BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

| 1. | Corporate Identity Number (CIN) of the Listed Entity | : | L74999DL1987PLC029553 |
|-----|--|---|--|
| 2. | Name of the Listed Entity | : | SANDHAR TECHNOLOGIES LIMITED ("the Company" or STL) |
| 3. | Year of incorporation | : | 19–10–1987 |
| 4. | Registered office address | : | B-6/20, L.S.C. Safdarjung Enclave New Delhi, Delhi, India, 110029 |
| 5. | Corporate address | : | Plot-13, Sector-44, Gurugram, Haryana, India, 122002 |
| 6. | E-mail | : | brsr@sandhar.in |
| 7. | Telephone | : | 0124-4518900 |
| 8. | Website | : | www.sandhargroup.com |
| 9. | Financial year for which reporting is being done | : | 2024–2025 |
| 10. | Name of the Stock Exchange(s) where shares are listed | : | National Stock Exchange of India Limited and BSE Limited |
| 11. | Paid-up Capital | : | ₹6,019.07 Lakhs |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | : | Shri. Yashpal Jain Email: brsr@sandhar.in Telephone: 0124–4518900 |
| 13. | Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together). | : | The disclosures under this report are made on a standalone basis. |
| 14 | Name of assessment or assurance provider: | : | The Company does not fall within the top 250 listed companies based on average market capitalization and, therefore, is not mandatorily required to undertake external assessment or assurance for the BRSR as per regulatory guidelines. Accordingly, this requirement is currently not applicable. |
| 15 | Type of assessment or assurance obtained: | : | NA |
| | | _ | |

II. Products/services

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

| S. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|--------|------------------------------|----------------------------------|-----------------------------|
| 1. | Manufacturing | Metal & Metal Products | 100% |

17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

| S. No. | Product/Service | NIC Code | % of total Turnover contributed |
|-----------|------------------------|---------------------------------|---------------------------------|
| 1. | Locks | 259, 282, 293, 309, 453 and 454 | 24.07% |
| 2. | Sheet Metal Components | 282, 293, 309, 453 and 454 | 22.81% |
| 3. | Other Products | 282, 293, 309, 453 and 454 | 21.88% |
| 4. | Wheel Assembly | 293, 309, 453 and 454 | 9.39% |
| 5. | Cabins | 282 | 9.29% |
| 6. | Mirror Assembly | 282, 293, 309, 453 and 454 | 7.47% |
| 7. | Handle Bar Assembly | 293, 309, 453 and 454 | 3.34% |
| 8. | Plastic Parts | 292, 293, 309, 453 and 454 | 1.75% |

III. Operations

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

| Location | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National | 25* | 2 | 27 |
| International | - | - | - |

^{*}The total number of 25 plants includes two plants that are co-located at a single site.

19. Markets served by the entity:

a. Number of locations

| Locations | Number |
|----------------------------------|--------|
| National (No. of States) | 28 |
| International (No. of Countries) | 5 |

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

The overall contribution of the exports to the total turnover is 1.13%.

c. A brief on types of customers

The Company is a market leader in the automotive components and system segment, offering a wide range of innovative, high-quality, and cost-effective products to customers worldwide. Sales are primarily conducted through a Business-to-Business (B2B) model, catering mainly to Original Equipment Manufacturers (OEMs).

IV. Employees

- 20. Details as at the end of Financial Year:
 - a. Employees and workers (including differently abled):

| S. | Particulars | Total | Ma | ale | Female | |
|-----|--------------------------|----------|---------|-----------|--------|-----------|
| No. | | (A) | No. (B) | % (B / A) | No.(C) | % (C / A) |
| | E | MPLOYEES | | | | |
| 1. | Permanent (D) | 1,144 | 1,082 | 95% | 62 | 5% |
| 2. | Other than Permanent (E) | 44 | 38 | 86% | 6 | 14% |
| 3. | Total employees (D + E) | 1,188 | 1,120 | 94% | 68 | 6% |
| | | WORKERS | | | | |
| 4. | Permanent (F) | 501 | 475 | 95% | 26 | 5% |
| 5. | Other than Permanent (G) | 59 | 59 | 100% | - | 0% |
| 6. | Total workers (F + G) | 560 | 534 | 95% | 26 | 5% |

b. Differently abled Employees and workers:

| S. | Particulars | Total | Ma | ale | Female | |
|-----|---|------------|---------|-----------|--------|-----------|
| No. | | (A) | No. (B) | % (B / A) | No.(C) | % (C / A) |
| | DIFFERENTLY | ABLED EMP | LOYEES | | | |
| 1. | Permanent (D) | - | - | 0% | - | 0% |
| 2. | Other than Permanent (E) | - | - | 0% | - | 0% |
| 3. | Total differently abled employees (D + E) | - | - | 0% | - | 0% |
| | DIFFERENTL | Y ABLED WC | RKERS | | | |
| 4. | Permanent (F) | - | _ | 0% | _ | 0% |
| 5. | Other than permanent (G) | - | _ | 0% | _ | 0% |
| 6. | Total differently abled workers (F + G) | - | - | 0% | _ | 0% |

21. Participation/Inclusion/Representation of women

| | Total (A) | No. and per Fem | |
|----------------------------|-----------|--------------------|-----------|
| | | No. (B) | % (B / A) |
| Board of Directors* | 10 | 3 | 30% |
| Key Management Personnel** | 2 | - | 0% |

^{*} The Board of Directors includes one member of the Key Managerial Personnel (KMP), namely, Shri Jayant Davar, who is the Chairman, Managing Director and was appointed as the Chief Executive Officer of the Company with effect from 23rd May 2024.

22. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)

| | FY 2024–2025 (Turnover rate in current FY) | | FY 2023-2024 (Turnover rate in previous FY) | | | FY 2022–2023 (Turnover rate in the year prior to the previous FY) | | | |
|---------------------|---|--------|--|--------|--------|---|--------|--------|--------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 26.61% | 32.48% | 26.92% | 26.09% | 32.20% | 26.43% | 30.52% | 28.57% | 30.41% |
| Permanent Workers | 4.18% | 10.91% | 4.55% | 2.07% | 3.85% | 2.16% | 3.10% | 4.35% | 3.16% |

V. Holding, Subsidiary and Associate Companies (including joint ventures)

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

| S. No. | Name of the Holding/ Subsidiary/ Associate Companies/ Joint Ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|-----------|---|---|---|--|
| 1 | Sandhar Automotive Systems Private Limited | Subsidiary | 100% | No |
| 2 | Sandhar Ascat Private Limited (formerly known as Sandhar Tooling Private Limited) | Subsidiary | 100% | No |
| 3 | Sandhar Auto Castings Private Limited | Subsidiary | 100% | No |
| 4 | Sandhar Engineering Private Limited | Subsidiary | 100% | No |
| 5 | Sandhar Technologies Barcelona S. L | Subsidiary | 100% | No |
| 6 | Sandhar Auto Electric Solutions Private Limited | Subsidiary | 100% | No |
| 7 | Winnercom Sandhar Technologies Private Limited | Joint Venture | 50% | No |
| 8 | Sandhar Han Shin Auto Technologies Private Limited | Joint Venture | 50% | No |
| 9 | Sandhar Whetron Electronics Private Limited | Joint Venture | 50% | No |
| 10 | Sandhar Amkin Industries Private Limited | Joint Venture | 69.12% | No |
| 11 | Sandhar Han Sung Technologies Private Limited | Joint Venture | 50% | No |
| 12 | Kwangsung Sandhar Technologies Private Limited | Joint Venture | 50% | No |
| 13 | Jinyoung Sandhar Mechatronics Private Limited* | Joint Venture | 50% | No |
| | | | | |

^{*}The Company entered into a Share Purchase Agreement with Jinyoung Electro-Mechanics Company Limited, South Korea, on 27 March 2025, for the sale of its entire stake in the Joint Venture namely, Jinyoung Sandhar Mechatronics Private Limited. The consideration for the transaction was received on 15 April 2025. Consequently, Jinyoung Sandhar Mechatronics Private Limited ceased to be a Joint Venture of the Company as of 15 April 2025.

 $^{{\}tt **KMP}\ includes\ one\ member\ who\ is\ also\ part\ of\ the\ Board\ of\ Directors\ and\ one\ individual\ who\ holds\ dual\ responsibilities$ as Chief Financial Officer as well as Company Secretary.

VI. CSR Details

- 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) Yes
 - (ii) Turnover (in ₹) 2,91,303.56 Lakhs
 - (iii) Net worth (in ₹) 1,14,655.31 Lakhs

VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) | FY 2024–2025 Current Financial Year | | | FY 2023–2024 Previous Financial Year | | |
|---|--|---|---|---------|---|---|---------|
| | (If Yes, then provide web-link for grievance redress policy)* | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | Yes | - | - | - | - | - | - |
| Investors (other than shareholders) | Yes | - | - | - | - | - | - |
| Shareholders | Yes | - | - | - | - | - | - |
| Employees and workers | Yes | - | - | - | - | - | - |
| Customers | Yes | 1,361 | - | - | 488** | - | - |
| Value Chain Partners (Other than customers) | Yes | 382 | 9 | - | 201** | - | - |
| Other (please specify) | NA | - | - | - | - | - | - |

^{*}The Company's Vigil Mechanism/Whistle-Blower Policy provides a robust framework for employees and directors to raise concerns and grievances. The policy is accessible at: https://sandhargroup.com/investors/disclosures-under-regulation-46-of-the-lodr. Additionally, the Company has a Grievance Redressal Policy in place specifically for employees, ensuring that workplace-related concerns are addressed through a structured and transparent process.

A dedicated email ID, investors@sandhar.in, is available for investors and shareholders to raise their queries. The Legal and Secretarial Department oversees the monitoring and resolution of concerns received through this channel, in coordination with the relevant departments within the Company.

With regard to suppliers, customized surveys are periodically conducted to gauge their satisfaction and gather feedback on their business interactions with the Company.

Additionally, the Company obtains customer assessment and feedback through specified platforms as per the Company's Policy on a regular basis to identify areas of concern reported. This enables the identification of key concerns and areas for improvement, ensuring customer issues are addressed systematically and effectively.

^{**} The previous year's figures have been revised or regrouped wherever necessary.

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

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

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---------------------------------|--|--|---|---|
| 1 | Climate Change | Risk & Opportunity | Climate change poses both risks and opportunities with significant implications for the Company's long-term operational and financial sustainability. As a leader in the automotive components and systems sector, the Company is exposed to both physical risks (e.g., extreme weather events, supply chain disruptions) and transition risks (e.g., evolving regulations, shifting market preferences). At the same time, climate change presents opportunities through increased demand for sustainable mobility solutions, including electric vehicles (EVs) and low-emission technologies. | The Company has integrated climate-related considerations into its enterprise risk management framework. Key mitigation strategies include: - Ongoing assessment and reduction of carbon footprint across operations and supply chain. - Adoption of cleaner technologies and energy-efficient manufacturing practices. - Monitoring regulatory developments and adapting business strategies accordingly. These initiatives are aimed at ensuring business resilience and regulatory compliance, while supporting the Company's long-term sustainability vision. | Negative and Positive |
| 2 | Stakeholder Engagement | Opportunity | Stakeholder engagement presents a strategic opportunity for the Company to strengthen its relationships with key internal and external stakeholders, including customers, employees, investors, suppliers, regulators, and the communities it serves. Engaging meaningfully with stakeholders helps the Company: - Gather actionable insights and diverse perspectives. - Anticipate emerging expectations and market trends. - Enhance trust, transparency, and brand reputation. - Make informed decisions that are aligned with stakeholder priorities and long-term value creation. The Company has institutionalized a robust and continual stakeholder engagement framework, involving structured dialogues, feedback mechanisms, and periodic assessments to ensure alignment with | NA NA | Positive |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---------------------------------|--|---|--|---|
| 3 | Waste Management | Risk and Opportunity | Improper handling, treatment, or disposal of waste can pose environmental, regulatory, and reputational risks to the Company. Being part of a resource-intensive manufacturing sector, the Company generates various types of industrial and hazardous waste. At the same time, efficient waste management presents a strategic opportunity to enhance resource efficiency, promote circularity, and reduce environmental footprint. By focusing on waste reduction, recycling, and reuse, the Company can derive environmental and operational benefits while aligning with sustainability goals. | Disposal of waste through authorised vendors. | Negative and Positive |
| 4 | Water Management | Risk and Opportunity | Water is a critical natural resource for manufacturing operations, and its efficient management is essential for business continuity, environmental stewardship, and community well-being. The Company recognizes water scarcity, regulatory pressure, and community expectations as key risks that require proactive mitigation. At the same time, adopting sustainable water practices offers opportunities to reduce operational costs, strengthen license to operate, and demonstrate leadership in responsible resource use. The Company is committed to enhancing water-use efficiency and ensuring equitable access to water for stakeholders in and around its operational areas. | To address water-related risks and promote sustainability, the Company has adopted a multipronged approach: - Zero Liquid Discharge (ZLD)-compliant systems have been implemented in four major manufacturing units, utilizing Rotary Evaporators and Solar Evaporators to significantly reduce liquid discharge. - Other facilities are equipped with Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) to ensure proper treatment of industrial and domestic wastewater. - Treated water is reused for non-potable applications such as gardening, thereby reducing the Company's dependence on freshwater sources. - The Company continuously evaluates new technologies and practices to improve water recycling and conservation. | Negative and Positive |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---|--|--|---|--|
| 5 | Health & Safety | Risk & Opportunity | Health and safety management is a fundamental aspect of responsible business operations. Inadequate health and safety measures can lead to workplace incidents, legal liabilities, reputational damage, and loss of productivity making it a key risk area. On the other hand, robust health and safety practices enhance employee morale, retention, and operational efficiency, thereby presenting an opportunity to strengthen organizational resilience and stakeholder trust. The Company is fully committed to the continuous improvement of its health and safety practices, guided by its Safety, Health, and Environment (SHE) policy. This commitment applies across all business locations and extends to employees, contract workers, and other stakeholders. | A structured health and safety management system is in place to ensure compliance with relevant laws and internal standards. Regular training programmes, mock drills, and audits are carried out to promote awareness and preparedness. Safety monitoring and incident tracking systems are deployed to ensure timely interventions. Employee participation and feedback are actively encouraged in shaping safety initiatives. | Negative and Positive |
| 6 | Women Empowerment & Employee Engagement | Opportunity | A motivated, engaged, and inclusive workforce is essential for driving innovation, productivity, and sustainable business performance. The Company recognizes the importance of employee engagement and is committed to fostering a workplace culture that supports continuous learning, collaboration, and well-being. In addition, the Company is actively working toward enhancing gender diversity and empowering women through targeted initiatives, inclusive policies, and focused hiring efforts. These actions not only contribute to social equity but also strengthen the Company's positioning as a responsible and progressive employer. | NA | Positive |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---|--|---|--|--|
| 7 | Community Engagement | Opportunity | Effective community engagement is a cornerstone of sustainable business practices and social license to operate. The Company recognizes its responsibility to contribute positively to the social and economic development of communities in and around its operational areas. Engaging proactively with local communities helps identify their needs, fosters mutual trust, and creates shared value. | NA | Positive |
| | | | Through sustained dialogue and collaboration, the Company aims to support community well-being, enhance livelihoods, and promote inclusive growth. This engagement also helps mitigate potential social risks and strengthens long-term stakeholder relationships. | | |
| 8 | Responsible Supply Chain Management | Risk & Opportunity | The Company acknowledges that its supply chain plays a critical role in its overall sustainability performance and reputation. Risks such as supply disruptions, noncompliance with labour and environmental standards, and unethical sourcing practices can adversely impact the Company's operations and stakeholder trust. Conversely, responsible supply chain management presents opportunities to enhance resilience, ensure compliance, drive innovation, and create shared value with suppliers. By fostering transparency, ethical sourcing, and sustainability across its supply chain, the Company aims to mitigate risks and leverage opportunities aligned with its values and regulatory requirements. | Implementation of a robust supplier code of conduct that outlines expectations related to labour practices, human rights, environmental management, and business ethics. Regular supplier audits and assessments to monitor compliance and identify areas for improvement. Capacity-building initiatives to support suppliers in adopting sustainable practices. Integration of sustainability criteria in supplier selection and performance evaluation processes. | Negative and Positive |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---------------------------------|--|---|--|---|
| 9 | Innovation | Risk | In a highly dynamic and technology-driven industry, there is a continuous need to innovate to stay competitive. The risk arises when existing or new solutions fail to keep pace with evolving market trends, customer expectations, regulatory requirements, or technological advancements. In such cases, companies may experience delays in product development, reduced competitiveness, or missed market opportunities. The Company recognizes that without sustained innovation, it may not be able to meet emerging demands, particularly in the areas of electric mobility, automation, sustainability, and smart manufacturing. | To address this risk, the Company has implemented the following measures: - Identification and nurturing of new focus areas through cross- functional collaboration and benchmarking global best practices. - Continuous upskilling of internal teams to foster a culture of innovation and adaptability. | Negative |
| 10 | Disaster Recovery | Risk | Natural disasters such as earthquakes, cyclones, floods, and epidemics pose significant threats to business continuity, employee safety, and operational efficiency. These events can cause unforeseen disruptions in production, supply chain, logistics, and resource availability, leading to financial and reputational losses. Given the Company's geographically spread manufacturing operations, disaster recovery and preparedness are critical to minimize impact and ensure quick restoration of normal operations. | The Company has established a comprehensive Business Continuity Plan (BCP) that outlines protocols for disaster preparedness, emergency response, and recovery. Adequate insurance coverage is maintained to safeguard against material and financial losses arising from such events. Periodic drills and training are conducted to ensure employee readiness and operational resilience. Critical infrastructure and IT systems are backed by redundancy measures and secure data recovery processes. | Negative |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---------------------------------|--|--|---|--|
| 11 | Human Rights | Risk & Opportunity | Upholding human rights is a fundamental aspect of ethical and responsible business conduct. Risks such as discrimination, forced labor, unsafe working conditions, or violation of individual rights can lead to regulatory penalties, reputational damage, and stakeholder distrust. On the other hand, respecting and promoting human rights presents an opportunity to strengthen employee relations, supply chain accountability, and stakeholder confidence. The Company recognizes its responsibility to respect and protect the rights of all individuals impacted by its operations, including employees, contract workers, suppliers, and community members. | Adoption and implementation of a Human Rights Policy aligned with international frameworks such as the UN Guiding Principles on Business and Human Rights. Prohibition of child labor, forced labor, and discrimination across all operations and value chains. Inclusion of human rights criteria in vendor onboarding and audits. Grievance redressal mechanisms available to employees to report concerns confidentially and without fear of retaliation. Training and awareness programs to embed human rights awareness across all levels of the organization. | Negative and Positive |
| 12 | Training & Education | Opportunity | A skilled and well-trained workforce is a strategic asset to the Company. Employees who are equipped with the right knowledge, tools, and competencies are more efficient, productive, and less prone to workplace injuries. Investment in training and development enhances employee satisfaction, retention, and performance. The Company provides a need-based and innovative range of training programs aimed at building both technical and behavioural capabilities across all levels. These initiatives are designed not only to meet current operational needs but also to support long-term career growth and adaptability in a rapidly evolving industry. Additionally, the Company focuses on recruiting and nurturing talent, and ensures continuous professional development and personal well-being throughout the employee lifecycle. | NA | Positive |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------|---------------------------------|--|--|--|---|
| 13 | Data Privacy | Risk | In today's digital environment, data privacy and protection of confidential information are critical to maintaining stakeholder trust and business integrity. The Company is exposed to risks such as leakage of sensitive data, intellectual property (IP) theft, unauthorized access, infringement, or misuse of proprietary information. These risks can lead to legal liabilities, regulatory non-compliance, reputational damage, and financial loss. Intellectual property disputes, particularly in a highly competitive and innovation-driven sector, further underline the importance of robust data governance mechanisms. | Implementation of comprehensive data security policies and protocols across operations. Regular information audits to monitor data access, storage, and transmission processes Non-Disclosure Agreements (NDAs) are signed with external parties before exchanging any sensitive or proprietary information. Appropriate indemnity clauses are embedded in contracts. | Negative |
| 14 | Regulatory Compliance | Risk | Operating in a highly regulated sector, the Company is subject to a wide range of environmental, legal, financial, labor, product safety, and industry-specific regulations at the local, national, and international levels. Noncompliance whether intentional or inadvertent can result in significant legal penalties, operational disruptions, reputational damage, and loss of stakeholder confidence. As regulations continue to evolve, particularly in areas such as emissions, safety standards, Environmental, Social. and Governance (ESG) disclosures, and trade policies, staying ahead of compliance requirements is both a critical risk factor and a key component of responsible governance. | The Company has established appropriate systems and processes to ensure adherence to applicable laws, regulations, and standards across its operations. Regular internal audits and reviews are conducted to ensure compliance across all functions and locations. Engagement with legal experts and consultants to interpret complex regulatory frameworks and assess impact. | Negative |

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

| Di | sclosure Questions | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|----|---|---------------------------------------|---|---|--|---|---|--|--|-----------------------------------|
| Pc | licy and management processes | • | _ | | | | | | | |
| 1. | Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| | b. Has the policy been approved by the Board? (Yes/No) | rest | | | ne SEBI Re re approv | | | | | d and the lated by |
| | c. Web Link of the Policies, if available | can | | essed at: | ompany a https://s | | | | | |
| | | | | | npany's ir nal stakeh | | | nber of in | iternal po | licies that |
| 2. | Whether the entity has translated the policy into procedures. (Yes / No) | Yes | | | | | | | | |
| 3. | Do the enlisted policies extend to your value chain partners? (Yes/No) | upst inclu and | tream v uding hu safety, | alue chaiı ıman righ and fair v | Supplier of partners to partne | s, outlines nmental: onditions | s ethical a sustainab . These p | nd busin | ess requi upationa | rements |
| 4. | Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | ISO ISO ISO | :16949: 14001:2 45001: 9001:2 27001:2 | 2015 2018 015 2013 | | | | | | |
| 5. | Specific commitments, goals and targets set by the entity with defined timelines, if any. | The | Compa | ny has se | t a goal to | becom | e Carbon | Neutral b | y 2050. | |
| 6. | Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met. | initia prod Con envi repo | atives to ducts m npany's ronmer orting y | o reduce of lanufactu lendeavo ntal goal. ear FY 20 | As agains | ease prod Together nieve Carl t the prev gnificant | ductivity a with taki bon Neut vious yea progress | and enha ng other rality by 2 r's comm | nce quali initiatives 2050 as a itments, | ty of the |
| | | • | renewa increas | able ener se compa | of renewa gy consu ared to th an accele | mption o | f 10,808. is year (8, | 40 GJ, m. 303.57 G | arking a 3 5J), thereb | 0% |
| | | • | energy in FY 2 | intensity 023–24 t | ficiency: per rupe o 0.000(cy across | e of turno 009 in FY | over, which 2024–25 | :h reduce | d from 0 | .000010 |
| | | • | praction four keep potable | ces, inclu y units, a e purpos | ment: The ding impl long with es such a endency | ementati widespre s garden | on of ZLD ead reuse ing. These | complia of treate e steps h | nt systen ed water f ave helpe | ns in |
| | | • | and ot input n | her opera naterials : | ational wa | ste throu uminium | gh autho | rized ven | dors. Rec | hazardou cycled grated into |
| | | • | sessio of top | ns on env BOM sup | wareness ironment pliers and orcing sus | al compli 175% of i | ance (co manpowe | vering Pri er and fac | nciple 6) ilities ser | for 35% vice |
| | | visio unde con man asse | on. While ertaken tinued e ageme essmen g-term s | e the Cor initiative efforts to nt systen ts. These | | Iready or ts, the Co nhance tr oring ESG ill suppor | nits path ompany is ansparer ocommit t better t | to meet in s further of acy through ments an racking c | ts previou committe gh strong d perforr of progres | ısly d for er data |

time.

| Di | sclosure Questions | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 | |
|----|---|--|---------------------------|--|------------------------------------|------------------------------------|-------------------------------------|---------------------------------------|--------------------------|-----------|--|
| Go | overnance, leadership, and oversight | | | | | | | | | | |
| | Statement by director responsible for the business responsibility report, highlighting | | | eased to pre r the financia | | | Responsil | oility and | Sustainal | oility | |
| | ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure) | At STL, we view sustainability not just as a compliance requirement but as a strategic priority embedded in our values and operations. Our commitment to ESG principles continues to shape the way we create long-term value for all stakeholders. | | | | | | | | | |
| | | Duri | ng the | e reporting ye | ear, we m | ade mear | ningful pr | ogress a | cross key | areas: | |
| | | • | | chieved a 30 ncing our tra | | | | 0, | | ١, | |
| | | • | | ZLD systems, nced our wa | | | | jor units, | have sign | ificantly | |
| | | • | recy | trengthened cled input ma ugh authorize | aterials lik | ke alumini | | | | | |
| | | • | | nsured 100% conducted re s. | | | | | | | |
| | | • | mec | leepened sta nanisms, cor n our value cl | nmunity i | | | | | | |
| | | While these are encouraging steps, we acknowledge that several ESG-related challenges persist. These include the need for better integration ESG data systems, improved monitoring of performance indicators acrothe supply chain, and further clarity on interim milestones for our long-tegoal of carbon neutrality by 2050. | | | | | | | | | |
| | | sust evol busi | ainab Iving r iness | orward, we re ility performa aational and g conduct is a g with integr | ance, stro global ES dynamic | engthenin G standaı and ongo | g accour ds. We ui ing journe | ntability, a nderstan ey one we | and aligni d that res | ponsible | |
| 8. | Details of the highest authority responsible for implementation and oversight of the | Sandhar Leadership Team (SLT) is responsible for implementation of Business Responsibility policy (ies). | | | | | | | | | |
| | Business Responsibility policy (ies). | Mr. Jayant Davar (DIN 00100801), Chairman, Managing Director and Chief Executive Officer, is responsible for oversight of the Business Responsibility policy(ies). | | | | | | | | | |
| 9. | Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. | dec | ision r | LT as designa making on su members: | | | | | | | |
| | | Naı | me | | De | signation | | | | | |
| | | Shr | i Yash | pal Jain | Ch | ief Financ | ial Office | r and Co | mpany Se | cretary | |
| | | Shr | i Niraj | Hans | Bu | ief Opera siness | | | | | |
| | | | | inder Jeet Si | Au | nior Advis tomotive I | Business | | | | |
| | | | , , | Kumar Ragha | Too | ief Opera oling Busir | ness | | | | |
| | | | | k Kumar Sha | | ief of Qua | | | | | |
| | | Srir | nivasa | | | ief Opera | | er - Cabi | ins & Fabr | ications | |
| | | Sm | t. Shir | in Sachdeva | Ch - | ief of Staf | f | | | | |

Shri Ankush Passi

Shri Vikas Puri

Deputy Chief Operating Officer-Sheet Metal & Allied Business

Deputy Chief Operating Officer-Automotive Business

| 10. Details of Review of N | GRBC | Cs by 1 | the C | ompa | ny: | | | | | | | | | | | | | |
|---|--------|---|--------|--------|--------|--|---------|-----------------|--------|-------------------|-------------------------|-------------------------------|---|----------------------------|-----------------------------|--------------------|-----------------|--------|
| Subject for Review | Dire | Director / Committee of the Board / Any other | | | | Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify) | | | | | | | | | | | | |
| | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
| Performance against above policies and follow up action | | by th ctors | | as de | signa | ted by | y the E | Board | of | Anr | nual b | asis. | | | | | | |
| Compliance with statutory requirements of relevance to the principles and rectification of any noncompliances | Dire | | revie | wcon | nplian | | | ard of eleva | nt | | | | | | | | | |
| 11. Has the entity carried of working of its policies | | | | | | | | | | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
| name of the agency. | | | | | | | | | | ass Hov eng | essm wever gaging | ents o , it is e g an e | any co of the evalua xterna n the f | worki ting tl al age | ng of i ne pos ncy fo | ts pol ssibilit | icies. ty of | |

 $12. \quad \text{If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:} \\$

| Questions | P1 | P2 | Р3 | P4 | Р5 | Р6 | P7 | P8 | Р9 |
|---|----|----|----|----|----|----|----|----|----|
| The entity does not consider the Principles material to its business (Yes/No) | | | | | | | | | |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | | | | | | | | | |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No) | | | | | NA | | | | |
| It is planned to be done in the next financial year (Yes/No) | | | | | | | | | |
| Any other reason (please specify) | | | | | | | | | |

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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

Essential Indicator

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

| Segment | Total number of training and awareness programmes held | Topics/ principles covered under the training and its impact | %age of persons in respective category covered by the awareness programmes |
|--|--|---|--|
| Board of Directors | 2 | Familiarisation Programme for the Board of Directors of the Company are being organised on regular basis on various topics about the business segments, operations of the Company, regulatory requirements and other matters. | 80% |
| Key Managerial Personnel | 3 | Training on various topics about the business segments, operations of the Company, regulatory requirements and other matters. | 66.67% |
| Employees other than BoDs and KMPs | 60 | Employee Code of Conduct Prevention of Sexual Harassment (POSH) Anti Bribery Whistle-Blower Insider Training Human Rights | 95% |
| Workers | 50 | Employee Code of ConductPOSHAnti BriberyWhistle Blower | 92% |

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format

(Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

| | | | Monetary | | |
|-----------------|--------------------|---|--|---|---|
| | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Amount (in INR) | Brief of the Case | Has an appeal been preferred (Yes/No) |
| Penalty/Fine | Principle 1 | State Tax Officer, Adjudication, Vellore | 10,000 | Minor deficiency in vehicle carrying documents such as e-invoice etc., and the authority imposed penalty of INR10,000/ The Company has made the payment and settled the case. | No |
| Settlement | - | - | - | - | - |
| Compounding fee | - | - | - | - | - |
| | | No | n-Monetary | | |
| | | NGRBC Principle | Name of the regulatory/ enforcement agencies/judicial institutions | Brief of the Case | Has an appeal been preferred? (Yes/No) |
| Imprisonment | - | - | - | - | - |
| Punishment | _ | - | - | - | _ |

3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or nonmonetary action has been appealed.

| | Name of the regulatory/enforcement agencies/judicial institutions |
|----|---|
| NA | |

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

Yes, the Company has an Anti-Bribery Policy, which is accessible on the Company's Intranet. The Company is committed to upholding the highest standards of ethical conduct and integrity in all its business activities. Every employee, as well as any individual acting on behalf of the Company, is expected to conduct business in an honest, transparent, and professional manner.

The Company maintains a strict zero-tolerance stance towards bribery and corruption. The Company does not permit any form of bribery by or of its employees, or by any individual or organization acting on its behalf. The Board of Directors and senior management are fully committed to the implementation and enforcement of effective systems and controls designed to prevent, detect, and address any instances of bribery or unethical conduct.

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

| | FY 2024–25 (Current Financial Year) | FY 2023-2024 (Previous Financial Year) |
|------------|--|---|
| Director's | - | - |
| KMPs | - | - |
| Employees | - | - |
| Workers | - | - |

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

| | FY 2024–25 (Current Financial Year) | | FY 2023–24 (Previous Financial Year) | |
|--|--|---------|---|---------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | - | - | - | - |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | - | - | - | - |

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

Not Applicable, as there were no cases of corruption and conflicts of interest which were reported during the year.

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

| | FY 2024–25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) |
|------------------------------------|--|---|
| Number of days of accounts payable | 49 | 60 |

9. Open-ness of business

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

| Parameter | Metrics | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) |
|---------------|--|---|--|
| Concentration | a. Purchases from trading houses as % of total purchases | 2.04% | 2.3% |
| of Purchases | b. Number of trading houses where purchases are made from | 7 | 9 |
| | c. Purchases from top 10 trading houses as % of total purchases from trading houses | 100% | 2.2% |
| Concentration | a. Sales to dealers /distributors as % of total sales | 0.08% | 3% |
| of Sales | b. Number of dealers / distributors to whom sales are made | 13 | 94 |
| | c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors | 97.93% | 67% |
| Share of RPTs | a. Purchases (Purchases with related parties / Total Purchases) | 2.87% | 3.10% |
| in | b. Sales (Sales to related parties / Total Sales) | 3.06% | 2.51% |
| | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | 54.28% | 78.31% |
| | d. Investments (Investments in related parties / Total Investments made) | 18.31% | 17.44% |

Leadership Indicator

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

| Total number of awareness programmes held | Topics / principles covered under the training | %age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|--|---|
| 1 | Legal & Regulatory Compliance (Principle 1, 3, 6, 7) Environmental Compliance (Principle 6) | 35% of value chain partners, comprising BOM suppliers among the top 385 partners (by value of business conducted), were covered under the awareness programmes during the financial year. |
| 2 | Awareness Session on 9 principles of NGRBC, and 5 Ps of Sustainable Development. | 75% of value chain partners, comprising manpower services, security services, housekeeping and canteen providers, were covered under the awareness programmes during the financial year. |
| | | Note: The percentage has been calculated based on the number of value chain partners for these categories. |

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

Yes, the Company has processes in place to avoid/manage conflict of interests involving members of the Board. The Company has a detailed 'Code of Conduct for its Directors and Senior Management', which includes instructions and a reporting process for instances that can lead to a potential conflict of interest. The Policy is available on the website: https://sandhargroup.com/uploads/Investor/policy-on-code-of-conduct-for-bod-senior-mgt_new.pdf

PRINCIPLE 2 Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

| | FY 2024–25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) | Details of improvements in environmental and social impacts |
|-------|---|--|---|
| R&D | - | - | - |
| Capex | 0.34% | 1.38% | During the reporting period, the Company undertook several capital investments aimed at improving both environmental performance and social safety outcomes. These initiatives reflect our continued commitment to sustainable operations and responsible resource management. Key improvements include: |
| | | | STP and ETP Upgradation: Upgrading these systems has enhanced the efficiency of wastewater treatment, ensuring compliance with environmental discharge norms and reducing water pollution risks. |
| | | | Reverse Osmosis Plant (Capacity: 2000 LPH): Installation of this RO plant has improved water purification capacity, supporting safe and sustainable water use within the facility and reducing reliance on external water sources. |
| | | | • Retrofit Emission Control Devices St for Diesel Generators: The installation of Retrofit Emission Control Devices on diesel generators has significantly reduced particulate emissions, supporting cleaner air and alignment with regulatory air quality standards. |
| | | | Harris-Reg 653Z014 (Lockable) Gas Saver - 32 LPM: This device enhances gas usage efficiency and safety during welding operations, reducing wastage and minimizing potential risks associated with gas handling. |
| | | | Modular ABC-10kgs Automatic Fire Extinguisher: These automatic fire suppression units have been installed to improve workplace fire safety, ensuring quicker response to fire hazards and reducing risk to personnel and assets. |
| | | | These measures have contributed positively to our environmental footprint through better resource efficiency and emission control, while also enhancing the health and safety of our workforce and the communities in which we operate. |

Note: For the purpose of this disclosure, total capital expenditure (capex) investments made by the entity include both tangible and intangible assets.

- 2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)
 - Yes, the Company has procedures in place for sustainable sourcing, wherein, the Company assesses the sustainability parameters of its vendors at the time of their onboarding.
 - b. If yes, what percentage of inputs were sourced sustainably?
 - 100% of inputs were sourced sustainably as assessed at the time of onboarding of suppliers.
- 3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.
 - As a manufacturer of components and automobile parts, the Company's products are supplied directly to OEMs in accordance and automobile parts, the Company's products are supplied directly to OEMs in accordance and automobile parts, the Company's products are supplied directly to OEMs in accordance and automobile parts, the Company's products are supplied directly to OEMs in accordance and automobile parts, the Company's products are supplied directly to OEMs in accordance and automobile parts. The Company is products are supplied directly to OEMs in accordance and automobile parts. The Company is products are supplied directly to OEMs in accordance and automobile parts. The Company is products are supplied directly to OEMs in accordance and automobile parts. The Company is products are supplied directly to OEMs in accordance and automobile parts. The Company is products are supplied directly to OEMs in accordance and automobile parts. The Company is products are supplied directly to OEMs in accordance and automobile parts. The Company is product and accordance are supplied directly to OEMs in accordance and accowith their specific technical requirements. As such, the scope for product reclamation at the end of life is limited, since the products are integrated into the OEMs' final assemblies. However, the Company has established processes to ensure the safe handling, recycling, and disposal of various waste streams, including plastics (such as packaging materials), e-waste, hazardous waste, and other operational waste, in compliance with applicable environmental regulations. Additionally, reusable packaging materials such as crates are regularly employed and circulated as part of the Company's commitment to resource efficiency and sustainability.
- 4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

No, EPR is not applicable to the Company's activities. However, we ensure that all waste generated from our operations is managed through Government-approved vendors in compliance with applicable waste management regulations

Leadership Indicator

 Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

| NIC Code Nam Serv | - · · · · · · · · · · · · · · · · · · · | | Boundary for which the Life Cycle Perspective/ Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/No) If yes, provide the web-link. |
|----------------------|---|--|--|--|---|
|----------------------|---|--|--|--|---|

The Company has not yet conducted the Life Cycle Perspective/ Assessments for any of its products. However, the Company is planning to carry out such assessments in the coming years.

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

| Name of Product/Service | Description of the risk/concern | Action Taken | |
|---|---------------------------------|--------------|--|
| Not Applicable as currently, the Company is not conducting any Life Cycle Assessment for any of its products. | | | |

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

| Indicate input material* | Recycled or re-used input material to total materia | |
|--------------------------|---|---------------------------------------|
| | FY 2024–25 Current Financial Year | FY 2023–24 Previous Financial Year |
| Allum Alloy | 40% | - |
| Plastics and Woods scrap | - | 8.64% |
| Other Scrap | - | 5.04% |

^{*}Excludes packaging material

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

| | FY 2024–25 Current Financial Year | | FY 2023-24 Previous Financial Year | | ar | | |
|--------------------------------|---|----------|---------------------------------------|-----------|----------|--------|----------|
| | Re-Used | Recycled | Safely Disposed | Re-Used | Recycled | Safely | Disposed |
| Plastics (including packaging) | Not Applicable, as the Company supplies its products directly to the OEMs, therefore, | | | herefore, | | | |
| E-waste | there is limited scope for reclaiming it at the end of its life cycle. | | | | | | |
| Hazardous waste | | | | | | | |
| Other waste | | | | | | | |

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

| Indicate product category | Reclaimed products and their packaging materials as % of total products sold in respective category | |
|--|---|--|
| Not Applicable as the Company supplies its products directly to the OEMs, therefore, there is limited scope for reclaiming | | |

Not Applicable, as the Company supplies its products directly to the OEMs, therefore, there is limited scope for reclaiming it at the end of its life cycle.

PRINCIPLE 3 Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

1. a. Details of measures for the well-being of employees:

| Category | | | | | % of em | ployees c | overed by | | | | |
|---------------------|--------------|---------------|---------------|-----------------------|---------------|--------------------|---------------|--------------------|---------------|---------------------|----------------|
| | Total (A) | Health in: | surance | Accident Insurance | | Maternity Benefits | | Paternity Benefits | | Day Care Facilities | |
| | | Number (B) | % (B)/ (A) | Number (C) | % (C)/ (A) | Number (D) | % (D)/ (A) | Number (E) | % (E)/ (A) | Number (F) | % (F) / (A) |
| Permanent Employees | | | | | | | | | | | |
| Male | 1,082 | 1,082 | 100% | 1,082 | 100% | NA | NA | - | - | - | - |
| Female | 62 | 62 | 100% | 62 | 100% | 62 | 100% | - | - | - | - |
| Total | 1,144 | 1,144 | 100% | 1,144 | 100% | 62 | 100%* | _ | - | - | _ |
| | | | | Other | than Perm | anent Emp | loyees | | | | |
| Male | 38 | 38 | 100% | 38 | 100% | NA | NA | - | - | - | - |
| Female | 6 | 6 | 100% | 6 | 100% | 6 | 100% | - | _ | - | - |
| Total | 44 | 44 | 100% | 44 | 100% | 6 | 100%* | _ | _ | - | _ |

^{*} Employees covered under maternity benefits is disclosed as % of only female Employees and not total Employees.

For Health insurance 100% coverage. Employees are covered under either Group Medical Claim Policy or Personal Health Policy or ESIC.

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

| Category | | % of workers covered by | | | | | | | | | |
|----------|--------------|-------------------------|---------------|--------------------|---------------|-----------------------|---------------|-----------------------|---------------|------------------------|---------------|
| | Total (A) | Health insurance | | Accident insurance | | Maternity Benefits | | Paternity Benefits | | Day Care Facilities | |
| | | Number (B) | % (B)/ (A) | Number (C) | % (C)/ (A) | Number (D) | % (D)/ (A) | Number (E) | % (E)/ (A) | Number (F) | % (F)/ (A) |
| | | | | Per | manent v | vorkers | | | | | |
| Male | 475 | 475 | 100% | 475 | 100% | NA | NA | - | - | - | - |
| Female | 26 | 26 | 100% | 26 | 100% | 26 | 100% | - | - | - | - |
| Total | 501 | 501 | 100% | 501 | 100% | 26 | 100%* | - | - | - | - |
| | | | | Other tha | n Perma | nent work | ers | | | | |
| Male | 59 | 59 | 100% | 59 | 100% | NA | NA | - | - | - | - |
| Female | - | - | 0% | - | 0% | - | 0% | - | - | - | - |
| Total | 59 | 59 | 100% | 59 | 100% | _ | 0% | _ | - | _ | _ |

^{*}Permanent Workers covered under maternity benefits is disclosed as % of only female workers and not total permanent workers.

For Health Insurance: 100% coverage. Workers are covered under either Group Medical Claim Policy or ESIC or Personal Health Insurance Policy.

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

| | FY 2024–25 Current Financial Year | FY 2023–24 Previous Financial Year |
|---|--------------------------------------|---------------------------------------|
| Cost incurred on well- being measures as a % of total revenue of the company* | 0.0163% | 0.0073% |

^{*} Expenditure incurred on Health Checkups, Personal Accident Insurance and maternity benefits have been considered for the purpose of the aforesaid disclosure.

2. Details of retirement benefits, for Current FY and Previous Financial Year.

| Benefits | С | FY 2024-25 urrent Financial \ | ⁄ea r | FY 2023-24 Previous Financial Year | | | |
|--|--|--|--------------|--|--|--|--|
| | No. of employees covered as a % of total employees | employees covered as covered as a % of total workers | | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | |
| PF | 100% | 100% | Yes | 100% | 100% | Yes | |
| Gratuity* | 100% | 100% | Yes | 100% | 100% | Yes | |
| ESI** | 100% | 100% | Yes | 100% | 100% | Yes | |
| Others-National Pension Scheme (NPS)*** | 3.58% | NA | Yes | 2.84%# | NA | Yes | |

^{*}Employees who have successfully completed 5 years of tenure are entitled for Gratuity benefits.

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

The premises / offices of the entity are largely accessible to differently abled employees and workers, barring some of the locations, where it is not practically possible. However, the Company is planning to improvise the current system in place.

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

Yes, the Company has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016, which is available on the Company's Intranet.

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

| | | Permanent employees | Permanent workers | | | |
|--------|---------------------|---------------------|---------------------|----------------|--|--|
| Gender | Return to work rate | Retention rate | Return to work rate | Retention rate | | |
| Male* | NA | NA | NA | NA | | |
| Female | 0% | 0% | 0% | 0% | | |
| Total | 0% | 0% | 0% | 0% | | |

^{*} For male employees and workers, the return-to-work and retention rates are not applicable, as the Company does not have a Paternity Leave Policy.

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

| | Yes/No (If yes, then give details of the mechanism in brief) | | | | |
|--------------------------------|--|--|--|--|--|
| Permanent Workers | Yes, the Company has a formal Grievance Redressal Committee and a | | | | |
| Other than Permanent Workers | established Grievance Redressal Policy to address concerns raised by employees and workers, including permanent, temporary, and contractua | | | | |
| Permanent Employees | staff. Employees, and workers, including permanent, temporary, and contractual staff. Employees, and worker groups may raise their grievances to the | | | | |
| Other than Permanent Employees | Committee through a structured and confidential process, in line with provisions of the Policy. | | | | |

^{**} Applicable to employees as per the threshold limit prescribed under the Employees State Insurance Act, 1948.

 $^{{\}tt ***Pertains}\ to\ contribution\ made\ by\ employers\ for\ employees\ who\ have\ opted\ for\ the\ same.$

[#]The previous year's figures have been revised or regrouped wherever necessary.

7. Membership of employees and worker in association(s) or Unions recognized by the listed entity:

| Category | | FY 2024–2025 rent Financial Year) | | FY 2023-2024 (Previous Financial Year) | | | |
|---------------------------|--|---|------------|--|--|------------|--|
| | Total employees / workers in respective category | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D/C) | |
| Total Permanent Employees | 1,144 | _ | 0% | 1,055 | - | 0% | |
| Male | 1,082 | - | 0% | 1,000 | - | 0% | |
| Female | 62 | - | 0% | 55 | - | 0% | |
| Total Permanent Workers | 501 | - | 42% | 510 | 228 | 45% | |
| Male | 475 | 209 | 44% | 481 | 224 | 47% | |
| Female | 26 | 3 | 12% | 29 | 4 | 14% | |

8. Details of training given to employees and workers:

| Category | FY 2024–25 Current Financial Year | | | | | | FY 2023–24 Previous Financial Year | | | | |
|--------------------|--------------------------------------|---------|-----------|---------------------|-------------------------|-------|---------------------------------------|-----------|----------------------|-----------|--|
| | Total (A) | | | On Skill upgrada | On Skill upgradation | | On Health and safety measures | | On Skill upgradation | | |
| | | No. (B) | % (B / A) | No. (C) | % (C / A) | | No. (E) | % (E / D) | No. (F) | % (F / D) | |
| | | | | Employ | ees | | | | | | |
| Male | 1,120 | 1,052 | 94% | 797 | 71% | 1,036 | 953 | 92% | 701 | 68% | |
| Female | 68 | 57 | 84% | 51 | 75% | 64 | 52 | 81% | 46 | 72% | |
| Total Employees | 1,188 | 1,109 | 93% | 848 | 71% | 1,100 | 1,005 | 91% | 747 | 68% | |
| | | | | ٧ | orkers/ | | | | | | |
| Male | 534 | 497 | 93% | 451 | 84% | 533 | 487 | 91% | 430 | 81% | |
| Female | 26 | 24 | 92% | 23 | 88% | 29 | 27 | 93% | 25 | 86% | |
| Total Workers | 560 | 521 | 93% | 474 | 85% | 562 | 514 | 91% | 455 | 81% | |

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

| Category | | FY 2024- Current Finan | | | FY 2023–24 Previous Financial Year | | | |
|----------|-----------|---------------------------|-----------|-----------|---------------------------------------|----------|--|--|
| | Total (A) | No. (B) | % (B)/(A) | Total (C) | No.(D) | %(D)/(C) | | |
| | | | Employ | yees | | | | |
| Male | 1,120 | 1,091 | 97% | 1,036 | 995 | 96% | | |
| Female | 68 | 64 | 94% | 64 | 58 | 91% | | |
| Total | 1,188 | 1,155 | 97% | 1,100 | 1,053 | 96% | | |
| | | | Work | ers | | | | |
| Male | 534 | 510 | 96% | 533 | 508 | 95% | | |
| Female | 26 | 24 | 92% | 29 | 27 | 93% | | |
| Total | 560 | 534 | 95% | 562 | 535 | 95% | | |

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

Yes, an Occupational Health and Safety Management System has been implemented across 24 out of 25 manufacturing plants of the Company, in accordance with the ISO 45001 standard. The implementation at the remaining unit (SKC Unit) is currently underway and is expected to be completed shortly. The system ensures proactive identification, assessment, and mitigation of occupational health and safety risks across the covered facilities.

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

The Company follows a well-defined Hazard Identification and Risk Assessment (HIRA) process in alignment with EHS standards and ISO 45001:2018. This process is used to routinely and systematically identify occupational health and safety hazards, as well as assess associated risks for both employees and workers.

HIRA involves the evaluation of both routine and non-routine activities through manual monitoring, as well as internal and external audits. It characterizes risks based on their likelihood, frequency, and severity, and assesses potential adverse outcomes, such as injuries or operational losses.

The insights from HIRA serve as a factual basis for implementing targeted risk mitigation measures and shaping the Company's overall workplace safety strategy, ensuring continuous improvement in health and safety performance.

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

Yes, the Company have defined processes in place at unit level for workers to report work-related hazards and to remove themselves from such risks, in accordance with the nature of operations.

- d. Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/No) Yes, all employees and workers of the entity have access to non-occupational medical and healthcare services.
- 11. Details of safety related incidents, in the following format:

| Safety Incident/Number | Category* | FY 2024–25 Current Financial Year | FY 2023–24 Previous Financial Year |
|---|-----------|---|--|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours | Employees | | _ |
| worked) | Workers | | _ |
| Total recordable work-related injuries | Employees | | _ |
| | Workers | | _ |
| No. of fatalities | Employees | | |
| | Workers | | _ |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | | |
| | Workers | _ | - |

^{*}Including in the contract workforce

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

The Company is committed to providing a safe and healthy working environment for all its employees and workers. The Company has implemented several proactive measures to promote workplace safety and well-being, including:

- Regular safety training programs for employees and workers
- Periodic fire mock drills
- First-aid training sessions
- Health and safety awareness sessions of 10-minutes conducted on a regular basis during tea breaks
- · Reporting and analysis of safety near-miss incidents
- Implementation of Poka-Yoke (error-proofing solutions to prevent future incidents)
- Conducting Root Cause Analysis (RCA) for incidents
- Continuous improvement initiatives through Quality Circles (QC) and Kaizen
- Annual observance of Safety Week to strengthen safety cultured

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

| | | FY 2024–25 Current Financial Year | | | FY 2023-24 Previous Financial Year | | | |
|--------------------|--------------------------|--------------------------------------|---------|--------------------------|---------------------------------------|---------|--|--|
| | Filed during the year | | Remarks | Filed during the year | • | Remarks | | |
| Working conditions | _ | - | - | - | - | - | | |
| Health & Safety | - | _ | _ | - | _ | - | | |

14. Assessments for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Health and Safety practices | 48% of plants were assessed by statutory authorities and third parties. |
| Working Conditions | 48% of plants were assessed by statutory authorities and third parties. |

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

Not Applicable, as there were no significant risks/concerns which have arisen from assessments of health and safety practices and working conditions.

Leadership Indicators

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

Yes, the Company extends life insurance and compensatory package in the event of an accidental death of employees and

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

The Company takes due care to ensure that the statutory dues applicable are deducted and deposited by the value chain partners. The Company's Supplier Code of Conduct outlines the specifics. To support business responsibility principles and ideals of transparency and accountability, all supply chain partners are required to adhere to it in every way. Some of the measures undertaken by the Company to ensure that statutory dues have been deducted and deposited by these value chain partners includes:

- Inspection of the GST portal as automated by the GST authorities to ensure GST payments.
- Periodic examination of the relevant forms and returns for ensuring tax related compliances.
- 3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

| | Total no. of affected emp | loyees/ workers | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment | | |
|-----------|--|--------------------------------------|---|---|--|
| | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) | |
| Employees | - | - | - | - | |
| Workers | - | - | - | - | |

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

Yes, the Company provides transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment on merits.

5. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------|---|
| Health and Safety practices | BOM suppliers accounting for 50% of the total procurement value were assessed through audits for their health and safety practices and working conditions. |
| Working conditions | Additionally, 100% of the value chain partners providing manpower services, security services, housekeeping and canteen services were assessed on health and safety practices and working conditions. |

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

Not Applicable, as there were no significant risks/concerns which have a risen from assessments of health and safety practices and working conditions of value chain partners.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

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

Key Stakeholders are identified as all the individuals, organizations and institutions who are connected with the Company and have material influence on the Company or how they are materially influenced by the Company's corporate decisions and the results of those decisions.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

| Stakeholder Group | Whether identified as Vulnerable & Marginal- ized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|-------------------------------|---|---|---|---|
| Investors and Shareholders | No | • Emails | Quarterly | To inform about Company's current |
| Shareholders | | • Analyst meets and conference calls | | performance and future |
| | | Annual General Meeting | | plans. |
| | | Official communication channels such as Newspaper publications, website etc.; | | |
| | | Investor meeting | | |
| Board of | No | Board Meetings | Quarterly | Compliance of law |
| Directors and KMPs | | One-to-one meetings | | Major decisionsDay-to-day functioning |
| Employees and | No | • Emails | Frequently | Day to day activities/ |
| Workers | | Phone Calls | | conduct of business. |
| | | • Conferences | | |
| | | Workshops | | |
| | | Training Sessions | | |
| | | Notice Boards | | |
| | | One-to-one interaction | | |
| | | Grievance Redressal Mechanism | | |

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|--|--|---|---|--|
| Suppliers/ Vendors | No | EmailMeetingsSupplier Portal | As and when required | - Price and Terms Negotiation: Discussion on pricing and payment terms - Delivery Coordination: Alignment on delivery schedules and timelines. - Quality Assurance: Ensuring compliance with product quality and |
| | | | | specifications. - Contract Management: Monitoring and enforcement of contractual obligations |
| Customers | No | Email;SMS;Website;Meeting;Phone Calls;Feedback reports;Surveys etc. | As and when required | Business discussion related to Quality, Cost, Delivery and Development Activities (QCCD) |
| Government and Regulatory Bodies | No | Official communication channels Regulatory Audits/Inspections Statutory Corporate Filings Environmental Compliances Good Governance | As and when required | Regulatory and legal requirements |
| Communities | Yes | Community Meetings and in person visit by project representatives | Half yearly | Promote activities to raise awareness on green, safe and sustainable living, education, empowering communities for economic progress and inclusive prosperity. |

Leadership Indicators

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

The consultation process between stakeholders and the Board on economic, environmental, and social topics begins with the identification and mapping of relevant stakeholders and ESG-related matters to appropriate business divisions.

Consultation is delegated to the Senior Leadership Team, which includes business heads and the Managing Director. The SLT engages regularly with key stakeholders such as investors, customers, suppliers, and employees and escalates significant inputs and concerns to the Board.

Additionally, the Company has constituted dedicated committees such as the Risk Management Committee, Stakeholder Relationship Committee, Grievance Redressal Committee and CSR Committee. These committees are responsible for reviewing and monitoring developments related to economic, environmental, and social topics, and they regularly update the Board and seek its guidance on strategic actions and responses.

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

Yes, the Company has maintained consistent and proactive contact with its key stakeholders, ensuring the identification and management of environmental and social needs of the community. Engaging with stakeholders aids in identifying community needs and promotes accountability, compliance, organizational learning, quality management, community support, and

sustainability within both the community and the organization. Based on the identified needs, the Company implements policies and initiatives to reach out to various stakeholders.

Please find below instances of stakeholder feedback being incorporated into policies and activities:

A. Details of Instances of Stakeholder Feedback Incorporated into Policies and Activities:

Access to Primary Healthcare Services

As per community requirements and recommendations by the village panchayat, a Community Healthcare Center has been established at Begumpur Khatola, where a doctor provides OPD services and medicines to migrant workers and community members. Further, gynecological services have been introduced based on the identified needs.

Ensuring Nutrition for the Elderly

During the implementation of the 'Adopt a Gran' project, a need was identified to support the nutritional requirements of the elderly. As a result, monthly grocery distributions were initiated, benefiting 32 elderly community members. Additionally, regular health check-ups were conducted to ensure their overall well-being.

- Women Empowerment through Livelihood Diversification

Under the Swabhimaan project, community women expressed the need for vocational training. In response, 70 women from the Dhaula Kuan community received training in stitching. They have since adopted it as a means of income generation, contributing to their economic empowerment, Additionally, 38 women received beautician training, enhancing their skill sets.

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

The Company is committed to supporting vulnerable and marginalized stakeholder groups through its various Corporate Social Responsibility (CSR) initiatives. The Company continuously endeavors to identify and address the concerns of such groups, and undertakes need-based interventions aimed at enhancing their socio-economic well-being.

For more details on the Company's engagement and initiatives, please refer to Annexure C 'Annual Report on CSR Activities' for FY 2024-25.

PRINCIPLE 5 Businesses should respect and promote human rights

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

| Category | | FY 2024–202 rent Financial | | FY 2023-24 Previous Financial Year | | | |
|----------------------|-----------|--|-----------|---------------------------------------|--|-----------|--|
| | Total (A) | No. of employees / workers covered (B) | % (B / A) | Total (C) | No. of employees / workers covered (D) | % (D / C) | |
| | | Employees | | | | | |
| Permanent | 1,144 | 965 | 84% | 1,055 | 870 | 82% | |
| Other than permanent | 44 | 41 | 93% | 45 | 41 | 91% | |
| Total Employees | 1,188 | 1,006 | 85% | 1,100 | 911 | 83% | |
| | | Workers | | | | | |
| Permanent | 501 | 490 | 98% | 510 | 495 | 97% | |
| Other than permanent | 59 | 56 | 95% | 52 | 49 | 94% | |
| Total Workers | 560 | 546 | 98% | 562 | 544 | 97% | |

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

| Category | | FY 2024–25 Current Financial Year | | | | FY 2023–24 Previous Financial Year | | | | |
|----------------------|--------------|--------------------------------------|------------|---------|---------------------------|---------------------------------------|--------------------------|------------|---------------------------|------------|
| | Total (A) | | | | More than Minimum Wage | | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No.(F) | % (F/D) |
| | | | Emple | oyees | | | | | | |
| Permanent | 1,144 | _ | 0% | 1,144 | 100% | 1,055 | - | 0% | 1,055 | 100% |
| Male | 1,082 | - | 0% | 1,082 | 100% | 1,000 | - | 0% | 1,000 | 100% |
| Female | 62 | - | 0% | 62 | 100% | 55 | - | 0% | 55 | 100% |
| Other than permanent | 44 | - | 0% | 44 | 100% | 45 | - | 0% | 45 | 100% |
| Male | 38 | - | 0% | 38 | 100% | 36 | - | 0% | 36 | 100% |
| Female | 6 | - | 0% | 6 | 100% | 9 | - | 0% | 9 | 100% |
| | | | Wor | kers | | | | | | |
| Permanent | 501 | _ | 0% | 501 | 100% | 510 | _ | 0% | 510 | 100% |
| Male | 475 | - | 0% | 475 | 100% | 481 | - | 0% | 481 | 100% |
| Female | 26 | - | 0% | 26 | 100% | 29 | - | 0% | 29 | 100% |
| Other than permanent | 59 | - | 0% | 59 | 100% | 52 | - | 0% | 52 | 100% |
| Male | 59 | - | 0% | 59 | 100% | 52 | - | 0% | 52 | 100% |
| Female | - | - | 0% | - | 0% | - | - | 0% | - | 0% |

- 3. Details of remuneration/salary/wages, in the following format:
 - a. Median remuneration / Wages:

| | | Male | | Female |
|----------------------------------|--------|--|--------|--|
| | Number | Median remuneration/ salary/ wages of respective category (in Rs.) | Number | Median remuneration/ salary/ wages of respective category (in Rs.) |
| Board of Directors (BoD)* | 6 | 6,12,500 | 3** | 6,35,000 |
| Key Managerial Personnel*** | 2 | 5,27,56,140.8 | - | - |
| Employees other than BoD and KMP | 1,118 | 9,47,899 | 68 | 8,17,578 |
| Workers | 534 | 3,79,531 | 26 | 2,58,294 |

^{*}Includes Non-Executive Directors only (including Independent Directors) who are paid only sitting fee and commission. Hence the median is calculated considering the same. Non-Executive Directors who were paid only sitting fees and resigned during the year have not been considered for this disclosure.

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

| | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) |
|--|--|---|
| Gross wages paid to females as % of total wages* | 4.59% | 4.76% |

^{*}The aforesaid calculations have been provided on the basis of Cost to the Company which includes perquisites as well.

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

Yes, the Company has a team of senior leaders responsible for addressing human rights impacts or issues caused or contributed to by the business. This team meets periodically to review and discuss such matters.

^{**} Include Independent Non-Executive Director, Smt. Aabha Bakaya, who was appointed on the Board of the Company on 08th August 2024.

^{***} The remuneration of the Managing Director, who also serves as the Chairman and Chief Executive Officer, has been considered in the calculation of the median remuneration of Key Managerial Personnel (KMP) including commission, and not in the calculation for the Board of Directors. (Calculations are done as per section 197(12) of the Companies Act, 2013).

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

To uphold honest and ethical business and employment practices, the Company considers respect for human rights as a core value. It is committed to providing a safe and inclusive work environment, regardless of an individual's ethnicity, gender, race, caste, religion, or other identity.

To support this commitment, the Company has established the following internal mechanisms to address grievances related to human rights issues:

- Code of Conduct for Employees
- POSH Policy
- Grievance Redressal Policy.
- 6. Number of Complaints on the following made by employees and workers:

| | Cur | FY 2024-25 rent Financial ` | Year | FY 2023–24 Previous Financial Year | | | |
|-----------------------------------|--------------------------|--|-------------|---------------------------------------|--|---------|--|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks | |
| Sexual Harassment | - | - | - | - | - | - | |
| Discrimination at workplace | - | _ | - | - | _ | - | |
| Child Labour | _ | - | _ | _ | _ | - | |
| Forced Labour/Involuntary Labour | - | - | - | _ | - | - | |
| Wages | - | - | _ | _ | _ | - | |
| Other human rights related issues | _ | _ | _ | _ | _ | _ | |

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

| | FY 2024–25 Current Financial Year | FY 2023–24 Previous Financial Year |
|---|--------------------------------------|---------------------------------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | - | _ |
| Complaints on POSH as a % of female employees/workers | 0% | 0% |
| Complaints on POSH upheld | - | - |

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

The Company has a comprehensive Grievance Redressal Policy and a Policy on Prevention of Sexual Harassment of Women at Workplace, both of which include specific provisions to protect complainants from any adverse consequences in cases of discrimination and harassment. These policies outline procedures to ensure that all concerns are handled with strict confidentiality and impartiality.

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

Yes, the Company's Code of Conduct for Suppliers and Contractors contains facets for human rights requirement.

10. Assessments for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) | | |
|-----------------------------|---|--|--|
| Child labour | | | |
| Forced/Involuntary labour | | | |
| Sexual harassment | Ne such accessments were conducted during the Financial Voca | | |
| Discrimination at workplace | No such assessments were conducted during the Financial Year. | | |
| Wages | | | |
| Others-please specify | | | |

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.

NA.

Leadership Indicators

- 1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.
 - Not Applicable, as no grievances/complaints were received with respect to human rights during the reporting period.
- 2. Details of the scope and coverage of any Human rights due diligence conducted.
 - While the Company does not conduct direct human rights due diligence as a separate exercise, relevant aspects are indirectly addressed through the Human Rights Policy of the Company. During the year, the internal audit process covered several areas related to human rights across the Company plants in alignment with the policy.
- 3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?
 - The premises / offices of the entity are largely accessible to differently abled visitors, barring some of the locations, where it is not practically possible. However, the Company is planning to improvise the current system in place.
- 4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------|--|
| Sexual harassment | All upstream value chain partners are required to acknowledge and comply |
| Discrimination at workplace | with the Company's Supplier Code of Conduct, which explicitly prohibits sexual harassment, workplace discrimination, child labour, forced or involuntary |
| Child labour | labour, and ensures fair wage practices. 100% of the partners are assessed |
| Forced/Involuntary labour | for compliance with these principles during the onboarding process. Periodic |
| Wages | reviews and audits are also undertaken, as necessary, to monitor ongoing adherence. |
| Others-please specify | |

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

Based on the assessments referenced in Question 4 above, no significant risks or concerns were identified. As a result, no corrective actions are currently required or underway.

The organization remains committed to continuous monitoring of all relevant processes to ensure ongoing compliance and the early detection of any emerging risks.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

| Parameter | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) |
|--|--|---|
| From Renewable sources | | |
| Total electricity consumption (A) (In Giga Joules) | 10,808.40 | 8,303.57 |
| Total fuel consumption (B) (In Giga Joules) | - | - |
| Energy consumption through other sources (C) (In Giga Joules) | - | - |
| Total energy consumed from renewable sources (A+B+C) | 10,808.40 | 8,303.57 |
| From Non-Renewable sources | | |
| Total electricity consumption (D) (In Giga Joules) | 2,39,014.80 | 2,16,151.20 |
| Total fuel consumption (E) (In Giga Joules) | 24,305.30 | 22,639.00 |
| Energy consumption through other sources (F) (In Giga Joules) | - | - |
| Total energy consumed from non- renewable sources (D+E+F) (In Giga Joules) | 2,63,320.10 | 2,38,790.20 |
| Total energy consumed (A+B+C+D+E+F) (In Giga Joules) | 2,74,128.50 | 2,47,093.77 |

| Parameter | FY 2024–25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) |
|---|--|---|
| Energy intensity per rupee of turnover (Total Revenue from operations) | 0.000009 | 0.000010 |
| Energy intensity per rupee of turnover adjusted for Purchasing power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP*) | 0.000194 | 0.00021 |
| Energy intensity in terms of physical output - Total energy consumption in Giga Joules/ production of finished goods in Metric Tonnes | 1.73 | 1.62 |
| Energy intensity (optional) – the relevant metric may be selected by the entity | - | - |

^{*} The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 20.66 as per the 2025 update.

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

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

Not Applicable, as the Company does not have any sites / facilities identified as DCs under the PAT Scheme of the Government and the Company does not have any sites of the Government and the Company does not have any sites of the Government does not have a site of the Government does not have does not have a site of the Government does not have does not have a site of the Government does not have does nof India.

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

| Parameter | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) |
|---|--|--|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | _ | |
| (ii) Groundwater | 1,24,769.81 | 1,00,443.00 |
| (iii) Third party water | 1,24,682.86 | 71,670.00 |
| (iv) Seawater/Desalinated water | _ | |
| (v) Others | | |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 2,49,452.67 | 1,72,113.00 |
| Total volume of water consumption (in kilolitres) | 1,79,460.71 | 1,24,702.00 |
| Water intensity per rupee of turnover (Water consumed / turnover) | 0.000006 | 0.000005 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) | 0.000127 | 0.000103 |
| Water intensity in terms of physical output - Total water consumption in Kilolitres/production of finished goods in Metric Tonnes | 1.14 | 0.82 |
| Water intensity (optional) - the relevant metric may be selected by the entity | | |

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

4. Provide the following details related to water discharged

| Parameter | FY 2024–25 Current Financial Year | FY 2023-24 Previous Financial Year |
|---|---|--|
| Water discharge by destination and level of treatment (in | kilolitres) | |
| (i) To surface Water | 69,991.96 | 47,411 |
| No treatment | - | - |
| With treatment (please specify level of treatment) | As per State Pollution Control Board (SPCB)/ Central Pollution Control Board (CPCB) Guidelines, wastewater generated is treated in STP | As per SPCB / CPCB Guidelines, wastewater generated is treated in STP. |
| (ii) To Ground Water | _ | _ |
| No treatment | - | _ |
| With treatment (please specify level of treatment) | - | _ |
| (iii) To Seawater | | |
| No treatment | | |
| With treatment (please specify level of treatment) | | |
| (iv) Sent to third parties | | |
| No treatment | | |
| With treatment (please specify level of treatment) | | |
| (v) Others | | |
| No treatment | | |
| With treatment (please specify level of treatment) | - | _ |
| Total water discharge (in kilolitres) | 69,991.96 | 47,411 |

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

 $5. \quad Has the {\it entity} implemented a mechanism for Zero Liquid Discharge? If yes, provide {\it details} of its coverage and implementation.$

While the Company does not currently hold formal ZLD certification, it recognizes the importance of responsible water management across its operations. The Company is committed to enhancing water-use efficiency and ensuring equitable access to water for all stakeholders within and around its operational areas.

The Company has implemented ZLD-compliant systems in four of its major units, which include the use of Rotary Evaporators and Solar Evaporators to minimize liquid discharge. In other units, ETP and STP have been installed to treat wastewater. The treated water is reused for gardening and other non-potable applications, thereby reducing freshwater dependency and promoting sustainable water practices.

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

| Parameter | Please specify unit | FY 2024–25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) |
|-------------------------------------|---------------------------|---|--|
| NOx | MT | 0.04321 | 0.05599 |
| Sox | MT | 0.02843 | 0.03071 |
| Particulate matter (PM) | MT | 0.00024 | 0.00033 |
| Persistent organic pollutants (POP) | MT | NA | NA |
| Volatile organic compounds (VOC) | MT | NA | NA |
| Hazardous air pollutants (HAP) | MT | NA | NA |
| Others-please specify | _ | - | |

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

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

| Parameter | Unit | FY 2024–25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) |
|--|---------------------------------------|---|--|
| Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 11,297.61 | 4,506 |
| Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 45,430.58 | 48,634.02 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | - | 0.000002 | 0.000002 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | | 0.00004 | 0.00004 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output (Total Scope 1 and Scope 2 GHG emissions / production of finished goods in Metric Tonnes) | | 0.36 | 0.35 |
| Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity | | - | - |

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

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

Yes, the Company has implemented multiple initiatives aimed at reducing greenhouse gas (GHG) emissions. These initiatives are part of the Company's broader commitment to sustainability and environmental responsibility. Key projects include:

Solar Power Integration

In stall at ion of solar energy systems across various operational units to harness renewable energy and reduce dependency on fossil fuel-based electricity.

• Installation of Retrofit Emission Control Devices

Deployment of Retrofit Emission Control Devices in diesel generator sets to reduce air emissions and improve the environmental performance of backup power systems.

• Adoption of Variable Frequency Drives (VFD)

Implementation of VFDs in air compressors, particularly in utility areas like wastewater treatment systems, to enhance energy efficiency and lower electricity consumption.

• Installation of IE-3 Energy-Efficient Motors

Replacement of conventional motors with IE-3 class energy-efficient motors to optimize energy use and contribute to indirect GHG reduction.

Installation of LED Lighting

Transition to LED lighting across all units to reduce energy consumption associated with lighting infrastructure.

These initiatives collectively support the organization's efforts to mitigate climate change impacts by actively reducing GHG emissions through energy efficiency and cleaner energy sources.

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

| Parameter | FY 2024-25 (Current Financial Year | FY 2023–24 (Previous Financial Year) |
|---|--|--|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | 270.99 | 595.24 |
| E-waste (B) | | 0.20 |
| Bio-medical waste (C) | _ | |
| Construction and demolition waste (D) | 10 | |
| Battery waste (E) | 0.05 | |
| Radioactive waste (F) | _ | |
| Other Hazardous waste. Please specify, if any. (G) (ETP sludge, hydraulic oil, paint sludge) | 367.48 | 340.36 |

| Parameter | FY 2024-25 (Current Financial Year | FY 2023-24 (Previous Financial Year) |
|---|--|--|
| Other Non-hazardous waste generated (H) . Please specify, if any. (Waste paper, drum, board, wood, furniture etc.) | 552.5 | 457.76 |
| Total (A+B+C+D+E+F+G+H) | 1,201.02 | 1,393.56 |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) | 0.0000004 | 0.0000005 |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) | 0.0000009 | 0.00000103 |
| Waste intensity in terms of physical output - Total waste generated in Metric Tonnes/production of finished goods in Metric Tonnes | 0.0076 | 0.0091 |
| Waste intensity (optional) - the relevant metric may be selected by the entity | - | - |
| For each category of waste generated, total waste recovered through recycling, re-u (in metric tonnes) | ising or other reco | very operations |
| Category of waste | | |
| (i) Recycled | - | - |
| (ii) Re-used | - | 37.59 |
| (iii) Other recovery operations | - | - |
| Total | - | 37.59 |
| For each category of waste generated, total waste disposed by nature of disposal me | thod (in metric to | nnes) |
| Category of waste | - | _ |
| (i) Incineration | - | - |
| (ii) Landfilling | 10 | _ |
| (iii) Other disposal operations | 1,190.42 | 1,355.77 |
| Total | 1,200.42 | 1,355.77 |

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

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your Company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

The Company has adopted a structured waste management policy that emphasizes segregation at source and promotes a hierarchy of practices aligned with circular economy principles namely, Recover, Reduce, Reuse, and Recycle. The key waste management practices implemented across the Company's establishments include:

- Waste prevention
- Reusing waste where practicable
- Recycling of materials
- Responsible and compliant disposal

To support these practices, the Company continuously seeks to recover resources, minimize the use of natural inputs, and adopt low-impact, cost-effective solutions that drive both environmental and operational efficiencies.

With regard to hazardous waste, the Company ensures full compliance with applicable regulations issued by the SPCB and CPCB. All hazardous materials are handled, stored, transported, and disposed of through licensed agencies, with proper documentation maintained to track their movement and disposal.

For non-hazardous waste, the Company has implemented innovative, low-investment solutions aimed at minimizing environmental impact. For example, recycled cardboard boxes are now used as fillers in packaging to reduce dependence on wooden pallets. Additionally, initiatives such as the use of reusable pallets and ongoing recycling programs for paper and plastic are part of the Company's broader strategy to reduce waste generation and promote resource conservation.

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

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

Not Applicable, as the Company does not have any operations/offices in/around ecologically sensitive areas.

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

| Name and brief details of project | EIA Notification No. | Date | | Results communicated in public domain (Yes / No) | Relevant web link |
|-----------------------------------|-------------------------|------|-----------------|--|----------------------|
| | | | agency (Yes/No) | | |

No environmental impact assessment of projects was undertaken by the Company during the current Financial Year. Hence, this requirement is not applicable.

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India, such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Yes, the Company is compliant with all the applicable environmental laws/regulations/guidelines in India.

| S. No. | Specify the law / regulation / guidelines which was not complied with | Provide details of the non- compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action taken if any |
|--------|---|--|---|--------------------------------|
|--------|---|--|---|--------------------------------|

Not Applicable, since there is no non-compliance with the applicable environmental laws/regulations/guidelines in India.

Leadership Indicators

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

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

- (i) Name of the area: Gurugram, Bawal, Jaipur, Pathredi (Tijara), Bengaluru
- (ii) Nature of operations: Manufacturing of auto components.
- (iii) Water withdrawal, consumption, and discharge in the following format:

| Parameter | FY 2024–25 (Current Financial Year) | FY 2023-24 (Previous Financial Year) |
|--|---|---|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | | - |
| (ii) Groundwater | 83,990.96 | 60,390.00 |
| (iii) Third party water | 40,584.86 | 47,440.00 |
| (iv) Seawater / desalinated water | | - |
| (v) Others | | - |
| Total volume of water withdrawal (in kilolitres) | 1,24,575.82 | 1,07,830.00 |
| Total volume of water consumption (in kilolitres) | 86,781.28 | 86,510.00 |
| Water intensity per rupee of turnover (Water consumed / turnover) | 0.000003 | 0.000003 |
| Water intensity (optional) – the relevant metric may be selected by the entity | - | - |
| Water discharge by destination and level of treatment | t (in ki l olitres) | |
| (i) Into Surface water | 37,794.54 | 21,320.00 |
| - No treatment | - | - |
| - With treatment - please specify level of treatment | As per SPCB / CPCB Guidelines, waste water generated is treated in STP. | As per SPCB / CPCB Guidelines, waste water generated is treated in STP. |
| (ii) Into Groundwater | _ | - |
| - No treatment | - | - |
| - With treatment - please specify level of treatment | - | - |
| (iii) Into Seawater | - | - |
| - No treatment | - | _ |
| - With treatment - please specify level of treatment | | - |
| (iv) Sent to third parties | _ | - |
| - No treatment | _ | - |
| - With treatment - please specify level of treatment | - | - |

| Parameter | FY 2024-25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) |
|--|--|---|
| (v) Others | | |
| - No treatment | | |
| - With treatment - please specify level of treatment | | |
| Total water discharged (in kilolitres) | 37,794.54 | 21,320.00 |

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

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

| Parameter | Unit | FY 2024–25 (Current Financial Year) | FY 2023–24 (Previous Financial Year) |
|---|------------------|--|---|
| Total Scope 3 emissions | Metric tonnes of | Scope-3 emissions are not considered by the | |
| (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | CO2 equivalent | Company presently. The Cof laying down the roadm | |
| Total Scope 3 emissions per rupee of turnover | | | |
| Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity | - | | |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Not Applicable

- 3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.
 - Not Applicable, as the Company does not have any operations/offices in/around ecologically sensitive areas.
- 4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

| Sr. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|------------|--|---|---|
| 1 | Solar Power Integration | Some part of the electricity comes from solar systems installed across various units, contributing to renewable energy use. | Reduction in carbon footprint by 2,212.24 MT of CO2e through solar energy utilization. |
| 2 | Installation of Retrofit Emission Control Devices | The Company is installing Retrofit Emission Control Devices in all the DG sets which will help the Company in reducing its air emissions and in improving the overall environmental impact. | Reduction in air pollution by 70%. |
| 3 | Adoption of Variable Frequency Drives (VFD) | Adoption of VFD for air compressors to enhance energy efficiency and reduce power consumption In ETP/STP . | Saved 5,502.06 KWH of energy consumption annually with a corresponding reduction of 4 MT of CO2e. |
| 4 | Installation of ETP and Ultra filtration in STP | Installation of ETP recycling units to conserve water resources and minimize wastewater discharge | Reduced freshwater usage |
| 5 | Installation of LED Lighting | Installation of LED lights across all units to reduce energy consumption and enhance lighting efficiency | Saving in energy consumption. |

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

Yes, the Company has a Business Continuity Policy, available on the Company's Intranet. The Policy aims to ensure that all business activities are maintained at normal or near-normal performance levels following any disruptive incident. It focuses on minimizing impacts on human life, environment, economic losses, and stakeholders.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

No significant adverse environmental impacts have been identified within the Company's upstream value chain, based on periodic assessments of sourcing suppliers. As part of the Company's commitment to environmental sustainability, all suppliers are required to acknowledge and comply with the Supplier Code of Conduct, which includes adherence to applicable environmental regulations. Furthermore, suppliers are encouraged to embed and promote these principles within their own supply chains. While no major impacts have been observed, The Company continues to monitor supplier practices and is prepared to implement mitigation or adaptation measures as necessary.

- 7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.
 - BOM suppliers accounting for 50% of the total procurement value were assessed through audits for their environmental impact.
- 8. How many Green Credits have been generated or procured:

onwards, in line with SEBI's guidelines.

- a. By the listed entity
 - No Green Credits have been generated or procured by the listed entity during the reporting period.
- b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners

 According to SEBI's Circular issued on 28 March 2025, Green Credits has been identified as a new non-mandatory leadership indicator. The Company is committed to incorporate this in Value Chain Partners disclosures from FY 2025–26

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

Essential Indicators

- 1. a. Number of affiliations with trade and industry chambers/ associations: 7
 - b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

| S. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/ National) |
|-----------|---|--|
| 1 | Confederation of Indian Industry (CII) | National |
| 2 | Automotive Component Manufacturers Association (ACMA) | National |
| 3 | Gurgaon Industrial Association (GIA) | State |
| 4 | Quality Circle Forum of India (QCFI) | National |
| 5 | National Safety Council (NSC) | National |
| 6 | Industrial Park-IV | State |
| 7 | Attibele Industrial Association (AIA) | State |

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

| N. C. II. II. | D 1 (()) | |
|-------------------|-------------------|-------------------------|
| Name of authority | Brief of the case | Corrective action taken |
| | | |

Not Applicable, since the Company has not received any adverse order from any regulatory authorities on any issues relating to anti-competitive conduct.

Leadership Indicators

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

| S.No. | Public policy advocated | Method resorted for such advocacy | available in public | Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others | Web Link, if available |
|-------|-------------------------|-----------------------------------|---------------------|---|------------------------|
| | | | | please specify) | |

The Company does not engage in influencing regulatory policy. However, the Company practices proactive advocacy not for securing certain benefits for industry, but for advocating certain best practices for the benefit of society at large. The Company believes in adopting best practices and using the common platforms like ACMA, CII and other business forums for the purpose.

The Company engages with all the stakeholders including customers and investors. Its endeavour is to actively seek their opinions and share its perspectives, fostering two-way communication, including accepting the best of the industry practices to make the Company a better place to work.

PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

Essential Indicators

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

| Name and brief details of project | SIA Notification No. | Date of notification | by independent | Results communicated in public domain (Yes / No) | Relevant Web link |
|---|-------------------------|----------------------|----------------|---|-------------------|
| | | | | | |

Not Applicable, as there were no projects that required SIA as per the law in the current Financial Year.

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

| S.No. Name of Project for which R&R is ongoing State District | No. of Project | % of PAFs | Amounts paid |
|---|-------------------|------------|----------------|
| | Affected Families | covered by | to PAFs in the |
| | (PAFs) | R&R | FY (In INR) |

Not Applicable, as there were no projects requiring R&R.

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

The Company has designated representatives who engage with the local communities at regular and need-based intervals. Feedback and suggestions received during these interactions are duly acknowledged and addressed in a timely and appropriate manner.

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

| | FY 2024–25 Current Financial Year | |
|---|--------------------------------------|-------|
| Directly sourced from MSMEs/small producers | 51% | 57% |
| Directly from within India | 98% | 83.6% |

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

| Location | FY 2024–25 Current Financial Year | FY 2023-24 Previous Financial Year |
|--------------|---|--|
| Rural | 0.00% | 4.37% |
| Semi-Urban | 15.88% | 22,19% |
| Urban | 50.12% | 42.32% |
| Metropolitan | 34.00% | 31.12% |

Note: The aforesaid calculations have been provided on the basis of Cost to the Company which includes perguisites as well.

Leadership Indicators

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

| Details of negative social impact identified | Corrective action taken | |
|---|-------------------------|--|
| Not Applicable, as there were no projects that required SIA based on applicable laws in the current Financial Year. | | |

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

| S. No. | State | Aspirational District | Amount spent (In INR) | |
|---|-------|-----------------------|-----------------------|--|
| The Company has not undertaken any CSR projects in designated aspirational districts as identified by government bodies | | | | |
| during the current Financial Year. | | | | |

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

No, as of now, the Company does not have a preferential procurement policy, where it gives preference to purchase from suppliers comprising marginalized/vulnerable groups.

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

NA

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

NA

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

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

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

| Name of authority | Brief of the case | Corrective action taken |
|-------------------|-------------------|-------------------------|
| NA | | |

6. Details of beneficiaries of CSR Projects:

| S. No. | CSR Project | No. of persons benefitted from CSR Projects | % of beneficiaries from vulnerable and marginalized groups |
|-----------|---|---|--|
| 1 | Education | 900 | 100% |
| 2 | Health Care | 18,860 | 100% |
| 3 | Skill Development & Vocational Training | 108 | 100% |

PRINCIPLE 9 Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

The Company obtains customer assessment and feedback through specified platforms as per the Company's Policy on a regular basis to identify the areas of concern reported. In order to improve customer satisfaction, remedial measures are therefore devised and put into action. To access the overall business objectives, top management compiles, monitors and reviews the success of the actions at predetermined intervals.

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

| | As a percentage to total turnover |
|---|---|
| Environmental and social parameters relevant to the product | Since, the Company operates in the B2B segment, supplying its products directly to OEMs, therefore the Company's products |
| Safe and responsible usage | do not reach the end consumers directly, henceforth, these requirements are not directly applicable to the Company. |
| Recycling and/or safe disposal | — течинетненть ате постинеству аррнсавие то тне сотпрану. |

3. Number of consumer complaints in respect of the following:

| | FY 2024–25 (Current Financial Year) | | Remarks | FY 2023-24 (Previous Financial Year) | | Remarks |
|---------------------------------|--|---|---------|--|---|---------|
| | Received during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Data privacy | - | - | - | The Company has | | |
| Advertising | - | - | - | not received any consumer complaints | | |
| Cyber-security | - | - | | with respect to data privacy, advertising, cyber-security, delivery of essential services, restrictive trade practices, unfair trade | | |
| Delivery of essential services | - | - | - | | | |
| Restrictive Trade Practices | - | - | - | | | |
| Unfair Trade Practices | - | - | - | practices. | | |
| Other (Technical Complaints) | 1,361 | - | - | 488* - | | - |

^{*}The previous year's figures have been revised or regrouped wherever necessary.

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

| | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | - | NA |
| Forced recalls | - | |

- 5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.
 - Yes, the Company has a Policy on Cyber Security and risks related to data privacy, which can be accessed at Company's Intranet.
- 6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.
 - Not Applicable, as neither any complaints with respect to advertising, delivery of essential services, cyber security and data privacy of customers, re-occurrence of instances of product recalls were received during the reporting period nor any penalties were paid to, or actions were taken by regulatory authorities on account of safety of products/services.
- 7. Provide the following information relating to data breaches:

| A. Number of instances of data breaches | No instances of data breaches were identified during the current Financial Year. |
|---|---|
| B. Percentage of data breaches involving personally identifiable information of customers | Not Applicable, as no instances of data breaches were identified during the current Financial Year. |
| C. Impact, if any, of the data breaches | Not Applicable, as no instances of data breaches were identified during the current Financial Year. |

Leadership Indicators

- 1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).
 - Information on products and services of thes Company can be accessed at the Company's website: https://sandhargroup.com/products
- 2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.
 - As the Company primarily supplies its products directly to OEMs, who in turn assemble and market the final products to end-user customers, its direct role in informing or educating end-users about the safe and responsible usage of its products remains limited.
- 3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.
 - The Company does not directly provide essential services. However, the Company remains committed to minimizing any potential disruptions that could affect its customers' operations. Regular and proactive communication channels are maintained with customers to ensure timely updates and necessary support, thereby helping to mitigate risks related to any potential disruptions.
- 4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)
 - Not Applicable, as the Company supplies its products to OEMs, where its products are used as components or raw materials in the OEMs' finished goods.
 - The Company has not conducted any formal survey regarding consumer satisfaction relating to its major products, services, or significant locations of operation. However, the Company maintains regular engagement with its customers through various feedback mechanisms and incorporates the inputs received to continuously improve its products and services.