

June 26, 2024

|   |   |
|---|---|
| To,<br><br>Asst. Vice President<br>Listing & Compliance<br><b>National Stock Exchange of India Limited</b><br>Exchange Plaza<br>Bandra-Kurla Complex<br>Bandra (East)<br>Mumbai 400 051<br><br><b>Scrip Code – OFSS</b> | To,<br><br>Asst. General Manager<br>Listing & Compliance<br><b>BSE Ltd.</b><br>1 <sup>st</sup> Floor, Phiroze Jeejeebhoy Towers,<br>Dalal Street,<br>Mumbai 400 001<br><br><b>Scrip Code – 532466</b> |
|---|---|

**Sub: Business Responsibility and Sustainability Report for the financial year ended March 31, 2024**

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Business Responsibility and Sustainability Report for the financial year 2023-24. The same is also uploaded on the Company's website at <https://www.oracle.com/a/ocom/docs/industries/financial-services/business-responsibility-and-sustainability-report-2023-24.pdf>.

This is for your information and records.

Thanking you,

Yours sincerely,

**For Oracle Financial Services Software Limited**

**Onkarnath Banerjee**  
**Company Secretary & Compliance Officer**  
**Membership No. ACS8547**

Encl: as above

# Business responsibility and sustainability report for the financial year 2023-24

## Section A: General disclosures

### I. Details of the listed entity

|     |  |   |
|-----|--|---|
| 1.  | Corporate Identity Number (CIN) of the Listed Entity   | L72200MH1989PLC053666   |
| 2.  | Name of the Listed Entity  | Oracle Financial Services Software Limited  |
| 3.  | Year of incorporation  | 1989  |
| 4.  | Registered office address  | Oracle Park, off Western Express Highway, Goregaon (East), Mumbai 400063, Maharashtra, India.                         |
| 5.  | Corporate address  | Oracle Park, off Western Express Highway, Goregaon (East), Mumbai 400063, Maharashtra, India.                         |
| 6.  | E-mail   | investors-vp-ofss_in_grp@oracle.com   |
| 7.  | Telephone  | +91 22 6718 3000  |
| 8.  | Website  | <a href="https://investor.ofss.oracle.com">https://investor.ofss.oracle.com</a>                                       |
| 9.  | Financial year for which reporting is being done   | April 1, 2023 to March 31, 2024   |
| 10. | Name of the Stock Exchange(s) where shares are listed  | BSE Limited<br>National Stock Exchange of India Limited   |
| 11. | Paid-up Capital  | ₹ 433.36 million  |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report   | Onkarnath Banerjee, Company Secretary & Compliance Officer<br>+91 22 6718 3000<br>investors-vp-ofss_in_grp@oracle.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). | The disclosures under this report are made on a standalone basis.   |
| 14. | Name of assurance provider   | SGS India Private Limited   |
| 15. | Type of assurance obtained   | Reasonable assurance of core indicators   |

### 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      | Information and communication | Product licenses and related activities; IT solutions and consulting activities. | 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      | Product licenses and related activities ('Products') | 62011    | 91.91%                          |

### 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      | Nil              | 9                 | 9     |
| International | Nil              | 2                 | 2     |

19. Markets served by the entity:

**a. Number of locations**

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 10     |
| International (No. of Countries) | 48     |

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

87.27%

**c. A brief on types of customers**

The Company provides Information Technology solutions to the global financial institution that their drive mission critical operations and help in compliance and provide analytical decision support. The customers include global multinational banks, regional and local banks, specialized financial institutions, central banks, commercial institutions and lending & leasing institutions.

**IV. Employees**

20. Details as at the end of financial year:

The Company personnel are either permanent employees or other than permanent employees (which includes those contracted through third party contractors). There are no 'Workers' in the Company, hence details sought of the Workers category are not applicable in all the sections below.

**a. Employees (including differently abled):**

| S. No. | Particulars              | Total (A) | Male No. (B) | % (B/A) | Female No. (C) | % (C/A) |
|--------|--------------------------|-----------|--------------|---------|----------------|---------|
| 1.     | Permanent (D)            | 7,890     | 5,340        | 67.68%  | 2,550          | 32.32%  |
| 2.     | Other than Permanent (E) | 562       | 463          | 82.38%  | 99             | 17.62%  |
| 3.     | Total Employees (D+E)    | 8,452     | 5,803        | 68.66%  | 2,649          | 31.34%  |

**b. Differently abled employees:**

As per the data privacy and non-discrimination principles, the Company does not maintain / disclose this information.

21. Participation/Inclusion/Representation of women

|                            | Total (A) | No. and percentage of Females |           |
|----------------------------|-----------|-------------------------------|-----------|
|                            |           | No. (B)                       | % (B / A) |
| Board of Directors*        | 11        | 2                             | 18.18%    |
| Key Management Personnel** | 3         | 0                             | 0%        |

\* Two Non-Executive, Independent Directors have retired with effect from close of business hours on March 31, 2024.

\*\*Includes one Executive Director.

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

|                     | FY 2023-24<br>(Turnover rate in current FY) |        |        | FY 2022-23<br>(Turnover rate in previous FY) |        |        | FY 2021-22<br>(Turnover rate in the year prior to the previous FY) |        |        |
|---------------------|---|--------|--------|--|--------|--------|--|--------|--------|
|                     | Male  | Female | Total  | Male   | Female | Total  | Male   | Female | Total  |
| Permanent Employees | 11.30%                                      | 10.25% | 10.96% | 15.58%                                       | 13.84% | 15.01% | 29.45%   | 24.95% | 27.99% |

**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) |
|---|--|--|-----------------------------------|--|
| Please refer to form AOC-1 included in the Annual Report for the financial year 2023-24 |  |  |                                   |  |

## VI. CSR details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- (ii) Turnover (in ₹): ₹ 47,844.96 million
- (iii) Net worth (in ₹): ₹ 61,844.81 million

## 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) (If Yes, then provide web-link for grievance redress policy)   | FY 2023-24<br>Current Financial Year       |  |         | FY 2022-23<br>Previous Financial Year      |  |         |
|---|--|--|--|---------|--|--|---------|
|   |  | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
|   | Oracle Code of Ethics & Business Conduct (CEBC Policy) governs the grievance redress mechanism for all stakeholders. The web link to the CEBC Policy is: <a href="https://www.oracle.com/assets/cebc-176732.pdf">https://www.oracle.com/assets/cebc-176732.pdf</a> |  |  |         |  |  |         |
| Communities                                       | Yes, CEBC Policy   | Nil  | Nil  | -       | Nil  | Nil  | -       |
| Investors (other than shareholders)*              | Not Applicable   | Nil  | Nil  | -       | Nil  | Nil  | -       |
| Shareholders                                      | Yes, as per SEBI Listing Regulations and CEBC Policy   | 75   | Nil  | -       | 98   | Nil  | -       |
| Employees   | Yes, CEBC Policy   | 02   | 01   | -       | 06   | 04   | -       |
| Customers   | Yes, as provided in Contracts and CEBC Policy  | 01   | Nil  | -       | Nil  | Nil  | -       |
| Value Chain Partners                              | Yes, CEBC Policy   | 01   | Nil  | -       | Nil  | Nil  | -       |
| Other   | Yes, CEBC Policy   | 01   | 01   | -       | Nil  | Nil  | -       |

\* All investors are shareholders in the Company. The Company has not raised funds through any other means.

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      | Environment Stewardship             | Opportunity                                | Environmental stewardship is demonstrated in multiple actions such as reducing energy carbon footprint, efficient recycling of waste products, safe disposal of hazardous materials, optimizing energy consumption by using low wattage computing and office equipment, etc.<br>The industry dynamics and demand for experienced employees result in attrition and create shortage of critical skills that may constrain delivery capacity, affect quality as also schedule of commitments.<br>Nurturing a culture which integrates employee wellbeing, training and development attracts and retains talent in the long run. Our workforce is highly diverse and helps in fostering innovation and creative solutions. | Not applicable  | The environmental stewardship efforts could have higher capex and running costs in the short-term but would yield savings in the longer term and help the Company's sustainability goals.   |
| 2.     | Human Capital and Talent Attraction | Risk                                       |   | The Company has taken several measures that help in retention of key talent and contain the risk.   | Some attrition containment measures result in increased staff cost and affect the margins.  |
| 3.     | Employee Wellbeing and Safety       | Opportunity                                | Health and safety of employees is a critical aspect of employee welfare. Providing a safe and healthy work environment along with well-directed employee wellbeing policies leads to a highly productive and motivated employee workforce.  | Not applicable  | This has a highly positive impact through engaged and motivated workforce.  |
| 4.     | Corporate Social Responsibility     | Opportunity                                | Our CSR initiatives serve as an important opportunity for us to invest in projects that help provide critically required assistance. Such interventions help increase brand reputation which fosters a sense of loyalty and trust within the Company's stakeholders.  | Not applicable  | These measures positively impact employee retention, productivity and teamwork.   |
| 5.     | Cyber Security and Data Breaches    | Risk                                       | Data is critical and potentially vulnerable asset of the Company. With technology running every aspect of our operations, any cyber-attack or data breach can adversely affect the operations and our reputation.   | The Company's IT systems are amongst the best in the world and use most advanced and latest tools to protect the data and systems from any external threats. We also deploy fail safe technologies and processes that ensure critical operations are available without material breakdowns. | Demonstrates Company's commitment to making a positive impact on society.<br><br>While cyber security is a major concern within industry as also with the regulators, the Company adopts latest technologies that helps it stay ahead of the threats. |

## Section B: Management and process disclosures

### NGRBC Principles P1 to P9

| S. No. | Principle Description   | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--------|---|----|----|----|----|----|----|----|----|----|
| P1     | Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable        |    |    |    |    |    |    |    |    |    |
| P2     | Businesses should provide goods and services in a manner that is sustainable and safe   |    |    |    |    |    |    |    |    |    |
| P3     | Businesses should respect and promote the well-being of all employees, including those in their value chains                        |    |    |    |    |    |    |    |    |    |
| P4     | Businesses should respect the interests of and be responsive to all its stakeholders  |    |    |    |    |    |    |    |    |    |
| P5     | Businesses should respect and promote human rights  |    |    |    |    |    |    |    |    |    |
| P6     | Businesses should respect and make efforts to protect and restore the environment   |    |    |    |    |    |    |    |    |    |
| P7     | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |    |    |    |    |    |    |    |    |    |
| P8     | Businesses should promote inclusive growth and equitable development  |    |    |    |    |    |    |    |    |    |
| P9     | Businesses should engage with and provide value to their consumers in a responsible manner  |    |    |    |    |    |    |    |    |    |

| S. No. | Disclosure Questions  | P1  | P2  | P3  | P4  | P5 | P6    | P7 | P8  | P9 |  |
|--------|---|---|-----|-----|-----|----|-------|----|-----|----|--|
| 1.     | Policy and management processes   |   |     |     |     |    |       |    |     |    |  |
| a.     | Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)  | Y   | Y   | Y   | Y   | Y  | Y     | Y  | Y   | Y  |  |
| b.     | Has the policy been approved by the Board? (Yes/No)   | Y   | Y   | Y   | Y   | Y  | Y     | Y  | Y   | Y  |  |
| c.     | Web Link of the Policies, if available (see reference below)  | 1,2,3   | 2,4 | 1,5 | 1,6 | 1  | 5,6,7 | 1  | 1,6 | 1  |  |
| 2.     | Whether the entity has translated the policy into procedures. (Yes / No)  | Y   | Y   | Y   | Y   | Y  | Y     | Y  | Y   | Y  |  |
| 3.     | Do the enlisted policies extend to your value chain partners? (Yes/No)  | Y   | Y   | Y   | Y   | Y  | Y     | Y  | Y   | Y  |  |
| 4.     | Name of the national and international codes / certifications / labels / standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | / ISO 27001:2013 Information Security Management System |     |     |     |    |       |    |     |    |  |

|  |   |
|--|---|
| <p>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</p>  | <p>The Company aligns itself to the Global ESG commitments of Oracle Corporation. It strives to minimize the impacts of the business operations on the environment, and society at large, as much as possible.</p>  |
| <p>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</p>   | <p>In its efforts to attain energy efficiency, the Company is already using renewable energy sources to power its office premises and lower dependency on traditional energy sources.</p>   |
| <p>Governance, leadership and oversight</p>  |   |
| <p>7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements</p>                                  | <p>Dear Stakeholders,<br/>We're excited to share our progress on Environmental, Social, and Governance (ESG) principles in our Business Responsibility and Sustainability Report (BRSR). This report aligns with the latest SEBI regulations, focusing on key indicators that are relevant to our business.</p> <p>This year, we have conducted a reasonable assurance of the report as required by the regulations.</p> <p>Fostering a diverse, inclusive, and equitable workplace is core to our ESG mission. We celebrate our people's unique skills and perspectives, promoting well-being and attracting top talent through inclusive policies and development programs. We go beyond business by giving back. Our CSR initiatives support education, environmental protection, and community well-being, making a real difference where it matters most.</p> <p>We lead with Integrity by upholding the highest ethical standards and transparency. We operate in strict compliance with all regulations, building trust with open communication channels for all our stakeholders. Our commitment to ESG is an ongoing journey. We are actively integrating these factors into every decision we make, to support India's smooth transition to net Zero 2070.</p> <p>Together, we can build a more sustainable future. Thank you for your continued support and collaboration.</p> |
| <p><b>Makarand Padalkar</b><br/><b>Managing Director and Chief Executive Officer</b></p>   |   |
| <p>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).</p>  | <p>The Business Responsibility Committee of the Company oversees the Business Responsibility &amp; Sustainability Policy. Managing Director &amp; CEO is the Chairperson of the Business Responsibility Committee.</p>  |
| <p>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.</p> | <p>Yes, the Business Responsibility Committee comprises of various members of management who implement sustainability measures in their areas and the Committee as a whole oversee these efforts.</p>   |

| 10. Details of review of NGRBCs by the Company:   | Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee |    |    |    |    |    |    |    |    |    | Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify) |    |    |    |    |    |    |    |  |
|---|--|----|----|----|----|----|----|----|----|----|--|----|----|----|----|----|----|----|--|
| Subject for Review  | P1   | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2   | P3 | P4 | P5 | P6 | P7 | P8 | P9 |  |
| Performance against above policies and follow up action   | Y  | Y  | Y  | Y  | Y  | Y  | Y  | Y  | Y  |    |  |    |    |    |    |    |    |    |  |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances   | Y  | Y  | Y  | Y  | Y  | Y  | Y  | Y  | Y  |    |  |    |    |    |    |    |    |    |  |
| Compliance with statutory requirements of relevance to the principles, and rectification of non-compliances is done by the Audit Committee.                           |  |    |    |    |    |    |    |    |    |    |  |    |    |    |    |    |    |    |  |
| 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. | P1   | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2   | P3 | P4 | P5 | P6 | P7 | P8 | P9 |  |
|   | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  | N  |  |

Policies referenced in the above table:

- (1) Code of Ethics and Business Conduct - <https://www.oracle.com/assets/cebc-176732.pdf>
- (2) Supplier Code of Ethics and Business Conduct - <http://www.oracle.com/us/corporate/supplier/coe-070625.pdf>
- (3) Global Anti-Corruption Policy and Business Courtesy Guidelines - <https://secure.ethicspoint.com/domain/media/en/gui/31053/anticorruption.pdf>
- (4) Sustainable Procurement Statement - <https://www.oracle.com/a/ocom/docs/corporate/citizenship/sustainable-procurement-statement.pdf>
- (5) Workplace safety and Global Environment, Health and Safety Policy - Available on the Company's Intranet
- (6) Corporate Social Responsibility - <https://www.oracle.com/a/ocom/docs/industries/financial-services/ofss-social-responsibility.pdf>
- (7) Environmental Policy - <https://www.oracle.com/a/ocom/docs/corporate/citizenship/oracle-environmental-policy.pdf>

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

Not applicable.



## Section C: Principle wise performance disclosure

Principle 1 - Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent and accountable

### 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   | % of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|---|---|
| Board of Directors                |  |   | 100%  |
| Key Managerial Personnel (KMP)    |  |   | 100%  |
| Employees other than BoD and KMPs |  | Employees at Oracle benefit from a comprehensive array of training programs designed to enhance their skills, knowledge, and awareness across various domains. These initiatives encompass both technical and non-technical courses, as well as mandatory awareness sessions. From fostering environmental, health, and safety awareness to ensuring compliance with sexual harassment prohibition laws in India, Oracle prioritizes creating a safe and respectful workplace. Moreover, the Board and KMPs are familiarized with Oracle's Code of Ethics and Business Conduct, ensuring alignment with the Company's values and ethical standards along with various ESG-related awareness sessions. | 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):**

None.

**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.**

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.**

The Company is committed to maintain high standards of business ethics and compliance with the law in the conduct of its business operations worldwide. The Company has a 'Global Anti-Corruption Policy & Business Courtesy Guidelines', which covers anti-corruption and anti-bribery policies encompassing all its business operations. The purpose of this policy is to institute standards and procedures that are to be followed by employees of the Company to ensure compliance with the fast-developing body of global anti-corruption laws and maintain the Company's reputation for ethical business practices. The Company prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise or relative of any such person for the purposes of influencing such persons to gain any improper advantage for the Company. 'Global Anti-Corruption Policy & Business Courtesy Guidelines' are a part of the Company's Code of Ethics and Business Conduct which is available at <https://www.oracle.com/assets/cebc-176732.pdf>.

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

Nil.

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

Nil.

**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 / services procured) in the following format:**

|                                     | FY 2023-24<br>Current Financial Year | FY 2022-23<br>Previous Financial Year |
|-------------------------------------|--------------------------------------|---------------------------------------|
| Number of days of accounts payables | 45                                   | 44                                    |

## 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<br>Current Financial Year | FY 2022-23<br>Previous Financial Year |
|----------------------------|--|--------------------------------------|---------------------------------------|
| Concentration of Purchases | a. Purchases from trading houses as % of total purchases                                 | Nil                                  | Nil                                   |
|                            | b. Number of trading houses where purchases are made from                                | Nil                                  | Nil                                   |
|                            | c. Purchases from top 10 trading houses as % of total purchases from trading houses      | Nil                                  | Nil                                   |
| Concentration of Sales     | a. Sales to dealers/ distributors as % of total sales                                    | 0.29%                                | 0.22%                                 |
|                            | b. Number of dealers/ distributors to whom sales are made                                | 6                                    | 6                                     |
|                            | c. Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors    | 100%                                 | 100%                                  |
| Share of RPTs in           | a. Purchases (Purchases with related parties/ Total Purchases)                           | 31.04%                               | 34.62%                                |
|                            | b. Sales (Sales to related parties / Total Sales)  | 85.43%                               | 85.86%                                |
|                            | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | Nil                                  | 2.88%                                 |
|                            | d. Investments (Investments in related parties/ Total Investments made)                  | 100%                                 | 100%                                  |

## 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.

|       | Current Financial Year  | Previous Financial Year | Details of improvements in environmental and social impacts |
|-------|---|-------------------------|---|
| R&D   | The Company's technology products empower its customers to deliver better financial services efficiently, indirectly leading to environmental, social and governance benefits.  |                         |   |
| Capex | The Company makes regular investments in advancing its IT infrastructure, which include equipment, software and communication networks. The initiatives taken by the Company for environmental sustainability are highlighted in its response to question 8 of principle 6 below. |                         |   |

#### 2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

The Company's business does not require sourcing raw / unfinished materials; however, the Company remains cognizant of ESG related aspects and promotes principles of sustainable sourcing in supplier contracts.

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

All the suppliers are required to enter into an agreement with the Company as part of onboarding. This agreement encompasses various terms and conditions, including provisions related to Environmental, Social, and Governance (ESG) considerations outlined in the Code of Ethics and Business Conduct.

#### 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.

The Company does not manufacture any tangible products and this question is not applicable to the Company's operations.

#### 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 to the Company.

## 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                       | Total (A)   | Health insurance |         | % of employees covered by |         |                    |         | Paternity benefits |         | Day Care facilities |         |
|--------------------------------|---|------------------|---------|---------------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                                |   | Number (B)       | % (B/A) | Accident insurance        |         | Maternity benefits |         | Number (E)         | % (E/A) | Number (F)          | % (F/A) |
|                                |   |                  |         | Number (C)                | % (C/A) | Number (D)         | % (D/A) |                    |         |                     |         |
| Permanent Employees            |   |                  |         |                           |         |                    |         |                    |         |                     |         |
| Male                           | 5,340   | 5,340            | 100%    | 5,340                     | 100%    | NA                 | NA      | 5,340              | 100%    | 0                   | 0%      |
| Female                         | 2,550   | 2,550            | 100%    | 2,550                     | 100%    | 2,550              | 100%    | NA                 | NA      | 0                   | 0%      |
| Total                          | 7,890   | 7,890            | 100%    | 7,890                     | 100%    | 2,550              | 32.32%  | 5,340              | 67.68%  | 0                   | 0%      |
| Other than Permanent Employees |   |                  |         |                           |         |                    |         |                    |         |                     |         |
| Male                           | The Company does not capture details for Other than Permanent Employees. The Company's contracts require the supplier of such resources to provide such facilities as mandated by the law and maintain the records. |                  |         |                           |         |                    |         |                    |         |                     |         |
| Female                         |   |                  |         |                           |         |                    |         |                    |         |                     |         |
| Total                          |   |                  |         |                           |         |                    |         |                    |         |                     |         |

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

|   | FY 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|---|--|---|
| Cost incurred on well-being measures as % of total revenue of the Company | 0.57%                                  | 0.53%                                   |

The Company does not capture details for Other than Permanent Employees. Company's supplier contracts require the supplier to provide such facilities as mandated by the law and maintain the details.

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

| Benefits | FY 2023-2024<br>Current Financial Year             |  | FY 2022-2023<br>Previous Financial Year            |  |
|----------|--|--|--|--|
|          | No. of employees covered as a % of total employees | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | Deducted and deposited with the authority (Y/N/N.A.) |
| PF       | 100%   | Y  | 100%   | Y  |
| Gratuity | 100%   | NA   | 100%   | NA   |

#### 3. Accessibility of workplaces

**Are the premises / offices of the entity accessible to differently abled employees, 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 Company's office premises are well-equipped to provide complete access to differently abled employees as per the requirements of the Rights of Persons with Disabilities Act, 2016.

#### 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's Code of Ethics and Business Conduct available at <https://www.oracle.com/assets/cebc-176732.pdf> outlines an equal opportunity policy for all its employees including persons with disabilities.

#### 5. Return to work and retention rates of permanent employees that took parental leave.

| Gender | Permanent employees |                |
|--------|---------------------|----------------|
|        | Return to work rate | Retention rate |
| Male   | 99.68%              | 82.52%         |
| Female | 48.87%              | 87.68%         |
| Total  | 84.49%              | 84.20%         |

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

| Yes/No (If yes, then give details of the mechanism in brief) |  |
|--|--|
| Permanent Employees  | Yes. Permanent employees and those other than Permanent Employees can redress their grievances through their supervisor, Human Resources or submit a confidential complaint to the compliance & ethics helpline. The complaint registration and investigation mechanism are provided in the Company's Code of Ethics and Business Conduct, which is available at <a href="https://www.oracle.com/assets/cebc-176732.pdf">https://www.oracle.com/assets/cebc-176732.pdf</a> |
| Other than Permanent Employees                               |  |

**7. Membership of employees in association(s) or unions recognized by the listed entity:**

| Category                  | FY 2023-2024<br>Current Financial Year     |  |           | FY 2022-2023<br>Previous Financial Year    |  |           |
|---------------------------|--|--|-----------|--|--|-----------|
|                           | Total employees in respective category (A) | No. of employees in respective category, who are part of association(s) or Union (B) | % (B / A) | Total employees in respective category (C) | No. of employees in respective category, who are part of association(s) or Union (D) | % (C / D) |
| Total Permanent Employees | 7,890                                      | Nil  | Nil       | 7,680                                      | Nil  | Nil       |
| Male                      | 5,340                                      | Nil  | Nil       | 5,135                                      | Nil  | Nil       |
| Female                    | 2,550                                      | Nil  | Nil       | 2,545                                      | Nil  | Nil       |

**8. Details of training given to employees:**

Employee Health and Safety (EHS) training is a mandatory course for the employees of the Company and is periodically updated and repeated.

| Category | FY 2023-2024<br>Current Financial Year |                               |         |                      | FY 2022-2023<br>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) |                      |        |
| Male     | 5,340                                  | 5,329                         | 99.79%  | 5,182                | 97.04%                                  | 5,135     | 5,088                         | 99.08%  | 4,940                | 96.20% |
| Female   | 2,550                                  | 2,538                         | 99.53%  | 2,457                | 96.35%                                  | 2,545     | 2,509                         | 98.59%  | 2,403                | 94.42% |
| Total    | 7,890                                  | 7,867                         | 99.71%  | 7,639                | 96.82%                                  | 7,680     | 7,597                         | 98.92%  | 7,343                | 95.61% |

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

| Category | FY 2023-2024<br>Current Financial Year |         |         | FY 2022-2023<br>Previous Financial Year |         |         |
|----------|--|---------|---------|---|---------|---------|
|          | Total (A)                              | No. (B) | % (B/A) | Total (C)                               | No. (D) | % (D/C) |
| Male     | 5,340                                  | 4,951   | 92.72%  | 5,131                                   | 4,439   | 86.51%  |
| Female   | 2,550                                  | 2,302   | 90.27%  | 2,549                                   | 2,253   | 88.39%  |
| Total    | 7,890                                  | 7,253   | 91.93%  | 7,680                                   | 6,692   | 87.14%  |

The Company performance appraisal cycle spans from June to May. Therefore, the data reported for this indicator reflects the performance appraisals conducted within the corresponding reporting period.

**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 such system?**

Yes. The Company is committed to conducting its business operations in a manner that consistently protect and safeguard the health and safety of its employees, contractors, and visitors. The Company's governance framework and management systems ensures that identification and management of regulatory compliances are done regularly. The Company has established an Environment, Health & Safety Management System (EHSMS) to assist in identification of any health and safety related risks for its employees, contractors, and visitors. Regular EHS training programs are conducted to ensure a safe and healthy workplace which adheres to the laws and regulations and are in conformance with the Company's EHS Policy.

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

The Company has EHSMS in place which is based on a Plan-Do-Check-Act (PDCA) framework. The PDCA methodology is an iterative four-step process that is used to control and continuously improve the processes. The goal of the system is adherence to regulatory compliance and continuous improvement of the EHS practices in the Company. In addition to an EHSMS, the Company identifies the risks and establishes objectives and processes which are necessary to manage EHS throughout the operations. The Company also conducts risk assessments to identify risks and hazards and update risk assessments on a periodic basis. The EHSMS related audits, self-inspections, and Regulatory Applicability Evaluations (RAEs) are carried out and corrective actions are verified and managed for closure.

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

Not Applicable.

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

Yes.

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

| Safety Incident/Number  | Category* | FY 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|---|-----------|--|---|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) |           |  |   |
| Total recordable work-related injuries  |           |  |   |
| No. of fatalities   | Employees | Nil                                    | Nil                                     |
| High consequence work-related injury or ill-health (excluding fatalities)     |           |  |   |

*\*including the contract workforce*

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

The Company is committed to conduct itself in a manner that protects the health and safety of employees, contractors, and visitors. The Company:

- has developed comprehensive health and safety programs adhering to global standards and local regulations to identify and eliminate the unsafe conditions and practices and promote an injury and illness-free workplace.
- regularly monitors and reviews its health and safety processes.

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

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 | The Company internally monitors all its offices for health, hygiene, and safety concerns, and takes appropriate measures to ensure that all related compliances, laws and regulations are followed. |
| Working conditions          | There were no statutory assessments conducted on health and safety practices by a local statutory body during the financial year 2023-24.   |

**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.**

There were no incidents reported during the current financial year and consequently, there are no corrective actions underway to address any concerns. However, the Company's Employee Health and Safety Management System (EHSMS) always strives to promote a safe, healthful, and environmentally responsible workplace.

## 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.

Stakeholders – both internal and external – play a crucial role in determining the Company's success. After considering criteria such as - the Company's operations / activities creating an impact on the stakeholders and the importance of these stakeholders to the business of the Company, the key stakeholders identified include Employees, Board of Directors, and Management of the Company as internal stakeholders; and Customers, Shareholders, Suppliers, and Industry bodies it has alliances with as external stakeholders.

#### 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   |
|----------------------|--|---|--|---|
| Employees            | No   | Email, notice board, surveys, town halls, appraisals, grievance handling, intranet  | Ongoing  | Career development, skill building, diversity and equal opportunity, health and safety, learning and development, compliance communications, transaction/policy updates, grievance management and survey feedback.          |
| Customers            | No   | Email, phone, meetings, marketing events, conferences, project communications   | Ongoing  | Product and service updates, understanding customer goals, surveys, project related support and communications, executive relationship/interactions, customer grievance handling, customer forums, conference updates, etc. |
| Shareholders         | No   | Email, newspaper, phone, website, annual meetings, annual report, results, corporate updates                                  | Ongoing, quarterly, event based  | Results and other corporate disclosures as mandated by the regulations. AGMs as a forum for direct shareholder interactions with the Board of Directors. Shareholder grievance handling.                                    |
| Suppliers & partners | No   | Email, phone, conferences, audit reviews  | On need basis  | Procurement processes, new opportunities, supplier development; data privacy, code of conduct and compliance/ audits; ESG and sustainability; grievance handling, whistleblower complaints                                  |

## Principle 5 – Businesses should respect and promote human rights

### Essential Indicators

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

| Category               | FY 2023-2024<br>Current Financial Year |                              |           | FY 2022-2023<br>Previous Financial Year |                              |           |
|------------------------|--|------------------------------|-----------|---|------------------------------|-----------|
|                        | Total (A)                              | No. of employees covered (B) | % (B / A) | Total (C)                               | No. of employees covered (D) | % (D / C) |
| Permanent*             | 7,890                                  | 7,867                        | 99.71%    | 7,680                                   | 7,647                        | 99.57%    |
| Other than permanent** | 562                                    | 562                          | 100%      | NA                                      | NA                           | NA        |
| Total Employees        | 8,452                                  | 8,429                        | 99.73%    | 7,680                                   | 7,647                        | 99.57%    |

\*Training provided at joining and in an annual cycle.

\*\*Data for FY23 was not captured.

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

| Category                 | FY 2023-2024<br>Current Financial Year |                          |         |                           |         | FY 2022-2023<br>Previous Financial Year |                          |         |                           |         |
|--------------------------|--|--------------------------|---------|---------------------------|---------|---|--------------------------|---------|---------------------------|---------|
|                          | Total (A)                              | Equal to<br>Minimum Wage |         | More than<br>Minimum Wage |         | Total<br>(D)                            | Equal to<br>Minimum Wage |         | More than<br>Minimum Wage |         |
|                          |  | No. (B)                  | % (B/A) | No. (C)                   | % (C/A) |   | No. (E)                  | % (E/D) | No. (F)                   | % (F/D) |
| Permanent                |  |                          |         |                           |         |   |                          |         |                           |         |
| Male                     | 5,269                                  | Nil                      | Nil     | 5,269                     | 100%    | 5,063                                   | Nil                      | Nil     | 5,063                     | 100%    |
| Female                   | 2,543                                  | Nil                      | Nil     | 2,543                     | 100%    | 2,538                                   | Nil                      | Nil     | 2,538                     | 100%    |
| Other than<br>Permanent* |  |                          |         |                           |         |   |                          |         |                           |         |
| Male                     | 463                                    | Nil                      | Nil     | 463                       | 100%    | Nil                                     | Nil                      | Nil     | Nil                       | Nil     |
| Female                   | 99                                     | Nil                      | Nil     | 99                        | 100%    | Nil                                     | Nil                      | Nil     | Nil                       | Nil     |

\*The Company has started capturing details of other than permanent employees from FY 2024 onwards.

**3. Details of remuneration/salary/wages**

**a. Median remuneration/wages:**

|                                  | Number | Male  |        | Female  |        |
|----------------------------------|--------|---|--------|---|--------|
|                                  |        | Median remuneration/salary/wages of respective category | Number | Median remuneration/salary/wages of respective category | Number |
| Board of Directors (BoD)         | 7      | 4,200,000   | 2      | 1,950,000   |        |
| Key Managerial Personnel         | 3      | 11,787,871  | Nil    | Nil   |        |
| Employees other than BoD and KMP | 4,440  | 2,116,153   | 2,265  | 1,496,802   |        |

Note: For statistically relevant computation of median value of remuneration/wages, Directors and KMPs who have served the entire 12 months in the corresponding financial year were considered. The remuneration includes the commissions paid to directors, remuneration paid to the executive directors and KMPs and employees excluding the perquisite value of any options exercised during the year. KMP includes one executive director.

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

|  | FY 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|--|--|---|
| Gross wages paid to female employees as % of total wages | 25.92%                                 | 26.74%                                  |

**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, all employees can report and seek redressal for their grievances including any human rights related concerns by reaching out to their manager or human resources or the Compliance and Ethics Officer and/or may report the matter on the Oracle Integrity Helpline.

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

An integrity helpline platform is available to all employees to confidentially raise any human rights issue. The matter can also be raised anonymously. Further, the Company has constituted Internal Complaints Committees that handle sexual harassment issues raised by female employees. Every employee has also been mandated to complete Global Compliance training at regular intervals. This training sensitizes employees to identify any human rights or compliance issues and their reporting.

All such matters reported to the Company are reviewed and investigated accordingly to the established processes and appropriate actions, if any, are taken promptly.

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

|                                    | FY 2023-2024<br>Current Financial Year |                                       |         | FY 2022-2023<br>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                      | 1                                     | 1       | -                                       | 1                                     | Nil     |
| Discrimination at workplace        | Nil                                    | Nil                                   | -       | 1                                       | Nil                                   | -       |
| Child Labour                       | Nil                                    | Nil                                   | -       | NA                                      | Nil                                   | -       |
| Forced Labour / Involuntary Labour | Nil                                    | Nil                                   | -       | NA                                      | Nil                                   | -       |
| Wages                              | Nil                                    | Nil                                   | -       | Nil                                     | Nil                                   | -       |
| Other human rights related issues  | 1                                      | 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 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|--|--|---|
| Total Complaints reported under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 1                                      | 1                                       |
| Complaints on POSH as a % of female employees  | 0.04%                                  | 0.04%                                   |
| Complaints on POSH upheld  | Nil                                    | Nil                                     |

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

The Company recognizes the pivotal role that businesses play in safeguarding human rights over the long haul and is dedicated to upholding the rights of its employees. To ensure a supportive environment, an internal helpline platform is accessible to all, facilitating the reporting of any human rights violations or related concerns. Moreover, Internal Complaints Committees have been instituted to proficiently address cases of sexual harassment. Additionally, the Company mandates that all employees undergo periodic Global Compliance Training to reinforce the Company's commitment to ethical practices and compliance standards.

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

Yes, the Company's supplier/service provider contracts require compliance with the Company's Code of Ethics and Business Conduct. The Code comprises of ethical business conduct that foster human rights and ethical work practices.

**10. Assessments for the year:**

|                             | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)   |
|-----------------------------|---|
| Child labour                | The Company internally monitors all compliances relating to laws and regulations with respect to these matters. There were no statutory assessments conducted by local statutory bodies during the financial year 2023-24 |
| Forced/involuntary labour   |   |
| Sexual harassment           |   |
| 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.**

No risks or any significant concerns were reported.



## 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:

The Company uses electricity as a primary source of energy. Electricity sourcing includes supply from electricity distribution companies, onsite rooftop solar panels and third-party procurement, which is generated from renewable energy sources.

| Parameter   | FY 2023-2024<br>Current Financial<br>Year      | FY 2022-2023<br>Previous Financial<br>Year |
|---|--|--|
| From renewable sources  |  |  |
| Total electricity consumption (A)   | 6,092GJ  | 4,697 GJ                                   |
| Total fuel consumption (B)  | 0  | 0  |
| Energy consumption through other sources (C)  | 0  | 0  |
| Total energy consumed from renewable sources (A+B+C)  | 6,092GJ  | 4,697 GJ                                   |
| From non-renewable sources  |  |  |
| Total electricity consumption (D)   | 37,775 GJ                                      | 40,745 GJ                                  |
| Total fuel consumption (E)  | 2,050 GJ                                       | 1,755 GJ                                   |
| Energy consumption through other sources (F)  | 0  | 0  |
| Total energy consumed from non-renewable sources (D+E+F)  | 39,825 GJ                                      | 42,500 GJ                                  |
| Total energy consumed (A+B+C+D+E+F)   | 45,917 GJ                                      | 47,197 GJ                                  |
| Energy intensity per rupee of turnover<br>(Total energy consumed / Revenue from operations)   | 0.96 GJ/million-₹                              | 1.11 GJ/million-₹                          |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total energy consumed / Revenue from operations adjusted for PPP) | 21.96 GJ/₹                                     | 25.38 GJ/₹                                 |
| Energy intensity in terms of physical output  | Not applicable owing to the nature of business |  |

The fuel consumption is for the diesel generator sets mainly used as a backup source during power outage.

**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.**

Yes. Independent assessment has been carried out by SGS India Private Limited.

#### 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.

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

| Parameter  | FY 2023-2024<br>Current Financial<br>Year      | FY 2022-2023<br>Previous Financial<br>Year |
|--|--|--|
| Water withdrawal by source (in kilolitres)   |  |  |
| (i) Surface water  | Nil  | Nil  |
| (ii) Groundwater   | 7,750  | 3,318                                      |
| (iii) Third party water  | 24,059   | 18,672                                     |
| (iv) Seawater / desalinated water  | Nil  | Nil  |
| (v) Others   | Nil  | Nil  |
| Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)   | 31,809   | 21,990                                     |
| Total volume of water consumption (in kiloliters)  | 28,150   | 14,826                                     |
| Water intensity per rupee of turnover (Total water consumption / Revenue from operations)  | 0.59 KL/₹                                      | 0.35 KL/₹                                  |
| Water intensity per rupee of turnover adjusted for purchasing power parity (PPP)<br>(Total water consumption / Revenue from operations adjusted for PPP) | 13.46  | 7.97                                       |
| Water intensity in terms of physical output  | Not applicable owing to the nature of business |  |

**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.**

Yes. Independent assessment has been carried out by SGS India Private Limited.

**4. Provide the following details related to water discharged:**

| Parameter   | FY 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|---|--|---|
| Water discharge by destination and level of treatment (in kiloliters) |  |   |
| (i) To Surface water  |  |   |
| - No treatment  | 0                                      | 0                                       |
| - With treatment – please specify level of treatment                  | 0                                      | 0                                       |
| (ii) To Groundwater   |  |   |
| - No treatment  | 0                                      | 0                                       |
| - With treatment – please specify level of treatment                  | 0                                      | 0                                       |
| (iii) To Seawater   |  |   |
| - No treatment  | 0                                      | 0                                       |
| - With treatment – please specify level of treatment                  | 0                                      | 0                                       |
| (iv) Sent to third-parties  |  |   |
| - No treatment  | 3,660                                  | 7,164                                   |
| - With treatment – please specify level of treatment                  | 0                                      | 0                                       |
| (v) Others  |  |   |
| - No treatment  | 0                                      | 0                                       |
| - With treatment – please specify level of treatment                  | 0                                      | 0                                       |
| Total water discharged (in kilolitres)                                | 3,660                                  | 7,164                                   |

**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.**

Yes. Independent assessment has been carried out by SGS India Private Limited.

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

Since the Company does not require water for any industrial activity, it has not implemented a mechanism for zero liquid discharge. The entire usage of water in the Company is limited to human consumption purposes only, and hence, the Company has taken an extra step by installing onsite sewage treatment plants to re-use the wastewater at its owned premises.

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

The Company does not have any air emissions other than those arising from operation of diesel generator sets during power outages. The Company has necessary consent under the Air (Prevention & Control of Pollution) Act 1981, for operation of DG sets. The Company undertakes annual sample testing of DG stacks for air emission on NOx, SOx, Particulate Matter and Carbon Monoxide parameters.

| Parameter                           | Please specify unit | FY 2023-2024<br>Current Financial Year  | FY 2022-2023<br>Previous Financial Year |
|-------------------------------------|---------------------|---|---|
| NOx                                 | mg/nm <sup>3</sup>  | The Company undertakes annual testing of air emission through DG sets through an NABL accredited laboratory to check that the air emissions are within the limits as per CPCB norms |   |
| SOx                                 | mg/nm <sup>3</sup>  |   |   |
| Particulate matter (PM)             | mg/nm <sup>3</sup>  |   |   |
| Persistent organic pollutants (POP) | NA                  | NA  | NA                                      |
| Volatile organic compounds (VOC)    | NA                  | NA  | NA                                      |
| Hazardous air pollutants (HAP)      | NA                  | 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.**

Yes. Independent assessment has been carried out by SGS India Private Limited.

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

Scope-1 emissions are from the fuel used in the diesel generator sets that work as backup electricity source during power outages and also from refrigerants used during the reporting period.

Scope-2 emissions are associated with purchased electricity.

The breakup is as below:

| Parameter   | Unit   | FY 2023-2024<br>Current Financial Year         | FY 2022-2023<br>Previous Financial Year |
|---|--|--|---|
| Total Scope 1 emissions<br>(Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)                              | Metric tons of CO <sub>2</sub> equivalent    | 371.63   | 999.36                                  |
| Total Scope 2 emissions<br>(Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)                              | Metric tons of CO <sub>2</sub> equivalent    | 7,513  | 8,044                                   |
| Total Scope 1 and Scope 2 emissions per rupee of turnover<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)  | tCO <sub>2</sub> e/million-₹                 | 0.16   | 0.21                                    |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | tCO <sub>2</sub> e/million-₹ adjusted to PPP | 3.77   | 4.86                                    |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output  |  | Not applicable owing to the nature of business |   |

Source for emission factors used to calculate scope 1 emissions- DEFRA Conversion Factors.

Source for emission factors used to calculate scope 2 emissions- CEA CO<sub>2</sub> baseline database for the Indian Power Sector.

**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.**

Yes. Independent assessment has been carried out by SGS India Private Limited.

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

The Company has undertaken projects to reduce Green House Gas (GHG) emissions, which include renewable energy generation through the onsite solar panels and procuring renewable energy through third-party purchase agreements. These reduce dependency on the conventional and fossil fuel-based electricity sources and helps us to make a shift towards alternative and more sustainable energy sources.

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

| Parameter   | Current Financial Year<br>FY 2023-2024     | Previous Financial Year<br>FY 2022-2023 |
|---|--|---|
| Total Waste generated (in metric tons)  |  |   |
| Plastic waste (A)   | 0.40                                       | 0.34                                    |
| E-waste (B)   | 6.19                                       | 13.36                                   |
| Bio-medical waste (C)   | -  | -                                       |
| Construction and demolition waste (D)   | -  | 15.50                                   |
| Battery waste (E)   | 7.96                                       | 43.54                                   |
| Radioactive waste (F)   | Nil  | Nil                                     |
| Other Hazardous waste. Please specify, if any (G)   | 1.93                                       | 2.11                                    |
| Other Non-hazardous waste generated (H) Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)                  | 78.23                                      | 62.52                                   |
| Total (A+ B + C + D + E + F + G + H)  | 94.71                                      | 137.37                                  |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)   | 0.002                                      | 0.003                                   |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) | 0.045                                      | 0.074                                   |
| Waste intensity in terms of physical output   | Not applicable owing to nature of business |   |
| 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  | 45.54                                      | 94.58                                   |
| (ii) Re-used  | -  | -                                       |
| (iii) Other recovery operations   | -  | -                                       |
| Total   | 45.54                                      | 94.58                                   |

| Parameter  | Current Financial Year<br>FY 2023-2024 | Previous Financial Year<br>FY 2022-2023 |
|--|--|---|
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tons) |  |   |
| Category of waste  |  |   |
| (i) Incineration   | Nil                                    | Nil                                     |
| (ii) Landfilling   | Nil                                    | Nil                                     |
| (iii) Other disposal operations  | 44.14                                  | 41.51                                   |
| Total  | 44.14                                  | 41.51                                   |

The hazardous waste, e-waste and battery waste are handed over to the Pollution Control Board (PCB) authorized recycler. The generated quantities if remaining at the end of the financial year for disposal are carried forward to dispose in the next year. Non-hazardous waste such as paper, packaging waste and food waste is handed over to landlords/local corporations/ third parties for disposal.

**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.**

Yes. Independent assessment has been carried out by SGS India Private Limited.

**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's operations do not involve any manufacturing and does not use any sort of hazardous or toxic chemicals, therefore, reducing usage of such chemicals is not applicable. For the normal office operations, and the waste mostly comprises of e-waste, paper and plastic. The Company has organic waste converters / compost machines at owned premises to recycle the food and other biodegradable waste. The insignificant amount of potentially hazardous waste generated during the office operations such as battery waste, DG lubrication oil, transformer oil, oil filters and e-waste are disposed through Pollution Control Board (PCB) authorized recyclers. The Company supports Go-Green initiatives that encourage minimum usage of paper and promote electronic communications wherever permissible.

**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 |
|---|--------------------------------|--------------------|--|
| The Company's campuses are built on government-approved land and do not fall within protected areas or high-biodiversity 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 | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|---|------------------|------|---|--|-------------------|
| No such assessments were applicable and undertaken in the financial year 2023-24. |                  |      |   |  |                   |

**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:**

The Company is compliant with all the applicable environmental laws/regulations/guidelines in India. No incidents of non-compliance were reported during the financial year 2023-24.

**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.**

Three (3).

**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      | Bombay Chamber of Commerce & Industry                      | National  |
| 2      | Electronics and Computer Software Export Promotion Council | National  |
| 3      | Bangalore Chamber of Industry and Commerce                 | 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 |
|-------------------|--|-------------------------|
|                   | The Company has not received any adverse orders from regulatory authorities related to anti-competitive conduct during the current financial year. |                         |

**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.**

Not Applicable.

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

Not applicable to the Company's operations.

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

Given the nature of the business, this is not applicable as the Company does not interact or impact the communities around its offices.

While the Company prioritizes its Corporate Social Responsibility initiatives in the local area, it also focuses on areas requiring advancing education, enriching community life by addressing health, hunger and community needs and emergency response to calamity or natural disaster. The Company has offices in major metro cities which generally have better and more developed social and livelihood facilities as compared to other non-metro cities or the rest of India. Therefore, the Company believes in adopting a broader geographical coverage for its CSR programs to deliver interventions where the need is higher.

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

|  | FY 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|--|--|---|
| Directly sourced from MSMEs/ small producers | 9.60%                                  | 15.37%                                  |
| Directly from within India                   | 75.42%                                 | 82.19%                                  |

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

|              | FY 2023-2024<br>Current Financial Year | FY 2022-2023<br>Previous Financial Year |
|--------------|--|---|
| Rural        | Nil                                    | Nil                                     |
| Semi-Urban   | Nil                                    | Nil                                     |
| Urban        | Nil                                    | Nil                                     |
| Metropolitan | 100%                                   | 100%                                    |

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)  
[https://rbi.org.in/scripts/bs\\_viewcontent.aspx?id=2035](https://rbi.org.in/scripts/bs_viewcontent.aspx?id=2035)

## 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 has a robust mechanism to track and respond to customer complaints and feedbacks. The Company operates only in a business to business (B2B) mode and product support services are primarily delivered through a dedicated support portal (<https://support.oracle.com>). Additionally, Support Hub/Hotline numbers are available to the customers to access using regional/local phone numbers 24X7 across the globe. The global directory of Hub/Hotline numbers is available at <https://www.oracle.com/support/contact.html>. To make these hotlines more accessible and consumer friendly, contact center/Hubs are employed with center/Hub experts having multi-lingual capabilities who can effectively communicate with the customer.

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

The Company offers an integrated portfolio of Products & Services built around Digital, IoT, Cloud, Automation, Cybersecurity & Analytics. All the products and services are intangible in nature hence this question is not applicable.

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

|                                | FY 2023-24               |                                   | Remarks | FY 2022-23               |                                   | Remarks |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------|-----------------------------------|---------|
|                                | Current Financial Year   |                                   |         | Previous Financial Year  |                                   |         |
|                                | Received during the year | Pending resolution at end of year |         | Received during the year | Pending resolution at end of year |         |
| Data privacy                   | Nil                      | Nil                               | -       | Nil                      | Nil                               | -       |
| Cyber-security                 | Nil                      | Nil                               | -       | Nil                      | Nil                               | -       |
| Delivery of essential services | Nil                      | Nil                               | -       | Nil                      | Nil                               | -       |
| Restrictive Trade Practices    | Nil                      | Nil                               | -       | Nil                      | Nil                               | -       |
| Unfair Trade Practices         | Nil                      | Nil                               | -       | Nil                      | Nil                               | -       |
| Others                         | 1                        | Nil                               | -       | Nil                      | Nil                               | -       |

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

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, the Company has a policy framework to address cyber security and privacy related concerns. The policy can be accessed at <https://www.oracle.com/corporate/security-practices/> & <https://www.oracle.com/legal>

#### 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.

None. There were no such incidents recorded during the financial year 2023-24.

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

During the financial year 2023-24, there was no instance of data breaches.

# INDEPENDENT ASSURANCE STATEMENT

**The Board of Directors and Management,  
Oracle Financial Services Software Limited,**  
Oracle Park, off Western Express Highway,  
Goregaon (East), Mumbai 400063

## Nature of the Assurance

SGS India Private Limited (hereinafter referred to as 'SGS India') was commissioned by Oracle Financial Services Software Limited (the 'Company' or 'OFSS') to conduct an independent assurance of the Company's Business Responsibility and Sustainability Reporting (BRSR) (the 'Report') pertaining to the reporting period of April 1, 2023, to March 31, 2024. The Report has been prepared following the National Guidelines for Responsible Business Conduct of the BRSR Framework, covering the performance of the Company across environmental, social, and governance (ESG) indicators.

## Responsibilities

The information in the report and its presentation are the responsibility of the directors or governing body and the management of the Company. SGS India has not been involved in the preparation of any of the material included in the report.

Our responsibility is to express an opinion on the text, data, and statements within the defined scope of assurance, aiming to inform the management of the Company, and in alignment with the agreed terms of reference. We do not accept or assume any responsibility beyond this specific purpose, and it is not intended for use in interpreting the overall performance of the Company, except for the aspects explicitly mentioned within the scope. The Company holds the responsibility for preparing and ensuring the fair representation of the assurance scope.

## Assurance Standard

This engagement was performed in accordance with the International Standard on Assurance Engagement (ISAE) 3000 (Assurance Engagements other than Audits or Reviews of Historical Financial Information). Our evidence-gathering procedures were designed to obtain a 'Reasonable' level of assurance, which is a high level of assurance but is not absolute certainty. It involves obtaining sufficient appropriate evidence to support the conclusion that the information presented in the report is fairly stated and is free from material misstatements.

## Scope of Assurance

The assurance process involved assessing the quality, accuracy, and reliability of BRSR Core Indicators (KPIs) within the report for the period April 1, 2023, to March 31, 2024. The reporting scope and boundaries include the Company's offices across India, Dubai, and Abu Dhabi.

The assurance verified data and control systems for the following offices:

- OFSS, Ambrosia, Pune
- OFSS, CV Raman Nagar, Bengaluru
- OFSS, Global Axis, Bengaluru
- OFSS, Green I-Tech, Chennai
- OFSS, Oracle Park, Mumbai
- OFSS, The Edge, Dubai
- OFSS, Yas Creative Hub, Abu Dhabi

## Assurance Methodology

The assurance comprised a combination of desk research, interaction with the key personnel engaged in the process of developing the report, on-site visits, and remote verification of data. Specifically, SGS India undertook the following activities:

- Assessment of the suitability of the applicable criteria in terms of its comprehensiveness, reliability, and accuracy.
- Conducted interviews with key personnel responsible for collecting, consolidating, and calculating the BRSR core KPIs and assessed the internal control mechanisms in place to ensure data quality.
- Application of analytical procedures and verification of documents on a sample basis for the compilation and reporting of the KPIs.
- Assessing the aggregation process of data at the Head Office level.
- Critical review of the report regarding the plausibility and consistency of qualitative and quantitative information related to the KPIs.

## Limitations

The assurance scope excludes:

- Disclosures other than those mentioned in the assurance scope
- Validation of any data and information other than those presented in “Findings and Conclusion”
- Verification of data and information outside the defined reporting period (April 1, 2023, to March 31, 2024)

## Findings and Conclusions

Based on the procedures we have performed and the evidence we have obtained, we are satisfied that the information presented by the Company in its report, on the specified KPIs (listed below) is accurate, reliable, has been fairly stated in all material respects, and is prepared in line with the BRSR requirements.

The list of BRSR Core Indicators that were verified within this assurance engagement are given below:

| S. No. | BRSR Core Attribute                               | BRSR Core Indicator  |
|--------|---|--|
| 1      | Greenhouse gas (GHG) footprint                    | - Total Scope 1 emissions<br>- Total Scope 2 emissions<br>- GHG Emission Intensity (Scope 1 +2)  |
| 2      | Water footprint                                   | - Total water consumption<br>- Water consumption intensity<br>- Water Discharge by destination and levels of Treatment   |
| 3      | Energy footprint                                  | - Total energy consumed<br>- % of energy consumed from renewable sources<br>- Energy intensity   |
| 4      | Embracing circularity                             | - Plastic waste<br>- E-waste<br>- Battery waste<br>- Other hazardous waste<br>- Other non-hazardous waste<br>- Total waste generated<br>- Waste intensity<br>- Total waste recovered through recycling, re-using or other recovery operations<br>- Total waste disposed by nature of disposal method |
| 5      | Employee well-being and safety                    | - Spending on measures towards well-being of employees as a % of total revenue of the Company<br>- Details of safety related incidents for employees   |
| 6      | Enabling gender diversity in business             | - Gross wages paid to females as % of wages paid<br>- Complaints on POSH   |
| 7      | Enabling inclusive development                    | - Input material sourced from MSMEs/ small producers as % of total purchases<br>- Wages paid to persons employed in smaller towns as % of total wage cost  |
| 8      | Fairness in engaging with customers and suppliers | - Instances involving loss/breach of data of customers as a percentage of total data breaches or cyber security events<br>- Number of days of accounts payable   |
| 9      | Open-ness of business                             | - Concentration of purchases & sales done with trading houses, dealers, and related parties<br>- Loans and advances & investments with related parties   |

OFSS has established a thorough monitoring system to ensure adherence to environmental and social compliance requirements. Additionally, the Company has successfully implemented a data management system and established a control mechanism for the systematic collection, analysis, and consolidation of ESG-related data.

## Statement of Independence and Competence

SGS India affirms our independence from Oracle Financial Services Software Limited, being free from bias and conflicts of interest with the organization, its subsidiaries, and stakeholders. Our work was performed in compliance with the requirements of the IFAC Code of Ethics for Professional Accountants, which provides a comprehensive framework that guides assurance practitioners in maintaining professional integrity, objectivity, and ethical conduct. The assurance team has the required competencies and experience to conduct this engagement.

### For and on behalf of SGS India Private Limited

**Ashwini K. Mavinkurve,**  
Head – ESG & Sustainability Services,  
Pune, India  
May 31<sup>st</sup>, 2024