


Verification Statement

Zero Liquid Discharge

Statement ID	ZLD 8123568632	
Statement Holder	Godrej Consumer Products Limited NH-37, Sarusajai, Lokhra Chariali, Near ASEB Power Station, Guwahati, Kamrup (M), Assam- 781040, India,	
Ref File No.	GCPL_Kamrup_ZLD_FY2023-24	
Project Boundary	To undertake the Zero Liquid Discharge verification of Godrej Consumer Products Limited at Kamrup, Guwahati Plant	
Objective	To verify the Organization Zero Liquid Discharge initiative	
Monitoring Period	01 st April 2023 to 31 st March 2024 (Inclusive of both day)	
Reference	TUVI Methodology	

The verification team reviewed the **wastewater data**, including the processes for **recycling and reuse**, and confirms that during the monitoring period, **GCPL's Kamrup, Guwahati plant** maintained **zero effluent discharge**, in accordance with TÜV India's **Zero Liquid Discharge (ZLD) methodology**.

TÜV India conducted an evaluation of the ZLD methodology as applied across the defined reporting boundary and assessed it for **accuracy, consistency, completeness, transparency, and conformance** with relevant criteria. Based on this assessment, TÜV India confirms that **no wastewater was discharged beyond the factory premises** during the reporting period.

For and on behalf of TÜV India Private Limited



Manojkumar Borekar
Product Head - Sustainability Assurance Service
TUV India Private Limited

Issued on: 2025-05-27
Valid until: 2026-05-26
Place: Mumbai, India

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Annexure-1

Introduction and Engagement

Godrej Consumer Products Limited (hereafter "GCPL") engaged TÜV India Private Limited (TUVI) to conduct an **independent verification** of GCPL's **Zero Liquid Discharge (ZLD)** claims for the reporting period **April 1, 2023 to March 31, 2024**. The verification was carried out in accordance with the **TÜV India ZLD Methodology**.

An **remote verification** of the ZLD implementation at **GCPL's Kamrup, Guwahati plant** was conducted by TUVI in **March 2025**. The objective of the engagement was to assess the accuracy, transparency, and completeness of GCPL's ZLD processes and data in line with TUVI's assurance protocols.

Management's Responsibility

GCPL management holds full responsibility for the **accurate preparation and disclosure** of all information and data related to its **Zero Liquid Discharge (ZLD)** claims. This includes the **identification of relevant input parameters**, data monitoring, implementation of **quality assurance and quality control (QA/QC)** measures, as well as the aggregation, validation, and documentation of the reported data. It is also the responsibility of GCPL to **design, implement, and maintain** the necessary systems and processes to support the ZLD framework and to ensure that the disclosed information is **free from material misstatements**, whether due to error or omission. TÜV India Private Limited (TUVI) conducted the **independent assurance engagement** of the ZLD-related documentation and processes in accordance with the **terms outlined in the agreed contract**.

Scope, Boundary, and Limitations of Assurance

The scope of this assurance engagement conducted by TÜV India Private Limited (TUVI) for GCPL's Zero Liquid Discharge (ZLD) claim at the Kamrup, Guwahati plant included verification and review of the following components:

- I. Consent to Operate by State Pollution Control Board with confirmation on - "No effluent shall be discharged outside the factory premises."
- II. Verification of quality of information presented in the 'ETP Daily Report' over the reporting period.
- III. Assessment of monitoring systems and the implementation of Quality Assurance/Quality Control (QA/QC) methods applied by GCPL.
- IV. Review and validation of the water mass balance, ensuring accurate tracking of water inflows, reuse, recycling, and discharge (if any).
- V. Verification of supporting documentation, including meter readings logs, instrument calibration records, utility bills, and other operational data relevant to ZLD compliance.,
- VI. Examination of third-party wastewater quality analysis reports to ensure alignment with internal monitoring and regulatory standards.

GCPL has adopted the operational control approach at its Kamrup, facility to implement and sustain a Zero Liquid Discharge (ZLD) system. The reporting boundary encompasses the GCPL Kamrup plant, located at NH-37, Sarusajai, Lohra Chariali, Near ASEB Power Station, Guwahati, Kamrup (M), Assam- 781040, India.

The assurance team conducted an onsite verification of the Kamrup site. As part of this assessment, GCPL's primary water treatment systems—including the Effluent Treatment Plant (ETP), Sewage Treatment Plant (STP), and the water recycling and reuse processes—were evaluated for the adequacy of their monitoring, reporting, and QA/QC practices.

Verification Methodology

During the assurance engagement, TÜV India Private Limited (TUVI) adopted a **risk-based approach**, with a focus on the verification of GCPL's **Zero Liquid Discharge (ZLD)** documentation. The assurance team assessed the accuracy of the water-related data, reviewed the ZLD claims, and evaluated the robustness of the underlying **data management systems, information flows, and control mechanisms**. The following key activities were undertaken:

- I. **Remote audit** of the GCPL **Kamrup plant** (Guwahati, Assam) to evaluate the **sewage and industrial effluent treatment process**, along with the **water recycling and reuse systems**.
- II. **Desk review** of the **water mass balance** and **quantification methodology** provided by GCPL, as well as supporting documentation including **water quality test reports** and **Consent to Operate** statements.
- III. Verification of the **inlet and outlet wastewater volumes and quality parameters** as reported in the **Effluent Treatment Plant (ETP) Monitoring Sheet**, and assessment of the **data management framework** supporting these disclosures.
- IV. Examination and review of relevant documentation, including but not limited to: **inlet and outlet water parameter records, meter readings, instrument calibration records, third-party water quality reports, and daily ETP reports**.
- V. **Interviews with key GCPL personnel**, including data owners and decision-makers, to understand the implementation, oversight, and governance of the ZLD processes.

- VI. **Sample-based verification** of the data entry and reporting processes, focusing on the 'ETP Daily Report' spreadsheet, to assess the accuracy and completeness of reported data for the specified period.

Conclusions

In our opinion, based on the scope of this assurance engagement, the documentation reviewed — including the **Consent to Operate** issued by the Assam Pollution Control Board, third-party **wastewater quality reports**, disclosures related to **Effluent Treatment Plant (ETP) KPI Monitoring**, and the **ETP Daily Report spreadsheet** — has been **appropriately reported** and reflects the actual conditions and performance during the monitoring period.

Based on the procedures performed, **nothing has come to our attention** that causes us to believe that the information subject to this assurance engagement has not been prepared in accordance with **TUVI's ZLD Methodology**. Furthermore, TUVI did not identify any instances of **greenwashing** or **misleading environmental claims** in the scope of this verification.

During the validity of this assurance statement, **GCPL is expected to adhere to the conditions** set forth in its **Consent to Operate** (Consent Order No: WB/GUW/T-2697/14-15/351 Dt.25/04/2023), including:


- i. *The facility sources its water from groundwater, with a total raw water consumption of 59 KLD. Effluent generation amounts to 20 KLD, which is treated through an Effluent Treatment Plant (ETP) with an equal capacity of 20 KLD. The Central Ground Water Authority (CGWA) has granted permission for the extraction of up to 65 KLD of groundwater.*
- ii. *For discharge of treated water and storm water, the unit shall comply with general discharge standards, notified by the MoEF & CC, GOI, vide GSR.422 (E) dated.19.05.1993.*
- iii. *Storm water shall not be allowed to mix with effluent and/or floor washing.*
- iv. *Storm water within the battery limits shall be channelized through separate drain/pipe passing through an Oil and Grease Trap cum Sedimentation tank.*
- v. *Rainwater harvesting facility shall be installed and maintained.*

TUV's Competence and Independence

TUV India Private Limited (TUVI) is an independent and neutral third-party organization providing water services with a team of qualified specialists in environmental management, water, energy, and greenhouse gas (GHG) verification. TUVI affirms its independence and impartiality in relation to this assurance engagement. During the reporting year, TUVI did not engage with Godrej Consumer Products Limited (GCPL) in any capacity that could compromise the objectivity or neutrality of our findings and conclusions. TUVI was not involved in the preparation or development of any content, data, or statements included in the submitted spreadsheets or supporting documents, except for this **Verification Statement**. TUVI has maintained complete impartiality throughout the engagement, including during interviews and interactions with GCPL personnel. The responsibility for the accuracy, completeness, and content of the "Zero Liquid Discharge (ZLD) data and documents" lies solely with GCPL. TUVI further confirms that there were no prior interactions or engagements with GCPL or its stakeholders that could impair the impartiality of the assurance results or the recommendations presented in this statement.

Verification Statement

Zero Liquid Discharge

Statement ID	ZLD 8123583892	
Statement Holder	Godrej Consumer Products Limited (Mosquito coil Manufacturing Section) 240/6, Kurumbakaram, Nedungadu Karaikal, Puducherry, 609603	
Ref File No.	GCPL_Karaikal_ZLD_FY2023-24	
Project Boundary	To undertake the Zero Liquid Discharge verification of Godrej Consumer Products Limited at Karaikal, Puducherry Plant	
Objective	To verify the Organization Zero Liquid Discharge initiative	
Monitoring Period	01/04/2023 to 31/03/2024 (Inclusive of both day)	
Reference	TUVI Methodology	

The verification team reviewed the **wastewater data**, including the processes for **recycling and reuse**, and confirms that during the monitoring period, **GCPL's Karaikal, plant** maintained **zero effluent discharge**, in accordance with TÜV India's **Zero Liquid Discharge (ZLD) methodology**.

TÜV India conducted an evaluation of the ZLD methodology as applied across the defined reporting boundary and assessed it for **accuracy, consistency, completeness, transparency, and conformance** with relevant criteria. Based on this assessment, TÜV India confirms that **no wastewater was discharged beyond the factory premises** during the reporting period.

For and on behalf of TÜV India Private Limited



Manojkumar Borekar
Product Head - Sustainability Assurance Service
TUV India Private Limited

Issued on: 2025-06-04
Valid until: 2026-06-03
Place: Mumbai, India

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Annexure-1

Introduction and Engagement

Godrej Consumer Products Limited (hereafter "GCPL") engaged TÜV India Private Limited (TUVI) to conduct an **independent verification** of GCPL's **Zero Liquid Discharge (ZLD)** claims for the reporting period **April 1, 2023 to March 31, 2024**. The verification was carried out in accordance with the **TÜV India ZLD Methodology**.

An **onsite verification** of the ZLD implementation at **GCPL's Karaikal, plant** was conducted by TUVI in **March 2025**. The objective of the engagement was to assess the accuracy, transparency, and completeness of GCPL's ZLD processes and data in line with TUVI's assurance protocols.

Management's Responsibility

GCPL management holds full responsibility for the **accurate preparation and disclosure** of all information and data related to its **Zero Liquid Discharge (ZLD)** claims. This includes the **identification of relevant input parameters**, data monitoring, implementation of **quality assurance and quality control (QA/QC)** measures, as well as the aggregation, validation, and documentation of the reported data. It is also the responsibility of GCPL to **design, implement, and maintain** the necessary systems and processes to support the ZLD framework and to ensure that the disclosed information is **free from material misstatements**, whether due to error or omission. TÜV India Private Limited (TUVI) conducted the **independent assurance engagement** of the ZLD-related documentation and processes in accordance with the **terms outlined in the agreed contract**.

Scope, Boundary, and Limitations of Assurance

The scope of this assurance engagement conducted by TÜV India Private Limited (TUVI) for GCPL's Zero Liquid Discharge (ZLD) claim at the Karaikal, plant included verification and review of the following components:

- I. Consent to Operate issued by the State Pollution Control Board, including confirmation of the condition: "No effluent shall be discharged outside the factory premises."
- II. Verification of the quality and consistency of information reported in the Effluent Treatment Plant (ETP) Daily Reports throughout the reporting period.
- III. Assessment of monitoring systems and the implementation of Quality Assurance/Quality Control (QA/QC) methods applied by GCPL.
- IV. Review and validation of the water mass balance, ensuring accurate tracking of water inflows, reuse, recycling, and discharge (if any).
- V. Verification of supporting documentation, including meter readings logs, instrument calibration records, utility bills, and other operational data relevant to ZLD compliance.
- VI. Examination of third-party wastewater quality analysis reports to ensure alignment with internal monitoring and regulatory standards.

GCPL has adopted the operational control approach at its Karaikal, plant facility to implement and sustain a Zero Liquid Discharge (ZLD) system. The reporting boundary encompasses the GCPL Karaikal, plant, located at Village-240/6, Kurumbakaram, Nedungadu, Karaikal, Puducherry, 609603, India.

The assurance team conducted an onsite verification of the Karaikal, Puducherry site. As part of this assessment, GCPL's primary water treatment systems—including the Effluent Treatment Plant (ETP), Sewage Treatment Plant (STP), and the water recycling and reuse processes—were evaluated for the adequacy of their monitoring, reporting, and QA/QC practices.

Verification Methodology

During the assurance engagement, TÜV India Private Limited (TUVI) adopted a **risk-based approach**, with a focus on the verification of GCPL's **Zero Liquid Discharge (ZLD)** documentation. The assurance team assessed the accuracy of the water-related data, reviewed the ZLD claims, and evaluated the robustness of the underlying **data management systems, information flows, and control mechanisms**. The following key activities were undertaken:

- I. **Onsite audit** of the GCPL Karaikal, (Puducherry) to evaluate the **sewage and industrial effluent treatment process**, along with the **water recycling and reuse systems**.
- II. **Desk review** of the **water mass balance and quantification methodology** provided by GCPL, as well as supporting documentation including **water quality test reports** and **Consent to Operate** statements.
- III. Verification of the **inlet and outlet wastewater volumes and quality parameters** as reported in the **Effluent Treatment Plant (ETP) Monitoring Sheet**, and assessment of the **data management framework** supporting these disclosures.
- IV. Examination and review of relevant documentation, including but not limited to: **inlet and outlet water parameter records, meter readings, instrument calibration records, third-party water quality reports, and daily ETP reports**.
- V. **Interviews with key GCPL personnel**, including data owners and decision-makers, to understand the implementation, oversight, and governance of the ZLD processes.

- VI. **Sample-based verification** of the data entry and reporting processes, focusing on the **'ETP Daily Report' spreadsheet**, to assess the accuracy and completeness of reported data for the specified period.

Conclusions

In our opinion, based on the scope of this assurance engagement, the documentation reviewed — including the **Consent to Operate** issued by the Puducherry Pollution Control Committee, third-party **wastewater quality reports**, disclosures related to **Effluent Treatment Plant (ETP) KPI Monitoring**, and the **ETP Daily Report spreadsheet** — has been **appropriately reported** and reflects the actual conditions and performance during the monitoring period.

Based on the procedures performed, **nothing has come to our attention** that causes us to believe that the information subject to this assurance engagement has not been prepared in accordance with **TUVI's ZLD Methodology**. Furthermore, TUVI did not identify any instances of **greenwashing** or **misleading environmental claims** in the scope of this verification.

During the validity of this assurance statement, **GCPL is expected to adhere to the conditions** set forth in its **Consent to Operate** (Consent Order Ref No: (435205) / (2024)), including:

- I. *The max daily water requirement or effluent discharge (zero) shall not exceed the prescribed limits.*
- II. *There should be no discharge of effluent from the process, in any form.*
- III. *The domestic waste water being generated shall be treated in the existing Sewage Treatment Plant and the treated water shall be used for gardening after confirming prescribed standards.*
- IV. *The cooling water wherever required shall be recycled.*
- V. *Water flow meters provided both at inlet and outlet of the existing Sewage Treatment Plant shall be regularly operated and the meter readings shall be recorded in a log book.*
- VI. *GCPL shall maintain logbook for the flow meter of the existing bore well.*
- VII. *The unit shall conduct Effluent Monitoring for Sewage Treatment Plant, engaging an NABL accredited Laboratory, for the prescribed parameters and shall submit the report of same to the authority.*

TUV's Competence and Independence

TUV India Private Limited (TUVI) is an independent and neutral third-party organization providing water services with a team of qualified specialists in environmental management, water, energy, and greenhouse gas (GHG) verification. TUVI affirms its independence and impartiality in relation to this assurance engagement. During the reporting year, TUVI did not engage with Godrej Consumer Products Limited (GCPL) in any capacity that could compromise the objectivity or neutrality of our findings and conclusions. TUVI was not involved in the preparation or development of any content, data, or statements included in the submitted spreadsheets or supporting documents, except for this **Verification Statement**. TUVI has maintained complete impartiality throughout the engagement, including during interviews and interactions with GCPL personnel. The responsibility for the accuracy, completeness, and content of the "Zero Liquid Discharge (ZLD) data and documents" lies solely with GCPL. TUVI further confirms that there were no prior interactions or engagements with GCPL or its stakeholders that could impair the impartiality of the assurance results or the recommendations presented in this statement.

Verification Statement

Zero Liquid Discharge

Statement ID ZLD 8123568607

Statement Holder Godrej Consumer Products Limited
9HR2+GJX, Industrial Units Kathua,
Jammu and Kashmir 184102, India



Ref File No. GCPL_Kathua_ZLD_FY2023-24

Project Boundary To undertake the Zero Liquid Discharge verification of Godrej Consumer Products Limited at Kathua, Jammu Plant

Objective To verify the Organization Zero Liquid Discharge initiative

Monitoring Period 01/04/2023 to 31/03/2024 (Inclusive of both day)

Reference TUVI Methodology

The verification team reviewed the **wastewater data**, including the processes for **recycling and reuse**, and confirms that during the monitoring period, **GCPL's Kathua plant** maintained **zero effluent discharge**, in accordance with TÜV India's **Zero Liquid Discharge (ZLD) methodology**.

TÜV India conducted an evaluation of the ZLD methodology as applied across the defined reporting boundary and assessed it for **accuracy, consistency, completeness, transparency, and conformance** with relevant criteria. Based on this assessment, TÜV India confirms that **no wastewater was discharged beyond the factory premises** during the reporting period.

For and on behalf of TÜV India Private Limited



Manojkumar Borekar
Product Head - Sustainability Assurance Service
TUV India Private Limited

Issued on: 2025-05-26
Valid until: 2026-05-25
Place: Mumbai, India

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Annexure-1

Introduction and Engagement

Godrej Consumer Products Limited (hereafter "GCPL") engaged TÜV India Private Limited (TUVI) to conduct an **independent verification** of GCPL's **Zero Liquid Discharge (ZLD)** claims for the reporting period **April 1, 2023 to March 31, 2024**. The verification was carried out in accordance with the **TÜV India ZLD Methodology**.

A **remote verification** of the ZLD implementation at **GCPL's Kathua plant** was conducted by TUVI in **March 2025**. The objective of the engagement was to assess the accuracy, transparency, and completeness of GCPL's ZLD processes and data in line with TUVI's assurance protocols.

Management's Responsibility

GCPL management holds full responsibility for the **accurate preparation and disclosure** of all information and data related to its **Zero Liquid Discharge (ZLD)** claims. This includes the **identification of relevant input parameters**, data monitoring, implementation of **quality assurance and quality control (QA/QC)** measures, as well as the aggregation, validation, and documentation of the reported data. It is also the responsibility of GCPL to **design, implement, and maintain** the necessary systems and processes to support the ZLD framework and to ensure that the disclosed information is **free from material misstatements**, whether due to error or omission. TÜV India Private Limited (TUVI) conducted the **independent assurance engagement** of the ZLD-related documentation and processes in accordance with the **terms outlined in the agreed contract**.

Scope, Boundary, and Limitations of Assurance

The scope of this assurance engagement conducted by TÜV India Private Limited (TUVI) for GCPL's Zero Liquid Discharge (ZLD) claim at the Kathua plant included verification and review of the following components:

- I. Consent to Operate issued by the State Pollution Control Board, including confirmation of the condition: "No effluent shall be discharged outside the factory premises."
- II. Verification of the quality and consistency of information reported in the Effluent Treatment Plant (ETP) Daily Reports throughout the reporting period.
- III. Assessment of monitoring systems and the implementation of Quality Assurance/Quality Control (QA/QC) methods applied by GCPL.
- IV. Review and validation of the water mass balance, ensuring accurate tracking of water inflows, reuse, recycling, and discharge (if any).
- V. Verification of supporting documentation, including meter readings logs, instrument calibration records, utility bills, and other operational data relevant to ZLD compliance.
- VI. Examination of third-party wastewater quality analysis reports to ensure alignment with internal monitoring and regulatory standards.

GCPL has adopted the operational control approach at its Kathua facility to implement and sustain a Zero Liquid Discharge (ZLD) system. The reporting boundary encompasses the GCPL Kathua plant, located at 9HR2+GJX, Industrial Units, Kathua, Jammu and Kashmir 184102, India.

The assurance team conducted a remote verification of the Kathua site. As part of this assessment, GCPL's primary water treatment systems—including the Effluent Treatment Plant (ETP), Sewage Treatment Plant (STP), and the water recycling and reuse processes—were evaluated for the adequacy of their monitoring, reporting, and QA/QC practices.

Verification Methodology

During the assurance engagement, TÜV India Private Limited (TUVI) adopted a **risk-based approach**, with a focus on the verification of GCPL's **Zero Liquid Discharge (ZLD)** documentation. The assurance team assessed the accuracy of the water-related data, reviewed the ZLD claims, and evaluated the robustness of the underlying **data management systems, information flows, and control mechanisms**. The following key activities were undertaken:

- I. **Remote audit** of the GCPL Kathua plant (Jammu) to evaluate the **sewage and industrial effluent treatment process**, along with the **water recycling and reuse systems**.

- II. **Desk review** of the **water mass balance** and **quantification methodology** provided by GCPL, as well as supporting documentation including **water quality test reports** and **Consent to Operate** statements.
- III. Verification of the **inlet and outlet wastewater volumes and quality parameters** as reported in the **Effluent Treatment Plant (ETP) Monitoring Sheet**, and assessment of the **data management framework** supporting these disclosures.
- IV. Examination and review of relevant documentation, including but not limited to: **inlet and outlet water parameter records, meter readings, instrument calibration records, third-party water quality reports, and daily ETP reports.**
- V. **Interviews with key GCPL personnel**, including data owners and decision-makers, to understand the implementation, oversight, and governance of the ZLD processes.
- VI. **Sample-based verification** of the data entry and reporting processes, focusing on the '**ETP Daily Report**' spreadsheet, to assess the accuracy and completeness of reported data for the specified period.

Conclusions

In our opinion, based on the scope of this assurance engagement, the documentation reviewed — including the **Consent to Operate** issued by the **Jammu & Kashmir Pollution Control Committee**, third-party **wastewater quality reports**, disclosures related to **Effluent Treatment Plant (ETP) KPI Monitoring**, and the **ETP Daily Report spreadsheet** — has been **appropriately reported** and reflects the actual conditions and performance during the monitoring period.

Based on the procedures performed, **nothing has come to our attention** that causes us to believe that the information subject to this assurance engagement has not been prepared in accordance with **TUVI's ZLD Methodology**. Furthermore, TUVI did not identify any instances of **greenwashing** or **misleading environmental claims** in the scope of this verification.

During the validity of this assurance statement, **GCPL is expected to adhere to the conditions** set forth in its **Consent to Operate** (Consent Order No: **PCC/digital//23042326060 of 2023**), including:


- I. **Trade Effluent:** GCPL must ensure the continuous operation and maintenance of a comprehensive effluent treatment system (Primary/Secondary/Tertiary) to meet the prescribed discharge quality standards.
- II. **Sewage Effluent:** A suitable sewage treatment system must be in continuous operation and maintenance to meet the prescribed treatment standards prior to disposal.
- III. **Water Consumption and Disposal:**
 - a) Daily water consumption must not exceed the sanctioned **KLD** limit.
 - b) Daily sewage effluent generation must remain within the approved **KLD** threshold.
 - c) All wastewater generated must be properly treated through **ETP/STP** systems prior to reuse or final disposal

TUV's Competence and Independence

TUV India Private Limited (TUVI) is an independent and neutral third-party organization providing water services with a team of qualified specialists in environmental management, water, energy, and greenhouse gas (GHG) verification. TUVI affirms its independence and impartiality in relation to this assurance engagement. During the reporting year, TUVI did not engage with Godrej Consumer Products Limited (GCPL) in any capacity that could compromise the objectivity or neutrality of our findings and conclusions. TUVI was not involved in the preparation or development of any content, data, or statements included in the submitted spreadsheets or supporting documents, except for this **Verification Statement**. TUVI has maintained complete impartiality throughout the engagement, including during interviews and interactions with GCPL personnel. The responsibility for the accuracy, completeness, and content of the "Zero Liquid Discharge (ZLD) data and documents" lies solely with GCPL. TUVI further confirms that there were no prior interactions or engagements with GCPL or its stakeholders that could impair the impartiality of the assurance results or the recommendations presented in this statement.

Verification Statement

Zero Liquid Discharge

Statement ID	ZLD 8123568615	
Statement Holder	Godrej Consumer Products Limited Plot no.: U-30, Industrial Area, Malanpur, 447, Ravi Nagar, Gwalior, Malanpur (CT), Gohad, Bhind (MP)- 477116, India	
Ref File No.	GCPL_Malanpur_ZLD_FY2023-24	
Project Boundary	To undertake the Zero Liquid Discharge verification of Godrej Consumer Products Limited at Malanpur, Madhya Pradesh Plant	
Objective	To verify the Organization Zero Liquid Discharge initiative	
Monitoring Period	01/04/2023 to 31/03/2024 (Inclusive of both day)	
Reference	TUVI Methodology	

The verification team reviewed the **wastewater data**, including the processes for **recycling and reuse**, and confirms that during the monitoring period, **GCPL's Malanpur plant** maintained **zero effluent discharge**, in accordance with TÜV India's **Zero Liquid Discharge (ZLD) methodology**.

TÜV India conducted an evaluation of the ZLD methodology as applied across the defined reporting boundary and assessed it for **accuracy, consistency, completeness, transparency, and conformance** with relevant criteria. Based on this assessment, TÜV India confirms that **no wastewater was discharged beyond the factory premises** during the reporting period.

For and on behalf of TÜV India Private Limited



Manojkumar Borekar
Product Head - Sustainability Assurance Service
TUV India Private Limited

Issued on: 2025-06-04
Valid until: 2026-06-03
Place: Mumbai, India

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Annexure-1

Introduction and Engagement

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An **onsite verification** of the ZLD implementation at **GCPL's Malanpur plant** was conducted by TUVI in **February 2025**. The objective of the engagement was to assess the accuracy, transparency, and completeness of GCPL's ZLD processes and data in line with TUVI's assurance protocols.

Management's Responsibility

GCPL management holds full responsibility for the **accurate preparation and disclosure** of all information and data related to its **Zero Liquid Discharge (ZLD)** claims. This includes the **identification of relevant input parameters**, data monitoring, implementation of **quality assurance and quality control (QA/QC)** measures, as well as the aggregation, validation, and documentation of the reported data. It is also the responsibility of GCPL to **design, implement, and maintain** the necessary systems and processes to support the ZLD framework and to ensure that the disclosed information is **free from material misstatements**, whether due to error or omission. TÜV India Private Limited (TUVI) conducted the **independent assurance engagement** of the ZLD-related documentation and processes in accordance with the **terms outlined in the agreed contract**.

Scope, Boundary, and Limitations of Assurance

The scope of this assurance engagement conducted by TÜV India Private Limited (TUVI) for GCPL's Zero Liquid Discharge (ZLD) claim at the Malanpur plant included verification and review of the following components:

- I. Consent to Operate issued by the State Pollution Control Board, including confirmation of the condition: "No effluent shall be discharged outside the factory premises."
- II. Verification of the quality and consistency of information reported in the Effluent Treatment Plant (ETP) Daily Reports throughout the reporting period.
- III. Assessment of monitoring systems and the implementation of Quality Assurance/Quality Control (QA/QC) methods applied by GCPL.
- IV. Review and validation of the water mass balance, ensuring accurate tracking of water inflows, reuse, recycling, and discharge (if any).
- V. Verification of supporting documentation, including meter readings logs, instrument calibration records, utility bills, and other operational data relevant to ZLD compliance.
- VI. Examination of third-party wastewater quality analysis reports to ensure alignment with internal monitoring and regulatory standards.

GCPL has adopted the operational control approach at its Malanpur facility to implement and sustain a Zero Liquid Discharge (ZLD) system. The reporting boundary encompasses the GCPL Malanpur plant, located at Plot No. U-30, Industrial Area, Malanpur, 447, Ravi Nagar, Gwalior, Malanpur (CT), Gohad, Bhind (MP)-477116, India.

The assurance team conducted an onsite verification of the Malanpur site. As part of this assessment, GCPL's primary water treatment systems—including the Effluent Treatment Plant (ETP), Sewage Treatment Plant (STP), and the water recycling and reuse processes—were evaluated for the adequacy of their monitoring, reporting, and QA/QC practices.

Verification Methodology

During the assurance engagement, TÜV India Private Limited (TUVI) adopted a **risk-based approach**, with a focus on the verification of GCPL's **Zero Liquid Discharge (ZLD)** documentation. The assurance team assessed the accuracy of the water-related data, reviewed the ZLD claims, and evaluated the robustness of the underlying **data management systems, information flows, and control mechanisms**. The following key activities were undertaken:

- I. **Onsite audit** of the GCPL **Malanpur plant** (Madhya Pradesh) to evaluate the **sewage and industrial effluent treatment process**, along with the **water recycling and reuse systems**.
- II. **Desk review** of the **water mass balance** and **quantification methodology** provided by GCPL, as well as supporting documentation including **water quality test reports** and **Consent to Operate** statements.
- III. Verification of the **inlet and outlet wastewater volumes and quality parameters** as reported in the **Effluent Treatment Plant (ETP) Monitoring Sheet**, and assessment of the **data management framework** supporting these disclosures.
- IV. Examination and review of relevant documentation, including but not limited to: **inlet and outlet water parameter records, meter readings, instrument calibration records, third-party water quality reports, and daily ETP reports**.
- V. **Interviews with key GCPL personnel**, including data owners and decision-makers, to understand the implementation, oversight, and governance of the ZLD processes.
- VI. **Sample-based verification** of the data entry and reporting processes, focusing on the **'ETP Daily Report' spreadsheet**, to assess the accuracy and completeness of reported data for the specified period.

Conclusions

In our opinion, based on the scope of this assurance engagement, the documentation reviewed — including the **Consent to Operate** issued by the M.P Pollution Control Board, third-party **wastewater quality reports**, disclosures related to **Effluent Treatment Plant (ETP) KPI Monitoring**, and the **ETP Daily Report spreadsheet** — has been **appropriately reported** and reflects the actual conditions and performance during the monitoring period.

Based on the procedures performed, **nothing has come to our attention** that causes us to believe that the information subject to this assurance engagement has not been prepared in accordance with **TÜV's ZLD Methodology**. Furthermore, TÜV did not identify any instances of **greenwashing** or **misleading environmental claims** in the scope of this verification.

During the validity of this assurance statement, **GCPL is expected to adhere to the conditions** set forth in its **Consent to Operate** (Consent Order No: AW-58071), including:

- I. The daily quantity of **trade effluent** at out fall of the unit shall not exceed **690 kL/day** and the daily quantity of **sewage** at out fall of the unit shall not exceed **200 kL/day**.
- II. **Trade Effluent:** The applicant shall provide comprehensive effluent treatment system of 900 KLD as per the proposal submitted to board and maintain the same properly to achieve the prescribed standards.
- III. **Sewage Treatment:** The applicant shall provide comprehensive sewage treatment system as per the proposal submitted to board and maintain the same properly to achieve the prescribed standards.
- IV. The effluent shall be treated up to prescribed Standards and reuse in the process, for cooling and for green belt devolvement/gardening within premises. Hence, **zero discharge condition shall be practiced**. In no case treated effluent shall be discharged outside of industry/unit premises.
- V. **Water meter** preferably electromagnetic/ultrasonic type with digital flow recording facilities shall be installed separately **for category wise consumption of water** for Industrial cooling/boiler feed, mine spray, process & domestic purposes and data shall be submitted online through XGN monthly patrak/statements. The industry/unit **shall also monitor the treated wastewater flow** and report the same online through monthly patrak/statements.
- VI. Any change in production capacity, process, raw material used etc. and for any enhancement of the above prior permission of the Board shall be obtained. All authorized discharges shall be consistent with terms and conditions of this consent. Facility expansions, production increases or process modifications which result new or increased discharges of pollutants must be reported by submission of a fresh consent application for prior permission of the Board.
- VII. All **treatment/control facilities/systems** installed or used by the applicant shall be regularly maintained in good working order and **operate effectively/efficiently** to achieve compliance of the terms and conditions of this consent.
- VIII. The specific effluent limitations and pollution control systems applicable to the discharge permitted herein are set forth as above conditions.
- IX. **Compilation of Monitoring data:**
 - i. Samples and measurements taken to meet the monitoring requirements specified above shall be representative of the volume and nature of monitored discharge.
 - ii. Following promulgation of guidelines establishing test procedures for the analysis of pollutants, all sampling and analytical methods used to meet the monitoring requirements specified above shall conform to such guidelines unless otherwise specified sampling and analytical methods shall conform to the latest edition of the Indian Standard specifications and where it is not specified the guidelines as per standard methods for the examination of Water and Waste latest edition of the American Public Health Association, New York U.S.A. shall be used.
 - iii. The applicant shall take samples and measurement to meet the monthly requirements specified above and report online through XGN the same to the Board.
- X. **Recording of Monitoring Activities & Results:**
 - i. The applicant shall make and maintain online records of all information resulting from monitoring activities by this Consent.
 - ii. The applicant shall record for each measurement of samples taken pursuant to the requirements of this Consent as follows:
 - (i) The date, exact place and time of sampling
 - (ii) The dates on which analysis were performed
 - (iii) Who performed the analysis?
 - (iv) The analytical techniques or methods used and
 - (v) The result of all required analysis
 - iii. If the applicant monitors any Pollutant more frequently as is by this Consent, he shall include the results of such monitoring in the calculation and reporting of values required in the discharge monitoring reports which may be prescribed by the Board. Such increased frequency shall be indicated on the Discharge Monitoring Report Form.
 - iv. The applicant shall retain for a minimum of 3 years all records of monitoring activities including all records of Calibration and maintenance of instrumentation and original strip chart regarding continuous monitoring instrumentation. The period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the applicant or when requested by Central or State Board or the court.
- XI. **Reporting of Monitoring Results:** Monitoring Information required by this Consent shall be summarized and reported by submitting a Discharge Monitoring report on line to the Board.
- XII. **Limitation of discharge of oil Hazardous Substance in harmful quantities:** The applicant shall not discharge oil or other hazardous substances in quantities defined as harmful in relevant regulations into natural water course. Nothing in this Consent shall be deemed to preclude the institution of any legal action nor relive the applicant from any responsibilities, liabilities, or penalties to which the applicant is or may be subject to clauses.
- XIII. **Limitation of visible floating solids and foam:** During the period beginning date of issuance the applicant shall not discharge floating solids or visible foam.
- XIV. **Disposal of Collected Solid waste/sludge:** All hazardous waste/sludge shall be disposed of as per the Authorization issued under Hazardous & other waste (M&TM) Rules 2016. And/other Solids Sludge, dirt, silt or other pollutant separated from or resulting from treatment shall be disposed of in such a manner as to prevent any pollutant from such

- materials from entering any such water. Any live fish, shell fish or other animal collected or trapped as a result of intake water screening or treatment may be returned to eaters body habitat.
- XV. **Provision for Electric Power Failure:** The applicant shall assure to the consent issuing authority that the applicant has installed or provided for an alternative electric power source sufficient to operate all facilities utilized by the applicant to maintain compliance with the terms and conditions of the Consent.
 - XVI. **Prohibition of Bypass system of treatment facilities:** The diversion or by-pass of any discharge from facilities utilized by the applicant to maintain compliance with the terms and conditions of this Consent is prohibited except :
 - i. where unavoidable to prevent loss of life or severe property damage, or
 - ii. where excessive storm drainage or run off would damage any facilities necessary for compliance with the terms and conditions of this Consent. The applicant shall immediately notify the consent issuing authorities in writing of each such diversion or by-pass in accordance with the procedure specified above for reporting non-compliance.
 - XVII. Industry/ Institute/mine management shall submit the information online through XGN in reference to compliance of consent conditions.
 - XVIII. Industry shall install, operate and **maintain the ETP/STP** to achieve zero effluent discharge condition within premises.
 - XIX. The surface water drains network shall be separate; industry shall ensure that drains /pipes carrying effluent shall not be joined to any surface water runoff carrying drains.

TUV's Competence and Independence

TUV India Private Limited (TUVI) is an independent and neutral third-party organization providing water services with a team of qualified specialists in environmental management, water, energy, and greenhouse gas (GHG) verification. TUVI affirms its independence and impartiality in relation to this assurance engagement. During the reporting year, TUVI did not engage with Godrej Consumer Products Limited (GCPL) in any capacity that could compromise the objectivity or neutrality of our findings and conclusions. TUVI was not involved in the preparation or development of any content, data, or statements included in the submitted spreadsheets or supporting documents, except for this **Verification Statement**. TUVI has maintained complete impartiality throughout the engagement, including during interviews and interactions with GCPL personnel. The responsibility for the accuracy, completeness, and content of the "Zero Liquid Discharge (ZLD) data and documents" lies solely with GCPL. TUVI further confirms that there were no prior interactions or engagements with GCPL or its stakeholders that could impair the impartiality of the assurance results or the recommendations presented in this statement.