



Divgi TorqTransfer Systems

Divgi TorqTransfer Systems Limited

CIN: L32201MH1964PLC013085

75, General Block, MIDC, Bhosari,

Pune 411 026, India

Tel: (+91-20) 63110100

Web: www.divgi-tts.com

Ref.: DTTS/Sec/24-25/38

July 18, 2024

To, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400001 BSE Scrip Code – 543812	To, National Stock Exchange of India Limited, "Exchange Plaza" 5th Floor, Plot No. C-1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai – 400051 NSE Scrip Code - DIVGIITTS
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Sub: Resubmission of Business Responsibility and Sustainability Report for the Financial Year 2023-24.

Dear Sir / Madam,

This is with reference to our letter no. DTTS/Sec/24-25/31 dated July 06, 2024, we are enclosing herewith a revised copy of the Business Responsibility and Sustainability Report for FY 2023-24 which forms part of Annual Report for the FY 2023-24 uploaded with reference to our letter no. DTTS/Sec/24-25/37

This is also hosted on the Company's website <https://divgi-tts.com/annual-reports/>

Kindly take this submission on your record.

Thanking you,

For **Divgi TorqTransfer Systems Limited**

Sanika Nirgude
Company Secretary & Compliance Officer
A71466

Enclosure: As above



Annexure E

Business Responsibility and Sustainability Report

A: General Disclosures

A.1: Details of the listed entity

1. Corporate identity number (CIN) of the listed entity	:	L32201MH1964PLC013085
2. Name of the listed entity	:	Divgi TorqTransfer Systems Limited
3. Year of incorporation	:	16-12-1964
4. Registered office address	:	Plot no. 75, General Block, MIDC Bhosari Pune Maharashtra, India 411026
5. Corporate address	:	Plot no. 75, General Block, MIDC Bhosari Pune Maharashtra, India 411026
6. E-mail	:	companysecretary@divgi-tts.com
7. Telephone	:	020-63110100
8. Website	:	https://divgi-tts.com
9. Financial year for which reporting is being done	:	2023 - 2024
10. Name of the stock exchange(s) where shares are listed	:	BSE, NSE
11. Paid-up Capital (in Rs.)	:	152914635
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	:	Rupam S. Parwate, 9975712951, rsparwate@divgi-tts.com
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).	:	Standalone basis
14. Name of assurance provider	:	NA
15. Type of assurance obtained	:	NA

A.2: 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
	Manufacturing	Manufacture of parts & accessories of motor vehicles & engines	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
	Transfer Case	2930	64
	Auto Looking Hub	2930	1.42
	Transmission Components & Others	2930	25.13
	EV Transmission	2930	9.45

A.3: 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	4	1	5
International	0	0	0

19. Markets served by the entity:

a. Number of locations:

Location	Number
National (No. of States)	2
International (No. of Countries)	2

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

1.25

c. A brief on types of customers:

Divgi TTS provide world class torque transfer and transmission solutions to automotive OEMs encompassing utility, passenger, commercial, electric and agriculture vehicles in India and across the globe. Some of the marquee customers are stated here in below: Mahindra & Mahindra : The Company is an Indian multinational automotive manufacturing corporation headquartered in Mumbai. MG Motors : MG Motor UK Limited (MG Motor) is a British automotive company owned by SAIC. Motor UK, which, in turn, is owned by the Shanghai-based Chinese state-owned company, SAIC Motor, headquartered in London, United Kingdom TATA Motors: Tata Motors, India's largest automobile company, is a part of the USD 100 bn Tata. Group founded by Jamshedji Tata in 1868. Toyota Kirloskar: Toyota Kirloskar is an Indian joint venture between Toyota Motor Corporation and the Kirloskar Group for the manufacture of Toyota cars in India. The company's headquarters are located in Bidadi (Karnataka). The Company manufactures transmissions and cars that are marketed worldwide. Force Motors : Force Motors Ltd, is an Indian multinational automotive manufacturing company, based in Pune, BorgWarner : Borg Warner is an American automotive supplier. The Company is among the 25 largest automotive suppliers in the world.

A. 4: Employees

20. Details as at the end of financial year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
EMPLOYEES								
1.	Permanent (D)	246	243	98.78	3	1.22		0
2.	Other than Permanent (E)	33	26	78.79	7	21.21		0
3.	Total employees (D+E)	279	269	96.42	10	3.58	0	0
WORKERS								
4.	Permanent (F)	0	0	0	0	0		0
5.	Other than Permanent (G)	373	344	92.23	29	7.77		0
6.	Total workers (F+G)	373	344	92.23	29	7.77	0	0

**b. Differently abled employees and workers:**

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

21. Participation/inclusion/representation of women:

Leadership team	Total (A)	Number and percentage of females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.50
Key Management Personnel	3	1	33.33

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

Particulars	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	Other	Total	Male	Female	Other	Total	Male	Female	Other	Total
	Permanent Employees	31	3	0	34	6.0	1.0	0	7.0	29.0	0	0
Permanent Workers	1	0	0	1	0	0	0	0	0	0	0	

A. 5: Holding, Subsidiary and Associate Companies (including joint ventures)**23. Details of holding/subsidiary/associate companies/joint ventures.:**

S. No.	Entity name (A)	Entity type	% of shares held	Entity (A) participate in the BRSR initiatives of the parent entity?
	Divgi Holding Private Limited	Holding	51.6	No

A. 6: CSR Details**24. CSR details of the company:**

a. Whether CSR is applicable as per section 135 of Companies Act, 2013	: Yes
b. Turnover (in Rs.)	: 2534243674
c. Net worth (in Rs.)	: 5803428812

A. 7: 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?	If Yes, then provide web-link for policy	FY 2023 - 2024 Current Financial Year			FY 2022-2023 Previous Financial Year			If NA, then provide the reason
			No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	
Communities	Yes	https://divi-tts.com/policies-an-code-of-conduct	0	0		0	0	NA	
Investors (other than shareholders)	Yes	https://divi-tts.com/policies-an-code-of-conduct	0	0		0	0	NA	
Shareholders	Yes	https://divi-tts.com/policies-an-code-of-conduct	0	0		0	0	NA	
Employees and workers	Yes	https://divi-tts.com/wp-content/uploads/2023/03/8.-Policy-on-Vigil-Mechanism.pdf	0	0		0	0	NA	
Customers	Yes	e-mail communications, Portal	21	0		15	0	All complaints resolved	
Value chain partners	Yes	e-mail communications, Portal	0	0		0	0	NA	



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 (R) or opportunity (O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
	Climate protection	O	Reducing greenhouse gas emissions, energy use and mitigating the effects of long-term changes in the Earth’s climate and its physical impacts on business operations, communities and the natural environment.	-	Positive Implications
	Sustainable product design and life cycle management	O	Fostering a circular economy by addressing customer and societal demands for more sustainable products and services. Ensuring environmental regulations through product designing and lifecycle management.	-	Positive Implications
	Cybersecurity and data management	O	Cyber and data security as risk and business opportunity for the benefit of all. Management of risks related to collection, retention and use of sensitive, confidential and/or proprietary customer or user data.	-	Positive Implications
	Employee health and safety ESG	O	Creating safe and healthy work environment Management system for identification, prevention, minimization of potential ESG-risks	-	Positive Implications
	Diversity, equity & inclusion	O	Company’s policy to ensure that it’s culture and hiring and promotion practices foster the building of a diverse and inclusive workforce	-	Positive Implications
	Corporate governance and sustainability leadership	O	Management follows clear sustainability policy and guidelines for encouraging Sustainability practices across the plants	-	Positive Implications
	Compliance management	O	Management system for ensuring, that the company and its employees follow all laws, regulations, standards, and ethical practices.	-	Positive Implications
	Social and ecological standards in the supply chain	O	Driving sustainability performance in the supply chain including minimum social and ecological standards	-	Positive Implications

B: Management and Process Disclosures

B. 1: Policy and management processes

1-6. Policy and management processes:

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1 a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1 b. Has the policy been approved by the Board?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1 c. Web Link of the Policies, if available	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/	https://di.vgi-tts.com/policies-and-code-of-conduct/
2. Whether the entity has translated the policy into procedures.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners?	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles	No	No	No	No	No	No	No	No	No
The entity does not have the financial or/human and technical resources available for the task	No	No	No	No	No	No	No	No	No
It is planned to be done in the next financial year	No	No	No	No	No	No	No	No	No
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

C: Principle Wise Performance Disclosures

C.1: Principle 1

Essential indicators

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	1	The Board is familiarized of the principles of the NGRBC released by SEBI and Divgi TTS Conduct of conduct The Board periodically reviews the BCG	100
Key Managerial Personnel	2	NGRBC principles and Divgi TTS Conduct of conduct and Sustainability policy guidelines	100
Employees other than BoD and KMPs	2	NGRBC principles and Divgi TTS Conduct of conduct and Sustainability policy guidelines	100
Workers	1	Divgi TTS Conduct of conduct - Workers are required to undergo training during induction and periodic refresher	100



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):

- a. Monetary:

Penalties and Fees	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred?
Penalty/Fine	NA	NA	0	NA	No
Settlement	NA	NA	0	NA	No
Compounding fee	NA	NA	0	NA	No

- b. Non-monetary:

Legal sanctions	NGRBC principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the case	Has an appeal been preferred?
Imprisonment	NA	NA	NA	No
Punishment	NA	NA	NA	No

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

4. Details about anti-corruption or anti-bribery policy.:

- a. Does the entity have an anti-corruption or anti-bribery policy?:

Yes

- b. If yes, provide details in brief:

Divgi TTS has an anti-corruption and anti-bribery policy as part of its Code of Business Conduct & Ethics and plays a vital role in the Company's aspiration to make ethical and responsible decisions in the interest of all stakeholders.

- c. If available, provide a web-link to the policy.:

<https://divgi-tts.com/policies-and-code-of-conduct/>

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

Organizational roles	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

Complaints type	FY 2023 - 2024 (Current Financial Year)		FY 2022-2023 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	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

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

Question	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Number of days of accounts payables	60	58

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 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0	0
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	0	0
	b. Number of dealers / distributors to whom sales are made	0	0
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	0	0
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0	0
	b. Sales (Sales to related parties / Total Sales)	0	0
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0	0
	d. Investments (Investments in related parties / Total Investments made)	0	0



Leadership indicators

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	P1, P2, P3, P4, P5, P6, P8, P9 (suppliers onboarded are covered through the Divgi TTS Code of Conduct for Suppliers, QEHS Policy, Supplier quality manual requirements)	100

2. **Details about the processes in place to avoid/ manage conflict of interests involving members of the Board.:**

a. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board?

Yes

b. If yes, provide details of the same.:

To avoid/manage conflicts of interest, Divgi TTS obtains a mandatory declaration from the members of its Board. The declaration ensures that the members of the Board are in compliance with the Code Conduct and ethics Guidelines.

C.2: Principle 2

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.:**

Expenditure type	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	1.83	1.01	NA
Capex	63.68	22.38	NA

2. **Details about sustainable sourcing:**

a. Does the entity have procedures in place for sustainable sourcing? : Yes

b. If yes, what percentage of inputs were sourced sustainably? : 100

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for the following waste categories.:**

Product type	Process description
a. Plastics (including packaging)	Parts goes to automotive OEM, OEM Service manual gives guideline on recycling and safe disposal of product . Sustainable Product Life-cycle management involves in-depth analysis of all processes and systems from the stage of receiving RFQs, and signing NBO till the products / services reach the end consumer.
b. E-waste	Parts goes to automotive OEM, OEM Service manual gives guideline on recycling and safe disposal of product . Sustainable Product Life-cycle management involves in-depth analysis of all processes and systems from the stage of receiving RFQs, and signing NBO till the products / services reach the end consumer.
c. Hazardous waste	Parts goes to automotive OEM, OEM Service manual gives guideline on recycling and safe disposal of product . Sustainable Product Life-cycle management involves in-depth analysis of all processes and systems from the stage of receiving RFQs, and signing NBO till the products / services reach the end consumer.
d. Other waste	Parts goes to automotive OEM, OEM Service manual gives guideline on recycling and safe disposal of product . Sustainable Product Life-cycle management involves in-depth analysis of all processes and systems from the stage of receiving RFQs, and signing NBO till the products / services reach the end consumer.

4. Details about Extended Producer Responsibility (EPR):

Questions	Response
Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities.	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.	NA

Leadership indicators

1. Details about the Life Cycle Perspective / Assessments (LCA):

- a. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? : No
- b. 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	Results communicated in public domain	If yes, provide the web-link.

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

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 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Waste Recycle	84	84.0

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:

Complaints type	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (Previous Financial Year)		
	Re-Used	Recycled	Safely disposed	Re-Used	Recycled	Safely disposed
Plastics (including packaging)	0	10	0	0	10	0
E-waste	0	0	0	0	0.07	0
Hazardous waste	0	44	29	0	44.22	29
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
NA	

C.3: Principle 3

Essential indicators

1. Details regarding well-being of employees and workers:

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	243	0	0	243	100	0	0	0	0	0	0
Female	3	0	0	3	100	3	100	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0
Total	246	0	0	246	100	3	1.22	0	0	0	0
Other than permanent employees											
Male	26	0	0	26	100	0	0	0	0	0	0
Female	7	0	0	7	100	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0
Total	33	0	0	33	100	0	0	0	0	0	0

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	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0
Other than permanent workers											
Male	344	0	0	344	100	0	0	0	0	0	0
Female	29	0	0	29	100	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0
Total	373	0	0	373	100	0	0	0	0	0	0

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

Question	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Cost incurred on well being measures as a % of total revenue of the company	0.02	0.02

2. Details of retirement benefits, for the current and previous financial year.:

Complaints type	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (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	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	18.15	0	Yes	100	0	Yes

3. Accessibility of workplaces:

Questions	Response
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?	Yes
If not, whether any steps are being taken by the entity in this regard.	NA

4. Details about equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016.:

Questions	Response
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 https://divgi-tts.com/policies-and-code-of-conduct/ The Business code Conduct and sustainability, social accountability policy guidelines document declares the equal opportunity policy under the values of â Respect to each otherâ . Divgi TTS also undertakes the responsibility of â working conditionsâ for its employees and workers. The principles of equal opportunity and equal treatment are guaranteed without regard to any disability. These policy guidelines are available on the company portal.

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	0	0	0	0
Female	100	100	0	0
Other	0	0	0	0
Total	100	100	0	0

6. a. Is there a mechanism available to receive and redress grievances for the : No following categories of employees and worker?
- b. If yes, give details of the mechanism in brief.:

Category	Yes/No	If Yes, then give details of the mechanism in brief
Permanent workers	Yes	
Other than permanent workers	Yes	The Company has a grievance redressal mechanism in line with the statutory framework under Industrial Dispute Act, 1947 for grievance redressal mechanism for the permanent workers where workers or their representatives can raise their grievances in areas like wages, discrimination, child labor, human rights related issues etc. POSH Policy, Divgi TTS Sustainability guidelines under the element Protection against discrimination , Social accountability policy in place.
Permanent employees	Yes	The Company has a grievance redressal mechanism in line with the statutory framework under Industrial Dispute Act, 1947 for grievance redressal mechanism for the permanent workers where workers or their representatives can raise their grievances in areas like wages, discrimination, child labor, human rights related issues etc. POSH Policy, Divgi TTS Sustainability guidelines under the element Protection against discrimination , Social accountability policy in place.



Category	Yes/No	If Yes, then give details of the mechanism in brief
Other than permanent employees	Yes	The Company has a grievance redressal mechanism in line with the statutory framework under Industrial Dispute Act, 1947 for grievance redressal mechanism for the permanent workers where workers or their representatives can raise their grievances in areas like wages, discrimination, child labor, human rights related issues etc. POSH Policy, Divgi TTS Sustainability guidelines under the element Protection against discrimination, Social accountability policy in place.

7. Membership of employees and worker in association(s) or Unions recognised 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	246	0	0	274	0	0
Male	243	0	0	264	0	0
Female	3	0	0	10	0	0
Other	0	0	0	0	0	0
Total permanent workers	373	0	0	0	0	0
Male	344	0	0	0	0	0
Female	29	0	0	0	0	0
Other	0	0	0	0	0	0

8. Details of training given to employees and workers:

Category	FY 2023 - 2024 (Current Financial Year)					FY 2022-2023 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (F/D)
Employees										
Male	243	243	100	243	0	264	250	94.70	250	94.70
Female	3	3	100	3	0	10	9	90	9	90
Other	0	0	0	0	0	0	0	0	0	0
Total	246	246	100	246	0	274	259	94.53	259	94.53
Workers										
Male	344	344	100		0	306	306	100	306	100
Female	29	29	100		0	32	32	100	32	100
Other	0	0	0		0	0	0	0	0	0
Total	373	373	100	0	0	338	338	100	338	100

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

Category	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (Previous Financial Year)		
	Total (A)	Number (B)	% (B/A)	Total (C)	Number (D)	% (D/C)
Employees						
Male	243	243	100	264	264	100
Female	3	3	100	10	10	100
Other	0	0	0	0	0	0
Total	246	246	100	274	274	100
Workers						
Male	344	344	100	0	0	0
Female	29	29	100	0	0	0
Other	0	0	0	0	0	0
Total	373	373	100	0	0	0

10. Health and safety management system:

Questions	Response
a. Whether an occupational health and safety management system has been implemented by the entity? If yes, the coverage such system?	Yes Divgi TTS has implemented an occupational health and safety management system certifiable to ISO 45001. Maintaining, fostering, and improving the safety and well-being of employees is enshrined in the Company-wide risk management and control process. Throughout the organisation, safety is critical. There are 10 emergency situations identified and preparedness is also available. Safety and ergonomic requirements are considered well in advance while designing a workstation and equipment selection during APQP programme phase three. Standardised workstations are equipped with detailed operational guidelines in terms of SOS and JES. A layered process audit was conducted to check for and bring out deficiencies, if any. Corrective actions were tracked for effective implementation. Employees are encouraged to give a suggestion, Kaizen and JDI are recorded, and management provides resources for implementing Kaizen. TPM ensures machine safety through periodic predictive tests like vibration and thermography for electrical fire hazards. Safety and fire mock drills are executed as per the EPRP plan and procedure. Management has given approval for upgrading the fire protection system.



Questions	Response
b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	As part of implementation of ISO 45001 standard, procedures for Hazard Identification and Risk Assessment (HIRA) have been established and implemented within the business units. HIRA is conducted for routine and non-routine activities. Work related hazards are identified by people involved in the operations, The identified hazards are recorded, and control measures are discussed and defined as per hierarchy of controls. The CAPA (Corrective and Preventive Action) tracker is implemented to proactively identify safety risks in high-risk activities and implement engineering controls to mitigate the risks. A Cross Functional Team reviews high risk activity and implements engineering controls, as feasible to mitigate risks. The outcome from the CAPA tracker is reviewed quarterly. The team's daily FRM includes the agenda on safety performance and incidence, communication on corrective actions, and horizontal deployment. Periodic inspection of fire hydrants, fire extinguishers, safety audits, statutory and regulatory requirements, etc.is being done by competent person. Rule follow mechanism reporting established as part of ISO 45001 to report of Unsafe Acts, Unsafe Conditions, near misses and incident reporting. Same are analyzed in KYT /KYM, Corrective and preventive actions are initiated to mitigate safety risks, effectiveness status checked through LPA and MRM.
c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks.	Yes
d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?	Yes

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

Safety incident/number	Category*	FY 2023 - 2024	FY 2022-2023
		(Current Financial Year)	(Previous Financial Year)
Lost time injury frequency rate (LTIFR) (per one million- person hours worked)	Employees	0	0
	Workers	0	0
Total recordable work-related injuries	Employees	0	0
	Workers	0	0
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	2

*Including in the contract workforce

12. Describe the measures taken by the entity to ensure a safe and healthy work place.:

The company has a well-equipped fire control system through smoke detectors / sensors installed throughout the company, apart from fire extinguishers installed on the shopfloor and in office areas. Safety ERT (Emergency Response Team) conducts monthly audits, and safety meetings are held every month to analyse and sort out issues pertaining to safety. Regular training and mock drills on fire and emergency evacuation are conducted for all employees. All moving and rotating parts of the machines have been provided with safeguards. All machines on the shop floor have been equipped with safety sensors and two- hand operation so that no employee is injured while working on the machines. providing safe and healthy workplace. has implemented a Zero Harm Culture campaign to proactively ensure safe and healthy workplace.

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

Complaints type	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (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	0	0	NA	0	0	NA
Health and safety	0	0	NA	0	0	NA

14. Assessments for the year:

Category	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100
Working conditions	100

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.:

Focused trainings are conducted on Behavioral Based Safety (BBS) to promote awareness amongst third party and contractor employees to adopt safe work practices. Online training modules / portal made available for Safety trainings. EHS compliance and system effectiveness audit are done annually by DQS India, as independent due diligence.

Leadership indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of:

Category	Response
Employees	Yes
Workers	Yes

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

Yes, we do ensure that our associate partners pay statutory liabilities as they submit us monthly PF, ESIC challan along with bills.

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:

Category	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 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Employees	0	0	0	0
Workers	0	0	0	0

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

5. Details on assessment of value chain partners:

Category	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100
Working conditions	100

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.:

Improvement measures agreed-upon with suppliers relate either to actual deviations from the business Code of conduct, of Conduct for Suppliers or to structural improvements in management systems and the lack of specific processes and guidelines implemented by the supplier. Agreed upon improvement measures: Health & Safety First aid boxes in the factory Installation of fire alarm in all areas Providing appropriate PPE to all the employees & ensure usage of the same while working. Working Conditions Age verification check process for recruiting new workers Employees being paid in line with legal minimum wages Applicable benefits like PF, ESI, Leave & Bonus are extended to eligible employees For monitoring purposes, LPA audits performed, the Company remains committed to partnerships with suppliers and helps them to improve. However, if the problems continues or a supplier does not show a willingness to take necessary remedial action, the Company may choose to phase out that supplier.

C.4: Principle 4
Essential indicators
1. Describe the processes for identifying key stakeholder groups of the entity.:

Stakeholder groups are identified based on the nature of their engagement with the Divgi TTS , Annual review taken as IATF 16949 process . Any individual or group of individuals or institution that adds value to the business chain of the Company is identified as a core stakeholder. Our stakeholders include Customers, Investors, Contractors, Shareholders, Suppliers, Statutory Bodies, R & D Institutions, Communities, Media, Academia etc.

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	Channels of communication	Details of other channels of communication	Frequency of engagement	Details of other frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Other	E-Mail , Townhall Meeting , Employee of The Month, Plant FRM, Safety Meetings, Employee engagement Survey, Notice Board	Annually		Information about Company's business growth plans and KPI - business performance Top- down communication about important organization changes, policies, wellbeing initiatives Platform for gathering informal feedback
Shareholders	No	Other	Email, Newspaper, Website, conference calls, virtual meetings	Others à please specify	Need based , Quarterly	Shareholder related communication

Stakeholder group	Whether identified as vulnerable & marginalized group	Channels of communication	Details of other channels of communication	Frequency of engagement	Details of other frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors/Analyst	No	Other	Email, conference calls, virtual meetings	Others â please specify	Half-yearly plus as and when requested by investors	To understand the Company's results, major events and future direction
Customers	No	Other	Email, Website, KAM Visita, Auto Expo	Others â please specify	As and when required	Information on Business offerings
NGOs & Communities	No	Other	Meetings Quarterly and Annual Reports	Quarterly		Initiating CSR project along with the community
Suppliers	No	Other	Supplier Manual, Monthly Score Card, Supplier Conference, Supplier Audits	Others â please specify	As and when required, Monthly, Yearly	Sharing growth vision and business targets and Quality, delivery and sustainability expectation.

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 stakeholders are systematically engaged by various functions of the Company. The Board of Directors / Committee there of takes feedback of the status of various functions and provide directions for improving processes / practices wherever applicable. The Company also regularly consults its internal and external stakeholders to identify and manage environmental and social topics. and takes external help from institutional and experts on ESG improvement opportunity.

- 2.** a. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics. : Yes
- b. 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.:

Production diversification into EV segments, development, and manufacturing of precision quality products to improve the vehicle efficiency and reduction of greenhouse gas emissions. Setting targets for usage of renewable energy to meet the carbon neutrality and decarbonization targets.

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

Divgi TTS through its strategic focus areas for its Corporate Social Responsibility: Shri Kalyanam, Shri Vidyadayini, Shri Aarogyam, Shri Sanskriti guiding principles, Divgi TTS through constantly engage with communities through valuable CSR projects, few of them are: Enabling Leadership, Pragatee Foundation, Kumta. The Society for Door Step School, Pune Ambulance for Vishwa Seva Samiti, Sirsi Punyatma Prabhakar Sharma Seva Mandal, Igatpuri Vedanta Foundation-Bhagvad Gita Garm Gaurav Prathisthan (Pani Panchayat)

3. Details of remuneration/salary/wages:

a. Median remuneration/wages:

Gender	Male		Female		Other	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)	7	14000000	1	1400000	0	0
Key Managerial Personnel	2	4220500	1	1200000	0	0
Employees other than BoD and KMP	240	559940	3	559940	0	0
Workers	344	228984	29	228984	0	0

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

Question	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Gross wages paid to females as % of total wages	2.25	1.83

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

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

Divgi TTS has a grievance redressal mechanism in line with the statutory framework under Industrial Dispute Act, 1947 for grievance redressal mechanism for the permanent workers where workers or their representatives can raise their grievances in areas like wages, discrimination, child labour, human rights related issues etc. The HR Head is responsible for addressing human rights impacts or issues caused or contributed to by the business. Divgi TTS applies a value chain approach to address negative environmental and social impact created out of the business operations, Process owners and plant heads responsible to evaluate any environmental or social impact caused or contributed to by the business and mitigate them effectively. The Management Systems Head centrally maintains oversight for such impacts occurring across the value chain and ensures that all the processes are in place and the impacts if any are systematically mitigated.

6. Number of complaints on the following made by employees and workers:

Category	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (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	0	0	No complaint received	0	0	No complaint received
Discrimination at workplace	0	0	No complaint received	0	0	No complaint received
Child labour	0	0	No complaint received	0	0	No complaint received



Category	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (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
Forced labour/ involuntary labour	0	0	No complaint received	0	0	No complaint received
Wages	0	0	No complaint received	0	0	No complaint received
Other human rights related issues	0	0	No complaint received	0	0	No complaint received

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

Category	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

For cases related to Sexual Harassment, there is an Internal Committee for redressal of the same. The POSH Committee takes concrete actions to ensure that every Complainant is protected. It maintains confidentiality of all complaints.

9. Do human rights requirements form part of your business agreements and contracts? : Yes

10. Assessments for the year:

Category	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100
Forced/involuntary labour	100
Sexual harassment	100
Discrimination at workplace	100
Wages	100

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.:

The Company has a robust human rights due diligence process through which it continuously assesses and improves its ability to respond to any negative human rights impacts.

2. Details of the scope and coverage of any human rights due-diligence conducted.:

Factory & Office location: The Business code of Conduct Guidelines are an integral element of all employment contracts. Every employee is responsible for respecting human rights. Organization does not tolerate discrimination, sexual harassment, or any other form of personal attack on individuals or groups. In addition, the principles of equal opportunity and equal treatment apply without restriction. Divgi TTS committed to safeguarding and respecting human rights in every stage of the value chain. The goal is to identify any human rights violations occurring anywhere in the value chain as early as possible and to mitigate risk identified. Independent statutory audit conducted periodically.

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? : Yes

4. Details on assessment of value chain partners:

Category	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	0
Discrimination at workplace	0
Child labour	100
Forced labour/involuntary labour	0
Wages	0

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

Whenever deviations from the principles of the Code of Conduct suppliers, and therefore also violations of the human rights principles defined in the Code are identified, the procurement team works with the supplier to clarify how lasting corrective action can be taken within a reasonable time frame. If all efforts to implement remedial actions remain unsuccessful, Divgi TTS reserves the right to terminate the business relationship and phase out the supplier. Agreed upon improvement measures: Age verification process for recruiting new workers Employees being paid in line with legal minimum wages Applicable benefits like PF, ESI, Leave & Bonus are extended to eligible employees

C.6: Principle 6

Essential indicators

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

Parameter	Unit	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
From renewable sources			
Total electricity consumption (A)	GJ	0	0
Total fuel consumption (B)	GJ	0	0
Energy consumption through other sources (C)	GJ	0	0
Total energy consumed from renewable sources (A+B+C)	GJ	0	0
From non-renewable sources			
Total electricity consumption (D)	GJ	5316	0
Total fuel consumption (E)	GJ	0	0
Energy consumption through other sources (F)	GJ	0	0
Total energy consumed from non-renewable sources (D+E+F)	GJ	5316	0
Total energy consumed (A+B+C+D+E+F)	GJ	5316	0

Parameter	Unit	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Energy intensity per rupee of turnover (Total energy consumed/revenue from operations)	GJ/crore ₹ turnover	0	0
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/revenue from operations adjusted for PPP)	GJ/crore ₹ turnover	0	0
Energy intensity in terms of physical output	GJ/unit production	0	0
Energy intensity (optional) – the relevant metric may be selected by the entity		0	0
Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?		No	No
If yes, name of the external agency.		NA	NA

2. Details about Performance, Achieve and Trade (PAT) Scheme of the Government of India:

Questions	Response
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?	No
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.	NA

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

Parameter	Unit	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Water withdrawal by source			
(i) Surface water	kilolitres	0	0
(ii) Groundwater	kilolitres	1643.1	2564
(iii) Third party water	kilolitres	9865.72	0
(iv) Seawater/desalinated water	kilolitres	0	0
(v) Others	kilolitres	0	0
Total volume of water withdrawal (i + ii + iii + iv + v)	kilolitres	11508.82	2564
Total volume of water consumption	kilolitres	11508.81	2564
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	kilolitres/ crore ₹ turnover	0	0
Water intensity per rupee of turnover adjusted for purchasing power parity (Total water consumption / Revenue from operations adjusted for PPP)	kilolitres/ crore ₹ turnover	0	0
Water intensity in terms of physical output (Total water consumption / physical unit)		0	0

Parameter	Unit	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Water intensity (optional) – the relevant metric may be selected by the entity		0	0
Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?		No	No
If yes, name of the external agency.		NA	NA

4. Provide the following details related to water discharged:

Parameter	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(ii) To Groundwater	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(iv) To Seawater	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(iii) Sent to third-parties	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(v) Others	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0
Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?	No	No
If yes, name of the external agency.	NA	NA

5. Details about zero liquid discharge (ZLD):

Category	Response
Has the entity implemented a mechanism for zero liquid discharge (ZLD)?	Yes
If yes, provide details of its coverage and implementation.	Water being an important environmental resource, necessary initiatives are taken across all the manufacturing units to conserve and recycle water, thus ensuring the ZLD (Zero liquid Discharge). At all manufacturing locations suitable and sufficient wastewater treatment like sewage treatment plants (STP) are installed with primary, secondary, and tertiary treatment which include nano filtration / RO / UV treatment facilities to treat wastewater to usable quality water. The treated water is further used for flushing and gardening activities within the premises. This in-turn has resulted in reduced use of freshwater.



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

Parameter	Please specify unit	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
NOx	mg/Nm3	3.29	3.29
SOx	kg/day	0.86	0.72
Particulate matter (PM)	mg/Nm3	30.23	30.47
Persistent organic pollutants (POP)	mg/Nm3	0	0
Volatile organic compounds (VOC)	mg/Nm3	0	0
Hazardous air pollutants (HAP)	PPM	27.5	25.74
Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?		Yes	Yes
If yes, name of the external agency.		Environment Test done by MoEFCC recognised laboratory , Third party verification during yearly surveillance audit by DQS india as per ISO 14001 standard requirements.	Environment Test done by MoEFCC recognised laboratory , Third party verification during yearly surveillance audit by DQS india as per ISO 14001 standard requirements.

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

Parameter	Unit	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Total scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	tCO2e	0	0
Total scope 2 emissions(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	tCO2e	0	0
Total scope 1 and scope 2 emission intensity per rupee of turnover (Total scope 1 and scope 2 GHG emissions / Revenue from operations)	tCO2e/crore ₹ turnover	0	0
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)	tCO2e/crore ₹ turnover	0	0
Total scope 1 and scope 2 emission intensity in terms of physical output	tCO2e/unit production	0	0
Total scope 1 and scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		0	0
Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?		No	No
If yes, name of the external agency.		NA	NA

8. Does the entity have any project related to reducing GHG emission? If yes, then provide details.:

To achieve net-zero in own operations, Divgi TTS has plan to installed solar panels on the factory roofs at Shirwal plant in first phase by Novà 23. Apart from solar power, the Company is driving multiple Energy Efficiency programs to reduce the CO2 emissions.

9. Details related to waste management:

- a. Different types of waste generated by the entity, in the following format:

Parameter	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Total waste generated (in metric tonnes)		
Plastic waste (A)	0	0
E-waste (B)	0.26	0
Bio-medical waste (C)	0.0	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)	80.41	67.73
Other Non-hazardous waste generated (H). Please specify, if any	0	0
Total (A+B+C+D+E+F+G+H)	80.67	0
Waste intensity per crore rupee of turnover (tonne/crore ₹ turnover)	0	67.73
Waste intensity per crore rupee of turnover adjusted for Purchasing Power Parity (PPP) (tonne/crore ₹ turnover)	0	0
Waste intensity in terms of physical output (tonne/unit production)	0	0
Waste intensity (optional) – the relevant metric may be selected by the entity	0	0

- b. Different types of waste recovered or disposed by the entity, in the current financial year:

Category of waste (in metric tonnes)	Recycled	Re-used	Other recovery operations	Incineration	Landfilling	Other disposal operations
Plastic waste	0	0	0	0	0	0
E-waste	0	0.26	0	0	0	0
Bio-medical waste	0	0	0	0	0	0
Construction and demolition waste	0	0	0	0	0	0
Battery waste	0	0	0	0	0	0
Radioactive waste	0	0	0	0	0	0
Other hazardous waste, if any	0	0	0	80.4	0	0
Other non-hazardous waste generated, if any	16.6	0	0	0	0	0
Total	16.60	0.26	0	80.40	0	0



c. Different types of waste recovered or disposed by the entity, in the previous financial year:

Category of waste (in metric tonnes)	Recycled	Re-used	Other recovery operations	Incineration	Landfilling	Other disposal operations
Plastic waste	0	0	0	0	0	0
E-waste	0	0	0	0	0	0
Bio-medical waste	0	0	0	0	0	0
Construction and demolition waste	0	0	0	0	0	0
Battery waste	0	0	0	0	0	0
Radioactive waste	0	0	0	0	0	0
Other hazardous waste, if any	0	0	0	67.73	0	0
Other non-hazardous waste generated, if any	0	0	0	0	0	0
Total	0	0	0	67.73	0	0

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.:

Solid and hazardous waste management as per the ISO 14001 guidelines Solid waste categorization at the source for recyclable purposes through authorised agencies regularly review sustainability strategy and goals in management reviews and board meetings. Visual Standardisation SOS for waste management, Separate bins are provided for hazardous and non-hazardous waste storage, Continual improvements on waste reduction by the 4 R principles, DQS India audit the compliance during yearly surveillance assessment.

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?	If no, the reasons thereof and corrective action taken, if any.
	NA	NA		NA

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	Results communicated in public domain	Relevant web link
NA	NA	NA	No	No	NA

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

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
	NA			

Leadership indicators

1. Details of water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

- a. Name of the water stress area and nature of operations:

Name of the area	Nature of operations
NA	NA

- b. Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater/desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	0	0
Total volume of water consumption (in kilolitres)	0	0
Water intensity per rupee of turnover// n(Water consumed/turnover)	0	0
Water intensity (optional) – the relevant metric may be selected by the entity	0	0
Water discharge by destination and level of treatment (in kilolitres)	0	0
(i) Into Surface water	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(ii) Into Groundwater	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(iv) Into Seawater	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(iii) Sent to third-parties	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
(v) Others	0	0
-- No treatment	0	0
-- With treatment - please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0
Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?	No	No
If yes, name of the external agency.	NA	NA



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

Parameter	Unit	FY 2023 - 2024	FY 2022-2023
		(Current Financial Year)	(Previous Financial Year)
Total scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	0	0
Total scope 3 emissions per rupee of turnover	tCO ₂ e/crore ₹ turnover	0	0
Total scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		0	0
Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?		No	No
If yes, name of the external agency.			

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.:

Currently no office or factory locations are part of 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:

S. No.	Initiatives undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
	Installation of storage oil skimmer at HMC Machines	NA	This resulted in increase in the coolant life.
	Collection mechanism installed for collecting dripping water from air compressors.	NA	This water being used for gardening purpose after STP treatment
	Reusing of filter oil	NA	Oil consumption reduced by 50%, Saving 2000 Liters per year.
	Machine reconditioning and retrofitting of old machines	Total 14 machines reconditioned and retrofitted resulted in higher productivity and energy efficient.	Such efforts Contributed to overall energy saving.
	The organization partnered with a packaging solution provider for recyclable & reusable packaging.	For multiple to and fro transfer, Tegatai packaging introduced for the models EV transmission and W501	Such high volume recyclable packaging, which directly reduced the usage of single PP boxes and wooden boxes
	TPM activities	Taking reduce and elimination efforts for oil spillage and leakage through the TPM pillar, Kobetsu kaizen.	Arrested oil spillage and compressor air leakage.
	Replacing Compact fluorescent lamps (CFL) by Light Emitting Diode (LED) lights	Replacement of lighting fixtures in staircase, lobby and production areas.	Contributed in overall Energy saving

5. Details about the disaster management plan.:

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

The Company has a EPRP (Emergency preparedness and response plan) for managing crisis affecting Company's operations, assets and staff under its responsibility and duty of care. The Company's Business Continuity Plan (BCP) is based on ISO 14001, ISO 45001, ISO 22301 and covers Mitigation and recovery plan for the following components: a. Environmental disasters c. Disaster recovery planning for IT Applications and Infrastructure, d. Situation specific business level BCP Mock drills are conducted twice a year.

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.:

Divgi TTS ensures that there are no adverse impacts to the environment arising from its value chain, periodic audits at supplier premises or through self-assessment checklist, risk and measures are monitored.

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts. : 56.0

C.7: Principle 7

Essential indicators

1. a. Number of affiliations with trade and industry chambers/associations. : 5
- 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
1	Confederation of Indian Industry (CII)	National
2	MAHRATTA CHAMBER OF COMMERCE, INDUSTRIES AND AGRICULTURE (MCCA)	State
3	Automotive Research Association of India (ARAI)	National
4	Birla Institute of Technology and Science (BITS)	National
5	College of Engineering Pune (COEP)	State
6		
7		
8		
9		
10		

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

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

**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?	Frequency of review by board	Details of other frequency of review by Board	Web Link, if available
	The Company has diversified its product portfolio in EV segment, supplying E-gear transmission to top Indian OEM and contribute on specific sustainable business issues.	Through membership with trade and industry associations the Company shares its feedback on matters as mentioned in the adjacent cell.	Yes	Others à please specify		Not applicable

C.8: Principle 8**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	Results communicated in public domain	Relevant web link
NA	NA	NA	No		

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)
	NA	NA	NA	0	0	0

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

The Company has a defined a process to ensure all the complaints and feedback from all stakeholders including communities are received and addressed. This defined process includes: (i) A dedicated contact page on the website (ii) Complaints / Feedback received on contact Email CFT team manage all the complaints and feedback to ensure timely response.

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

Category	FY 2023 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	15.47	15.47
Directly from within India	45.1	45.1

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 - 2024 (Current Financial Year)	FY 2022-2023 (Previous Financial Year)
Rural	0	0
Semi-urban	0.92	0.77
Urban	1.11	0.37
Metropolitan	3.76	4.04

Leadership indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (reference: Q1 of essential indicators above):

Details of negative social impact identified	Corrective action taken
NA	NA

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)
	Karnataka	Sirsi	1365000
	Karnataka	Bangalore	1250000
	Karnataka	Kumta	2000000
	Maharashtra	Purandar	414900
	Maharashtra	Pune	2757000
	Maharashtra	Lonawala	400000
	Maharashtra	Karla	2500000
	Maharashtra	Chinchwad	304500
	Maharashtra	Palghar	504000
	Maharashtra	Shirwal	740000

3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/ vulnerable groups? : No
- b. From which marginalized/vulnerable groups do you procure? : Not applicable
- c. What percentage of total procurement (by value) does it constitute? : 0

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	Benefit shared	Basis of calculating benefit share
	Divgi TTS does not have (acquired or owned) Intellectual Property Rights based on the traditional knowledge during the reporting period.	No	No	NA

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

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

6. Details of beneficiaries of CSR projects:

S. No.	CSR project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
	Gram Gourav Pratisthan-Water Structure Restoration (DONI) Project	700	100
	Enabling Leadership, Pragatee Foundation- Project PLAY (Football)	500	100
	The Society for Door Step School- Community Education Programme	500	100
	Vedanta Cultural Foundation	100	100

S. No.	CSR project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
	Inga Health Foundation	5	100
	Shree Trust- Parijnanashram Vidyalaya	200	100
	Bharat Itihas Sanshodhak Mandal	100	100
	Guruprasad High School	100	100
	Action For Impact Foundation	100	100
	Education for Equality Foundation	100	100
	Janata Vidyalaya- Kulave Barur	100	100
	Gram Gourav Pratisthan- Pani Panchayat Shirwal	700	100

C.9: Principle 9

Essential indicators

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

Divgi TTS has the customer support function which proactively work on customer complaint resolution and increasing customer satisfaction index. Customer Focus is one of the leadership principles of the Company. There are mechanisms in place that aim to minimise customer complaints and grievances, while ensuring prompt redressal. The Company primarily caters to automotive OEMs. There is a robust mechanism instituted in the Company to deal with issues and complaints reported by OEMs. Issues can be raised through their online portals, e-mail communications, during plant visits or at meetings. Customer complaint logged in Defect Tracking Sheet, and effective resolution made referring to customer complain handling procedure, 8D.

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

Category	As a percentage to total turnover
Environmental and social parameters relevant to the product	0
Safe and responsible usage	0
Recycling and/or safe disposal	0

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

Category	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (Previous Financial Year)		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	0	0	No complaints received	0	0	No complaints received
Advertising	0	0	No complaints received	0	0	No complaints received
Cyber-security	0	0	No complaints received	0	0	No complaints received
Delivery of essential services	0	0	No complaints received	0	0	No complaints received
Restrictive trade practices	0	0	No complaints received	0	0	No complaints received

Category	FY 2023 - 2024 (Current Financial Year)			FY 2022-2023 (Previous Financial Year)		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Unfair trade practices	0	0	No complaints received	0	0	No complaints received
Other	0	0	No complaints received	0	0	Auto OEM Customer complaints. All complaints resolved.

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

State	Number	Reasons for recall
Voluntary recalls	0	No recall cases registered
Forced recalls	0	No recall cases registered

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy?:

Questions	Response
Does the entity have a framework/ policy on cyber security and risks related to data privacy?	Yes
If available, provide a web-link of the policy.	https://divgi-tts.com/?s=Policy

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.:

There were no consumer complaints on issues relating to advertising, delivery of essential services, cyber security, and data privacy of customers. The complaints in other category under indicator 5 of this principle pertains to Product supplied to customers (Auto OEM); all complaints of FY 22-23 resolved.

7. Provide the following information relating to data breaches.:

- | | | |
|---|---|----|
| a. Number of instances of data breaches. | : | 0 |
| b. Percentage of data breaches involving personally identifiable information of customers | : | 0 |
| c. Impact, if any, of the data breaches. | : | NA |

Leadership indicators

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

<https://divgi-tts.com/products/> The information displayed on the product label is as per the applicable laws and in line with the prevalent market practise. The company displays product information as required by the customer and AIAG traceability requirement. Apart from the mandated declarations, additional declaration are furnished on the products/ labels relating to the product and their usage in the service manual.

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

The information displayed on the product label is as per the applicable laws and in line with the prevalent market practise. The company displays product information as required by the customer and AIAG traceability requirement. Apart from the mandated declarations, additional declaration are furnished on the products/ labels relating to the product and their usage in the service manual. Frequent engagement with the dealers and customer for awareness on product related information and handling.



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

Divgi-TTS does not deal in essential product and services. However, risk are proactively taken care with FMEA (Failure mode and effect analysis) approach and warranty analysis. Risk of disruption/ discontinuation informs to consumer by email.

4. Details about display of product information.

Questions	Response
Does the entity display product information on the product over and above what is mandated as per local laws?	Yes
If yes, provide details in brief.	The information displayed on the product label is as per the applicable laws and in line with the prevalent market practise. The company displays product information as required by the customer and AIAG traceability requirement. Apart from the mandated declarations, additional declaration are furnished on the products/ labels relating to the product and their usage in the service manual. Frequent engagement with the dealers and customer for awareness on product related information and handling. Customer satisfaction survey: A customer satisfaction survey is conducted every year and "customer satisfaction index" is plotted. Result of the survey are analysed to understand the area of improvement. Score card provided by customer is also a measure of customer satisfaction. Average customer satisfaction rating is above 90% and score card rating is Excellent.
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