

28<sup>th</sup> May 2024

BSE Limited Corporate Relationship Dept. 1 <sup>st</sup> . Floor, New Trading Ring, Rotunda Building, P. J. Towers, Fort <u>Mumbai – 400 001</u>  BSE:504112	National Stock Exchange of India Limited 5 <sup>th</sup> Floor, Exchange Plaza, Plot No.C-1, Block “G” Bandra Kurla Complex Bandra (East) <u>Mumbai – 400 051</u>  NSE:Nelco EQ
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Dear Sirs,

Sub: Business Responsibility and Sustainability Report

Pursuant to Regulations 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations 2015 (“Listing Regulations”), we are submitting herewith the Business Responsibility and Sustainability Report for FY 2023-24, which forms an integral part of the Annual Report FY 2023-24 submitted to the Exchanges.

We request you to take this on record and to treat the same as compliance with the applicable provisions of the Listing Regulations.

This is for your information and record.

Thanking you,

Yours faithfully  
For Nelco Limited

Ritesh N. Kamdar  
Company Secretary  
ACS 20154

Encl: As above.

## BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

### SECTION A: GENERAL DISCLOSURE

#### I. Details of the Listed Entity

1	<b>Corporate Identity Number (CIN) of the Listed Entity</b>	L32200MH1940PLC003164		
2	<b>Name of the Listed Entity</b>	Nelco Limited		
3	<b>Year of incorporation</b>	1940		
4	<b>Registered office address</b>	EL-6, TTC Industrial Area, Electronics Zone, MIDC Mahape, Navi Mumbai 400710		
5	<b>Corporate address</b>	EL-6, TTC Industrial Area, Electronics Zone, MIDC Mahape, Navi Mumbai 400710		
6	<b>E-mail</b>	<a href="mailto:services@nelco.in">services@nelco.in</a>		
7	<b>Telephone</b>	022 67399100		
8	<b>Website</b>	<a href="http://www.nelco.in">www.nelco.in</a>		
9	<b>Financial year for which reporting is being done</b>	2023-24		
10	<b>Name of the Stock Exchange(s) where shares are listed</b>	BSE Limited (BSE), National Stock Exchange of India Limited (NSE)		
11	<b>Paid-up Capital</b>	INR 228174610		
<b>Contact Person</b>				
12	<b>Name of the Person</b>	Ms. Leena Thomas		
	<b>Telephone</b>	022 67399100		
	<b>Email address</b>	<a href="mailto:leena.thomas@nelco.in">leena.thomas@nelco.in</a>		
<b>Reporting Boundary</b>				
13	<b>Type of Reporting</b>	Consolidated		
	<b>If selected consolidated:</b>	<b>Sr No.</b>	<b>Name of the Subsidiaries/JVs/ Associate Companies</b>	<b>CIN Numbers</b>
		1	Nelco Network Products Limited (Subsidiary)	U32309MH2016PLC285693
		2	Piscis Networks Pvt. Ltd (Associate)	U72900MH2021PTC363941
14	<b>Name of assurance provider</b>	Not Applicable		
15	<b>Type of assurance obtained</b>	Not Applicable		

#### II. Product/Services

16	Details of business activities (accounting for 90% of the turnover):	S. No.	Description of Main Activity	Description of Business Activity	% Turnover of the Entity
		1	Information and Communication	Wired, wireless or satellite Telecommunication services	100%

17	Products/ Services sold by the entity	S. No.	Product/Service	NIC Code	% of Total Turnover contributed
		1	43212: Installation of telecommunications wiring, computer network and cable television wiring, including fiber optic, satellite dishes 61900: Other telecommunications activities	43212 61900	Sale of Bandwidth-69% Sale of Equipment-14% AMC Services – 7% Rental of VSAT -4% Other -6%

### III. Operations

18	Number of locations where plants and/or operations/offices of the entity are situated:	Location	Number of plants	No. of Offices	Total
		National	0	13	13**
		International	0	0	0
19	Market served by the entity	Locations			
	a. No. of Locations	National (No. of States)	28 States & 8 Union Territories		
		International (No. of Countries)	0		
	b. What is the contribution of exports as a percentage of the total turnover of the entity?	30.87%*			
	c. A brief on types of customers	Nelco provides satellite communication services to the companies in various segments such as: Banking: Bank branches, ATMS, Managed service providers. Oil, Energy and Gas: Oil retail companies and Petrol Pumps, Solar farms, Hydro farms, Wind farms, Offshore and onshore rigs WiFi on aircrafts and Maritime communication, Telecommunication, and manufacturing companies			

\*Revenue is generated by providing services to customers located outside India.

\*\* Includes 9 offices & 4 Warehouse

### IV. Employees

20. Details as at the end of Financial Year:						
S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>a. Employees and workers (including differently abled)</b>						
<b>Employees</b>						
1	Permanent Employees (A)	174	154	89%	20	11%
2	Other than Permanent Employees (B)	108	103	95%	5	5%
3	Total Employees (A+B)	282	257	91%	25	9%
<b>b. Differently abled employees and workers</b>						
<b>Employees</b>						
1	Permanent Employees (E)	0	0	0	0	0
2	Other than Permanent Employees (F)	0	0	0	0	0
3	Total Employees (E+F)	0	0	0	0	0

Note: Nelco does not employ any workers, hence there will be no disclosures applicable

21. Participation/Inclusion/Representation of women				
S. No.	Category	Total (A)	No. and % of females	
			No. (B)	% (B/A)
1	Board of Directors	6	1	17%
2	Key Management Personnel	2	0	0

\*Managing Directors & Chief Executive Officer is considered in BOD and Chief Financial officer, Company Secretary are considered as KMPs.

22. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)									
Category*	FY 2023-2024 (Turnover rate in current FY)			FY 2022-2023 (Turnover rate in previous FY)			FY 2021-22 (Turnover rate in previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	10%	5%	10%	8%	0	8%	8%	0	8%
Permanent Workers	0	0	0	0	0	0	0	0	0

\* Voluntary turnover rates are disclosed

#### 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	Indicate whether it is a holding / Subsidiary / Associate / or 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.	The Tata Power Company Ltd.	Holding Company	50.04	No
2.	Nelco Network Products Limited (NNPL)	Subsidiary Company	100.00	Yes
3.	Piscis Networks Pvt. Ltd.	Associate Company	31.72	No

#### VI. CSR Details

24	a. Whether CSR is applicable as per section 135 of Companies Act, 2013:	Yes
	Turnover (in ₹)	320.30 crores
	Net worth (in ₹)	123.58 crores

**VII. Transparency and Disclosures Compliances**

<b>25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct</b>								
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
<b>Communities</b>	Yes	For Grievance redressal, Nelco has POSH committee for employees, Stakeholder relationship committee, Vigil Mechanism, Whistle blower policy in place.  Additionally, all Vendors are aware about TATA CoC.  For every purchase order, grievance redressal email is provided for vendors. Link: <a href="https://www.tcplindia.co.in/InvestorCharter.html">https://www.tcplindia.co.in/InvestorCharter.html</a>  For Communities, Nelco grievances can be addressed at <a href="mailto:ethics@nelco.in">ethics@nelco.in</a>  For customers, Nelco provides helpline link <a href="mailto:helpdesk@nelco.in">helpdesk@nelco.in</a> to address any grievances and queries	0	0	-	0	0	-
<b>Investors (other than shareholders)</b>	Investors and shareholders are the same for Nelco		0	0	-	0	0	-
<b>Shareholders</b>			4	0	Resolved	4	0	Resolved
<b>Employees and workers</b>	Yes		5	0	Minor field injuries	1	0	Minor field injuries
<b>Customers</b>	Yes		0	0	-	0	0	-
<b>Value Chain Partners</b>	Yes		0	0	-	0	0	-
<b>Other (please specify)</b>			0	0	-	0	0	-

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

<b>Material Issue Identified</b>	<b>Indicate whether risk or opportunity</b>	<b>Rationale for identifying the risk/opportunity</b>	<b>In case of risk, approach to adapt or mitigate</b>	<b>Financial implications of the risk or opportunity (Indicate positive or negative implications)</b>
Customer relationship management	Opportunity	Robust customer relationship management can help the Company to strengthen its market leadership position in key segments and enhance growth.		Positive, as successful customer relationship can drive revenue growth and profitability.
Supply chain management	Risk	Nelco depends on its supply chain partners for Satcom equipment and bandwidth capacity. Any disruption in timely supply, price escalations, and/or regulatory compliance, can profoundly affect the company's operations and its ability to deliver satisfactory services to customers.	Building a resilient supply chain by diversification of supply chain partners, continual stakeholder engagement, and comprehensive supply chain assessment.  Well managed supply chain disruptions can indeed present opportunities for maintaining and even strengthening supply chain relationships that can lead to stronger partnerships that endure beyond the disruptions	Negative as due to supply chain disruptions might lead to price escalations, increased costs, slower customer satisfaction, and reduced competitiveness
Talent Management	Opportunity	The Company on boards and builds newer competencies to aid its multifold growth. The Company also plans to enhance skills of existing people and build future required competencies.		Positive, in terms of higher productivity of the people, fosters innovation, expertise, and competitiveness, ensuring a skilled workforce to drive business growth and success.
Corporate Governance and Ethics	Risk	Dynamic regulatory landscape and increasing stakeholder expectations regarding good governance practices poses risk concerning corporate governance & business practices.	The Company has adopted a powerful, competent, and diverse Board. It has instituted robust policies and SoPs to ensure good corporate governance.	Negative due to legal issues, reputational damage, loss of investor confidence, and decreased stakeholder trust, harming long-term sustainability.

Material Issue Identified	Indicate whether risk or opportunity	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)
Business continuity and Risk Management	Risk	<p>The Company's infrastructure is vulnerable to interruptions caused by earthquakes, floods, heavy rainfall, catastrophes, power outages, fire and other similar events. Information technology system failures, security breaches or human errors can affect the quality of services and impact customer satisfaction. Failure to have a proper business continuity framework and integration in risk management can compromise the organization's resilience and sustenance</p>	<p>Nelco has established a risk management framework and policy based on which existing and emerging risks are identified and assessed across its business segments</p> <p>The Risk Management Committee (RMC) is responsible for monitoring and reviewing the risk management plan and ensuring its effectiveness.</p> <p>The Company's key risks are discussed with RMC three times a year.</p> <p>The major risks identified by the businesses and functions are systematically addressed through mitigating actions on a continuous basis.</p>	<p>Negative due to higher expenditure in mitigation measures &amp; asset cost, revenue loss, operational disruptions, increased recovery costs, and damage to brand reputation</p>

Material Issue Identified	Indicate whether risk or opportunity	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)
Cybersecurity & Data Privacy	Risk	<p>Since Nelco operates in Satellite communication industry, cybersecurity and data protection is vital for organization as data breach and cyber-attacks can potentially expose the organization to vulnerability leading to financial and reputational loss</p>	<p>Cybersecurity and Data Privacy policy as per global standards and implementation of procedural guidelines in true spirit.</p> <p>Strict adherence to cyber security compliances and implementation of robust policies will help to mitigate the risk.</p> <p>Nelco is certified for ISO/IEC 27001:2013, an international certification on information security management system (ISMS)</p> <p>Providing continuous training to employees on cybersecurity best practices and incident response protocols</p>	<p>Negative implications encompass the possibility of incurring additional or increased costs associated with the management of timely, frequent, and customized updates in the following areas:</p> <ol style="list-style-type: none"> <li>1. Internal IT infrastructure and architecture</li> <li>2. Software purchases</li> <li>3. IT hardware</li> <li>4. Adjustments necessitated by sector-specific or theme-specific regulatory requirements.</li> </ol>
Digitalization	Opportunity	<p>Embracing digitalization enhances operational efficiency, service delivery, and customer experience through automated processes, real-time monitoring, and innovative solutions like IoT integration and predictive maintenance in satellite communication networks. Nelco is driving multiple digitalization initiatives across the organization and taking external help where required</p>	-	<p>Positive as digitalization and use of AI/ML has the potential to enhance operational efficiency</p>



Material Issue Identified	Indicate whether risk or opportunity	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)
Diversity, Equity and Inclusion	Opportunity	The DE&I approach can help Nelco to promote fair treatment and full participation of all employees i.e., groups of individuals, including people of different races, ethnicities, religions, abilities, genders, and sexual orientation. A diverse, equitable and inclusive ecosystem can help Nelco to respond to challenges, retain the top talent, and meet the needs of various stakeholder in a better way	-	Positive as workforce diversity is vital for business success, attracting talent, and enhancing its reputation as a premier service provider
People Well-being, Health and Safety	Opportunity	Better People wellbeing, health and safety measures can prevent injury, create a better workplace by eliminating hazards and improve employee productivity. A healthy workplace can contribute positively to organization's growth and development	-	Positive as it boosts the morale, productivity, and retention, creating a safer, healthier work environment and positive company culture.
Emissions Reduction and Energy Management	Opportunity	Emission Reduction & Energy Management will help Nelco to reduce the cost of operation by means of increase in efficiency, and optimized energy use	-	Positive due to Improved operational efficiency, cost savings, and enhanced reputation as an environmentally responsible company, leading to increased customer trust and loyalty
Community Development	Opportunity	Community development will help Nelco to contribute to the community and enhance their social reputation	-	Positive as it can enhance brand reputation, foster goodwill, support talent attraction, and foster sustainable relationships with local stakeholders.
Waste and Water Management	Opportunity	Efficient waste & water Management can help Nelco to lower their operational costs & enhance reputation	-	Positive due to Reduced environmental impact, cost savings, regulatory compliance, and enhanced reputation

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

*Integrating the principles of the National Guidelines for Responsible Business Conduct into the structures, policies and processes ensure that stakeholder interests are integrated into the business fabric. Creating adequate governance enables businesses to contribute towards wider development goals.*

### NGRBC Principle

#### PRINCIPLE 1

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



#### PRINCIPLE 2

Businesses should provide goods and service in a manner that is sustainable and safe.



#### PRINCIPLE 3

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



#### PRINCIPLE 4

Businesses should respect the interests of and be responsive to all its stakeholders.



**PRINCIPLE 5**  
Businesses should respect and promote human rights.



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



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



**PRINCIPLE 8**  
Businesses should promote inclusive growth and equitable development.



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



Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes										
1	<b>a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	<b>b. Has the policy been approved by the Board? (Yes/No)</b>	Yes, policies as required by the applicable statutes are approved by the Board/ Committees, and other internal policies are approved by the Managing Director & Chief Executive Officer of the Company.								
	<b>c. Web Link of the Policies, if available</b>	<p>All the Company policies are made available to respective stakeholders. Some of the policies are available on the Company's website at <a href="https://www.nelco.in/">https://www.nelco.in/</a> for customers / suppliers etc. For employees they are available on the Company's internal portal.</p> <p>Nelco Limited has the following policies:</p> <p>P1: Tata Group Code of Conduct (TCoC), Whistle Blower, Vigil Mechanism Policy</p> <p>P2: Occupational Health &amp; Safety Policy</p> <p>P3: Prevention of Sexual Harassment Policy (POSH), Occupational Health &amp; Safety Environment Policy, Tata Code of Conduct</p> <p>P4: Tata Code of Conduct</p> <p>P5: POSH Policy, Tata Code of Conduct</p> <p>P6: Occupational Health &amp; Safety Environment Policy, Extended Producer Responsibility (EPR)</p> <p>P7: Code of conduct for Non-Executive Directors, Code of conduct for Prevention of Insider Trading</p> <p>P8: Corporate Social Responsibility (CSR) Policy</p> <p>P9: Data Privacy and cybersecurity</p>								
2	<b>Whether the entity has translated the policy into procedures. (Yes / No)</b>	Yes, the approved policies are translated into procedures.								
3	<b>Do the enlisted policies extend to your value chain partners? (Yes/No)</b>	Yes								
4	<b>Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.</b>	The policies adhere to international standards like TL 9000, ISO 27001, ISO 20000 and meet the regulatory requirements such as SEBI Listing Regulations etc. The policies reflect Tata groups commitment to improve the quality of life of the communities it serves and practice of giving back to the society.								
5	<b>Specific commitments, goals and targets set by the entity with defined timelines, if any.</b>	Yes, Nelco has developed a strategic plan for their journey in environmental, social, and governance (ESG) practices. This year, the business will establish an ESG strategy to define its goals for sustainability.								

<p>6</p>	<p><b>Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b></p>	<p>Nelco is undergoing a process of developing comprehensive ESG strategy integrating and embedding key material priorities into its business. As a part of future-ready roadmap, Nelco is committed to ESG goals given below:</p> <p>Nelco’s governance framework is designed to support a robust ethical operating environment and is structured around:</p> <ul style="list-style-type: none"> <li>• Customer Relationship Management to foster trust and satisfaction of customers ensuring that their needs are at the heart of its business strategy.</li> <li>• Supply Chain Management to build and maintain efficient and resilient supply chain that upholds ethical standards and minimizes risks thereby contributing to sustainable growth.</li> <li>• Corporate Governance and Ethics to uphold highest standards of ethical conduct and respect for all stakeholders.</li> <li>• Business Continuity and Risk Management to have robust continuity plans in place to safeguard against operational, financial and strategic risks.</li> <li>• Cybersecurity and Data Privacy implementing cutting-edge cybersecurity measures and data privacy practices to meet regulatory requirements and establish customer confidence.</li> <li>• Digitalization leveraging technology to optimize operations, innovate service offerings and enhance stakeholder engagement.</li> </ul> <p>Nelco is committed to sustainable practices that address key environmental concerns through the following focused areas:</p> <ul style="list-style-type: none"> <li>• Emissions Reduction and Energy Management to minimize greenhouse gas emissions by optimizing energy usage and investing in energy-efficient technologies.</li> <li>• Waste and Water Management, to reduce waste generation at its source and enhancing reusing and recycling activities and acknowledging water as a critical resource. It has set goals to not only reduce its water but to implement efficient usage policies and engage in initiatives that support water conservation.</li> </ul>
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		<p>Nelco is fully committed to making a positive social impact through targeted initiatives that align with its core values of respect, empowerment, and sustainable development. Its social goals encompass the following areas:</p> <ul style="list-style-type: none"> <li>• Talent Management to nurture the growth and development of its employees by providing trainings, career advancement opportunities, and a supportive work environment that stimulates professional excellence and innovation.</li> <li>• Diversity, Equity, and Inclusion to foster an inclusive culture that embraces diversity in all its forms. It is actively working towards creating equitable opportunities for all its employees.</li> <li>• People Wellbeing, Health and Safety is paramount to Nelco and we strive to offer programs that support mental, emotional, and physical health to ensure that the health and safety of its staff is a top priority.</li> <li>• Community Development to contribute to the broader, long-term socio-economic upliftment of these communities.</li> </ul>
Governance, Leadership and Oversight		
7	<p>Statement by Director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.</p> <p>Climate change has emerged as one of the biggest risks faced by the humanity, with far reaching impact on the socioeconomic systems around the world. Additionally, inclusive growth and the transition to a sustainable economy have become the global agenda. Therefore, investors, regulators and other stakeholders are considering company's sustainability performance as important as its financial and operational performance. I am pleased to share with you Company's BRSR report which reiterates our commitment to become a sustainability leader by creating long-term value for stakeholders through an ESG-focused business strategy and roadmap.</p> <p>Our goal is not just to adhere to compliance, but to transform every aspect of our business with sustainability trends, to ensure long-term value creation. We are in this journey together and we will contribute positively to create a sustainable ecosystem.</p>	
8	<p><b>Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b></p>	<p>Name: PJ Nath DIN: 05118177 Designation: Managing Director and CEO</p>
9	<p><b>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.</b></p>	<p>Name: PJ Nath Designation: Managing Director and CEO</p>

<b>10. Details of Review of NGRBCs by the company:</b>	P1	P2	P3	P4	P5	P6	P7	P8	P9
Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									
Performance against above policies and follow up action	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)									
Performance against above policies and follow up action	The Board of Directors and its Committees meet quarterly and as and when required. BRSR issues (if any) are discussed in respective meetings.								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes, on need basis								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	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:**

<b>Questions</b>	P1	P2	P3	P4	P5	P6	P7	P8	P9
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 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)									
Any other reason (please specify)									

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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

#### ESSENTIAL INDICATORS

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	1	POSH, Ethics, Governance	100%
Key Management Personnel	1	POSH, Ethics, Governance	100%
Employees other than BODs and KMPs	16	POSH, Ethics, Governance, ESG & BRSR	96%

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.

#### a. Monetary

Type	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	0	Not Applicable			
Settlement	0				
Compounding fee	0				

#### b. non-Monetary

Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the case	Has an appeal been preferred? (Yes/No)
Imprisonment	0	Not Applicable		
Punishment	0			



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

Not Applicable

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

Yes, Nelco is committed to preventing, deterring, and identifying any instances of bribery and other unethical business practices. As a part of the Tata Group, Nelco adheres to the Tata Code of Conduct (TCoC), a comprehensive guide outlining ethical standards for all Tata employees, companies, and third parties associated with Nelco, encompassing its entire operations. In addition to the TCoC, Nelco has its own independent policy, the Anti-bribery and Anti-corruption policy (ABAC), which provides additional guidelines to complement the TCoC and is available on Company website at <https://www.nelco.in/pdf/Policies/ABAC%20Policy.pdf>

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

Category	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:**

Topic	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	0	Not Applicable	0	Not Applicable
Number of complaints received in relation to issues of Conflict of Interest of KMPs	0			

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	59	76

## 9. Open-ness of business

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

Parameter	Metrics	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	Not Applicable	Not Applicable
	b. Number of trading houses where purchases are made from		
	c. Purchases from top 10 trading houses as % of total purchases from trading houses		
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	Not Applicable	Not Applicable
	b. Number of dealers / distributors to whom sales are made		
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors		
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	8.25%	3.62%
	b. Sales (Sales to related parties / Total Sales)	4.13%	4.97%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0	0
	d. Investments (Investments in related parties / Total Investments made)	0	0

## LEADERSHIP INDICATORS

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

The company collaborates with local service providers to acquire installation and maintenance services for remote VSAT terminals. Regular training sessions are provided to enhance their skills and capabilities in these areas. Additionally, capacity building sessions on POSH policies and principles are conducted for franchisees, other than permanent employees.

Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in value chain covered by the awareness programmes
16	POSH (Prevention of Sexual Harassment), Ethics, Safety & Health, Training on TCoC	100%

### 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 role of the Chairman of the Board is non-executive and distinct from that of the Managing Director and Chief Executive Officer (MD & CEO). The Codes of Conduct for Non-Executive Directors (NEDs) and Independent Directors (IDs) contain specific clauses addressing the prevention of conflicts of interest. Similarly, the Tata Code of Conduct (TCoC) includes explicit clauses prohibiting any employee, including the Managing Director (MD), from accepting any position of responsibility, with or without compensation, in any other organization without prior written approval from the Company. Approval for the MD must be obtained from the Board.

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

### ESSENTIAL INDICATORS

- 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.**

Type	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)	Details of improvement in social and environmental aspects
Research & Development (R&D)	0	0	Not Applicable
Capital Expenditure (CAPEX)	0	0	

- Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes, Nelco places a high emphasis on reliability, quality, and affordability in its procurement of materials and services. All the vendors are required to adhere to and sign the Tata Code of Conduct upon onboarding. Nelco ensures compliance with guidelines regarding environmental protection, safety, human rights, and ethics throughout its sourcing processes. Compliance with labor principles and relevant laws by the vendor is a mandatory requirement before finalizing any supply and service agreements.

- If yes, what percentage of inputs were sourced sustainably?**

Nelco is actively working on establishing a framework to monitor sustainable sourcing practices among its suppliers. Currently, there is no system in place to provide a precise percentage of sustainable sourcing, but it is a priority, and the organization is committed to developing this capability.

- Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

The company operates its own product repair center, aiming to prolong product lifespan, promote recycling, and reduce waste. In cases where a remote site is disconnected, electronic hardware and antennas are frequently relocated to alternative sites, effectively recycling the products. IT scrap and electronic waste are responsibly disposed off through certified E-waste management service providers approved by the Central Pollution Control Board and/or corresponding State Pollution Boards.

- 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.**

Yes, the entity is subject to Extended Producer Responsibility (EPR). Nelco is authorized to gather E-waste in accordance with the E-Waste (Management) Rules, 2016. Nelco intends to retrieve waste from collection centers through their E-waste collection partners. Their logistics partner transports the waste from primary collection centers and delivers it to the recycling partners, Enviocare Recycling Pvt Ltd., EchoTech Recycling Pvt. Ltd., Green India E-Waste & Recycling Opc Pvt. Ltd.

## 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?

Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/ No) If yes provide web-link
No services undergo Life Cycle Assessment (LCA)				

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.

S. No.	Name of the product	Description of the risk	Action Taken
No services undergo Life Cycle Assessment (LCA)			

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).
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:

Input material	Recycled or re-used input material to total material	
	FY 2023-24 (Current FY)	FY 2022-23 (Previous FY)
E-waste	90%	92%

	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste (in Metric Tonnes)	5.961	-	0.44	2.809	-	0.24
Hazardous waste	-	-	-	-	-	-
Other waste - oil (litres)	-	-	200	-	-	400

**Note** - Approximately 0.25 metric tons of the accumulated scrap awaits disposal and is expected to be included in the next year's report.

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

Not applicable as there were no significant issues reported necessitating corrective actions. Nevertheless, as a standard procedure, we provide training to both new hires and existing staff on these requirements. No notable risks or concerns have been raised. However, Company's ongoing efforts include assessments by labor consultants, maintaining awareness of ethics, and reporting measures for all employees and stakeholders (EHS). Additionally, we consistently provide training on these requirements to both new and existing personnel as part of its operational process.

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

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

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)
<b>Permanent Employees</b>											
<b>Male</b>	154	154	100%	154	100%	0	0	0	0	0	0
<b>Female</b>	20	20	100%	20	100%	20	100%	0	0	0	0
<b>Total</b>	174	174	100%	174	100%	20	11%	0	0	0	0
<b>Other than Permanent Employees</b>											
<b>Male</b>	103	103	100%	103	100%	0	0	0	0	0	0
<b>Female</b>	5	5	100%	5	100%	4	80%	0	0	0	0
<b>Total</b>	108	108	100%	108	100%	4	4%	0	0	0	0

Note - No parental leaves have been availed during the year.

#### b. 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 wellbeing measures as a % of total revenue of the company	0.37%	0.20%

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

Sr. No.	Benefits	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	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 worker	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	Not Applicable	Y	100%	Not Applicable	Y
2	Gratuity	100%		Y	100%		Y
3	ESI	0%		Y	0%		Y
4	Others* - Medical insurance after retirement	9%		Y	9%		Y

\*Nelco allows its employees to continue their company-purchased medical coverage at their own cost.

#### 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 offers accessibility to ground-floor facilities for differently abled employees, including access to healthcare amenities. Additional facilities catering to their needs will be incorporated into upcoming projects. This is currently being addressed as part of the forthcoming Infrastructure Development Project.

**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.**

Nelco adheres to the Tata Code of Conduct (TCoC) which mentions the Equal Opportunity policy. Detailed policy is available on <https://www.nelco.in/investor-relation/corporate-governance.php>,

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

Gender	Total number of people returned after parental leave in FY	Total Number of people who took parental leave in FY	Return to work rate	Total Number of people retained for 12 months after returning from parental leave	Total number of people returned from parental leave in prior FY	Retention Rate
<b>Permanent Employees</b>						
Male	Not Applicable	0	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Female		0				
<b>Total</b>		0				

No parental leaves have been availed during the year.

**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.**

Category	Yes/No	Details of the mechanism in brief
Permanent Employees	Yes	<p>The Company has adopted a Whistle Blower &amp; Vigil Mechanism Policy for establishing a mechanism for employees to report to the management, concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct or ethics policy. The Vigil Mechanism provides a mechanism for employees of the Company to approach the Chief Ethics Counsellor (CEC)/Chairman of the Audit Committee of the Company for redressal.</p> <p>The Company has adopted a POSH policy to establish a mechanism for employees to report their concerns on sexual harassment and discrimination, hostile behaviour &amp; others. The company has formed Internal Compliant committee which evaluates the complaints in line with the rules &amp; regulations.</p>
Other than Permanent Employees	Yes	

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

Category	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
	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)
<b>Permanent Employees</b>						
Male	154	0	Not Applicable	155	0	Not Applicable
Female	20	0		20	0	
<b>Total</b>	174	0		175	0	

## 8. Details of training given to employees and workers:

a. Details of Skill training given to employees	Category	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received Skill Training (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received Skill Training (D)	%(D/C)
<b>Permanent Employees</b>							
	<b>Male</b>	154	154	100%	155	155	100%
	<b>Female</b>	20	20	100%	20	20	100%
	<b>Total</b>	174	174	100%	175	175	100%
b. Details of training on Health and Safety given to employees	Category	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received training on Health and Safety (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received training on Health and Safety (D)	%(D/C)
<b>Permanent Employees</b>							
	<b>Male</b>	154	154	100%	155	155	100%
	<b>Female</b>	20	20	100%	20	20	100%
	<b>Total</b>	174	174	100%	175	175	100%

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

Category	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who had a career review (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who had a career review (D)	%(D/C)
<b>Permanent Employees</b>						
<b>Male</b>	154	154	100%	155	155	100%
<b>Female</b>	20	20	100%	20	20	100%
<b>Total</b>	174	174	100%	175	175	100%

**10. Health and safety management system:**

<b>a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No)</b>	Yes, Company has implemented an Occupational Health and Safety policy that extends to all employees and relevant stakeholders affected by its operations. The company conducts safety checks at its facilities to uphold rigorous health and safety standards. It adheres to regulatory compliance and consistently updates protocols regarding the disposal of hazardous waste.
<b>What is the coverage of such system?</b>	The Occupational Health and Safety (OHS) management system applies to all stakeholders working on the premises and engaged in business operations.
<b>b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?</b>	Nelco offers an online platform for reporting safety hazards, incidents, and observations and strictly follows a work permit system and Standard Operating Procedures (SOPs).
<b>c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)</b>	Not applicable as there are no workers.
<b>d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)</b>	Yes, the entity's employees have access to medical healthcare services for non-occupational purposes also

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

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

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

Nelco places paramount importance on fostering a safe and healthy work environment for its employees. The company's safety framework is robust, overseen by a dedicated Safety Works Committee that ensures compliance with industry-leading safety standards. A bespoke portal facilitates the seamless logging of safety incidents and observations, empowering employees to take proactive measures and contribute to a culture of safety. Regular electrical safety audits conducted by external experts at key offices in Mumbai and Delhi enhance workplace safety standards. Additionally, Nelco invests in fire hydrant systems at its Mahape office, subjecting them to rigorous maintenance checks to guarantee operational readiness. On-site medical provisions, including access to a doctor and health check-ups for employees aged 35 and above, underscore the company's commitment to employee well-being. The provision of hygienic canteen facilities and office spaces further reinforces a conducive work environment. Nelco also conducts regular training sessions on safety, ethics, and health to instill a culture of awareness and responsibility among its workforces.

**Safety precautions during onboarding**

As part of the onboarding process, each new employee undergoes a safety briefing. The office conducts regular fire drills and provides training on fire equipment usage. Before being fully integrated into the system, all employees must complete the safety induction procedure. The company maintains a structured safety training schedule to foster a safety-conscious culture among its employees.



**Welfare Measures**

Nelco takes a proactive and accountable stance in ensuring the well-being of its employees. This includes providing on-site doctors, medical check-up facilities, virtual seminars on health topics, fitness sessions, and company vehicles for commuting. Regular workshops and health camps are organized to promote awareness of health and hygiene. During Safety Week, specific awareness sessions are conducted to educate everyone, including vendors.

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

Topic	FY 2023-24 (Current FY)			FY 2022-23 (Previous FY)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
<b>Working Conditions</b>	11	0	-	0	0	No complaints
<b>Health &amp; Safety</b>	5	0	Minor field injuries	1	0	Minor field injuries

**14. Assessments for the year:**

Topic	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
<b>Health and safety practices</b>	100% (Internal Audits conducted)
<b>Working Conditions</b>	100% (Internal Audits conducted)

**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.**

Safety Standard Operating Procedures (SOPs) are enforced for all employees at the site or in the field. Permit systems have been established to ensure that staff are aware of potential hazards and take necessary precautions. Tailored training programs covering Technical, Safety, Functional, and Behavioral aspects have been developed for all employees and franchisee engineers.

**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).**

a. Employees (Yes/No): **Yes**

b. Workers (Yes/No): **Not Applicable**

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

During the invoicing process, the company verifies the compliance documents of its partners to confirm the payment of statutory dues. The vendor agreement stipulates the examination of vendors' statutory dues, granting Nelco the right to conduct audits. Nelco ensures vendors fulfill their statutory obligations, including ESIC, PF, and Professional tax payments, to the appropriate authorities punctually. Cross-checking with employees of the vendors is conducted to verify timely salary payments, and compliance documents are reviewed. The agreement incorporates statutory compliance requirements, with emphasis on timely filing.

3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been 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	
	Current FY 24	Previous FY 23	Current FY 24	Previous FY 23
Employees	0	0	0	0

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

*Yes, the company offers a procedure through which retired employees can opt to work as consultants for the company, contingent upon both the company's requirements and the employee's agreement.*

5. Details on assessment of value chain partners:

Topic	% of value chain partners (by value of business done with such partners) that were assessed*
Health and safety practices	*100% Service partners are assessed for health and safety practices and working conditions. The vendors agreement includes clauses to conduct periodical audits of the vendors. The vendors also need to adhere to Nelco's Occupational Health, safety and Environment policy.
Working Conditions	

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

Each employee must undergo online training covering various safety topics. Additionally, employees relevant to the task receive specialized training in electrical safety. Value chain partners providing services to Nelco adhere to all statutory safety standards and Nelco's Occupational Health and Safety (OHS) policy.

## 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:

This year, Nelco re-visited Materiality assessment by involving and engaging various stakeholder groups. The stakeholder engagement process involved identifying key internal and external stakeholders, such as leadership, employees, vendors, customers, and third-party experts. Once identified, their relevance to Nelco's business was assessed by considering their ability to influence and be influenced by Nelco's performance and operations. Sample sizes for different respondent groups and the engagement methods, including one-on-one discussions and online surveys, were determined based on location and availability.

**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
Shareholders/ Investors	No	• E-mail, Meetings, Company website, Newspaper, Advertisements	Annually	• Share price, Dividends, Growth prospects
Employees	No	• Employee Portal, E-mail, Company website, MD open house, Notice Boards	Ongoing	• Training and awareness, Health and safety, Engagement activities, Operational Efficiency
Suppliers	Yes	• E-mails, Company website, One-on-one engagement	Ongoing	• Timely delivery and payments, Safety concerns, Compliances, Collaborations
Customers	No	• E-mails, Survey, Helpdesk, One-on-one engagement	Ongoing	• Product Quality, Product guidelines
Local Communities	No	• Volunteering	Ongoing	• Community Development

### 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's management consistently engages with essential stakeholders, such as investors, customers, suppliers, and employees, through various channels and at different intervals. These interactions aim to grasp their requirements and gather suggestions to enhance both financial and non-financial performance.

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

Yes, the Materiality assessment revised in the fiscal year 2023-24 involved in-depth discussions with specific stakeholder groups to identify and prioritize the material topics to align with the overall organizational goal of enhancing its sustainable growth. This aims to pinpoint environmental, social, and governance matters crucial to the company's corporate sustainability and enabled Nelco to highlight and rank the topics, thereby facilitating the development of an ESG strategy aligned with Nelco's business objectives and risks.

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

There are no vulnerable/marginalized stakeholder groups identified by Nelco.

## PRINCIPLE 5: Businesses should respect and promote human rights.

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 FY			FY 2022-23 Previous FY		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	174	174	100%	175	175	100%
Other than permanent	108	108	100%	95	95	100%
<b>Total Employees</b>	<b>282</b>	<b>282</b>	<b>100%</b>	<b>270</b>	<b>270</b>	<b>100%</b>

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

Category	FY 2023-24 Current FY					FY 2022-23 Previous FY				
	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	154	0	0	154	100%	155	0	0	155	100%
Female	20	0	0	20	100%	20	0	0	20	100%
Other than Permanent										
Male	103	0	0	103	100%	91	0	0	91	100%
Female	5	0	0	5	100%	4	0	0	4	100%

3. Details of remuneration/salary/wages

- a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (INR)	Number	Median remuneration/ salary/ wages of respective category (INR)
Board of Directors (BoD)*	5	-	1	-
Key Managerial Personnel	2	58,09,486	0	0
Employees other than BoD and KMP	151	9,23,206	20	8,32,964

\*For details of remuneration of the Board Members, kindly refer to the Corporate Governance Report which forms a part of this Annual Report

Note:

- Managing Directors & Chief Executive Officer is considered in BOD.
- Key Managerial Personnel includes, CFO and Company Secretary.

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

	<b>FY 2023-24 (Current Financial Year)</b>	<b>FY 2022-23 (Previous Financial Year)</b>
<b>Gross wages paid to females as % of total wages</b>	8.45%	7.94%

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

Yes, the company has a POSH & Ethics Committees tasked with handling human rights concerns. Additionally, there is an ethics counselor designated to address grievances related to human rights issues. These complaints are brought to the attention and discussed with the Managing Director (MD) and are required to be resolved within a 90-day timeframe.

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

The Company upholds human rights, and its policies are designed to support, respect, and safeguard the human rights of both its direct and indirect employees, including those of its subsidiaries. It has adopted and implemented a Whistle-blower & Vigil Mechanism Policy to establish a system for employees to report concerns about unethical behaviour, actual or suspected fraud, or violations of the Company’s Code of Conduct or ethics policy to management. The Vigil Mechanism enables employees to approach the Chief Ethics Counsellor (CEC) or Chairman of the Audit Committee for redressal. The POSH committee handles complaints related to sexual harassment, extending coverage to associates, franchisee engineers, and vendors. Concerns regarding the Tata Code of Conduct (TCoC) are addressed internally through a review mechanism by the Ethics Counsellor and Senior Management.

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

	<b>FY 2023-24 Current FY</b>			<b>FY 2022-23 Previous FY</b>		
	<b>Filed during the year</b>	<b>Pending resolution at the end of year</b>	<b>Remarks</b>	<b>Filed during the year</b>	<b>Pending resolution at the end of year</b>	<b>Remarks</b>
<b>Sexual Harassment</b>	0	Not Applicable	No cases reported	0	Not Applicable	No cases reported
<b>Discrimination at workplace</b>	0			0		
<b>Child Labor</b>	0			0		
<b>Forced Labor/ Involuntary Labor</b>	0			0		
<b>Wages</b>	0			0		
<b>Other human rights related issues</b>	0			0		

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

	<b>FY 2023-24 (Current Financial Year)</b>	<b>FY 2022-23 (Previous Financial Year)</b>
<b>Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)</b>	0	0
<b>Complaints on POSH as a % of female employees / workers</b>	0	0
<b>Complaints on POSH upheld</b>	0	0

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

In alignment with the Whistleblower Policy and POSH Policy, the Company includes a section dedicated to safeguarding the anonymity of the complainant. All instances of discrimination and harassment are handled in strict accordance with Company' policy.

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

Yes. Human rights provision is integrated into all the supplier contracts, encompassing concerns such as child labor, forced labor, discrimination, working conditions, compensation, and disciplinary measures. Suppliers are mandated to adhere to these clauses outlined in the agreement and establish procedures for addressing any violations of such policies. The Supplier Code of Conduct is an integral component of the contract and is obligatory for all the vendors, encompassing compliance with labor laws, workplace regulations, and human rights.

**10. Assessments for the year:**

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
<b>Child labor</b>	100%
<b>Forced/involuntary labor</b>	We ensure that there is no violation of child labor, forced labor, sexual harassment, discrimination, minimum wages in Company's operations by strict adherence to the statutory laws and its policies on the same.
<b>Sexual harassment</b>	
<b>Discrimination at workplace</b>	
<b>Wages</b>	
<b>Others – please specify</b>	

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**

Not applicable, there were no issues reported to take any corrective actions.

**LEADERSHIP INDICATORS**

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

There were no grievances or complaints reported regarding the human rights during the year.

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

Nelco maintains 100% compliance of the statutory provisions at all their locations, although there was no due diligence conducted during the year.

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

Yes, the provisions are made available for the differently abled people on the ground floor premises. Accessibility to the differently abled people will be considered under future Infrastructure Development Project.

#### 4. Details on assessment of value chain partners:

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
<b>Child labor</b>	100%
<b>Forced/involuntary labor</b>	Periodical vendor audits are conducted by Nelco for all its vendors. We ensure that there is strict adherence to the statutory laws and the policies on the same. We also ensure that the vendors pay the statutory dues such as ESIC, PF, PT etc. in timely manner
<b>Sexual harassment</b>	
<b>Discrimination at workplace</b>	
<b>Wages</b>	

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

Not applicable as no major issues were reported upon which the corrective actions might be required. However, as a process the Company keeps training new joiners and existing employees on such requirements. No significant risk / concerns raised. However, external assessment by labor consultant, awareness on ethics and reporting measures are continued efforts to educate the employees and all stakeholders (EHS). The Company also keeps training new people and existing people on such requirements as part of the process.

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

Note - Environmental data covers nine locations which represents more than 95% of our operational footprint. Data for electricity consumption, water consumption and scope 1 and scope 2 emissions is restated as the scope of reporting is increased for FY 2022-23 and FY 2023-24.

#### ESSENTIAL INDICATORS

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

<b>Parameters</b>	<b>FY 2023-24 (Current Financial Year)</b>	<b>FY 2022-23 (Previous Financial Year)</b>
<b>From renewable sources</b>		
Total electricity consumption (A)	0	0
Total fuel consumption (B)	0	0
Energy consumption source (C)	0	0
<b>Total energy consumed from renewable sources (A+B+C)</b>	0	0
<b>From non-renewable sources</b>		
Total electricity consumption (D) (GJ)	8,170.07	8,146.25
Total fuel consumption (E) (GJ)	709.27	585.18
Energy consumption through other sources (F)	0	0
<b>Total energy consumed from non-renewable sources (D+E+F) (GJ)</b>	8,879.34	8,731.43
<b>Total energy consumed (A+B+C+D+E+F) (GJ)</b>	8,879.34	8,731.43
<b>Energy intensity per rupee of turnover</b> (Total energy consumed / Revenue from operations (₹ in lacs)) (GJ/Lacs INR)	0.28	0.27
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)	-	-
<b>Energy intensity in terms of physical output</b>	-	-

Parameters	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Energy 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.

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.**

PAT scheme is not applicable to Nelco.

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

Parameters	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	21,934	23,537
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	21,934	23,537
<b>Total volume of water consumption (in kilolitres)</b>	21,934	23,537
<b>Water intensity per rupee of turnover</b> (Total water consumption / Revenue from operations (₹ In lacs)) (KL/Lacs INR)	0.68	0.75
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP (₹ In lacs))	-	-
<b>Water intensity in terms of physical output</b>	-	-
<b>Water intensity</b> (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.

There was no independent assessment carried out by any external agency.



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

Parameters	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	-	-
No treatment	-	-
With treatment -please specify level of treatment	-	-
(ii) To Groundwater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) To Seawater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iv) Sent to third parties	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(v) Others	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	-	-

**Note:**

- i) As Nelco operates in leased and co-working offices, it is yet to establish mechanisms for tracking water discharge and will start reporting in the subsequent reports.
- ii) Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

There has been no independent assessment carried out by an external agency.

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

Since Nelco is service based company, mechanism of Zero Liquid discharge is not applicable.

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

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
NOx	<b>KG</b>	0.03	0.04
Sox	<b>KG</b>	0.04	0.06
Particulate matter (PM)	<b>KG</b>	0.18	0.25
Persistent organic pollutants (POP)	<b>NA</b>	-	-
Volatile organic compounds (VOC)	<b>NA</b>	-	-
Hazardous air pollutants (HAP)	<b>mg/m3</b>	-	-
Others – please specify	<b>PPM</b>	-	-

**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, Currently Nelco has not opted for assurance from any external agency.

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

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	<b>Metric tonnes of CO<sub>2</sub> equivalent</b>	50.05	40.87
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	<b>Metric tonnes of CO<sub>2</sub> equivalent</b>	1,624.93	1,606.62
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations (₹ In lacs))</b>	<b>tCO<sub>2</sub>/Lakh INR</b>	0.05	0.05
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP (₹ In Lacs))	<b>tCO<sub>2</sub>e/INR</b>	-	-
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>		-	-
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional)		-	-

**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, Currently Nelco has not opted for assurance from any external agency.

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

As the Company embarks on its ESG journey, it is committed to reducing emissions through forward-thinking initiatives. This includes upgrading outdated systems with energy-efficient alternatives, conducting energy audits, and deploying emission control devices for the generators. Additionally, it is exploring the feasibility of integrating renewable energy sources into the operations to further minimize its environmental impact.

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

Parameters	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	-	-
E-waste (B)	6.65	3.04
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (oil) (G)	0.16	0.33
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	-	-
<b>Total (A+B + C + D + E + F + G+ H)</b>	6.81	3.37
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations (₹ In lakh))	0.0002	0.0001
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP (₹ In lakh.))	-	-
Waste intensity in terms of physical output	-	-
<b>Waste intensity (optional)</b>	-	-
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	-	-
(ii) Re-used	5.96	2.81
(iii) Other recovery operations	-	-
<b>Total</b>	5.96	2.81
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations (e-waste scrap)	0.44	0.8 (Battery Waste)
(iii) Other disposal operations (oil)	0.16	0.32
<b>Total</b>	0.60	1.12

**Note** - Approximately 0.25 metric tons of the accumulated scrap awaits disposal and is expected to be included in the next year's report.

**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, Currently Nelco has not opted for assurance from any external agency.

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.

All generated E-Waste, including transformer and DG used oil from its operations, are disposed of by a certified e-waste vendor authorized by the Maharashtra Pollution Control Board (MPCB). The company emphasizes the use of Restriction of Hazardous Substances (RoHS) compliant products.

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

S. no	Location of Operations/ Offices	Type of Operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
1	Dehradun Teleport	Monitoring and management of remote VSATs	Yes

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

Nelco didn't engage in any projects that were subject to Environmental Impact Assessment requirements in accordance with the law.

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:**

Nelco operates as a service-based company, and its operations do not emit any harmful substances. However, the organization prioritizes environmental compliance with all rules and regulations.

## 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:

- (i) Name of the area
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	21,934	23,537
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres)</b>	21,934	23,537
<b>Total volume of water consumption (in kilolitres)</b>	21,934	23,537
<b>Water intensity per rupee of turnover</b> <i>(Water consumed / turnover)</i>	0.68	0.75
<b>Water intensity (optional)</b>	-	-

<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(ii) Into Groundwater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) Into Seawater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iv) Sent to third parties	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(v) Others	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	-	-

**Note:**

- i) As Nelco operates in leased and co-working offices, it is yet to establish mechanisms for tracking water discharge and will start reporting in the subsequent reports.
- ii) 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, Currently Nelco has not opted for assurance from any external agency.

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

<b>Parameter</b>	<b>Please specify unit</b>	<b>FY 2023-24 (Current Financial Year)</b>	<b>FY 2022-23 (Previous Financial Year)</b>
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	<i>Metric tonnes of CO<sub>2</sub> Equivalent</i>	-	-
Total Scope 3 emissions per rupee of turnover	<i>Metric tonnes of CO<sub>2</sub> Equivalent</i>	-	-
<b>Total Scope 3 emission intensity (optional)</b> – the relevant metric may be selected by the entity		-	-

Nelco acknowledges the significance of emissions across its value chain and is in the process of formulating a system to monitor and disclose scope 3 emissions in the forthcoming years.

**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, currently Nelco has not opted for assurance from any external agency.

**3. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**

Not applicable as there is no impact of the entity as only a satellite teleport is situated in this area.

**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.**

Nelco is developing ESG strategy focusing on key areas such as emissions reduction and energy management, waste and water management, and there are a few plans and actions lined up aiming for resource efficiency. Additionally, Nelco will establish KPIs around these pertinent issues to achieve the ultimate ESG goals.

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

Yes, Nelco has established a Business Continuity Plan (BCP) policy and procedures aligned with the ISMS framework for IT applications and infrastructure. This policy underscores Nelco's imperative for maintaining continuity in critical business processes, ensuring their recovery in the event of significant disruptions. Developed in accordance with operational requirements, the policy identifies critical disaster types under the BCP, along with their typical recovery and management methods.

BCP addresses all significant business processes and emphasize on:

- Identification of risks
- Identification of business requirements for continuity
- Quantification of impact of potential threat
- Establishing recovery priorities by defining Recovery Time

**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?**

Nelco has not conducted any evaluations to assess the impact of its value chain.

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

No value chain partners were assessed for environmental impact.

**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.**

Currently, we are engaged as participating members in two associations, namely Broadband India Forum (BIF) and Indian Space Association (ISpA), as indicated in the table below. The MD & CEO of Nelco serves as the Chairperson of the Satcom Committee for both BIF and ISpA.

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.	Broadband India Forum	Member
2.	Indian Space Association	Founding Member

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
<i>No such cases recorded</i>		

**LEADERSHIP INDICATORS**

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

S. no	Public policy advocated	Method resort for such advocacy	Whether the information is available in public domain? (Yes/No)	Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify)	Web Link, if available
1.	Nelco participated in several industry groupings and associations including DOT, TRAI, BIF, ISPA etc.	Nelco has advocated various telecom services, data communication services, National Broadcasting policy, digital transformation, administration and economic reforms. Nelco’s membership at these regulatory associations serves as a medium for such advocac	No	-	-

**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)	Resulted communicated in public domain	Relevant Web Link
As of now, no social impact assessments are conducted, since the business does not significantly affect communities in a negative manner.					

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

S. No	Name of project for which R&R is ongoing	State	District	No of Project Affected Families	% of PAF covered by RAR	Amount Paid to PAFs in the FY (in INR)
Not applicable, Nelco refrains from involvement in projects that necessitate Resettlement and Rehabilitation (R&R) activities.						

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

Nelco has developed a mechanism to receive and redress grievances of the community and local communities can voice their concerns by reaching out through the email addresses provided on the website: [ethics@nelco.in](mailto:ethics@nelco.in)

4. Percentage of input material (inputs to total inputs by value) sourced from local or small-scale suppliers:

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directly sourced from MSMEs/ Small producers	12%	15%
Directly from within India	88%	85%

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	-	-
Metropolitan	100%	100%

**Note:**

- Places to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan
- Only permanent employees are covered.

**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):

Not Applicable

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
1	Maharashtra	Turbhe- e-Vidya, Nelco sponsored Community Learning Centre	14,00,000
2	India	all over India - Akshay Patra Foundation	3,00,000
3	Maharashtra	Mumbai - CSA (Catalysts for Social Action)	6,00,000



Nelco is engaged in CSR initiatives in the partnership with TPDCT and Akshaya Patra which majorly is covered within Mumbai area and we understand that these initiatives are not situated in the aspirational districts according to the guidelines of NITI Aayog. However, Nelco aims to explore the opportunities and expand the coverage to the needful areas in the forthcoming years.

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

No

**(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.**

Not Applicable

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

Not Applicable

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

S. No.	CSR Project	No of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized group
1	Vatsalya Trust Old age home	32	100%
2	Vatsalya Trust home for children	28	100%
3	Akshay Patra Foundation, Thane	170	100%
4	Akshay Patra Foundation, Kalyan	120	100%
5	Akshay Patra Foundation, Bangalore	275	100%
6	Desire Society	40	100%
7	Jan Vikas Society	35	100%
8	CSA	10	100%
9	e-Vidya, Nelco sponsored Community Learning Centre	180	100%

**PRINCIPLE 9: Businesses should engage with and provide value to their consumers in responsible manner.**

**ESSENTIAL INDICATORS**

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

Customer satisfaction is a key focus for the company's operations. Nelco maintains a strong system for monitoring consumer complaints and feedback. The complaint management process follows a thorough protocol, including registering complaints, conducting root-cause analysis by the relevant department, engaging with the customer through various stakeholders as needed, and ultimately resolving the issues with feedback from the customer.

Customer complaints are received through the following sources:

- Service Desk portal,
- E-mail address (helpdesk@nelco.in) or by calling and
- Registering of complaint at Help desk no 022-67918728

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

Type	As a percentage to total turnover
Environment and Social parameters relevant to product	Not Applicable
Safe and responsible usage	
Recycling and/or safe disposal	

**3. Number of consumer complaints**

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	0	Not Applicable	No complaints received	0	Not Applicable	No complaints received
Advertising	0			0		
Cyber-security	0			0		
Delivery of essential services	0			0		
Restrictive Trade Practices	0			0		
Unfair Trade Practices	0			0		
Others	0			0		

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

	Number	Reason for recall
Voluntary recalls	Not Applicable, since Nelco is in the Service industry, there is no defect of product for which these need to be recalled. However, products are sold as enablers for service offering and if required these are repaired or replaced during Warranty/ AMC (Annual Maintenance Contract) period.	Not Applicable
Forced recalls		

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

Yes, Nelco is dedicated to safeguarding sensitive information, which contributes to fostering trust and confidence in its products and services. The company implements and upholds efficient controls to oversee the confidentiality, integrity, and accessibility of its information assets.

**Policy**

Nelco has Board approved policies concerning information security, cybersecurity, and data privacy. While the Data Privacy policy is accessible to both internal and external parties, the Information Security and Cybersecurity policies are available exclusively on the company's intranet. Web-link: <https://www.nelco.in/privacy-policy.php#>

## **Certifications**

Nelco holds ISO/IEC 27001:2013 certification, which is an internationally recognized standard for Information Security Management Systems (ISMS).

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

There has been no reported issues regarding advertising, delivery of essential services, cyber security, and data privacy of customers, nor has there been instances of product recalls or regulatory penalties/actions taken on product/service safety.

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

- a. **Number of instances of data breaches** – There were no data breaches occurred during the year.
- b. **Percentage of data breaches involving personally identifiable information of customers-** Not Applicable
- c. **Impact, if any, of the data breaches-** Not Applicable

## **LEADERSHIP INDICATORS**

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

Details about the Company's goods and services can be accessed on its website <https://www.nelco.in/> <https://www.nelco.in/key-services/vsat.php> Given that Nelco operates in the B2B sector, much of its customer engagement occurs through individual interactions, where consultative selling is often employed, considering the unique requirements of each customer.

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

Nelco's solutions are tailored for Business to Business (B2B) use, focusing on delivering satellite-based communication services. The company has established guidelines for clients to adhere to while on-site, specifically addressing consumer safety. These guidelines are communicated to customers via email during the contracting phase, and Nelco also provides safety information and best practices through presentations.

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

In case there is a planned downtime of service, customers are informed in advance. All the approvals for the same are taken prior to the disruption.

**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)**

**Yes**, consumers are provided with product information that exceeds the requirements mandated by local laws. Since Nelco offers services using technical products, displaying product information directly on the product is not feasible. However, these details are communicated to customers during the pre-sale process.

**Yes**, every year, a third-party agency conducts service-related surveys. Additionally, the company conducts a formal Customer Satisfaction (CSAT) survey annually through a reputable external market research agency. This survey encompasses a significant portion of the company's customer base. It aids in comprehending customer concerns and enables the company to be more responsive to their needs. The findings of the CSAT survey are deliberated upon with all relevant stakeholders to determine actionable points for enhancing customer satisfaction levels.