

STERLING TOOLS LIMITED

CIN: L29222DL1979PLC009668

WORKS: 5-A, DLF Industrial Estate
Faridabad – 121 003 Haryana India
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<u>Through NEAPS</u>	<u>By Listing Centre</u>
National Stock Exchange of India Limited "Exchange Plaza", Bandra-Kurla Complex, Bandra (E) Mumbai-400051	The Secretary BSE Limited 25 th Floor, P. J. Towers Dalal Street, Mumbai – 400001
Security Code No.: STERTOOLS	Security Code No.: 530759

Date: 22nd August 2024Sub: Business Responsibility and Sustainability Report (BRSR) for the FY 2023-24.

Dear Sir/ Madam

Pursuant to Regulations 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulation"), please find enclosed herewith the Business Responsibility and Sustainability Report (BRSR) for the FY 2023-24, which also forms part of the Annual Report and uploaded on the Website of the Company at <https://stlfasteners.com/>.

Kindly take the same on your records.

Thanking You.

Yours truly,
For **STERLING TOOLS LIMITED**

Abhishek Chawla
Company Secretary & Compliance Officer
M. No.- A34399

Encl.: As Above.

Business Responsibility & Sustainability Reporting

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L29222DL1979PLC009668
2	Name of the Listed Entity	Sterling Tools Limited or "The Company"
3	Year of Incorporation	1979
4	Registered office address	DJ-1210, 12 th Floor, DLF Tower-B, Jasola District Centre, New Delhi – 110025
5	Corporate address	Plot No. 5A, DLF Industrial Estate, Faridabad-121003
6	E-mail	csec@stlfasteners.com
7	Telephone	+91-8800544965
8	Website	www.stlfasteners.com
9	Financial year for which reporting is being done	FY 2023-2024
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited and BSE Limited
11	Paid-up Capital	₹ 720.48 Lakhs
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:	Abhishek Chawla, Company Secretary Tel: 0129-2270621 Email: csec@stlfasteners.com
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	Standalone basis
14	Name of Assurance Provider	The data provided in the BRSR Report has not been assured by any external agency.
15	Type of Assurance obtained	Not Applicable

II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Manufacturing of Fabricated and Metal Products, including Metal Fasteners	99.09%

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	Manufacturing of High Tensile Fasteners	25991	99.09%

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	4	2	6
International	Nil	Nil	Nil

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	14
International (No. of Countries)	3

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

1.55 % of the total turnover of the Company is contributed through exports.

c. A brief on types of customers.

The Company belongs to a diversified automotive group, being the premier producer of cold forged hi-tensile fasteners. The Company is currently catering to the fastener's requirement of all the legendary automotive Original Equipment Manufacturer (OEM's) in India. The Company has a distinguished and esteemed customer base, which includes Commercial Vehicle Manufacturers e.g. TATA Motors, Ashok Leyland and Daimler and in Passenger Car segment we have Maruti Suzuki, Hyundai & Mahindra etc. In the Two Wheelers segment, the Company works for Suzuki Motorcycles, Hero MotoCorp and Honda Motorcycles and Scooter, and in Tractor segment for the Company manufactures components for Mahindra, John Deere & Escorts and off highway vehicles JCB to name a few.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	376	366	97.34%	10	2.66%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total employees (D + E)	376	366	97.34%	10	2.66%
WORKERS						
4.	Permanent (F)	237	237	100%	0	0%
5.	Other than Permanent (G)	1167	1112	95.29%	55	4.71%
6.	Total workers (F+G)	1404	1349	96.08%	55	3.92%

b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently Abled Employees						
1.	Permanent (D)	0	0	0%	0	0%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D+E)	0	0	0%	0	0%
Differently Abled Workers						
4.	Permanent (F)	0	0	0%	0	0%
5.	Other than Permanent (G)	1	1	100%	0	0%
6.	Total differently abled workers (F+G)	1	1	100%	0	0%



Business Responsibility & Sustainability Report (Contd.)

21. Participation/Inclusion/Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	12	2*	16.67%
Key Management Personnel	3	0	0%

One of the Board member ceased to be a Director of the Company due to completion of second tenure as of the close of business on 31st March, 2024.

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

	FY 2023-24 (Turnover rate in current FY)			FY 2022-23 (Turnover rate in previous FY)			FY 2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	23.26%	40.00%	23.61%	25.23%	71.43%	26.30%	39.67%	37.50%	39.62%
Permanent Workers	17.99%	0%	17.99%	0.82%	0%	0.82%	6.00%	0%	6.01%

V. Holding, Subsidiary and Associate Companies (including joint ventures)**23. (a) Names of holding / subsidiary / associate companies / joint ventures**

S. No.	Name of the holding/subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Sterling Gtack E- Mobility Limited	Subsidiary	100%	No
2	Haryana Ispat Private Limited	Subsidiary	100%	No
3	Sterling Advanced Electric Machines Private Limited	Subsidiary	100%	No

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

(ii) Turnover (in ₹): ₹ 60813.75 Lakhs

(iii) Net worth (in ₹): ₹ 43,162.50 Lakhs

VII. Transparency and Disclosures Compliances**25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-24 (Current Financial Year)			FY 2022-23 (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
Communities	Yes, Grievance Policy	Nil	Nil	Nil	Nil	Nil	Nil
Investors (other than Shareholders)	Yes, Stakeholder Relationship Committee	Nil	Nil	Nil	Nil	Nil	Nil



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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk/ or opportunity (Indicate positive or negative implications)
1	Climate Change	Opportunity	The Company's Carbon reduction roadmap will offer distinct operational benefits. By integrating clean energy sources into existing power networks, the Company is now supplying approximately 2.3-3% of its energy requirements from renewable sources.	-	Initiatives addressing climate change will have some capex requirements, but it will financially be rewarding.
2	Emissions	Risk & Opportunity	Manufacturing emissions harm the environment. To align with the Government of India's Zero Carbon initiative, transitioning to green and clean energy solutions is essential.	In the coming years, the Company intends to implement a range of emission reduction measures, energy conservation initiatives, and energy-efficient processes across all its manufacturing facilities to reduce emissions.	Though investments in energy management systems and technology will have a financial impact, they will positively impact the Company's operations through energy conservation initiatives, yielding direct financial benefits.
3	Water management	Risk & Opportunity	Water, as a limited resource, will pose a risk to our Company's operations.	The Company aims to tackle the challenge of water scarcity by reducing raw water consumption in manufacturing and focusing on efficient water management. This proactive approach ensures the issue remains manageable and sustainable for the long term.	The Company has made substantial investment in waste water treatment for water conservation and maintaining Zero Liquid Discharge status in some of the plants. Similar investment will be made in future to sustain it or if possible, to further reduce it.

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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)
4	Diversity and equal opportunity	Opportunity	The ability of the Company to ensure that its culture, hiring, and promotion policies foster the development of a diverse and inclusive workforce, makes it's an opportunity for the Company.	-	Strategizing improved hiring techniques and systems may incur some minor financial implications no financial implications in this
5	Responsible supply chain	Opportunity	Building a robust supply chain has aided us in maintaining business continuity in various situations. Additionally, our strong supply chain has made sure that we can maintain competitive pricing, together with benefiting our customers alongside.	-	There may be some financial impacts while further strengthening supply chain management.
6	Community engagement	Opportunity	Alongside the Company's interests, aligning with community interests is crucial. Building a friendly relationship with local communities can enhance business perception and brand image positively. The Company actively engages in Corporate Social Responsibility (CSR) initiatives across all its plants to foster stronger community ties.	-	These continued initiatives would have some financial implications; however, would also contribute to the Company's brand image and the creation of value for its stakeholders.
7	Manufacturing efficiency	Opportunity	Efficient manufacturing procedures enable timely manufacture and delivery of products to our valued clients while also maintaining the sustainability of our operations. Investment in the new technology and processes to ensure the quality of the products manufactured.	-	This will have a positive impact on the business.



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SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	The Company's existing policies are periodically reviewed and approved by the Board. The recently formulated applicable Policies are under the approval process by either the Board or the respective committees. This ensures that each new policy receives thorough consideration and endorsement from the appropriate governance bodies before implementation.								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes. Some of the policies extended to the value chain partners as well.								
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.	ATF 16949: 2016 ISO 45001: 2018 ISO 14001: 2015 ISO 9001: 2015 ISO 17025								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company has identified some of the environmental and social Key Performance Indicators (KPIs) and is in the process of creating an Environment, Social, and Governance (ESG) Roadmap with clear commitments, goals, and targets for coming years:</p> <ul style="list-style-type: none"> • Achieve carbon neutrality through strategic initiatives and sustainable practices. • Assessment of Green House Gas (Scope 3) emissions. • Promoting the use of Renewable Energy and reducing overall energy consumption. • Promoting Gender Diversity and Human Rights. • Rehabilitation of the under-privileged group, improvement of the local community to help the marginalized sections of society. • Focus on creating shared value for our communities. 								
6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	The Company's goal has always been to integrate and comply with its objectives within the ESG framework. In FY 2023-24, the company conducted comprehensive assessments across all manufacturing operations to identify areas for improvement. Carbon footprints (Scope 1 & 2) were calculated, and department-specific goals were set for the next three years, with rigorous monitoring of progress. Moving forward, the company plans to initiate regular reporting on its performance against commitments, goals, and targets.								
Governance, leadership, and oversight									

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7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	The Company is committed to balancing business growth with environmental responsibility. As we seek to expand into existing markets, we prioritize aligning our commercial goals with environmental concerns.
	To support a greener future, The Company has conducted an ESG due diligence assessment, identifying areas for improvement to meet our sustainability goals. The Company have also assessed GHG (Scope 1 & 2) emissions for FY 2022-23 and FY 2023-24, identifying the major sources of these emissions.
	In the coming years, The Company will implement initiatives to reduce its emissions. Our goal is to conduct business in an environmentally conscious manner by adopting various green initiatives and practices.
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Chairman of the Company is responsible for the implementation and oversight of ESG-related issues.
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the Chairman of the Company is responsible to review the sustainability related issues on annual basis. The CSR committee also reviews the CSR initiatives undertaken by the Company on Annual basis.

10. Details of Review of NGRBCs by the Company:

Subject of Review	Indicate whether review was undertaken by Director / Committee of the Board/Any other Committee*									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against Above policies and follow up action	The Audit Committee, Risk Management Committee, and Board conduct regular assessments of all policies and procedures, either annually or at other appropriate intervals. During these evaluations, the effectiveness of operational policies is carefully examined, and any required adjustments to existing policies and procedures are enacted.																	
Compliance with statutory requirements of relevance to the principles and, rectification of any non-compliances																		

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.	<table border="1"> <tr> <th>P 1</th><th>P 2</th><th>P 3</th><th>P 4</th><th>P 5</th><th>P 6</th><th>P 7</th><th>P 8</th><th>P 9</th> </tr> <tr> <td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td> </tr> </table> <p>No, the Company has not appointed any external agency for this purpose so far, however, these have been evaluated internally.</p>	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	No	No	No	No	No	No	No	No	No
P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9											
No	No	No	No	No	No	No	No	No											

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)	Not Applicable								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									



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SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors Key Managerial Personnel	4	<ul style="list-style-type: none"> • Economic Outlook • Business of the Company • Strategy Discussion • Regulatory updates • Key Company Highlights • Industry Outlook 	100%
Employees other than BoDs and KMPs	115	<p>The trainings can be categorised as below:</p> <ol style="list-style-type: none"> 1. Training on behavioural development (POSH, 5S awareness, Statutory Compliance management etc.) 2. Employee Health and Safety trainings 3. IT related trainings (PMS module, Cyber-attack awareness etc.) 4. Trainings on quality matters (Advanced Product Quality Planning (APQP), IATF-16949/ISO-14001, CSR, POKA Yoke, 7 QC Tools, awareness of ISO 9001:2015 etc.) 5. Other technical trainings (PPAP, 4M Change Management, CQI, Data management, Control Plan, Product Knowledge, Microstructure Checking etc.) 	95%

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Workers	137	<p>The trainings can be categorised as below:</p> <ol style="list-style-type: none"> 1. Training on Behavioural development (5'S awareness, Motivational trainings etc.) 2. Employee Health and Safety trainings (First Aid, Safety awareness and Emergency etc.) 3. Trainings on quality matters (IATF, Kaizen and Presentation Skills/ Machine Setting, Awareness on MSA etc.) 4. Other technical trainings (Perpetual Inventory, Rework Analysis, Daily MIS, Maru-A and Understanding Drawing and Control Plan etc.) 	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):

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	No material fines/penalties have been levied on the Company				
Settlement	Nil				
Compounding fee	Nil				

Non-Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment	Nil				
Punishment	Nil				

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

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

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

Yes, The Company has strong Anti-Corruption and Anti-Bribery policy in line with its commitment to honesty and transparency. The Company has zero tolerance approach towards corruption, bribery and unethical practices. The Company has appropriate internal controls to prevent any involvement in unethical practice by itself or its employees. The policy is readily accessible on the Company's Intranet, which can be accessed by all the employees.

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

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

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

	FY 2023-24 (Current Financial Year)		FY 2022-23 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	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 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Number of days of accounts payables	24	21

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	FY24 (Current Financial Year)	FY23 (Previous Financial Year)
Concentration of Purchases*	a. Purchases from trading houses as % of total purchases	0%	0%
	b. Number of trading houses where purchases are made from	0%	0%
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0%	0%

Parameter	Metrics	FY24 (Current Financial Year)	FY23 (Previous Financial Year)
Concentration of Sales	a. Sales to dealers /distributors as % of total sales	12%	11%
	b. Number of dealers / distributors to whom sales are made	136	120
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors	32%	35%
Shares of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.03%	0%
	b. Sales (Sales to related parties / Total Sales)	0%	0%
	c. Loans & advances (Loans & advances given to related parties/ Total loans & advances)	0%	0%
	d. Investments (Investments in related parties / Total Investments made)	79%	73%

* This being not material in terms of value, hence not reported

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
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The trainings were held with value chain partners but a framework to track such awareness programs is not in place yet.

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

Yes, the Company has processes in place to avoid/ manage conflict of interests involving members of the Board. The Audit and Board Committees oversee and approve transactions involving board members' reciprocity. In instances of potential conflicts, individuals must disclose all pertinent details to both the Board of Directors and the Audit Committee.

In addition, the Code of Conduct of the Company outlines principles for managing conflicts of interest in order to detect any real or possible conflicts that might arise between the Company and its directors and employees when conducting business. All staff members have access to this policy via the company intranet, ensuring openness and moral behaviour.

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	Nil	Nil	Nil
Capex	27.09%	17.45%	The Company has taken initiatives to reduce the dependence on non-renewable energy and hence solar panels (700 KWP) have been installed at its Prithla plant. Furthermore, the Company is planning to further decrease this dependency even more and other measures will also be taken to improve the impact of the Company on the environment and society to be reported in the coming years of its sustainability journey.



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

Yes, the Company evaluates its direct material supplier/ vendors (value chain partners) on various parameters such as their reliability, product quality, dependency etc.

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

As mentioned in the previous questions, as a matter of practice, all major direct material suppliers were assessed on the broad parameters, including sustainable sourcing. These suppliers are mandated to adhere to certain aspects such as Labor Laws Compliance and Human Rights, Occupational Health and Safety, Environmental Protection and Ethical Business among others. The Company is in the process to further strengthen this practice and to incorporate the relevant requirements of sustainability in its vendor evaluation process.

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.

Not applicable, as the Company's products are delivered directly to OEMs, being (B2B) manufacturers. Therefore, it has limited scope for reclaiming its products at the end of its life cycle. However, the Company ensures that the waste generated is disposed of as per Guidelines/Regulations. E-waste is disposed through authorised vendors and all the hazardous and non-hazardous waste generated is sent to the recycler. Also, the Company restricts the usage of "hazardous chemicals" in the components used in products, to the extent possible. An internal standard is created considering various national and international laws on hazardous substances.

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.

Not Applicable

Leadership Indicators**1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

NIC Code	Name of Product/ Services	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/ No) If yes, provide the web-link.
The Company has not carried out LCA for any of its products so far. However, the Company has plans to carry out the same in the coming years.					

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

Name of Product / Service	Description of the risk / concern	Action Taken
Not Applicable		

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Not applicable, as the Company's processes do not involve reusing the recycled materials.		

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

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Re-used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)						
E-waste						
Battery waste	Nil	Nil	Nil	Nil	Nil	Nil
Hazardous waste						
Other waste						

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	Not applicable, as the Company directly supplies its products to the OEM customers supplier; therefore, it has limited scope for reclaiming it at the end of its life cycle.

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

Essential Indicators

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

Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	366	366	100%	366	100%	0	0%	0	0%	0	0%
Female	10	10	100%	10	100%	10	100%	0	0%	10	100%
Total	376	376	100%	376	100%	10	100%*	0	0%	10	100%
Other than Permanent employees											
Male	0	0	0%	0	0%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0	0%	0	0%	0	0%	0	0%	0	0%

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

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	237	237	100%	121	51.05%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	237	237	100%	121	51.05%	0	0%	0	0%	0	4
Other than Permanent workers											
Male	1112	1112	100%	1112	100%	0	0%	0	0%	0	0%
Female	55	55	100%	55	100%	55	100%	0	0%	0	0%
Total	1167	1167	100%	1167	100%	55	100%	0	0%	0	0%

*Not Applicable



Business Responsibility & Sustainability Report (Contd.)

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

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the Company	0.12%	0.09%

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

Benefits	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total Workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Y
Gratuity	100%	100%	Yes	100%	100%	Y
ESI	11.37%	0.40%	Yes	18%	2%	Y
Others - Please specify	Nil	Nil	NA	Nil	Nil	Nil

3. Accessibility of workplaces

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

Yes, the Company has the requisite infrastructure to facilitate the movement of differently abled employees/workers such as wheelchairs, lifts, handrails, etc. The Company's premises/offices are largely accessible to differently abled employees and workers in addition to regular employees in alignment with the Rights of Persons with Disabilities Act, 2016, except for a few places.

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

Yes, the Company has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016, which is available on Company's Intranet and accessible to all employees. The Company does not discriminate between employees/workers on the grounds of age, sex, colour, caste, religion, nationality, language, marital status, etc.

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention Rate	Return to work rate	Retention Rate
Male	Paternity benefits are not available for male employees/workers of the Company. Hence this question is not applicable.			
Female	Maternity benefits are provided to all the female employees/workers of the Company; however, none of them have availed this facility for the financial years under review. Hence this question is not applicable.			
Total	-	-	-	-

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, the company has a robust grievance redressal mechanism accessible to permanent workers, other than permanent workers, permanent employees and other than permanent employees.. Suggestion boxes and complaint registers are conveniently placed for addressing complaints or grievances. This mechanism ensures that complaints are addressed promptly, fairly, and impartially by the Company.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	Not Applicable, since none of the employees/ workers are part of any union/association.			Not Applicable, since none of the employees/ workers are part of any union/association.		
Male						
Female						
Total Permanent Workers						
Male						
Female						

8 Details of training given to employees and workers:

Category	FY 2023-24 Current Financial Year					FY 2022-23 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	366	195	53.28%	248	67.76%	339	127	37%	186	55%
Female	10	9	90.00%	5	50.00%	5	0	0%	4	80%
Total	376	204	54.26%	253	67.29%	344	127	37%	190	55%
Workers										
Male	237	237	100%	237	100%	241	108	45%	127	53%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Total	237	237	100%	237	100%	241	108	45%	127	53%



Business Responsibility & Sustainability Report (Contd.)

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

Category*	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Total (A)	No.(B)	% (B/A)	Total (C)	No.(D)	% (D/C)
Employees						
Male	366	366	100%	339	339	100%
Female	10	10	100%	5	5	100%
Total	376	376	100%	344	344	100%
Workers						
Male	237	237	100%	241	241	100%
Female	0	0	0%	0	0	0%
Total	237	237	100%	241	241	100%

*All the eligible employees and workers were considered for performance and career development reviews.

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

Yes, As part of its integrated management system, all the plants of the Company are ISO 45001 certified and hence a Health and Safety Policy is in place to focus on the physical and mental well-being of the employees and workers.

The Company's policy on Health and Safety is available on the Company's Intranet, which can be accessed by all the employees.

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

The company gives paramount importance to the health and safety of its employees. Hazard Identification and Risk Assessment (HIRA) has been put into place that helps in identifying work-related hazards and risks on a regular basis. Also, the Company follows risk assessment/identification process as per ISO 45001 for identification of risk and development of a mitigation plan for the same. Manufacturing Heads, in consultation with Plant Heads, establish these processes after thorough risk analysis. Mitigation plans are periodically updated for changes in materials, layouts, or processes to ensure workplace safety. A Material Safety Data Sheet is also prepared for regular risk assessments.

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

Yes, all the sites of the Company have incident and hazard reporting procedures laid down to assist the workforce highlight unsafe working conditions and remove themselves from such situations. We have multiple platforms for reporting work-related hazards and to remove themselves from such risks, including Safety Observation Tours, Online safety risk reporting mechanism, extensive safety training and Compliance management through online tool .

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

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

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

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

* Including the contract workforce

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

The health and safety of the employees and workers is Company's top priority. The Company considers employees and its workers as its most valued asset. All the plants of the Company are certified Occupational Health and Safety Management Systems as per ISO 45001. In addition to the inputs provided under question no. 10 above, several other steps are taken by the Company to provide safe and healthy working conditions for all employees, workers, and visitors as listed below:

- i) Trainings: Training are provided to the employees and workers on First aid, stress management, TPM, Fire Hydrant System, Fire and Safety, 5S Principles, product quality, product knowledge, technical training etc.
- ii) Medical rooms: These are equipped with basic emergency care equipment and medicines.
- iii) Mock Drills: Periodic mock drills are conducted to ensure Safety measures at each unit.
- iv) Action Plans: Well organised action plans and phase wise execution are ensured to eliminate the hazards and risks associated to Health, Safety and Environment.
- v) Safety Audit Process: These are regularly conducted internally.

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

Benefits	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	-	Nil	Nil	-
Health & Safety	Nil	Nil	-	Nil	Nil	-

14 Assessments for the year:

Safety Incident /Number	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100 %
Working Conditions	

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.

Nil

Leadership Indicators

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

Yes, Company provides life insurance coverage for employees and workers covered under Employees State insurance Act, 1948 (ESIC), as per the ESIC Scheme. For those not covered under ESIC, the Company offers Group Personal Accident (GPA) and Group Medical Coverage (GMC) to ensure comprehensive protection and support for all permanent employees.

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

The Company ensures that statutory dues have been deducted and deposited to the Company for direct material suppliers. The Company has also targeted to expand its cover to the suppliers in the coming financial years.

Business Responsibility & Sustainability Report (Contd.)

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q1 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

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

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

Yes, the Company retains employees in case of specific vacancies within organization on case-to-case basis. The agreements are made on mutually agreed-upon duration and is subjected to renewal based on their performance and the availability of further vacancies in the organization.

5. Details on assessment of value chain partners:

Safety Incident /Number	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices Working Conditions	Majority of sourcing supplier assessment through questionnaire

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

No significant risks/concerns were observed in the supplier's self-assessment regarding health and safety practices and working Conditions.

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.

The Company employs a systematic approach to identify key stakeholder groups, recognizing their material influence on the Company or on how they are materially influenced by the Company's corporate decisions and consequences of those decisions. The Company recognizes Board of Directors, Employees & Workers, Investors & Shareholders, Customers, Suppliers, Government and Regulatory Bodies, Suppliers, Communities and Service Providers as its key 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
Board of Directors	No	Board meetings and Email Communication	Quarterly and need based	<ul style="list-style-type: none"> Compliance of law strategic decision making

Business Responsibility & Sustainability Report (Contd.)

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	<ul style="list-style-type: none"> Review Meetings Training programmes Performance appraisals Employee Engagement Activities Internal communication through emails, and Notice Board 	Continuous Process	<ul style="list-style-type: none"> Empowering work environment Rewards and recognition Personal development and growth Motivational Schemes
Investors & Shareholders	No	<ul style="list-style-type: none"> Press releases and publications Quarterly Presentation of results, Newspaper Publications Investor conferences Stock Exchange Announcement Chorus Call 	Periodic	<ul style="list-style-type: none"> Financial Results Business updates Response to the queries New business growth
Customers	No	<ul style="list-style-type: none"> Market surveys Personal visits and Exhibitions. trials and events Feedback mechanisms Communication through e- mail, one-to-one meetings, conference. 	Continuous Process	<ul style="list-style-type: none"> Product and service quality Complaint resolution On-time delivery.
Suppliers and Service Providers	No	<ul style="list-style-type: none"> Supplier engagement and assessments process. Email & phone calls, mails 	Continuous Process	<ul style="list-style-type: none"> Planning and execution of work orders Delivery Schedule Product Development
Government and Regulatory Bodies	No	<ul style="list-style-type: none"> Official communication channels & Regulatory audits/ inspections Good governance 	Continuous Process	<ul style="list-style-type: none"> Statutory compliance, including environmental, social and governance compliance
Communities	Yes	<ul style="list-style-type: none"> CSR Activities 	Continuous Process	<ul style="list-style-type: none"> Healthcare and Sanitisation Promoting Promoting Education Promoting Sports Empowering Underprivileged section of the society and support to destitute (Rehabilitation)

Business Responsibility & Sustainability Report (Contd.)

Leadership Indicators

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

The Company prioritizes stakeholder consultation as integral to our corporate governance and sustainability initiatives. The approach involves proactive engagement with a diverse array of stakeholders. Stakeholder consultations are led by relevant executives, business leaders, and key process heads of the Company. The Company's decision-making processes are guided by stakeholder's opinion and view. Based on the thorough input from all stakeholder's involved, the company regularly reviews different developments. This guarantees that, in all pertinent fields, our strategic orientation is in line with our stakeholders' requirements and expectations.

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

Yes, stakeholder consultation is used to support the identification and management of environmental and social topics. The incorporation of stakeholder feedback into the process and policy formulation is highly valued by the Company. When necessary, stakeholder input is used to help identify and manage social and environmental issues. With this approach, the Company makes sure that the decisions taken are well-informed and take into account the various viewpoints and concerns of the people who are affected by the Company's activities.

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

The Company recognizes its responsibility and identifies underprivileged communities as disadvantaged, vulnerable, and marginalized stakeholders, and engages with them through various CSR initiatives. The Company believes that not everyone has equal opportunity, even though everyone has equal potential from birth, hence efforts are made to identify and assist these communities in light of this discrepancy.

PRINCIPLE

5

Businesses should respect and promote human rights

Essential Indicators

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

Category*	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Total (A)	No. of employees workers covered (B)	% (B/A)	Total (C)	No. of employees workers covered (D)	% (D/C)
Employees						
Permanent	376	376	100%	344	97	28%
Other than Permanent	0	0	0%	0	0	0%
Total Employees	376	376	100%	344	97	28%
Workers						
Permanent	237	112	47.25%	241	0	0%
Other than Permanent	1167	374	32.05%	915	0	0%
Total Workers	1404	486	34.62%	1156	0	0%

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

Category	FY 2023-24 Current Financial Year					FY 2022-23 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent										
Male	366	0	0%	366	100%	339	0	0%	339	100%
Female	10	0	0%	10	100%	5	0	0%	5	100%
Other than permanent										
Male	0	0	0%	0	0%	0	0	0%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Workers										
Permanent										
Male	237	112	47.26%	125	52.74%	241	0	0%	241	100%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Other than permanent										
Male	1112	667	59.98%	445	40.02%	915	684	75%	231	25%
Female	55	41	74.55%	14	25.45%	-	-	-	-	-

3. Details of remuneration/salary/wages, in the following format

a. Median remuneration / Wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (In ₹)	Number	Median remuneration/ salary/ wages of respective category (In ₹)
Board of Directors (BoD)	2	2,42,35,626	0	-
Key Managerial Personnel	2	50,28,630	0	-
Employees other than BoD and KMP	362	5,94,420	10	7,91,334
Workers	237	4,70,988	0	-

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

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Gross wages paid to females as % of total wages	1.27%	2.58%

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

Yes, the business, through its HR Policy, is dedicated to maintaining human rights in the workplace. The HR department is in charge of handling any human rights-related complaints, conducting in-depth investigations, and making sure that workers who voice concerns are not subjected to reprisal/retaliation.

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

The company has zero tolerance towards any form of human rights violations. For reporting on the internal mechanisms addressing grievances related to human rights issues, the company has implemented a structured approach to ensure transparency and effectiveness. And includes following policies:

- POSH Policy (<https://stlfasteners.com/investors/>)
- Grievance Redressal Policy (<https://stlfasteners.com/investors/>)
- Vigil Mechanism/Whistle Blower Policy (<https://stlfasteners.com/investors/>)



Business Responsibility & Sustainability Report (Contd.)

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

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	-	Nil	Nil	-
Discrimination at workplace	Nil	Nil	-	Nil	Nil	-
Child Labour	Nil	Nil	-	Nil	Nil	-
Forced Labour/Involuntary Labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil	-	Nil	Nil	-
Other human rights related issues	Nil	Nil	-	Nil	Nil	-

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

	FY24 Current Financial Year	FY23 Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees/workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

The Company has implemented POSH policy and has established an Internal Complaint Committee to address complaints against discrimination, harassment, and unfair practices, ensuring confidentiality and protection against retaliation.

Also, The Company has established a well-structured system for reporting complaints and grievances, overseen by a dedicated team responsible for analyzing and resolving issues quickly and efficiently.

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

Yes, business agreements and contracts contain a standard provision of compliance with all applicable laws, conventions and policies etc., which also encompasses the human rights requirements.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	100%, internally assessed
Forced/involuntary Labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	Nil

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

None

Leadership Indicators**1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.**

The Company periodically familiarises employees and workers about their rights and duties under Company policies and procedures. However, there were no grievances/complaints reported during the current financial year.

2. Details of the scope and coverage of any Human rights due diligence conducted.

Throughout the year, the Company continues to take measures to integrate human rights into its Company culture at all levels.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

The Company's premises/offices are largely accessible to differently abled visitors in addition to regular employees/workers.

4. Details on assessment of partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Majority of sourcing supply assessed through evaluation forms.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others- please specify	Nil

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

Currently there is no significant risks/ concerns were identified from assessments of the specified value chain partners and hence no corrective actions were required to be undertaken.

PRINCIPLE

6

Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

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

Parameter	Units	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
From Renewable sources			
Total electricity consumption (A)	Gigajoules	9,101.51	62.04.00
Total fuel consumption (B)	Gigajoules	0	0*
Energy consumption through other sources (C)	Gigajoules	0	0
Total energy consumption from renewable sources (A+B+C)	Gigajoules	9,101.51	6,204.00
From Non-Renewable sources			
Total electricity consumption (D)	Gigajoules	1,59,685.45	1,45,919.00
Total fuel consumption (E)	Gigajoules	69,666.94	85,009.26
Energy consumption through other sources (F)	Gigajoules	0	0
Total energy consumption from non-renewable sources (D+E+F)	Gigajoules	2,29,352.39	2,30,928.26*
Total energy consumed (A+B+C+D+E+F)	Gigajoules	2,38,453.89	2,37,132.26*
Energy intensity per rupee of turnover	Gigajoules	0.00003921	0.00003968*
(Total energy consumed/Revenue from operations)			
Energy intensity per rupee of turnover adjusted for Purchasing power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP)	Gigajoules/ Rupee of turnover	0.00087832**	0.00088877**
Energy intensity in terms of physical output	Gigajoule/ MT of physical output	7.004	7.126*
Energy intensity (optional) – the relevant metric may be selected by the entity		-	-

*The percentage reported in the previous year has been revised.

** PPP: INR Revenue X PPP Factor (US\$/INR)

PPP Factor = 22.4; World Economic Outlook (April 2024) - Implied PPP conversion rate (imf.org).

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Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

Not Applicable, as the company does not have any sites/facilities identified as DCs under the PAT scheme of the Government of India.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	69,189	76,432
(iii) Third party water	47,451	48,217
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1,16,640	1,24,649
Total volume of water consumption (in kilolitres)	97,542	1,05,373*
Water intensity per rupee of turnover (Water consumed / turnover)	0.00001604	0.00001763*
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.00035928**	0.00039494**
Water intensity in terms of physical output	2.86	3.16
Water intensity (optional) – the relevant metric may be selected by the entity		

*The percentage reported in the previous year has been revised.

** PPP: INR Revenue X PPP Factor (US\$/INR)

PPP Factor = 22.4; World Economic Outlook (April 2024) - Implied PPP conversion rate (imf.org).

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

4. Provide the following details related to water discharged:

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
(i) To surface Water		
- No treatment	9,787	5,876
- With treatment (please specify level of treatment)	9,311	12,998
(ii) To Ground Water		
- 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	0	402
- 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 discharge (in KL)	19,098	19,276

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

Yes, the Company has implemented a mechanism for Zero Liquid Discharge plant at Prithla and Bengaluru. The plant's wastewater is reused during the process, and the remaining wastewater that is not recyclable or reusable is evaporated in a boiler and sent back into the system. The Company also takes several initiatives across all the plants to conserve and recycle water. The other two plants at DLF and WDU, Ballabgarh are authorised to discharge the ETP treated water to the discharge line.

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

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year) (mg/Nm3)*
NOx	MT	6.12	400
SOx	MT	2.28	49.9
Particulate matter (PM)	MT	43.85	45.2
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others – please Specify	-	-	-

* The unit of measurement for air emission was mg/Nm3 for the FY 2022-23.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	4938.76	5931.00
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	31,759.30	32,831.00
Total Scope 1 and Scope 2 emissions intensity per rupee of Turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)		0.00000603	0.00000649*
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		0.00013517**	0.00014528**
Total Scope 1 and Scope 2 emission intensity in terms of physical output		1.078	1.165
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		-	0.98

*The percentage reported in the previous year has been revised.

** PPP: INR Revenue X PPP Factor (US\$/INR)

PPP Factor = 22.4; World Economic Outlook (April 2024) - Implied PPP conversion rate (imf.org).

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.



Business Responsibility & Sustainability Report (Contd.)

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

Initiative undertaken FY 23-24	Details of Initiative	Outcome of the Initiatives
DLF Plant		
Installation of Static VAR Generator (SVG) panel	Improvement in power factor by SVG panel installation	Maintaining good power factor, Reduction in unit loss
Overhauling of furnace SYCC-359	Overhauling with new brick lining and additional ceramic coating	Reduction in Energy consumption
Installation of Dual fuel kit for genset	Genset are retrofitted with dual fuel thereby reducing the exhaust emission	Carbon footprint reduction/ Reduction in air emissions
Prithla Plant		
Installation of new solar Plant	New Solar Plant of 700 KWP added to increase renewable energy utilization.	Carbon footprint reduction/ Reduction in air emissions
Installation of Dual fuel kit for genset	Genset are retrofitted with dual fuel thereby reducing the exhaust emission	Cost Saving & Carbon footprint reduction/ Reduction in air emissions
Reduction of PNG consumption	Temp. settings revised of Phosphating plant subsequently of Hot water generators	Carbon footprint reduction/ Reduction in air emissions
Bengaluru Plant		
Increase in 20% of tree plantations	Plantation of 60 Trees in Bangalore Plant	Offsetting Carbon footprint.
Reduction in PNG Consumption	Operational improvement	Carbon footprint reduction
Ballabgarh (WDU) Plant		
Tree Plantation	We have started campaign of trees plantation and plant 70 Nos of tree in our plant (Parking & boundary wall area)	Offsetting Carbon footprint.
Installation of Dual fuel kit for genset	Genset are retrofitted with dual fuel thereby reducing the exhaust emission	Cost Saving & Carbon footprint reduction/ Reduction in air emissions
Energy saving	Uses of 100% LED lights through the plant	Carbon footprint reduction

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	25.72	15.00
E-waste (B)	0.50	0.50
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) (Discarded Lube waste, mechanical, DG and service oils)	1985.20	1,425.60
Other Non-hazardous waste generated (H). Please specify, if any.	3185.91	3,167
Total (A+B + C + D + E + F + G + H)	5197.33	4,608.10
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.00000085	0.00000077
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.00001914*	0.00001727*
Waste intensity in terms of physical output	0.15	0.13
Waste intensity (optional) – the relevant metric may be selected by the entity		

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total	0	0
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	3044.17	2,941
(ii) Landfilling	1689.16	1,316
(iii) Other disposal operations	464.38	351.10
Total	5197.71	4,608.10

* PPP: INR Revenue X PPP Factor (US\$/INR)

PPP Factor = 22.4; World Economic Outlook (April 2024) - Implied PPP conversion rate (imf.org).

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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 primary focus is at the point of waste generation. The Company follow the concept of 3 R's: Reduce, Reuse, and Recycle. To reduce both hazardous and nonhazardous waste, improvement projects are being carried out. Reduction of waste is an important and critical management part of review index.

The Company follows legally prescribed procedures and applies environmentally sound disposal techniques for disposing of the hazardous waste, whereas the non-hazardous waste is sold to the authorized recyclers, as identified by the Company. Further, to reduce the wastage of water, the Company has installed ETPs and STPs at some of its plants, wherein the Company reuses the treated water for non-potable purposes.

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 there of and corrective action taken, if any.
Not Applicable, since there are no operations of the Company near above-mentioned areas.			

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Not applicable, as no environmental impact assessment of projects was undertaken by the Company during the current reporting Year.					

Business Responsibility & Sustainability Report (Contd.)

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

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

S. No	Specify the law / regulation/ guidelines which was not complied with	Provide details of the non- compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Not Applicable, since there is no non-compliance with the applicable environmental Laws/Regulations/Guidelines in India.				

Leadership Indicators

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

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

- Name of the area:** DLF Faridabad, WDU, Ballabhgarh Faridabad, Kolar-Bengaluru, Palwal-Faridabad
- Nature of operations:** Manufacturing of cold tensile fasteners
- Water withdrawal, consumption, and discharge in the following format:**

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	69,189	76,432
(iii) Third party water	47,451	48,217
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	1,16,640	1,24,649
Total volume of water consumption (in kilolitres)	97,542	1,05,373*
Water intensity per rupee of turnover (Water consumed / turnover)	0.00001604	0.00001763*
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)(Total water consumption / Revenue from operations adjusted for PPP)	0.00035928**	0.00039494**
Water intensity in terms of physical output	2.86	3.16
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment	9,787	5,876
- With treatment – please specify level of treatment	9,311	12,998
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	402
- 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)	19,098	19,276

*The percentage reported in the previous year has been revised.

** PPP: INR Revenue X PPP Factor (US\$/INR)

PPP Factor = 22.4; World Economic Outlook (April 2024) - Implied PPP conversion rate (imf.org).

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 Equivalent	The Company is yet to track Scope 3 emissions and is in the process of reviewing and deciding on its future course of action in this regard.	The Company is yet to track Scope 3 emissions and is in the process of reviewing and deciding on its future course of action in this regard.
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Not Applicable

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Installation of Static VAR Generator (SVG) panel	Improvement in power factor by SVG panel installation	Maintaining good power factor Reduction in unit loss
2	Overhauling of furnace SYCC-359	Overhauling with new brick lining and additional ceramic coating	Reduction in energy consumption
3	Installation of dual- fuel kit for genset	Genset are retrofitted with dual fuel thereby reducing the exhaust emission	Carbon footprint reduction/ Reduction in air emissions
4	Installation of new solar plant	New solar plant of 700 KWP added to increase renewable energy utilization.	Carbon footprint reduction/ Reduction in air emissions
5	Reduction of PNG consumption	Temperature settings revised for Phosphating plant and subsequently of hot water generators	Carbon footprint reduction/ Reduction in air emissions
6	Utilization of Rainwater	Water filtration system installed, and 1000 KL rainwater used in Plant after treatment	Contribution in preservation of natural resources
7	Rainwater utilization in Process	200 KL/year	Reduction in depletion of ground water
9	Tree Plantation	Tree plantation initiative undertaken and around 130 trees have been planted	Offsetting Carbon footprint.
10	Energy saving	Uses of 100% LED lights through the plant	Carbon footprint reduction



Business Responsibility & Sustainability Report (Contd.)

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

The Company has a robust Disaster management/Business continuity plan to handle the following natural disasters and emergencies:

- Fire Emergency
- Earthquake Emergency
- Medical Emergency
- Food Poisoning Emergency
- Gas Leakage Emergency

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

There is no major environmental impact resulting from the Company's value chain (sourcing suppliers assessed for this purpose).

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

80% of all the Sourcing suppliers were assessed for their environmental impacts

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

Essential Indicators

1. **a. Number of affiliations with trade and industry chambers/ associations: 2**
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.**

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Automotive Component Manufacturers Association of India (ACMA)	National
2	Society of Indian Automobile Manufacturers (SIAM)	National

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

Name of authority	Brief of the case	Corrective action taken
Not Applicable, as the Company has not received any adverse orders from any regulatory authorities		

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

S. No	Public Policy Advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/Half yearly/Quarterly/ Others-please specify)	Web Link, if available
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The Company directly or through industry bodies and other associations puts forth a number of suggestions with respect to the industry in general and its activities in particular. Further, the Company is part of different forums, where we participate in different meetings for our respective inputs.

PRINCIPLE

8

Businesses should promote inclusive growth and equitable development

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
Not Applicable, as there were no projects that required SIA based on applicable laws in the current financial year.					

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

S. No	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
Not Applicable, as there were no projects requiring an R&R.						

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

The Company has a mechanism in place to receive and redress community grievances as follows:

- The company maintains an Internal Grievance Redressal Committee to handle community grievances, forwarding issues to relevant departments.
- It actively conducts CSR activities to support local community needs near plant locations.
- The company encourages direct communication between Management and plant Operations, promoting transparency.
- It engages with local communities to address concerns and foster relations.
- The company focuses on the timely resolution of community issues to enhance community-company relations.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	The Company procures from vendors based on quality, cost, and delivery aspects. The Company strives for a fair, transparent, and inclusive, procurement process that provides equal opportunities for all suppliers.	
Directly from within India	98.39%	98.55%

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

Location	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Rural	-	-
Semi-Urban	-	-
Urban	15.98%	21.72%
Metropolitan	84.02%	78.28%

(Place to be categorized as per RBI classification system – rural / semi – urban / urban / metropolitan)

*The new jobs created by the Company in the FY2022-23 and FY2023-24 have only been considered.

CTC of employees has been considered as wages.

Bifurcation as per Database on Indian Economy, RBI's Data Warehouse <https://dbieold.rbi.org.in/>

Business Responsibility & Sustainability Report (Contd.)

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Not Applicable, as there were no projects that required SIA based on applicable law in the current reporting year.	

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

S. No.	State	Aspirational District	Amount Spent (In INR)
The company has not operated any CSR project under aspirational districts as all the CSR initiatives undertaken are in the localities close to operating locations but it is working on expanding its reach in the upcoming year.			

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

The Company does not have a formal policy in place for procurement from the aforesaid mentioned group. However, the company collaborates with various job workers, local suppliers, and vendors as required for its supply needs

(b) **From which marginalized /vulnerable groups do you procure?** Not Applicable

(c) **What percentage of total procurement (by value) does it constitute?** Not Applicable

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

S. No	Intellectual Property based on traditional knowledge	Owned Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
NIL				

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

Name of authority	Brief of the Case	Corrective action taken
Not Applicable, as mentioned in Question no. 4 above.		

6. **Details of beneficiaries of CSR Projects:**

S. No	CSR Project	No. of persons benefitted from CSR Projects	%of beneficiaries from vulnerable and marginalized groups
1	Healthcare	The benefits of the initiatives are	100%
2	Training and Education	extended to the entire community,	100%
3	Promoting Sports	however, the exact number of	100%
4	Sponsoring Homes for Orphans and sponsoring old age homes, day care centres and such other facilities for Senior Citizens	persons benefitted are not available.	100%

PRINCIPLE

9

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

Essential Indicators

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

The Company has established robust mechanisms to receive and address consumer complaints and feedback effectively. The Company is into B2B business, supplying products to OEMs. But the OEMs send us monthly supplier's rating, grading us on Quality, Cost, Delivery, Development, and Management. The Company's Sales and Marketing team dives into these reports, along with other stakeholders, to spot areas where we can do better. Then, the Company brainstorm strategies to improve based on the feedback received.

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

	As a percentage of total turnover
Environmental and social parameters relevant to the product.	Nil, as the Company is in B2B business, and the products are not meant for the end customers directly.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	-	Nil	Nil	-
Advertising	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	Nil	Nil	-	Nil	Nil	-

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

	Number	Reasons for recall
Voluntary recalls	Nil	
Forced recalls	Nil	-

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

Yes, the entity have a framework/ policy on cyber security and risks related to data privacy. The weblink is provided: <https://stlfasteners.com/assets/upload/investors/20240705100233-14-373259091989.pdf>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

Not applicable, as the Company is not dealing with rendering the Essential services.



Business Responsibility & Sustainability Report (Contd.)

7. Provide the following information relating to data breaches:

- a) **Number of instances of data breaches:** Nil
- b) **Percentage of data breaches involving personally identifiable information of customers:** Nil
- c) **Impact, if any, of the data breaches:** Nil

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

The official website of the Company provides information about products it offers to OEMs. The web-link for the Company's website is: <https://stlfasteners.com/>

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

The company is a B2B supplier, it directly provides products to OEMs, who further assemble and distribute the final products to end-user customers. Thus, limits the Company's involvement in informing and educating end users about the safe and responsible usage of its products.

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

Not Applicable, as the Company does not provide essential services.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable). If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Not applicable, as the Company supplies product exclusively to OEMs, thus lacking direct visibility to end users. However, the Company prioritize customer satisfaction, implementing various methods to ensure it. Customer feedback is gathered either directly or indirectly to address any grievances, enabling the development and implementation of corrective actions. Following this, summaries detailing customer satisfaction are collated, thoroughly examined, and supervised by all relevant process stakeholders in conjunction with the company's management team.