further immediately below — as reasonable, though conclusive, evidentiary support for a "Nil" disclosure under this item, and recommends this be confirmed directly by management as an affirmative statement rather than left as an inferred absence.

A further, related objective — grouped in the Objectives register under the heading "Remediation procedure in place for victims of discrimination and or harassment" — records that the organization maintains one hundred percent access to anonymous, confidential reporting channels across all business units at both checkpoints, and that training coverage on respectful workplace behaviour and reporting mechanisms likewise stood at one hundred percent at both checkpoints. The subsidiary target concerning investigation of substantiated complaints within fifteen business days records zero cases at both checkpoints, consistent with the absence of complaints ed above.

7.7 GRI 407: Freedom of Association and Collective Bargaining

407-1: Operations and suppliers in which the right to freedom of association may be at risk. The Objectives register's Union Recognition and Collective Bargaining theme records a able and creditable improvement between the two available checkpoints: the target of ensuring all union representatives receive relevant legal and organizational updates annually, against a one-hundred-percent coverage target, records zero percent at the first checkpoint and one hundred percent at the second — a genuine, verifiable positive development in labour-relations governance that the auditor is pleased to credit explicitly, in contrast to several of the more equivocal findings recorded elsewhere in this section. The associated dispute-resolution target, requiring ninety percent of reported disputes to be resolved within thirty days, records zero recorded disputes at both checkpoints, anated in the source register with the ation "No any report" at the second checkpoint, indicating that no disputes have arisen requiring resolution under this mechanism during either review period.

7.8 GRI 408: Child Labour

Materiality rationale. Assessed at high materiality, on the basis of the elevated risk perception generally associated with agricultural sourcing supply chains among international pharmaceutical and food-ingredient buyers.

408-1: Operations and suppliers with significant risk of incidents of child labour. The Training register evidences a dedicated "Child Labor, Forced Labor and Human Trafficking Awareness" module, directed at human resources, administration, procurement, security, and production supervisory personnel, delivered for five hours. The Objectives register's Child and Forced Labor theme records a target of one hundred percent supply chain compliance with the organization's Child and Forced Labor Policy, implemented through commitment to the Ethical Trading Initiative base code and site audits, against which both checkpoints record fifty percent, anated with a cumulative total of one hundred percent in the source register — an anation whose precise meaning, whether deing fifty percent of suppliers audited at each of two successive periods cumulating to full coverage, or some other measurement basis, has been clarified, and which the auditor recommends be resolved in unambiguous terms before this disclosure is finalized. The associated training target, set at a minimum of thirty hours, records five hours delivered in January 2025 and a further five hours in September 2025, a cumulative total of ten hours against the thirty-hour target.

Own-workforce age verification practice at the point of hiring has been separately confirmed.

7.9 GRI 409: Forced or Compulsory Labour

409-1: Operations and suppliers with significant risk of incidents of forced or compulsory labour. This disclosure item is substantially co-extensive, in the evidentiary material available to this audit, with the Child and Forced Labor theme discussed immediately above, and the same training module and objective figures apply. Confirmation of the organization's wage payment method — bank transfer being the stronger evidentiary basis for this disclosure than cash payment — together with its recruitment practices and any document-retention policy bearing on worker freedom of movement, has been separately supplied, and remains recommended for extraction from the organization's existing SEDEX-SMETA audit documentation, which characteristically addresses precisely this set of considerations.

7.10 GRI 413: Local Communities

413-1: Operations with local community engagement, impact assessments, and development programs. directly evidenced within either of the two newly supplied documents. Given the workforce's composition as recorded in Section 3.2 — an entirely locally resident, single-site workforce of thirty-two employees — local employment is likely already, in practical terms, a de facto organizational practice, though this has been formally quantified or disclosed as such.

413-2: Operations with significant actual or potential negative impacts on local communities. directly evidenced. Any noise, dust, or traffic-related complaint arising from the facility's operation within the Agro Food Park industrial estate has been confirmed as either present or absent, and remains an outstanding, low-priority confirmatory item.

7.11 GRI 414: Supplier Social Assessment

414-1: New suppliers screened using social criteria. The Training register's Supply Chain and Procurement category evidences a "Human Rights Due Diligence in Supply Chain" module, directed at procurement, corporate social responsibility, sustainability, and compliance personnel, delivered for six hours, together with the supplier-facing training modules discussed at Section 6.9 above. The Objectives register's Fair Competition Objective, recording an improving trend from five percent to ten percent supplier evaluation coverage across the two available checkpoints, provides a modest, though genuinely positive, quantitative foundation for this disclosure, withstanding that a formal, comprehensive social-screening protocol for the organization's full supplier base has yet been documented.

7.12 Summary Table: Social Objectives Performance Against Stated Targets

Theme	Target	First Review (01/06/2025)	Second Review (01/06/2026)	Auditor Assessment
Fire Safety — incidents	0	0	0	Sustained — favourable
Fire Safety — training hours	30 hrs	6 hrs	12 hrs (cumulative)	Below pace
Fire Safety — mock drills	8	2	6 (cumulative)	On track

Theme	Target	First Review (01/06/2025)	Second Review (01/06/2026)	Auditor Assessment
H&S — accidents/incidents	0	0	0	Sustained — favourable
H&S — training hours	30 hrs	8 hrs	16 hrs (cumulative)	Below pace
First Aid — training hours	30 hrs	8 hrs	16 hrs (cumulative)	Below pace
Human Rights — supply chain implementation	100%	0%	0%	No progress — requires attention
Human Rights — employee training	100%	100%	100%	Sustained — favourable
Workplace Safety — incidents	0	0	0	Sustained — favourable
Workplace Safety — training hours	35 hrs	8 hrs	16 hrs (cumulative)	Below pace
Child/Forced Labour — supply chain (ETI)	100%	50%	50% (anated cumulative 100%)	Requires clarification of measurement basis
Child/Forced Labour — training	30 hrs	5 hrs	10 hrs (cumulative)	Below pace
Anti-Harassment — training	30 hrs	3 hrs	6 hrs (cumulative)	Below pace
Anti-Harassment — zero tolerance/complaints	0	0	0	Sustained — favourable
Employment — benefits satisfaction	90%	100%	100%	Exceeds target — favourable, methodology to be confirmed
Employment — training sessions per employee	5	1	1	Materially below target
Diversity — training	100%	1 session	1 session	Unit-of-measure inconsistency; requires standardization
Non-discrimination — training	100%	100%	100%	Sustained — favourable
Freedom of Association — union representative briefings	100%	0%	100%	Genuine improvement — favourable

SECTION 8: GOVERNANCE

8.0 Introductory Remarks on the Evidentiary Basis of This Section

The Governance section of this report addresses those disclosure items concerned with the organization's institutional integrity, ethical conduct, and information stewardship — matters that, in the case of a two-director private limited company such as this organization, are properly assessed against a standard of practical proportionality rather than against the more elaborate governance architecture characteristic of larger, publicly listed entities. The auditor emphasizes this point at the outset because several of the disclosure items addressed below concern themes — conflict of interest, anti-money laundering, fair competition — that are, in a strict technical sense, more commonly associated with organizations of considerably greater scale and transactional complexity than a thirty-two-employee single-site processing facility. Their inclusion within the organization's own Objectives register nonetheless reflects a commendably comprehensive approach to governance self-assessment, and the auditor addresses each in turn below, while ing, where relevant, that certain targets appear framed at a level of formality somewhat exceeding what the organization's actual scale of operation would strictly necessitate.

8.1 GRI 2-9 to 2-21: Governance Structure

Recapitulation. As recorded in Section 3.5 of this report, the organization is constituted as a private limited company under two directors, Mr. Sunil and Mr. Sandeep, the latter bearing the sustainability and environmental, health, and safety reporting line. No board committee structure exists, a position the auditor regards as entirely proportionate to the organization's scale and accordingly a matter for adverse comment.

2-12: Role of the highest governance body in overseeing the management of impacts. The frequency and formality with which the two directors jointly review environmental, social, and governance performance has been independently confirmed to this audit, though the sheer breadth of the objectives and monitoring framework examined throughout Sections 4, 6, and 7 of this report — thirty-five distinct themes, each with a defined target, timeline, and two dated review checkpoints — constitutes reasonably strong indirect evidence that some structured periodic review process is, in substance, already being conducted, whether or it has been formally documented as a management review meeting in the sense contemplated by ISO

14001:2015 Clause 9.1. The auditor recommends that this existing practice be formalized as a named, minuted management review process, both to strengthen this disclosure and to support the organization's stated ambition of moving toward external assurance in a future reporting cycle.

8.2 GRI 205: Anti-corruption

Materiality rationale. Assessed at low-to-medium materiality in the earlier draft of this report, though the evidentiary record now available suggests a somewhat more developed governance practice than that initial assessment anticipated.

Management approach. The organization's certified ISO 37001 anti-bribery management system, recorded in Section 3.3 of this report, is corroborated by a discrete Anti-Corruption Objective within the Objectives register, and further reinforced by a "Business Ethics and Anti-Corruption/Bribery Training" module within the Training register's Ethics category, directed at all staff and particularly procurement, finance, and senior management personnel, delivered for four hours.

205-1: Operations assessed for risks related to corruption. The existence of the ISO 37001 certification presupposes an underlying corruption risk assessment as a condition of certification; the specific risk assessment documentation has itself been extracted for the purposes of this audit and is recommended as a straightforward means of closing this disclosure item, given that the underlying record almost certainly already exists.

205-2: Communication and training about anti-corruption policies and procedures. The Anti-Corruption Objective records a target of full, one-hundred-percent employee training coverage, against which both available checkpoints record full compliance — one hundred percent in February 2025 and one hundred percent again in November 2025. This is a favourable and well-evidenced finding, and the auditor credits it accordingly.

205-3: Confirmed incidents of corruption and actions taken. A subsidiary target concerning the review of reported incidents of suspected corruption within thirty days of submission records zero incidents at both available checkpoints. The auditor regards this as reasonable, though independently verified, evidentiary support for an affirmative "Nil" disclosure, and recommends this be confirmed directly by management as a formal statement rather than left as an inferred absence, consistent with the treatment recommended for analogous "Nil" findings elsewhere in this report.

8.3 Business Ethics, Conflict of Interest, and Fraud Prevention — A Consolidated Treatment

The auditor addresses these three themes together, withstanding that they do correspond to a single discrete GRI Topic Standard, because the underlying Objectives register treats them as closely related governance themes, and because their combined treatment avoids artificial fragmentation of what is, in substance, a coherent body of ethical-conduct evidence.

Business Ethics. The Business Ethics Objective records two subsidiary targets: first, sourcing of raw psyllium seed from farms implementing certified sustainable agricultural practices, targeted at forty percent by December 2028, against which the recorded checkpoint figures decline from five percent to zero percent — a pattern the auditor has already identified, at Section 4.4 of this report, as consistent with either a genuine discontinuation of a sourcing initiative or a correction of an overstated baseline, and which continues to require direct management clarification. Second, a target of full employee training coverage on sustainable consumption practices records zero percent at both available checkpoints, indicating that no training under this specific heading has yet been delivered, withstanding the target's stated one-hundred-percent ambition — a genuine and unambiguous gap, in contrast to several of the more favourable findings recorded elsewhere in this section.

Conflict of Interest. The Conflict-of-Interest Objective records a training target of one hundred percent coverage for personnel involved in sustainability-related decision-making, against which both checkpoints record full compliance, in February 2025 and again in November 2025. A subsidiary target concerning the disclosure of known conflicts of interest prior to major sustainability-related procurement or partnership decisions records zero percent at both checkpoints, an outcome the auditor considers ambiguous on its face: it may indicate that no disclosable conflict has arisen during either review period, which would be an entirely unremarkable and favourable position, or it may indicate that the disclosure mechanism itself has yet been operationalized in practice withstanding the training delivered. The Training register's inclusion of a dedicated "Conflict of Interest and Transparency Training" module, directed at procurement, sales, human resources, finance, and senior management personnel and delivered for three hours, provides corroborating evidence of the training component of this objective, though it does resolve the ambiguity ed above. A further subsidiary target concerning the resolution of identified conflict-of-interest cases within thirty days records zero cases at both checkpoints, consistent with the absence of any disclosed conflict.

Fraud Prevention in Sustainability Practices. This objective, set against a shorter implementation horizon of December 2026 rather than the December 2028 horizon applied elsewhere in the register, records two subsidiary targets. First, verified supplier documentation of sustainability claims, targeted at full coverage, shows an improving trend from five percent at the first checkpoint to ten percent at the second — a modest but genuine positive movement, though one that remains, in absolute terms, considerably distant from the stated one-hundred-percent target given the comparatively near-term December 2026 horizon against which it is measured. Second, training of relevant personnel on fraud prevention and ethical sustainability practices records zero percent coverage at both checkpoints, a clear and, in the auditor's assessment, higher-priority gap than the corresponding documentation-verification metric, since it suggests the organization's fraud-prevention framework currently rests on supplier-facing documentation requirements without a corresponding internal training foundation to support their consistent application.

8.4 GRI 205 : Anti-Money Laundering and Fair Competition

The auditor es, as a preliminary observation, that anti-money laundering risk is , in the ordinary course, a governance theme one would expect to feature prominently in the disclosure architecture of a thirty-two-employee agricultural processing facility of this kind, and its inclusion within the organization's own Objectives register reflects an unusually thorough, if perhaps somewhat disproportionate, approach to governance risk mapping. The auditor nonetheless addresses the recorded evidence on its own terms.

Anti-Money Laundering. The organization's Anti-Money Laundering Objective records two subsidiary targets, each showing zero progress at both available checkpoints: an assessment of forty percent of psyllium suppliers for sustainability-related risk, and a target requiring one hundred percent of flagged financial transactions to be reviewed and, where required, reported to relevant authorities. The absence of any flagged transaction at either checkpoint is, on its face, an entirely unremarkable finding for an organization of this scale and transactional profile, though the corresponding absence of any supplier risk assessment activity represents a genuine, if low-materiality, gap against the objective's own stated target.

Fair Competition. The Fair Competition Objective records a supplier sustainability evaluation target of fifteen percent, against which the recorded figures show an improving trend from five percent to ten percent — consistent with, and likely reflecting the same underlying activity as, the supplier-evaluation figures discussed in connection with Section 6.9 and Section 7.11 of this report above. A further subsidiary target, requiring two annual supplier sustainability training or capacity-building workshops, records one workshop completed in April 2025 and a further workshop completed in May 2026, a cumulative total of two workshops, meeting the stated target in full.

8.5 GRI 418: Customer Privacy

Materiality rationale. Assessed at low-to-medium materiality, though corroborated by a genuinely well-evidenced training record.

Management approach. The organization's certified ISO 27001 information security management system, recorded in Section 3.3 of this report, is directly reinforced by an Information Security Objective within the Objectives register, targeting full employee training coverage, against which both available checkpoints record full compliance — one hundred percent in February 2025 and one hundred percent in December 2025. The Training register's Ethics category further evidences a dedicated "Information Security and Data Privacy" module, directed at information technology, finance, human resources, sales, administrative, and management personnel, delivered for four hours.

418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data. independently confirmed within either newly supplied document. Given the strength of the training evidence discussed above and the existence of the underlying ISO 27001 certification, the auditor recommends this disclosure be completed through direct confirmation from management of a "Nil" finding for the reporting period, drawing on the certification's supporting incident-log records, rather than through further independent data collection.

8.6 GRI 415: Public Policy

415-1: Political contributions. addressed within either newly supplied document. Consistent with the assessment offered in the earlier draft of this report, no political contribution is identified or reasonably expected for an organization of this profile, and a brief, affirmatively stated "Nil" disclosure remains the recommended treatment.

8.7 GRI 417: Marketing and Labelling

417-1: Requirements for product and service information and labelling. The Training register's Specific/Technical/Food Safety category evidences a "Product Quality and Customer Health/Safety Awareness (including labelling compliance)" module, directed at quality assurance and quality control, packaging, labelling, export, sales, and research and development personnel, delivered for four hours — evidencing that labelling compliance is addressed as a discrete element of the organization's existing training curriculum, consistent with its GMP, HACCP, FSSAI, and BRCGS certification obligations. Confirmation of a "Nil" finding in respect of labelling non-compliance findings or customer complaints for the reporting period remains recommended, to be drawn from the organization's existing quality management records rather than assembled independently for the purposes of this report.

8.8 GRI 416: Customer Health and Safety, Considered in Its Governance Dimension

Although GRI 416 is, properly speaking, addressed as a Social rather than Governance Topic Standard, the auditor es here, for completeness, that the Customer Health, Safety and Sustainability Objective within the Objectives register records a training target of a minimum of thirty hours, against which four hours were delivered in May 2025 and a further four hours in June 2026 — a pace materially below the stated target, and one the auditor flags as the same substantive gap identified in this report's earlier draft, namely that GRI 416 remains the organization's most significant outstanding disclosure item withstanding the considerable strengthening of evidence achieved elsewhere in this Governance and the preceding Social section.

8.9 Summary Table: Governance Objectives Performance Against Stated Targets

Theme	Target	First Review (01/06/2025)	Second Review (01/06/2026)	Auditor Assessment
Anti-Corruption — training	100%	100% (Feb 2025)	100% (Nov 2025)	Sustained — favourable
Anti-Corruption — incident review timeliness	100% within 30 days	0 incidents	0 incidents	No incidents — favourable
Business Ethics — sustainable sourcing	40%	5%	0%	Declining — requires clarification

Theme	Target	First Review (01/06/2025)	Second Review (01/06/2026)	Auditor Assessment
Business Ethics — training	100%	0%	0%	No progress — genuine gap
Conflict of Interest — training	100%	100% (Feb 2025)	100% (Nov 2025)	Sustained — favourable
Conflict of Interest — disclosure	100%	0%	0%	Ambiguous — requires clarification
Conflict of Interest — case resolution	100% within 30 days	0 cases	0 cases	No cases — favourable
Fraud Prevention — supplier documentation	100% (Dec 2026)	5%	10%	Improving, but well below near-term target
Fraud Prevention — training	100% (Dec 2026)	0%	0%	No progress — genuine gap
Anti-Money Laundering — supplier risk assessment	40%	0%	0%	No progress recorded
Anti-Money Laundering — flagged transaction review	100%	0 (none flagged)	0 (none flagged)	No transactions flagged
Fair Competition — supplier evaluation	15%	5%	10%	Improving
Fair Competition — supplier workshops	2	1	2 (cumulative)	Target met — favourable
Information Security — training	100%	100% (Feb 2025)	100% (Dec 2025)	Sustained — favourable
Customer Health/Safety/Sustainability — training	30 hrs	4 hrs (May 2025)	8 hrs (cumulative)	Materially below pace

SECTION 9: GRI CONTENT INDEX

Statement of use.

This report has been prepared with reference to the GRI Standards 2021 for the reporting period April 2025 to March 2026. This is the organization's first sustainability disclosure cycle. Several disclosure items remain incomplete pending further client confirmation and are recorded as such below rather than presented as complete in order to preserve the accuracy of this index as a genuine reflection of the evidentiary record examined.

GRI Standard	Disclosure	Location	Status
GRI 1: Foundation	Basis of reporting claim	Section 1.5	Complete
GRI 2: General Disclosures	2-1 Organizational details	Section 3.1	Complete
	2-2 Entities included in reporting boundary	Section 1.2	Complete
	2-3 Reporting period, frequency, contact	Section 1.2, 1.8	Complete
	2-6 Activities, value chain	Section 3.1	Complete
	2-7 Employees	Section 3.2	Partial — headcount and gender composition disclosed; breakdown by employment category and age supplied
	2-9 Governance structure	Section 3.5, 8.1	Complete, proportionate to organizational scale
	2-12 Role of highest governance body in overseeing impact management	Section 8.1	Partial — inferred from breadth of objectives register; independently confirmed as a formalized process

GRI Standard	Disclosure	Location	Status
	2-22 Statement on sustainable development strategy	Section 2	Drafted; pending Managing Director's review and sign-off
	2-27 Compliance with laws and regulations	Section 6.8	Complete — "Nil" finding, pending direct client confirmation
	2-29 Approach to stakeholder engagement	Section 4.1–4.2	Partial — strengthened by objectives register but direct multi-stakeholder engagement yet conducted
GRI 3: Material Topics	3-1, 3-2, 3-3	Section 4	Substantially strengthened; pending formal management validation
GRI 201: Economic Performance	201-1	addressed	Gap — economic value data supplied
GRI 204: Procurement Practices	204-1	Section 6.9, 7.11	Partial — training evidence strong; quantitative local-sourcing percentage supplied
GRI 205: Anti-corruption	205-1, 205-2, 205-3	Section 8.2	Substantially complete — training and incident data evidenced; risk assessment documentation to be extracted from ISO 37001 records
GRI 301: Materials	301-1, 301-2	Section 6.1	Partial — material category identified; volume data supplied
GRI 302: Energy	302-1, 302-3, 302-4	Section 6.2, 6.3	Substantially complete — consumption and installed solar capacity confirmed; intensity metric pending production-volume data
GRI 303: Water and Effluents	303-1, 303-3, 303-4, 303-5	Section 6.5	Substantially complete — disposal route confirmation and unit-of-

GRI Standard	Disclosure	Location	Status
			measure verification pending
GRI 304: Biodiversity	304-1, 304-2, 304-3	Section 6.7	Complete for stated materiality level; sourcing-related sub-metric requires clarification
GRI 305: Emissions	305-1, 305-2, 305-3, 305-4, 305-7	Section 6.4	Partial — Scope 2 complete; Scope 1, Scope 3, and air emissions pending
GRI 306: Waste	306-1 to 306-5	Section 6.6	Partial — intensity trend complete; by-product diversion rate requires correction and confirmation
GRI 307: Environmental Compliance	307-1	Section 6.8	Complete — "Nil" finding, pending direct confirmation
GRI 308: Supplier Environmental Assessment	308-1	Section 6.9	Partial — training evidence strong; formal screening protocol yet documented
GRI 401: Employment	401-1, 401-2, 401-3	Section 7.1	Partial — benefits satisfaction and training-session shortfall evidenced; new-hire/turnover data supplied
GRI 402: Labor/Management Relations	402-1	Section 7.2	Gap — ice period confirmed
GRI 403: Occupational Health and Safety	403-1 to 403-10	Section 7.3	Substantially complete — incident and training data strong; medical surveillance and hazard-register extraction pending
GRI 404: Training and Education	404-1, 404-2, 404-3	Section 7.4	Partial — extensive module inventory evidenced; per-employee average and

GRI Standard	Disclosure	Location	Status
			performance-review data calculated
GRI 405: Diversity and Equal Opportunity	405-1, 405-2	Section 7.5	Complete — workforce composition and training disclosed; management narrative statement pending
GRI 406: Non-discrimination	406-1	Section 7.6	Substantially complete — training and complaint data evidenced
GRI 407: Freedom of Association	407-1	Section 7.7	Complete — genuine improvement evidenced between checkpoints
GRI 408: Child Labour	408-1	Section 7.8	Partial — training evidenced; supply chain measurement basis requires clarification
GRI 409: Forced or Compulsory Labour	409-1	Section 7.9	Partial — shares evidentiary basis with GRI 408; wage-payment method separately confirmed
GRI 413: Local Communities	413-1, 413-2	Section 7.10	Gap — evidenced in newly supplied documents
GRI 414: Supplier Social Assessment	414-1	Section 7.11	Partial — training and modest quantitative improvement evidenced
GRI 415: Public Policy	415-1	Section 8.6	Complete — "Nil" (typical for organizational profile)
GRI 416: Customer Health and Safety	416-1, 416-2	Section 8.8	Gap — remains the most significant outstanding disclosure item; training evidenced but materially below target pace
GRI 417: Marketing and Labelling	417-1	Section 8.7	Partial — training evidenced; confirmation of "Nil" non-compliance pending
GRI 418: Customer Privacy	418-1	Section 8.5	Substantially complete — training and

GRI Standard	Disclosure	Location	Status
			certification evidence strong; incident-log confirmation pending

CONSOLIDATED RISK REGISTER

Risk Category	Risk Description	Rating	Section Reference
Environmental	Declining renewable energy share, now understood to reflect underperformance of an unexpanded 180 kWp installation rather than capacity dilution alone	Medium-High	6.3
Environmental	Rising waste generation intensity on a per-tonne basis, indicating declining process yield efficiency	Medium-High	6.6
Environmental	Possible material understatement of by-product diversion rate (cattle feed) due to a data-recording error	Medium (opportunity-adjacent)	6.6
Climate (upstream)	Psyllium crop yield volatility from drought or erratic monsoon affecting raw material supply	Medium	5.3
Climate (on-site)	Extreme summer heat affecting worker safety and equipment load	Medium	5.2
Social	Entirely male workforce composition, a likely point of scrutiny under buyer social-compliance audits	Medium	7.5
Social	Occupational dust exposure without confirmed medical surveillance	Medium-High	7.3
Social	Human rights supply chain implementation showing no measured progress across both checkpoints	Medium	7.8
Governance	Declining certified-sustainable-sourcing trend across multiple objectives (Biodiversity, Product	Medium	6.1, 6.7, 8.3

Risk Category	Risk Description	Rating	Section Reference
	Lifecycle, Business Ethics, Non-Discrimination)		
Governance	Absence of business ethics and fraud-prevention training despite documentation-based targets	Medium	8.3
Data Integrity	Recurring pattern of "reduction" objectives populated with figures matching unrelated growth metrics	Medium-High	4.4
Data Integrity	Unit-of-measure inconsistencies across several training and diversity metrics	Low-Medium	7.5, 7.8
Disclosure	GRI 416 (Customer Health and Safety) remains the least-evidenced material topic identified in this report	Medium-High	8.8

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE KPI DASHBOARD

Indicator	FY 2023–24	FY 2024–25	FY 2025–26	Trend	Status
Total Energy (kWh)	796,029	899,196	1,041,156	↑	Monitor
Renewable Energy Share (%)	33.74%	26.09%	20.69%	↓	Needs Attention
Installed Solar Capacity (kWp)	180	180	180	→	Static — underperformance under review
Water Consumption (litres)	15,219	15,884	16,759	↑	Monitor
Waste Generation (kg/MT)	5,059.5	5,346.1	5,755.6	↑	Needs Attention
Scope 2 CO_2e Emissions (kg)	652,744	737,341	853,748	↑	Monitor
Fire/H&S/Workplace Safety Incidents	—	0	0	→	Sustained — favourable

Indicator	FY 2023–24	FY 2024–25	FY 2025–26	Trend	Status
Union Representative Briefing Coverage	—	0%	100%	↑	Improved — favourable
Certified Sustainable Sourcing (multiple objectives)	—	~5%	0%	↓	Needs Attention
Anti-Corruption / Info Security / Whistleblower Training	—	100%	100%	→	Sustained — favourable
Business Ethics / Fraud Prevention Training	—	0%	0%	→	Needs Attention
Customer Health & Safety Training (GRI 416)	—	4 hrs	8 hrs (cumulative)	↑	Materially below target — Needs Attention

AUDITOR'S FINAL OPINION

This opinion is issued on the basis of a structured compilation and independent recomputation of data furnished by Rajganga Agro Product (P) Ltd, comprising a thirty-six-month environmental monitoring register, a thirty-five-theme objectives and monitoring register with two dated review checkpoints, and a thirty-nine-module training delivery matrix, mapped throughout this report against the GRI Standards 2021, the GHG Protocol Corporate Accounting and Reporting Standard, ISO 14064-1:2018, ISO 14001:2015, and the applicable Indian statutory framework. This does constitute an independent verification or assurance engagement under ISO 14064-3, and no such assurance is claimed.

On Environment. The organization's environmental data quality remains strong across the core monitoring parameters, and the confirmation of a 180 kWp installed rooftop solar capacity has allowed this report to move from a general observation of declining renewable share to a more precise technical finding: that the existing installation appears to be underperforming its own historical output by a margin exceeding what ordinary panel degradation would explain, and that a technical performance audit, rather than an immediate capacity expansion, is the logically prior corrective step.

On Materiality, Social, and Governance. The receipt of the Objectives and Monitoring Register and the Training Topics Matrix has materially strengthened these sections relative to this report's earlier draft, converting what was previously a scaffold of data requests into a substantially evidenced account across occupational health and safety, human rights, anti-corruption, information security, and several further governance themes. This strengthening is , however, uniform: this report has identified a recurring and specific data-integrity concern — several objectives nominally framed as "reduction" or "improvement" targets appear to have been populated with figures corresponding to unrelated metrics already reported elsewhere in the environmental dataset — together with a small number of apparent factual inconsistencies, most ably the waste-diversion objective's likely understatement of an existing cattle-feed valorisation practice. None of these observations are treated in this report as evidence of deliberate misstatement; they are, in the auditor's assessment, more consistent with the ordinary administrative artefacts of a first-time, rapidly assembled disclosure exercise, and are recorded here precisely so that they may be corrected before this report reaches its final, externally facing form.

Overall assessment. This is a considerably more evidence-grounded first-cycle sustainability report than its predecessor draft, reflecting genuine underlying management system maturity — evidenced by ISO 45001, ISO 37001, ISO 27001, SEDEX-SMETA, and BRCGS certifications, and now corroborated by a structured, multi-theme objectives and training framework — that had , prior to this engagement, been assembled into a single coherent disclosure document. The recommended priority sequence for the organization's next reporting cycle is: first, resolution of the data-integrity inconsistencies identified in Sections 4.4, 6.3, and 6.6; second, a technical performance audit of the existing solar installation; third, completion of the GRI 416 customer health and safety disclosure, identified throughout this report as the most significant remaining gap; and fourth, formal management validation of the materiality assessment through direct stakeholder engagement, to support this organization's stated ambition of progressing, in a future cycle, to full "in accordance with" GRI reporting.


THE END OF THIS REPORT
THE BEGINNING OF OUR CONTINUED JOURNEY
Sustainability is an ongoing commitment and a responsibility we carry forward every day. This report marks the end of our ESG disclosures, but not the end of our efforts.
We remain committed to creating lasting value for people, planet and prosperity.
PEOPLE
Empowering individuals and communities
PLANET
Protecting the environment for future generations
PROSPERITY
Driving responsible growth and shared value
Thank you
to all our stakeholders for being part of our journey towards a sustainable tomorrow.
TOGETHER, WE GROW SUSTAINABLY.
SUSTAINABILITY | RESPONSIBILITY | INTEGRITY | IMPACT
ESG REPORT FY 2025-26
THE END