

Ref: STL / SE / 2024-2025 / BRSR / 36

Dated: 29th August, 2024

To,
Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers, Dalal Street,
Mumbai – 400 001

To,
Listing Department,
National Stock Exchange of India Limited
C-1, G-Block, Bandra-Kurla Complex
Bandra, (E), Mumbai – 400 051

BSE Code: 541163; NSE: SANDHAR

Subject: Business Responsibility and Sustainability Report for the Financial Year 2023-24

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report (“BRSR”) for the financial year 2023-24 which forms an integral part of the Annual Report of the Company for the financial year 2023-24.

We request you to take the same on record.

Thanking you,

For Sandhar Technologies Limited

Yashpal Jain
Chief Financial Officer & Company Secretary
M. No. A13981

Encl.: As above

Sandhar Technologies Limited

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	: 1987
4.	Registered office address	: B-6/20, L.S.C. Safdarjung Enclave, New Delhi - 110029
5.	Corporate address	: Plot-13, Sector - 44, Gurugram, Haryana - 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	: 2023-2024
10.	Name of the Stock Exchange(s) where shares are listed	: National Stock Exchange of India Limited and BSE Limited
11.	Paid-up Capital	: ₹ 6019.07 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 Assurance Provider:	Since, STL is not falling in the list of the top 150 listed companies based on the market capitalization as at 31st March 2024, therefore, it is not required to obtain assurance on BRSR, accordingly, this requirement would not be applicable.
15.	Type of Assurance obtained:	Not Applicable

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	23.2%
2.	Other Products	282, 293, 309, 453 and 454	22.6%
3.	Sheet Metal Components	282, 293, 309, 453 and 454	22.3%
4.	Cabins	282	9.4%
5.	Wheel Assembly	293, 309, 453 and 454	9.2%
6.	Mirror Assembly	282, 293, 309, 453 and 454	8.2%
7.	Handle Bar Assembly	293, 309, 453 and 454	3.8%
8.	Plastic Parts	292, 293, 309, 453 and 454	1.30%

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	21	2	23
International	0	0	0

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	28
International (No. of Countries)	7

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

c. The overall contribution of the exports to the total turnover is 0.96%.

d. A brief on types of customers

The Company is a market leader in the automotive components and system segment delivering a wide variety of innovative, superior quality and cost-effective products to customers all over the world. The sales are mainly through Business to Business (B2B) model to Original Equipment Manufacturers (OEMs).

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1,055	1,000	95%	55	5%
2.	Other than Permanent (E)	45	36	80%	9	20%
3.	Total employees (D + E)	1,100	1,036	94%	64	6%
WORKERS						
4.	Permanent (F)	510	481	94%	29	6%
5.	Other than Permanent (G)	52	52	100%	0	0%
6.	Total workers (F + G)	562	533	95%	29	5%

b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	0	0	0%	0	0%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	0	0	0%	0	0%
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0%	0	0%
5.	Other than permanent (G)	0	0	0%	0	0%
6.	Total differently abled workers (F + G)	0	0	0%	0	0%

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors*	11	2	18%
Key Management Personnel**	2	0	0%

* Board of Directors includes one member of Key Management Personnel i.e., Managing Director.
 ** Key Management Personnel includes one member who is acting as Chief Financial Officer as well as Company Secretary.

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2023–2024 (Turnover rate in current FY)			FY 2022–2023 (Turnover rate in previous FY)			FY 2021–2022 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	26.09%	32.20%	26.43%	30.52%	28.57%	30.41%	26.93%	34.67%	27.32%
Permanent Workers	2.07%	3.85%	2.16%	3.10%	4.35%	3.16%	1.03%	8.70%	1.38%

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 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

VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) –Yes

(ii) Turnover (in ₹) – 271,566.55 Lakhs

(iii) Net worth (in ₹) – 102,763.87 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 2023–2024 Current Financial Year			FY 2022–2023 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
Communities	Yes	Nil	Nil	-	Nil	Nil	-
Investors (other than shareholders)	Yes	Nil	Nil	-	Nil	Nil	-
Shareholders	Yes	Nil	Nil	-	1	Nil	-
Employees and workers	Yes	Nil	Nil	-	Nil	Nil	-
Customers	Yes	Nil	Nil	-	Nil	Nil	-
Value Chain Partners	Yes	Nil	Nil	-	Nil	Nil	-
Other (please specify)	Yes	Nil	Nil	-	Nil	Nil	-

*The Vigil Mechanism/Whistle-Blower Policy of the Company provides a robust framework for dealing with concerns and grievances for employees and directors and the same is available at <https://sandhargroup.com/investors/disclosures-under-regulation-46-of-the-lodr>.

There is a specific email ID investors@sandhar.in for addressing queries by any Investors and Shareholders. The Legal and Secretarial Department is responsible to monitor and resolve the queries and concerns raised through this email ID, taking inputs and resolutions from the relevant departments within the Company.

Further with respect to suppliers, customized surveys are conducted to get the pulse of their satisfaction with regard to the business done with them.

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	Pollution free environment	Risk	Failure to offer a safe working environment may expose the Company to compensation liabilities, decreased productivity, brand loss, and other consequences.	All relevant pollution control standards for air, water and soil are followed. The disposal of hazardous waste is regulated to ensure that it stays below permitted levels.	Negative
2	Waste Management	Risk and Opportunity	Waste handling and disposal pose a risk. Reduction of waste in conjunction with improved circular economy and performance, provides a chance for further environmental advantages.	Disposal of waste through authorised vendors.	Negative and Positive
3	Climate Change	Risk and Opportunity	Climate-related risks and opportunities have a substantial impact on the Company's long-term operations and financial viability. The effects of climate change are being seen in nearly every region and industry. It can lead to both physical risks as well as transitional risks being a market leader in the automotive components and systems segment, there are new opportunities in emerging EV markets. Lower greenhouse gas emissions have the power to limit climate change.	Climate change and industry transition are now embedded in the Company's risk management process Explore and identify ways to reduce carbon footprint as much as possible. Massive plantation drives.	Negative and Positive
4	Health & Safety	Risk and Opportunity	Managing health and safety is an integral part of running a business. Businesses need to do a risk assessment to identify hazards and risks in their workplace(s) and implement actions to successfully control them. The Company's commitment for continuous improvement in the areas of health and safety best practices around the world in accordance with our SHE policy for all of its employee and workers.	Several initiatives and programmes have been implemented to address all aspects of health and safety management and are being actively monitored for continuous improvement.	Negative and Positive
5	Training and Education	Opportunity	Skilled staff and workforce form an asset to the company. The highly trained workforce completes their tasks efficiently and effortlessly in less time and less chances of injury. Further, Company provides need-based and innovative range of trainings for development of their employees and workers. Furthermore, the Company is recruiting and developing suitable talent, as well as assuring professional development and personal well-being throughout their employment with the Company.	Not Applicable	Positive

6	Stakeholder engagement	Opportunity	Opportunity to communicate with and gather suggestions from stakeholders, contributes to enhanced decision-making by incorporating diverse perspectives and access to valuable insights and expertise. The Company has a well-defined continual stakeholder engagement process.	Not Applicable	Positive
7	Intellectual property	Risk	Leakage of confidential and private information. Risk of theft, infringement, loss, damage, or misuse of intellectual property. IP rights disputes might occur.	Implementing security measures or policies. Conducting Information Audits on a regular basis. Data exchange with vendors/customer in a secure manner. Entering into a Non-Disclosure Agreement (NDA) with parties for the purpose of exchanging information. Proper indemnity in documents to cover responsibility against third parties in the case of OEM patents.	Negative
8	Women Empowerment and employee engagement	Opportunity	Workforce that is motivated, devoted, and engaged; a significant number of female employees are employed.	Not Applicable	Positive
9	Disaster Recovery	Risk	Natural disasters including earthquakes, cyclones, floods, epidemics etc. can cause business intervention.	Adequate disaster preparedness, including proper insurance as covered under the Business Continuity Plan.	Negative
10	Innovation	Risk	Risk of better solutions failing to address current market trends, new requirements, or technology improvements.	New focus areas are developed in order to generate future capacity requirements. Structured technology development projects.	Negative
11	Operations environment	Opportunity	Opportunity to minimise costs and conserve resources while limiting the negative effects of non-compliance. Further, all environmental regulations are met, and operational improvements are implemented.	Not Applicable	Positive

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 NGRBC Principles and Core Elements.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. 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)	The policies as per the SEBI Regulations are approved by the Board and the rest of the policies are approved by the CSR Committee as designated by the Board.								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
c. Web Link of the Policies, if available	The Policies of the Company are placed on the Company's website, which can be accessed at: https://sandhargroup.com/investors/corporate-governance . Additionally, the Company's intranet hosts a number of internal policies that are available to internal stakeholders only.								
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)	The STL's Supplier Code of Conduct, which is applicable to the Company's upstream value chain partners, includes various ethical and business requirements such as human rights, environment, health and safety, and working conditions which also extends to them.								
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.	IATF: 16949:2016 ISO 14001:2015 ISO 45001:2018 ISO 9001:2015								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company has set a goal to become Carbon Neutral by 2050.								
6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	During the FY 2023-24, the STL has reduced its carbon footprints by 9.1% through various mitigatory measures.								
Governance, leadership, and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	At STL, priority revolves around the adoption of the highest level of environmental, social and governance integrity enabling long-term sustainability. The Company is a market leader in the automotive components and systems segment, delivering a wide variety of innovative, superior quality and cost-effective products to customers all over the world. The Company prioritizes the highest standards of health, safety, and environmental integrity, enabling long-term stability. The Company focuses on innovations and moving forward enthusiastically to the upcoming new era of Electric Vehicles (EVs) and New Technologies overcoming the environmental targets. The Company is committed towards its Goal of becoming Carbon Neutral by 2050 and has been accepting, adopting, and moving forward in this direction. With this goal the Company is venturing into new sustainability technologies. There has been a gradual shift from grid-based energy to renewable source of energy i.e. reducing the thermal energy & introducing renewable energy. Reduction in Consumption of fossil fuels and usage of Biomass, PNG, LPG Gas operated DG sets. The Company is exploring modes of transportation for employees and for supply of goods through EV, PNG vehicles. STL is also making efforts towards building economic, social, and environmental capital and enhancing social sustainability. The Company has consciously put in efforts to develop sustainable products through its in-house R&D team. Further, the Sandhar Leadership Team (SLT) Team oversees the ESG / Sustainability initiatives of the Company. To meet our goal of net Zero by 2050, we have started taking initiatives to reduce the carbon foot prints and monitoring the progress thereon. This year, we have been able to reduce our carbon footprints by 9.1% through various mitigatory measures which includes installation of Retrofit Emission Control Devices in all the DG sets, adoption of Variable Frequency Drives (VFD) to enhance energy efficiency and reduce power consumption and change of conventional motors into IE3 standard etc. The Business Responsibility and Sustainability Report demonstrate the Company's efforts to responsibly create and sustain value for all the stakeholders.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	SLT is responsible for implementation of Business Responsibility policy (ies). Mr. Jayant Davar (DIN 00100801), Co-Chairman and Managing Director, is responsible for oversight of the Business Responsibility policy(ies),								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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.	Yes, the Sandhar Leadership Team (SLT) is responsible for decision making on sustainability related issues, which comprises of the following members:								
	Name		Designation						
	Shri Yashpal Jain		Chief Financial Officer and Company Secretary						
	Shri Niraj Hans		Chief Operating Officer –Sheet Metal & Allied Business						
	Shri Yatendra Singh Chauhan		Senior Advisor and Chief Technology Officer – SAESPL & JV's						
	Shri Gurvinder Jeet Singh		Senior Advisor and Chief Operating Officer – Proprietary Business, SCID						
	Shri Ajay Raghav		Chief Operating Officer – Casting Machining & Tooling Business						
	Shri Ashok Kumar Sharma		Chief of Quality and Head Best Practices						
	Shri Venkataraman Srinivasan		Chief Operating Officer – Cabins & Fabrications						
	Shri Shirin Sachdeva		Chief of Staff						

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									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	Yes, by the Sandhar Leadership Team (SLT) as designated by the Board of Directors.																	
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Yes. The SLT as designated by the Board of Directors review compliance with all relevant statutory requirement									Annual basis.								
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	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
										Currently, the Company is conducting the assessment/evaluation of the working of its policies internally. However, in due course, the Company might also get these reviewed in terms of efficient working of these by an external agency.								

12. 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	P3	P4	P5	P6	P7	P8	P9
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)									
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	3	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. Brief technical capacity building session on Business Responsibility and Sustainability Reporting (BRSR) and its reporting framework.	80%
Key Managerial Personnel	5	Training on various topics about the business segments, operations of the Company, regulatory requirements and other matters. Brief technical capacity building session on BRSR and its reporting framework.	80%
Employees other than BoDs and KMPs	40	Employees Code of Conduct, POSH, Anti Bribery, Whistle Blower, Insider Trading.	92%
Workers	28	Employees Code of Conduct, POSH, Anti Bribery, Whistle Blower.	71%

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)	Has an appeal been preferred? (Yes/No)
Penalty/Fine	No material fines / penalties /punishment/ award/ compounding fees/ settlement amount were paid in proceedings by the Company or by directors / KMPs during the current Financial Year.			
Settlement				
Compounding fee				
Non-Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	NA	NA	NA	NA
Punishment	Nil	Nil	Nil	Nil

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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
Not Applicable	

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 available on the Company's intranet. STL is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on behalf of STL is responsible for conducting the Company's business honestly and professionally.

STL does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. Further, the Board and senior management of the Company are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery.

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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Director's	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2023-24 (Current Financial Year)		FY 2022-23 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Number of days of accounts payable	60	49

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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	2.3%	3%
	b. Number of trading houses where purchases are made from	9	16
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	2.2%	2.90%
Concentration of Sales	a. Sales to dealers /distributors as % of total sales	3%	3%
	b. Number of dealers / distributors to whom sales are made	94	58
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors	67%	84%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	3.10%	3.32%
	b. Sales (Sales to related parties / Total Sales)	2.51%	2.30%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	78.31%	47%
	d. Investments (Investments in related parties / Total Investments made)	17.44%	18.26%

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	Awareness sessions on BRSR	65% of buying value of top 150 suppliers

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 extensive 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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	Nil	Nil	NA
Capex	1.38%	1.45%	STL is undertaking various initiatives to improve its environmental and social impacts, which includes: Installation of Retrofit Emissions Control Devices in all the DG sets; Installation of ETPs and STPs at various locations; For the electric power saving company invested 26.5 Lakhs in Variable Frequency Drive (VFD) and Hybrid Automatic Power Factor Correction Relay (APFCR)

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, there is no scope for product reclamation for further processing. Our products are directly supplied to the OEM's as per their requirement; hence the Company has limited scope for reclaiming it at the end of its life cycle. However, the Company has processes in place to safely recycle hazardous waste, plastics (including packaging) and e-waste. We also reuse the crates (open boxes without final packaging) which are used to supply the final product manufactured by the Company as per specific OEM's requirements to be used in their final products.
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.
 EPR is not applicable on any of the units of the Company.

Leadership Indicator

1. 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	Name of Product/ Service	% of total Turnover contributed	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.
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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
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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 material	
	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Plastics and Woods scrap	8.64%	0.03%
Other Scrap	5.04%	4%

*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 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	Not applicable, as STL supplies its products directly to the OEMs, therefore, there is limited scope for reclaiming it at the end of its life cycle.					
E-waste						
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 STL 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 employees 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)
Permanent Employees											
Male	1,000	1,000	100%	1,000	100%	NA	NA	-	-	-	-
Female	55	55	100%	55	100%	55	100%	-	-	-	-
Total	1,055	1,055	100%	1,055	100%	55	100%*	-	-	-	-
Other than Permanent Employees											
Male	36	36	100%	36	100%	NA	NA	-	-	-	-
Female	9	9	100%	9	100%	9	100%	-	-	-	-
Total	45	45	100%	45	100%	9	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)
Permanent workers											
Male	481	481	100%	481	100%	NA	NA	-	-	-	-
Female	29	29	100%	29	100%	29	100%	-	-	-	-
Total	510	510	100%	510	100%	29	100%*	-	-	-	-
Other than Permanent workers											
Male	52	52	100%	52	100%	NA	NA	-	-	-	-
Female	0	0	0	0	0	0	0	-	-	-	-
Total	52	52	100%	52	100%	0	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 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the company*	0.0073%	0.0048%

*Expenditure incurred on Health Checkups and Personal Accident Insurance have been considered for the purpose of the aforesaid disclosure.

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

Benefits	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	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.)	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	97%	99%	Yes
ESI**	100%	100%	Yes	100%	100%	Yes
NPS	100%	100%	Yes	100%***	100%***	Yes

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

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

*** The previous year's figures have been rectified and recalculated.

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 Company are largely accessible to differently abled employees and workers, barring some of the locations, where it is practically not possible. However, the Company is attempting to make improvements to the current system.

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.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	NA	NA	NA	NA
Female	0%	50%	0%	0%
Total	0%	50%	-	-

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, there is Grievance Redressal Committee in place. All Employees, Union and its representative may raise their concerns to Grievance Redressal Committee.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2023-2024 (Current Financial Year)			FY 2022-2023 (Previous Financial Year)		
	Total employees / workers in respective category (A)	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	1,055	0	0%	1,064	0	0%
Male	1,000	0	0%	1,001	0	0%
Female	55	0	0%	63	0	0%
Total Permanent Workers	510	228	45%	507	233	46%
Male	481	224	47%	484	229	47%
Female	29	4	14%	23	4	17%

8. Details of training given to employees and workers:

Category	FY 2023-24 Current Financial Year					FY 2022-23 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	1,036	953	92%	701	68%	1,066	956	90%	658	62%
Female	64	52	81%	46	72%	72	57	79%	45	63%
Total Employees	1,100	1,005	91%	747	68%	1,138	1,013	89%	703	62%
Workers										
Male	533	487	91%	430	81%	529	476	90%	423	80%
Female	29	27	93%	25	86%	33	30	91%	26	79%
Total Workers	562	514	91%	455	81%	562	506	90%	449	80%

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

Category	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Total (A)	No. (B)	% (B)/(A)	Total (C)	No. (D)	% (D)/(C)
Employees						
Male	1,036	995	96%	1,066	1,028	96%
Female	64	58	91%	72	64	89%
Total	1,100	1,053	96%	1,138	1,092	96%
Workers						
Male	533	508	95%	529	503	95%
Female	29	27	93%	33	31	94%
Total	562	535	95%	562	534	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, the occupational health and safety management system has been implemented by the Company. The coverage of such occupational health and safety management system is as per EHS 45001: 2018, which covers Hazard identification and risk assessment, Emergency preparedness and response, Continual improvement, Performance monitoring and measurement, and Legal and regulatory compliances.

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

A well-defined process Hazard Identification & Risk Assessment (HIRA) as per EHS ISO 45001:2018 is there for manual monitoring of and to identify occupational health and safety hazards and their associated risk for the employees and workers through Internal and External Audits.

Hazard Identification Risk Assessment (HIRA) is the process of defining and describing risks by characterizing their probability, frequency and severity, as well as assessing undesirable outcomes, such as potential losses and injuries. It provides a factual basis for activities included in the business safety strategy to reduce losses from identified workplace hazards.

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

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

- d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?(Yes/ No)

Yes, the employees/workers of the Company have access to non-occupational medical and healthcare services.

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category*	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0	4
Total recordable work-related injuries	Employees	0	0
	Workers	0	2
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

*Including in the contract workforce

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

STL emphasizes the need to provide a safe and healthy working environment for all employees and workers. The following safety measures have been implemented by the Company to ensure a safe and healthy workplace:

- Regular safety trainings are being provided to employees and workers
- Regular Fire Mock Drills are being conducted
- First-Aiders Training
- Ten minutes awareness session on health and safety are being conducted during tea-breaks
- Safety Near Miss Incident capture, POKA Yoke (means it is Error Proofing solution to eliminate error in future), Root Cause Analysis (RCA) for Incident, Quality Circle (QC) Kaizen
- Safety Week is arranged

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

	FY 2023-24 Current Financial Year			FY 2022-23 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
Working conditions	Nil	Nil	-	Nil	Nil	-
Health & Safety	Nil	Nil	-	Nil	Nil	-

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	28% of plants were assessed by third party.
Working Conditions	28% of plants were assessed by third party.

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

1. 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 death of employees and workers.

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.
- Additionally, a check on compliances is maintained through monthly MIS and quarterly internal HR Audits.

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 employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

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	65% of buying value of top 150 suppliers
Working conditions	90% buying value of addressable suppliers are being assessed through system audits.

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.

No such observations found.

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 & 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
Investors and Shareholders	No	Emails; Analyst meets and conference calls; Annual General Meeting; Official communication channels such as Newspaper publications, website etc.; Investor meetings.	Quarterly	To inform about Company's current performance and future plans.
BOD and KMPs	No	Board Meetings; One-to-one meeting	Quarterly	Compliance of law Major decisions Day-to-day functioning
Employees and Workers	No	Emails, phone calls, conferences, workshops, training sessions, notice boards; One to one interaction; Grievance Redressal Mechanism.	Frequently	Day to day activities/ conduct of business.
Suppliers	No	Vendor assessments, Review and Upgradation Trainings; Supplier audits	As and when required	To upgrade suppliers. To get better services in terms of Quality, Cost, Delivery (QCD) parameters. To address the grievances of suppliers To have adjustment of Price revision
Customers	No	Emails, meetings, 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 Environmental Compliances Statutory Corporate Filings Good Governance	As and when required	Regulatory and legal requirements;
Communities	Yes	Community meetings, personal visits by project representatives.	As and when required	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 Process for consultation between Stakeholders and Board Members on economic, environmental, and social topics commences with a comprehensive listing of all the possible stakeholders and ESG related matters applicable to the Company and mapping of these to relevant business divisions.

The aforesaid process of consultation is delegated through the Senior Leadership Team (SLT) comprising of business heads and the Managing Director who meet at regular frequency. They in-turn keep the board informed.

The Company's management regularly interacts with key stakeholders i.e., investors, customers, suppliers, employees etc. The Company has Risk Management, Stakeholder Relationship Committee and CSR Committees that updates the progress of actions in respect to economic, environmental, and social topics to the Board and takes inputs on a regular basis.

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 always maintained a consistent and proactive contact with its key stakeholders, enabling it to effectively identify and handle environmental and social topics. Engagement with stakeholders, in our opinion, promotes more accountability, compliance, organizational learning, quality management, and sustainability. Based on the feedback received from the stakeholders, the Company has adopted major policy and procedural improvements and identified key environmental and social topics, which includes undertaking of the following programs:

A. Details of Instances of Stakeholders feedbacks being incorporated into policies & activities

- Human Capital Development
 - Based on the feedback from all employees and workers for a need for training and development, group devised a Training and Development (T&D) calendar to provide a minimum of 40 hours of T&D per year to all Company employees, contractual and Company Associates.
- Access to Healthcare
 - Employees: Apart from Group accidental insurance policy that covers all employees, we initiated doctor visits and annual health check-ups at all locations as per the requirements stated by the business locations.

B. Details of Instances from Environmental Domain

- Carbon Emissions
 - Stakeholders: In line with consciousness reverberated by the Board of Directors, our OEMs and civil society, we have installed Solar Power Plants of the capacity of 2833 KW mitigating 1868.30 MT of CO₂e through green energy uses till March 2024.

- Retrofit Emissions Control Devices

The entity is installing the retrofit emission control devices to its DG sets, to reduce the air pollution.

- Hazardous waste

The limited hazardous waste which is generated through our processes are hydraulic oil ETP sludge and paint sludge. Being responsible business users, we dispense paint sludge for input consumption by cement industry. Hydraulic Oil is disposed through authorised vendors only.

Multiple departments within the organisation are responsible for engaging with stakeholders on continuous basis. The domains of E, S & G are the most important issues and are reviewed on an annual basis for management process, risk assessment and strategic objectives.

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

Details of Instances to act on concerns of Vulnerable/Marginalized groups.

Human Capital Development

Communities: Based on feedback from community parents our CSR team undertook to set up Sandhar Centres of Learning implementing Remedial Education Programs in communities to augment the learning levels of less privileged students by supporting them with pedagogy, improved infrastructure and sanitation (WASH), mental health counselling and capacity building for enhanced employability.

Access to Healthcare

Stakeholders – Communities: Recognising the needs from the village communities around village Begumpur Khatola (Haryana) and recommendation from the Village Panchayat, we set up Sandhar Healthcare Centre to provide preventive health care which has benefitted more than one lakh OPD since inception, Centre provides access to a general physician and gynaecologist doctors. Centre also organises free health check-up camps and active referral facilitations to Primary health centres, ESI & Government hospitals in case of tertiary treatment.

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 2023-2024 Current Financial Year			FY 2022-23 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	1,055	870	82%	1,064	827	78%
Other than permanent	45	41	91%	74	69	93%
Total Employees	1,100	911	83%	1,138	896	79%
Workers						
Permanent	510	495	97%	507	461	91%
Other than permanent	52	49	94%	55	47	85%
Total Workers	562	544	97%	562	508	90%

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

Category	FY 2023-24 Current Financial Year					FY 2022-23 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	1,055	0	0%	1,055	100%	1,064	0	0%	1,064	100%
Male	1,000	0	0%	1,000	100%	1,001	0	0%	1,001	100%
Female	55	0	0%	55	100%	63	0	0%	63	100%
Other than permanent	45	0	0%	45	100%	74	0	0%	74	100%
Male	36	0	0%	36	100%	65	0	0%	65	100%
Female	9	0	0%	9	100%	9	0	0%	9	100%
Workers										
Permanent	510	0	0%	510	100%	507	20	4%	487	96%
Male	481	0	0%	481	100%	484	20	4%	464	96%
Female	29	0	0%	29	100%	23	0	0%	23	100%
Other than permanent	52	0	0%	52	100%	55	0	0%	55	100%
Male	52	0	0%	52	100%	45	0	0%	45	100%
Female	0	0	0%	0	100%	10	0	0%	10	100%

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)	8**	495,000	2	555,000
Key Managerial Personnel	2**	44,455,755	0***	0
Employees other than BoD and KMP	1034	876,960	64	784,638
Workers	533	371,647	29	253,941

* Annual Salary/Remuneration/Wages have been considered for the purpose of median calculation. Further, the median calculations have been provided on the basis of Cost to the Company which includes perquisites as well.

**Includes Non-Executive Directors only (including Independent Directors) who are paid only sitting fee and commission. Hence the median is calculated considering the same.

** Managing Director's remuneration considered in calculation of median remuneration of KMP and not in Board of Directors

*** Komal Malik resigned as Company Secretary & Compliance Officer w.e.f. 15th January, 2024.

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

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Gross wages paid to females as % of total wages*	4.76%	3.70%

*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 who meet periodically and discuss all the human rights impacts or issues related to business, and it is not just limited to legal, HR etc.

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

In order to ensure that honest and ethical business and employment practices are followed, the Company views respect for human rights as one of its essential and core values. Regardless of one's ethnicity, gender, race, caste, religion etc., the Company is dedicated to creating a secure work environment. To maintain this environment, the Company has following internal mechanisms in place to redress 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:

	FY 2023-24 Current Financial Year			FY 2022-23 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	Nil	Nil	-	Nil	Nil	-
Discrimination at workplace	Nil	Nil	-	Nil	Nil	-
Child Labour	Nil	Nil	-	Nil	Nil	-
Forced Labour/Involuntary Labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil	-	Nil	Nil	-
Other human rights related issues	Nil	Nil	-	Nil	Nil	-

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

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
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 detailed Grievance Redressal Policy and Policy on Prevention of Sexual Harassment of Women at Workplace, to prevent adverse consequences to the complainant in discrimination and harassment cases, which contains specific clauses as to how such concerns would be handled in a confidential manner.

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	28% of plants were assessed by third party, ensuring compliance with all
Forced/ Involuntary labour	the Statutory Laws/Regulatory Requirements including applicable Labour
Sexual harassment	Laws.
Discrimination at workplace	
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.

Not Applicable.

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.

The scope and coverage of Human rights due diligence is covered through Human Rights Policy of STL. During the year, through internal audit process, the areas of applicable human rights were covered for all the plants of STL.

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 Company are largely accessible to differently abled visitors, barring some of the locations, where it is practically not possible. However, the Company is attempting to make more improvements to the current system.

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	Acknowledgment from supplier for "Supplier Code of Conduct" - 100% of the
Discrimination at workplace	value chain partners are assessed at the time of on boarding.
Child labour	
Forced/ Involuntary labour	
Wages	
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.

No significant risks / concerns were observed arising from such assessments.

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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
From Renewable sources		
Total electricity consumption (A) (In Giga Joules)	8,303.57	6,809.13*
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)	8,303.57	6,809.13
From Non-Renewable sources		
Total electricity consumption (D) (In Giga Joules)	216,151.202	198,397.5**
Total fuel consumption (E) (In Giga Joules)	22,639	10,325.87
Energy consumption through other sources (F) (In Giga Joules)	-	-
Total energy consumed from non- renewable sources (D+E+F) (In Giga Joules)	238,790.202	208,723.37
Total energy consumed (A+B+C+D+E+F) (In Giga Joules)	247,093.77	215,532.50
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.00001	0.00001
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP***)	0.00020	0.00020
Energy intensity in terms of physical Output# - Total energy consumption in Giga Joules/ production of finished goods in Metric Tonnes	1.62214	1.52410
Energy intensity (optional) - the relevant metric may be selected by the entity	-	-

* The previous year's figures have been regrouped.

** The previous year's figures have been rectified and recalculated.

*** The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 22.4 for the FY ended 31st March, 2024 as per the 2024 update and 22.17 for the FY ended 31st March, 2023 as per the 2023 update.

For the purpose of this calculation, only the physical output with respect to material items have been considered.

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. 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 of India.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	100,443	158,187.20
(iii) Third party water	71,670	68,031
(iv) Seawater/Desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	172,113	226,218.20
Total volume of water consumption (in kilolitres)	124,702	222,661.40*
Water intensity per rupee of turnover (Water consumed / turnover)	0.000005	0.000009
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.000103	0.000206
Water intensity in terms of physical output** - Total water consumption in Kilolitres/ production of finished goods in Metric Tonnes	0.818655	1.574508
Water intensity (optional) - the relevant metric may be selected by the entity	-	-

* The previous year's figures have been rectified and recalculated

**For the purpose of this calculation, only the physical output with respect to material items have been considered.

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 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Water discharge by destination and level of treatment (in kilolitres)		
(i) To surface Water	47,411	3,556.80
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 Sewage Treatment Plant	As per State Pollution Control Board (SPCB)/ Central Pollution Control Board (CPCB) Guidelines, wastewater generated is treated in Sewage Treatment Plant
(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)	47,411	3,556.8

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. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Yes. The proper management of water resources both inside and outside of its functioning areas is recognized as being necessary by the Company. All stakeholders' access to water is ensured while efforts are made to increase its efficiency.

STL has a Zero Liquid Discharge system in the 6 major units, with Rotary Evaporator & Solar Evaporator. In other units Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STP) are installed. The treated water is re-used for gardening and other non-potable uses.

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

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
NOx	MT	0.05599	0.05999
Sox	MT	0.03071	0.03290
Particulate matter (PM)	MT	0.00033	0.00035
Persistent organic pollutants (POP)		NA	NA
Volatile organic compounds (VOC)		NA	NA
Hazardous air pollutants (HAP)		NA	NA
Others-please specify		NA	NA

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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	4,506	6,592.02
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	48,634.02	44,639.44*
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)	-	0.000004	0.000005
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)	-	0.34886	0.36227
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

* The previous year's figures have been rectified and recalculated.

**For the purpose of this calculation, only the physical output with respect to material items have been considered.

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, as a responsible business owner, STL strives to improve resource efficiency, wherein the Company has undertaken the following projects related to reduction of Green House Gas emission:

- The Company is changing all the conventional motors into the IE3 standard which will indirectly help in conservation of energy and reduction of carbon footprints of the Company.
- The Company has installed retrofit emission control devices in the DG sets.
- The Company has its existing solar power units which further helps to reduce the GHG emissions.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	595.24	500.86
E-waste (B)	0.2	0.68
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) (Hydraulic Oil, coolant, paint and ETP sludge)	340.36	450.58
Other Non-hazardous waste generated (H). Please specify, if any. (Waste paper, drum, board, wood, furniture etc.)	457.76	89.68
Total (A+B + C + D + E + F + G + H)	1,393.56	1,041.80
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.00000005	0.00000004
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.00000115	0.00000096
Waste intensity in terms of physical output* – Total waste generated in Metric Tonnes/ production of finished goods in Metric Tonnes	0.00914856	0.00736689
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	0	500.56
(ii) Re-used	37.59	0
(iii) Other recovery operations	0	0
Total	37.59	500.56
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	1355.77	541.24
Total	1355.77	541.24

*For the purpose of this calculation, only the physical output with respect to material items have been considered.

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 implemented a waste management policy that supports the Company's operations by segregating waste at the source and carrying out the following practises:

- Waste prevention
- Reusing waste
- Recycling waste
- Responsible disposal of waste

Furthermore, at Company level, we use a hierarchy of waste reduction to implement the concepts of the circular economy, covering the aspects of Recover, Reduce, Reuse & Recycle including the following areas:

- Recovering resources as much as possible
- Reducing usage of natural resources and materials
- Reusing waste wherever practicable
- Recycling materials whenever possible

With respect to hazardous wastes, these are managed in accordance with the applicable Regulations (*State Pollution Control Board (SPCB)/Central Pollution Control Board (CPCB) Rules and Guidelines*). As per these Regulations, all of these items are handled, delivered, recycled, stored and disposed of through licenced agencies. Further, proper records are being maintained for all types of hazardous waste and its movement.

With respect to non-hazardous wastes, over the period, the Company has devised specific solutions to handle and dispose of non-hazardous waste in the most efficient available mechanism. These solutions require either no or very low investment, to achieve advancement both commercially and environmentally. For example, to eliminate the need for wood pallets for delivering the products, we have started using the recycled cardboard boxes as a filler for packaging material. Use of reusable pallets and recycling programmes for paper and plastic are some of the other initiatives.

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
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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	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes / No)	Relevant web link
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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
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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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	60,390	-
(iii) Third party water	47,440	68,031
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	107,830	68,031
Total volume of water consumption (in kilolitres)	86,510	64,474*
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 (in kilolitres)		
(i) Into Surface water	21,320	3,556.80
- No treatment		
- With treatment – please specify level of treatment	As per State Pollution Control Board (SPCB)/Central Pollution Control Board (CPCB) Guidelines, water generated is treated in Sewage Treatment Plant.	As per State Pollution Control Board (SPCB)/Central Pollution Control Board (CPCB) Guidelines, waste water generated is treated in Sewage Treatment Plant.
(ii) Into Groundwater	-	-
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater	-	-
- No treatment		
- With treatment – please specify level of treatment		

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
(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 discharged (in kilolitres)	21,320	3,556.8

* The previous year's figures have been rectified and recalculated.

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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	Scope-3 emissions are not considered by the Company presently. The Company is in the process of laying down the roadmap in the near future.	
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	20% of the electricity comes from solar systems installed across various units, contributing to renewable energy use.	Reduction in carbon footprint by 1868.30 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.	Saved 1,107,736 KWH of energy consumption annually with a corresponding reduction of 941.57 MT of CO2e.
4.	Installation of Effluent Treatment Plant (ETP) Recycling Units	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.

We at STL have a Business Continuity Policy, which is available on the Company's Intranet. The purpose of having such Policy is to make sure that, in the event of an occurrence that might disrupt or endanger the Company, all business operations can be maintained at normal or nearly-normal performance levels.

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.

There is no major environmental impact resulting from the Company's value chain (sourcing suppliers assessed for this purpose). Since we are mindful of the environmental consequences across the value chain, every supplier of ours is required to sign and abide by the Supplier's Code of Conduct. The Suppliers of the Company are expected to adhere to the compulsory Code of Conduct and further make attempt to inculcate the principles of the said Code of Conduct further in its supply chain.

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

STL has assessed 45% of the top 100 suppliers for environmental impacts.

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: 9
- 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	Automotive Component Manufacturers Association	National
2	Confederation of Indian Industry MSME National Council	National
3	Confederation of Indian Industry (CII)	National
4	Innovation Council, Govt. of Haryana	State
5	Quality Circle Forum of India (QCFI)	National
6	Employers Federation of India	National
7	National Safety Council	National
8	Gurgaon Industrial Association (GIA)	State
9	Indian Construction Equipment Manufacturers' Association	National

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.

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	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
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. We believe in adopting best practices and using the common platforms like ACMA, CII and other business forums for the purpose. We continuously engage with all our stakeholders including customers and investors. Our endeavour is always to seek their opinion and share our views as a means of two-way communication, including accepting the best of the industry practices to make our Company better place to work.					

PRINCIPLE 8 BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

1. 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	Whether conducted by independent external agency (Yes / No)	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 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 Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the 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 visit the communities at stated intervals/ as needed and their feedback/ suggestions are timely acknowledged & addressed.

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

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Directly sourced from MSMEs/ small producers	57.0%	56.36%
Directly from within India	83.6%	83.28%

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 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Rural	4.37%	5.14%
Semi-Urban	22.19%	18.77%
Urban	42.32%	35.85%
Metropolitan	31.12%	40.24%

*The aforesaid calculations have been provided on the basis of Cost to the Company which includes perquisites 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 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 marginalised/vulnerable groups.
- (b) From which marginalized /vulnerable groups do you procure?
- Not Applicable.
- (c) What percentage of total procurement (by value) does it constitute?
- Not Applicable.
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
Not Applicable				

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
Not Applicable		

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	970	100%
2	Health Care	13,500	100%
3	Eradicating Hunger & Malnutrition	550	100%
4	Skilling & Vocational Training	360	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	The Company is in the B2B business, and the products do not reach the customers directly. Hence, the clause is not applicable.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2023-24 (Current Financial Year)		Remarks	FY 2022-23 (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 not received any consumer complaints with respect to data privacy, advertising, cybersecurity, delivery of essential services, restrictive trade practices, unfair trade practices. The complaints in relation to defects relating to the quality of manufactured components/parts are insignificant as compared with the total annual volume.			The Company has not received any consumer complaints with respect to data privacy, advertising, cybersecurity, delivery of essential services, restrictive trade practices, unfair trade practices. The complaints in relation to defects relating to the quality of manufactured components/parts are insignificant as compared with the total annual volume.		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

	Number	Reasons for recall
Voluntary recalls	Nil	Not Applicable
Forced recalls	Nil	

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, STL 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 year.
b. Percentage of data breaches involving personally identifiable information of customers	Not Applicable, as no instances of data breaches were identified.
c. Impact, if any, of the data breaches	Not Applicable, as no instances of data breaches were identified.

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 the 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.

The Company is supplying child parts/components on B2B basis to OEMs hence, the Company has limited scope for informing and educating the consumers (end-users) about safe and responsible usage of products and/or services.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

Not Applicable, since the Company is not providing any essential services.

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 sells its products to OEMs who in turn use them as raw material for their finished products.

Further, as such the Company did not carry out any survey with regard to consumer satisfaction relating to the major products of the Company, significant locations of operation of the Company or the Company as a whole. However, the Company keeps on taking the feedback through various mechanisms on regular intervals from its customers and keeps on implementing those suggestions for improving its services.