





1st June, 2024

To,

| The Manager (Listing), The BSE Ltd. Mumbai | The Manager (Listing), National Stock Exchange of India Ltd. Mumbai |
|--|---|
| Company's Scrip Code: 505700               | Company's Scrip Code: ELECON  |

Sub.: Business Responsibility and Sustainability Report (BRSR) of the Company

for the Financial Year 2023-24

Ref.: Regulation 34(f) of SEBI (Listing Obligations and Disclosure Requirements)

Regulations, 2015

Dear Sir/Madam,

In terms of the subject referred Regulation, we hereby submit the Business Responsibility & Sustainability Report (BRSR) of the Company for the Financial Year 2023-24. The same is also available on the website of the Company at <a href="https://www.elecon.com">www.elecon.com</a>.

Please take the same on your record.

Thanking you.

Yours faithfully, For Elecon Engineering Company Limited,

Bharti Isarani Company Secretary & Compliance Officer

Encl.: As above





















Cranes

Rubber Industry

Marine Industr

Plastic Industry

Power Int

Steel Industr

Sugar Industry

Mining

Cement Industry

## ANNEXURE - E TO BOARD'S REPORT

## **Business Responsibility & Sustainability Report**

Elecon Engineering Company Limited is a brand that stands for industry leadership and relentless innovation in the Transmission business as well as being a provider of integrated solutions for the whole value chain of material handling systems. By working in collaboration with and enabling our stakeholders, we are committed to establishing an environment of transparency and accountability to foster sustainable development which is beneficial for all.

Environmental, Social and Governance (ESG) factors are important for our long-term growth and to all our stakeholders given that our activities are having an impact on the society and environment. We have integrated ESG aspects significantly into our Company's strategy.

### **SECTION A: GENERAL DISCLOSURES**

### Details of the listed entity

| 1.  | Corporate Identity Number (CIN) of the Listed Entity   | L29100GJ1960PLC001082  |
|-----|--|--|
| 2.  | Name of the Listed Entity  | ELECON ENGINEERING COMPANY LIMITED   |
| 3.  | Year of incorporation  | 1960   |
| 4.  | Registered address   | Anand-Sojitra Road,<br>Vallabh Vidyanagar - 388 120,<br>Dist. Anand, Gujarat.                                |
| 5.  | Corporate address  | Anand-Sojitra Road,<br>Vallabh Vidyanagar - 388 120,<br>Dist. Anand, Gujarat.                                |
| 6.  | E-mail id  | investor.relations@elecon.com  |
| 7.  | Telephone  | +91-2692-238701  |
| 8.  | Website  | www.elecon.com   |
| 9.  | Financial year for which reporting is being done   | 2023-24  |
| 10. | Name of the Stock Exchange(s) where shares are listed  | National Stock Exchange of India Limited and BSE Limited   |
| 11. | Paid-up Capital  | ₹ 2,244.00 Lakhs   |
| 12. | Name and contact details (telephone, email address) of<br>the person who may be contacted in case of any queries<br>on the BRSR report | Smt. Bharti L. Isarani, Company Secretary & Compliance Officer +91-2692-238701 investor.relations@elecon.com |
| 13. | Reporting boundary   | Standalone Basis   |
| 14. | Name of Assurance provider   | Not Applicable   |
| 15. | Type of Assurance obtained   | Not Applicable   |

#### II. Products/Services

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

| Sr.No. | Description of Main Activity | Description of Business Activity   | % of Turnover of the entity |
|--------|------------------------------|--|-----------------------------|
| 1.     | Manufacturing                | Electrical equipment, General Purpose and Special purpose Machinery & equipment, Transport equipment | 100%                        |

### 17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

| Sr.No. | Product/Service  | NIC Code | % of total Turnover contributed |
|--------|--|----------|---------------------------------|
| 1.     | Gears (Reduction gears)  | 29131    | 80.35%                          |
| 2.     | Bulk Material Handling Equipment                                       | 29151    | 17.95%                          |
| 3.     | Repair and maintenance of bearings, gears, gearing and driving element | 29138    | 0.88%                           |
| 4.     | Repair and maintenance of lifting and handling equipment               | 29158    | 0.82%                           |

## III. Operations

## 18. Number of locations where plants and/or operations/offices of the entity are situated:

| Location Number of plants |   | Number of offices | Total |  |  |
|---------------------------|---|-------------------|-------|--|--|
| National                  | 2 | 13                | 15    |  |  |
| International             | 5 | 6                 | 11*   |  |  |

<sup>\*</sup> Elecon is disclosing its international plants and offices which forms part of consolidated reporting boundary. However, the reporting boundary for the purpose of this report is standalone.

## 19. Markets served by the entity:

### a. Number of locations

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 28     |
| International (No. of Countries) | 54     |

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

Export constitutes 7.52% of the total turnover of the entity.

### c. A brief on types of customers

We are engaged in manufacturing of Industrial Gears and Material Handling Equipment. We cater to the following industries:

- Steel Industries
- Cement Manufacturing Industries
- Power Generation & Transmission Industries
- Sugar Manufacturing Industries
- Material Handling Equipment Industries
- Defense Industries
- Mining Industries
- Fertilizer Industries

### IV. Employees

### 20. Details as at the end of Financial Year:

## a. Employees and workers (including differently abled)

| Sr. | Particulars              | Total (A) | Male    |           | Female  |           |  |
|-----|--------------------------|-----------|---------|-----------|---------|-----------|--|
| No. | rarticulars              | Total (A) | No. (B) | % (B / A) | No. (C) | % (C / A) |  |
|     | EMPLOYEES                |           |         |           |         |           |  |
| 1.  | Permanent (D)            | 407       | 000/    |           | 20/     |           |  |
| 2.  | Other than Permanent (E) | 687       | 665     | 98%       | 22      | 2%        |  |
| 3.  | Total Employees (D + E)  | 687       | 665     | 98%       | 22      | 2%        |  |
|     |                          | WORKER    | S       | ,         |         |           |  |
| 1.  | Permanent (F)            | 1 207     | 1 206   | 1000/     | 1       |           |  |
| 2.  | Other than Permanent (G) | 1,287     | 1,286   | 100%      | l       | -         |  |
| 3.  | Total Workers (F + G)    | 1,287     | 1,286   | 100%      | 1       | -         |  |

## b. Differently abled Employees and Workers:

| Sr. | Particulars                             | Total (A)     | Ma        | ale       | Female  |           |
|-----|---|---------------|-----------|-----------|---------|-----------|
| No. | raiticulais                             | iotai (A)     | No. (B)   | % (B / A) | No. (C) | % (C / A) |
|     | DIFF                                    | ERENTLY ABLEC | EMPLOYEES |           |         |           |
| 1.  | Permanent (D)                           | 9             | 0         | 88.88%    | 1       | 11.12%    |
| 2.  | Other than Permanent (E)                | 9             | 8         | 88.88%    | ı       | 11.12%    |
| 3.  | Total differently abled Employees       | 9             | 8         | 88.88%    | 1       | 11.12%    |
|     | (D + E)                                 |               |           |           |         |           |
|     | DIF                                     | FERENTLY ABLE | D WORKERS |           |         |           |
| 1.  | Permanent (F)                           | 4             | 4         | 1000/     |         |           |
| 2.  | Other than Permanent (G)                | 4             | 4         | 100%      | -       | -         |
| 3.  | Total differently abled Workers (F + G) | 4             | 4         | 100%      | -       | -         |

## 21. Participation/Inclusion/Representation of women:

|                          | Total | No. and percentage of Females |           |  |
|--------------------------|-------|-------------------------------|-----------|--|
|                          | (A)   | No. (B)                       | % (B / A) |  |
| Board of Directors       | 8     | 1                             | 12.50%    |  |
| Key Management Personnel | 2     | 1                             | 50.00%    |  |

<sup>\*</sup> Excluding Key Management Personnel covered under Board of Directors

## 22. Turnover rate for permanent Employees and Workers (in %):

|                     | FY 2023-24<br>(Turnover rate in Current FY) |        | FY 2022-23<br>(Turnover rate in Previous FY) |       |        | FY 2021-22<br>(Turnover rate in the year<br>prior to the Previous FY) |       |        |       |
|---------------------|---|--------|--|-------|--------|---|-------|--------|-------|
|                     | Male  | Female | Total  | Male  | Female | Total   | Male  | Female | Total |
| Permanent Employees | 9.82  | 11.54  | 9.88   | 9.12  | 11.11  | 9.17  | 15.27 | -      | 14.94 |
| Permanent Workers   | 38.10                                       | -      | 38.10  | 32.36 | -      | 32.36   | 43.64 | -      | 43.64 |

## V. Holding, Subsidiary and Associate Companies (including joint ventures)

## 23. (a) Names of Holding / Subsidiary / Associate Companies / Joint Ventures

| Sr.<br>No. | Name of the Holding / Subsidiary /<br>Associate Companies / Joint Ventures<br>(A) | Indicate whether<br>holding/ Subsidiary/<br>Associate/ Joint<br>Venture | % of shares<br>held by<br>listed entity | Does the entity indicated<br>at column A, participate in<br>the Business Responsibility<br>initiatives of the listed entity?<br>(Yes/No) |  |
|------------|---|---|---|--|--|
| 1          | Radicon Transmission UK Limited   | Subsidiary  | 100                                     | No   |  |
| 2          | Elecon Singapore PTE. Limited   | Subsidiary  | 100                                     | No   |  |
| 3          | Elecon Middle East FZCO   | Subsidiary  | 100                                     | No   |  |
| 4          | Benzlers Systems AB   | Step Down Subsidiary  | 100                                     | No   |  |
| 5          | AB Benzlers   | Step Down Subsidiary  | 100                                     | No   |  |
| 6          | Radicon Drive Systems Inc.  | Step Down Subsidiary  | 100                                     | No   |  |
| 7          | Benzlers Transmission A.S.  | Step Down Subsidiary  | 100                                     | No   |  |
| 8          | Benzlers Antriebstechnik G.m.b.h  | Step Down Subsidiary  | 100                                     | No   |  |
| 9          | Benzlers TBA B.V.   | Step Down Subsidiary  | 100                                     | No   |  |
| 10         | OY Benzlers AB  | Step Down Subsidiary  | 100                                     | No   |  |
| 11         | Benzlers Italia s.r.l.  | Step Down Subsidiary  | 100                                     | No   |  |
| 12         | Elecon Radicon Africa (Pty) Ltd.  | Step Down Subsidiary  | 100                                     | No   |  |
| 13         | Eimco Elecon (India) Limited  | Associate   | 16.62                                   | No   |  |

## VI. CSR Details

- 24. (i) Whether CSR is applicable as per Section 135 of the Companies Act, 2013 (Yes/No): Yes
  - (ii) Turnover ₹ 1,59,967 Lakhs (FY 2023-24)
  - (iii) Net worth ₹ 1,34,751 Lakhs (FY 2023-24)
- VII. Transparency and Disclosures Compliances
- 25. Complaints/ Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

| Stakeholder<br>group from                 | Grievance<br>Redressal  | Curr  | FY 2023-24<br>ent Financial Ye  | ar      | FY 2022-23<br>Previous Financial Year               |   |         |  |
|---|---|---|---|---------|---|---|---------|--|
| whom complaint<br>is received             | Mechanism<br>in Place<br>(Yes/No) (If<br>Yes, then<br>provide<br>web-<br>link for<br>grievance<br>redress<br>policy | Number of<br>complaints<br>filed during<br>the year | Number of<br>complaints<br>pending<br>resolution at<br>close of the<br>year | Remarks | Number of<br>complaints<br>filed during<br>the year | Number of<br>complaints<br>pending<br>resolution at<br>close of the<br>year | Remarks |  |
| Communities                               | Yes   | -   | -   | NA      | -   | -   | NA      |  |
| Investors<br>(other than<br>shareholders) | Yes   | -   | -   | NA      | -   | -   | NA      |  |
| Shareholders                              | Yes   | 9   | -   | NA      | 11  | -   | NA      |  |
| Employees and<br>Workers                  | Yes   | -   | -   | NA      | -   | -   | NA      |  |
| Customers                                 | Yes   | 359   | 15  | NA      | 263   | 3   | NA      |  |
| Value Chain<br>Partners                   | Yes   | -   | -   | NA      | -   | -   | NA      |  |
| Other (please specify)                    | -   | -   | -   | NA      | -   | -   | NA      |  |

#### Links:

https://www.elecon.com/investors/policies

https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code%20Conduct-new-2023.pdf https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Human%20Rights%20Policy-new-2023.pdf https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Supplier%20Code%20of%20Conduct-2023.pdf https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Customer%20Relationship%20Policy-2023.pdf

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

| Sr.<br>No. | Material issue<br>identified | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the risk / opportunity   | In case of risk,<br>approach to adapt or<br>mitigate | Financial<br>implications of the<br>risk or opportunity<br>(Indicate positive<br>or negative<br>implications) |
|------------|------------------------------|---|--|--|---|
| 1.         | Sustainable<br>Product       | Opportunity   | Our R&D team is dedicated to enhancing our product range to minimize electricity and oil consumption during operation. Both our existing and upcoming products are focused on use of recyclable materials. | -  | Positive  |

| Sr.<br>No. | Material issue<br>identified       | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the risk / opportunity   | In case of risk,<br>approach to adapt or<br>mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|------------|------------------------------------|---|--|---|--|
| 2.         | Renewable<br>Energy                | Opportunity   | In our commitment to renewable energy, we have transitioned to solar and wind power, significantly expanding our renewable energy footprint. This shift not only benefits the environment but also helps to reduce our energy costs. Currently, we have an installed capacity of 4.7 MW in solar and 13.85 MW in wind farms. Our efforts are ongoing, as we are in the process of commissioning 4 MW renewable energy (solar). These initiatives reflect our dedication to sustainability and our proactive approach to adopting clean energy solutions. | -   | Positive   |
| 3.         | Sustainable<br>Supply Chain        | Opportunity   | The Company values long-term relationships with suppliers, viewing them as essential partners in growth. We regularly organize Strategic Partner Meetings to strengthen these bonds, promote open communication, and foster collaboration. This approach ensures mutual success, aligns strategic goals, and drives sustainable growth through shared innovation and partnership.  | -   | Positive   |
| 4.         | Occupational<br>Health &<br>Safety | Risk  | Neglecting health and safety can disrupt smooth operations, reduce workforce availability, and potentially result in legal action. Ensuring robust health and safety measures is crucial to maintaining operational efficiency, protecting employee well-being, and avoiding costly litigation. This proactive approach safeguards the company's productivity and reputation.  | We are enhancing our safe work practices/procedures by automating most of our machinery and working procedures. In addition, we are working towards increasing the frequency and coverage of our training and awareness programs. | Negative   |

| Sr.<br>No. | Material issue<br>identified         | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the risk / opportunity  | In case of risk,<br>approach to adapt or<br>mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|------------|--------------------------------------|---|---|--|--|
| 5.         | Training<br>and Skill<br>Development | Opportunity   | Our skill enhancement and training programs boost efficiency and help retain our highly skilled workforce. By investing in continuous learning and professional development, we ensure our employees remain competent and engaged, leading to improved performance and long-term retention of specialized talent. This commitment to growth drives our overall success and competitiveness.   | -  | Positive   |
| 6.         | Stakeholder<br>Engagement            | Opportunity   | As we strive to become a more sustainable business, including diverse stakeholders in our growth journey is essential. We incorporate their feedback into our strategic planning and regularly engage with employees, investors, suppliers, and customers. Through initiatives like employee engagement programs, investor meetings, and vendor conferences, we ensure ongoing collaboration and alignment with our sustainability goals. | -  | Positive   |
| 7.         | Ethical<br>Behavior                  | Opportunity   | Adhering to ethical behavior, as outlined in our Code of Conduct, promotes good governance and ensures compliance with regulatory standards. Our company places significant emphasis on ethical conduct and compliance, and it is one of our core values. This commitment fosters a positive organizational culture, upholding integrity, accountability, and responsible business practices.   | -  | Positive   |

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

## **Disclosure Questions**

| Polic | y and Management processes   | P1   | P2                                     | P3   | P4                    | P5                | P6                    | P7                      | P8        | Р9                |
|-------|--|--|--|--|-----------------------|-------------------|-----------------------|-------------------------|-----------|-------------------|
| 1.    | a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)  | Yes  | Yes                                    | Yes  | Yes                   | Yes               | Yes                   | Yes                     | Yes       | Yes               |
|       | b. Has the policy been approved by the Board? (Yes/No)   | Yes  | Yes                                    | Yes  | Yes                   | Yes               | Yes                   | Yes                     | Yes       | Yes               |
|       | c. Web Link of the Policies, if available  |  |  | https://w                                    | /ww.elec              | on.com/           | investor              | s/policie               | <u>s</u>  |                   |
| 2.    | Whether the entity has translated the policy into procedures. (Yes / No)   | Yes  | Yes                                    | Yes  | Yes                   | Yes               | Yes                   | Yes                     | Yes       | Yes               |
| 3.    | Do the enlisted policies extend to your value chain partners? (Yes/No)   | Yes  | Yes                                    | Yes  | Yes                   | Yes               | Yes                   | Yes                     | Yes       | Yes               |
| 4.    | Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | certification, Great Place to Work certification, ISO 9001 (2015), API standards as per requirement, National Accreditation Board for Testing & Calibration Laboratories (NABL) certificate, CE/ATEX certification   |  |  |                       |                   |                       |                         |           |                   |
| 5.    | Specific commitments, goals and targets set by the entity with defined timelines, if any.  | We continue our sustainability journey & have outlined ambitious ESG commitments. As we continue to progress in our ESG journey, we are in the process to benchmark our ESG indicators and set goals and SBTi targets.  We are actively transitioning to renewable energy by installing solar and wind systems to boost the proportion of renewable energy in our energy portfolio. We are commissioning 3 MW solar farm at Bamangam and 1 MW solar rooftop in our premises. Additionally, we nurture extensive green spaces on our premises and have implemented rainwater harvesting measures.  Socially, we are committed to increasing workforce diversity, enhancing employee well-being with comprehensive wellness programs, and doubling community engagement efforts. Governance-wise, we ensures ethical conduct through stringent codes of conduct. These goals, backed by specific timelines, exemplify Elecon's dedication to environmental stewardship, social responsibility, and transparent governance. |  |  |                       |                   |                       |                         |           |                   |
| 6.    | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.   | organi<br>genera   | zation's<br>ites elect<br>city bill. ( | ed a 2<br>greenho<br>tricity su<br>Our total | ouse gas<br>pplied to | emission the grid | ons. Add<br>d, with u | itionally<br>nit credit | , our wii | ndfarm<br>ing our |

| Gove | ernance, leadership and oversight  |   |  |  |  |  |
|------|--|---|--|--|--|--|
| 7.   | Statement by Director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) | The Company stands as a testament to the tireless efforts and ambitious vision of its founders and successors in maintaining excellence through a business strategy centered on sustainability, which places equal importance on ecological and social progress alongside financial growth. Our Company's progress hinges on our commitment to customer satisfaction, adoption of eco-friendly and energy-efficient manufacturing practices, and adherence to top-tier work safety and health standards, all aimed at meeting the diverse needs of our stakeholders.  To embed sustainability across our operations, our Board and Committees regularly engage in strategic discussions on key ESG issues, guided by a thorough materiality assessment process. We maintain open and continuous dialogue with employees, suppliers, customers, associations, and authorities to drive progress in quality, environmental stewardship, and workplace safety. This year, we refined our materiality assessment based on stakeholder feedback, emphasizing critical themes for action. Our innovative solutions are empowering industries and businesses to reduce their environmental footprint, ensuring a brighter future for generations to come. Upholding the highest standards in quality, resource conservation, energy efficiency, and safety, we are transitioning to renewable energy sources with significant investments in solar 4MW this year in addition to existing 4.7MW and wind farms 13.85MW. These investments not only enhance energy efficiency but also drive cost savings.  We continuously review and improve our management systems through internal and external evaluations, driving ongoing enhancements in our overall performance. The strong emphasis and engagement in our ESG & Sustainability agenda are encouraging, reflecting the early successes we've achieved and our commitment to sustained progress in this critical |  |  |  |  |
| 8.   | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).   | Our Board has overview on the Business Responsibility Policies. Respective Business Heads are responsible for implementing and driving the policies.  |  |  |  |  |
| 9.   | Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.   | and takes appropriate decisions as  | gs discusses topics on sustainability<br>and when required. The respective<br>implementation and monitoring of |  |  |  |
| 10.  | Details of Review of NGRBCs by the Company:  |   |  |  |  |  |
|      | Subject For Review   | Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee P1 P2 P3 P4 P5 P6 P7 P8 P9   | Frequency (Annually/ Half yearly/<br>Quarterly/ Any other – please<br>specify) P1 P2 P3 P4 P5 P6 P7 P8 P9      |  |  |  |
|      | Performance against above policies and follow up action  | As a sustainable practice, our Board reviews the policies on need basis and sustainability initiatives on an annual basis. During review, the effectiveness of the policies is assessed and any necessary changes to policies and procedures are adopted. Department and Business Heads also review our policies and their effectiveness periodically and any update or change is timely presented to the Board for approval, if required.  | Our Board reviews the policies on need basis and sustainability initiatives on an annual basis.                |  |  |  |
|      | Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances  | Board of Directors and its<br>Committee   | Annual Basis   |  |  |  |

| 11. | Has the entity carried out independent  | P1   | P2       | Р3       | P4      | P5        | P6       | P7       | P8   | P9 |
|-----|---|--|----------|----------|---------|-----------|----------|----------|------|----|
|     | assessment/ evaluation of the working of its policies by an external agency? (Yes / No). If yes, provide name of the agency.    | While the Company has not carried out an independent audit of the policies, the policies are periodically reviewed by the Board and its Committees as well as Auditors of respective functions like ISO Auditors, Internal Auditors and Secretarial Auditors, etc. In addition, Elecon is certified for ISO 9001, ISO 14001 and ISO 45001 which are assessments done by external audit agency. They assess the policies and procedures maintained by the organization, as part of the certification process. The Information security policy, privacy policy and risk management policy have been reviewed as part of this process. Elecon has a documented management policies reviewed and approved by Management. |          |          |         |           |          |          |      |    |
| 12. | If answer to question (1) above is "No" i.e. no   | t all Prir   | ciples a | re cover | ed by a | policy, r | easons t | o be sta | ted: |    |
|     | Questions   | P1   | P2       | P3       | P4      | P5        | P6       | P7       | P8   | P9 |
|     | The entity does not consider the Principles material to its business (Yes/No)   |  |          |          |         |           |          |          |      |    |
|     | The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) |  |          |          |         |           |          |          |      |    |
|     | The entity does not have the financial or/<br>human and technical resources available for<br>the task (Yes/No)                  | •  |          |          |         |           |          |          |      |    |
|     | It is planned to be done in the next financial year (Yes/No)  |  |          |          |         |           |          |          |      |    |
|     | Any other reason (please specify)   |  |          |          |         |           |          |          |      |    |

### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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

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

| Segment                           | Total number<br>of training<br>and awareness<br>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                | 5   | Recent Amendments in the SEBI<br>Regulations, update programme on<br>the plant operations, business strategy<br>and performance                     | 100%   |
| Key Managerial Personnel          | 2   | POSH, Values & Culture  | 100%   |
| Employees other than BoD and KMPs | 177   | POSH, Values, Health & Safety, Human<br>Rights & Culture, Skill Enhancement   | 100%   |
| Workers                           | 90  | Topics/ principles covered under<br>the training and its impact: Health &<br>Safety, Skill Enhancement, Quality &<br>Manufacturing Circle Awareness | 100%   |

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

|                 | Monetary        |   |               |                   |  |  |  |  |  |  |
|-----------------|-----------------|---|---------------|-------------------|--|--|--|--|--|--|
|                 | NGRBC Principle | Name of the<br>regulatory/<br>enforcement<br>agencies/ judicial<br>institutions | Amount (in ₹) | Brief of the Case | Has an appeal<br>been preferred?<br>(Yes/No) |  |  |  |  |  |
| Penalty/ Fine   | -               | None  | -             | Not Applicable    | Not Applicable                               |  |  |  |  |  |
| Settlement      | -               | None  | -             | Not Applicable    | Not Applicable                               |  |  |  |  |  |
| Compounding fee | -               | None  | -             | Not Applicable    | Not Applicable                               |  |  |  |  |  |

| Non-Monetary |                    |   |                  |                   |                                       |  |  |  |
|--------------|--------------------|---|------------------|-------------------|---------------------------------------|--|--|--|
|              | NGRBC<br>Principle | Name of the regulatory/<br>enforcement agencies/<br>judicial institutions | Amount<br>(in ₹) | Brief of the Case | Has an appeal been preferred (Yes/No) |  |  |  |
| Imprisonment | -                  | None  | -                | Not Applicable    | Not Applicable                        |  |  |  |
| Punishment   | -                  | None  | -                | Not Applicable    | Not Applicable                        |  |  |  |

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

| Case Details   | Name of the regulatory/ enforcement agencies/ judicial institutions |
|----------------|---|
| Not Applicable | 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. It is a part of our Code of Conduct. We ensure all our systems are operated ethically.

### Web-link to the policy:

 $\frac{https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Elecon-Code-of-Conduct.pdf,}{https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code%20of%20Conduct-new-2023.pdf.}$ 

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

| Particulars | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|-------------|--------------------------------------|---------------------------------------|
| Directors   | -                                    | -                                     |
| KMPs        | -                                    | -                                     |
| Employees   | -                                    | -                                     |
| Workers     | -                                    | -                                     |

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

| Particulars  |        | 3-24<br>nancial Year) | FY 22-23<br>(Current Financial Year) |                |  |
|--|--------|-----------------------|--------------------------------------|----------------|--|
|  | Number | Remarks               | Number                               | Remarks        |  |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | -      | Not Applicable        | -                                    | Not Applicable |  |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | -      | Not Applicable        | -                                    | Not Applicable |  |

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:

| Particulars                        | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|------------------------------------|--------------------------------------|---------------------------------------|
| Number of days of account payables | 81                                   | 130                                   |

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 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |  |
|------------------------|---|--------------------------------------|---------------------------------------|--|
|                        | a. Purchases from trading houses as % of total purchases                                  | 21.31%                               | 23.11%                                |  |
| Concentration of       | b. Number of trading houses where purchases are made from                                 | 442                                  | 412                                   |  |
| Purchases              | c. Purchases from top 10 trading<br>houses as % of total purchases<br>from trading houses | 59.41%                               | 65.42%                                |  |
|                        | a. Sales to dealers / distributors as % of total sales                                    | 9.00%                                | 10.00%                                |  |
| Concentration of Sales | b. Number of dealers / distributors to whom sales are made                                | 64                                   | 63                                    |  |
| Jaies                  | c. Sales to top 10 dealers/distributors as % of total sales to dealers / distributors     | 58.00%                               | 59.00%                                |  |
|                        | a. Purchases (Purchases with related parties / Total Purchases)                           | 12.14%                               | 10.47%                                |  |
|                        | b. Sales (Sales to related parties / Total Sales)   | 8.14%                                | 7.78%                                 |  |
| Share of RPTs in       | c. Loans & advances (Loans & advances given to related parties / Total loans & advances)  | -                                    | 59.70%                                |  |
|                        | d. Investments (Investments in related parties / Total Investments made)                  | 34.61%                               | 86.19%                                |  |

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

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

|     | FY 23-24<br>(Current<br>Financial Year) | FY 22-23<br>(Previous<br>Financial Year) | Details of improvements in environmental and social impacts  |
|-----|---|--|--|
| R&D | -                                       | -  | Our R&D department is not only focused on upgrading our technology but also focused on making our products more sustainable. To reduce the environment and social impact of our products the department works on projects considering reduction of weight of our product and optimal use of oil in operations, improvising safety features and operational efficiency. |
|     |   |  | Our R&D/Manufacturing department created a process for producing higher quality class gears to reduce meshing losses, which increases gearbox efficiency and reduces power loss. Furthermore, higher quality gears minimize noise levels, which is critical for the environment.   |

| Capex | 10.15 | 70.88 | In the previous years we had installed solar systems to increase our renewable energy consumption. In addition to this in FY 2023-24, we have undertaken following initiatives to increase our operational energy efficiency as under: |
|-------|-------|-------|--|
|       |       |       | Ground mounted solar generation at other premises having capacity of 2 MW.   |
|       |       |       | Installation of new plate cutting machine with upgraded environmental and operator's health features.  |
|       |       |       | Replacing older & out dated more power consuming equipment with energy efficient new equipment as well as loss prevention.   |

- a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)
  Yes
  - b. If yes, what percentage of inputs were sourced sustainably?

Yes, the Company has formulated an operating procedure to approve vendors. Materials are procured from approved vendors both, local and international. The quality assurance team of the Company conducts periodic audit of the vendors, especially those who supply key materials and there is very specific focus towards the conservation of energy, water & environment as well as safety at their end.

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

Our product line comprises products predominantly made of metals, accounting for around 99% of the composition. This metal content renders our products highly recyclable. The materials used, including ferrous and non-ferrous elements, contribute to a robust and sustainable life cycle lasting approximately 20-25 years. As a result, direct reclamation of our products for recycling post their life cycle is currently unviable.

Our product manual serves as a tool to raise awareness among customers, advocating for the recycling of used products through designated recyclers. At the end of their life cycle, our products do not generate plastic, e-waste, hazardous waste, or any other form of waste, aligning with our commitment to environmental sustainability.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes, we are disposing the waste in line with the EPR requirement to registered recyclers.

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:

|              | % of Employees covered by |                  |            |                    |            |                    |            |                       |            |                        |            |  |  |  |
|--------------|---------------------------|------------------|------------|--------------------|------------|--------------------|------------|-----------------------|------------|------------------------|------------|--|--|--|
| Category Tot |                           | Health insurance |            | Accident insurance |            | Maternity benefits |            | Paternity<br>Benefits |            | Day Care<br>facilities |            |  |  |  |
|              | Total (A)                 | Number<br>(B)    | %<br>(B/A) | Number<br>(C)      | %<br>(C/A) | Number<br>(D)      | %<br>(D/A) | Number<br>(E)         | %<br>(E/A) | Number<br>(F)          | %<br>(F/A) |  |  |  |
|              |                           | Per              | manent E   | mployees           | and Othe   | r than Pei         | rmanent E  | mployees              | i          |                        |            |  |  |  |
| Male         | 665                       | 665              | 100%       | 665                | 100%       | -                  | -          | -                     | -          | -                      | -          |  |  |  |
| Female       | 22                        | 22               | 100%       | 22                 | 100%       | 22                 | 100%       | -                     | =          | -                      | -          |  |  |  |
| Total        | 687                       | 687              | 100%       | 687                | 100%       | -                  | -          | -                     | -          | -                      | -          |  |  |  |

### b. Details of measures for the well-being of Workers:

|          | % of Workers covered by                            |                     |        |                    |      |                    |      |                       |   |                        |   |  |  |
|----------|--|---------------------|--------|--------------------|------|--------------------|------|-----------------------|---|------------------------|---|--|--|
| Category | Total (A)  | Health<br>insurance |        | Accident insurance |      | Maternity benefits |      | Paternity<br>Benefits |   | Day Care<br>facilities |   |  |  |
|          |  | Number              | %      | Number             | %    | Number             | %    | Number                | % | Number                 | % |  |  |
|          | Permanent Workers and Other than Permanent Workers |                     |        |                    |      |                    |      |                       |   |                        |   |  |  |
| Male     | 1,286  | 1,148               | 88.50% | 1,286              | 100% | -                  | -    | -                     | - | -                      | - |  |  |
| Female   | Female 1 1 100% 1 100% 1 100%                      |                     |        |                    |      |                    |      |                       | - |                        |   |  |  |
| Total    | 1,287  | 1,149               | 88.50% | 1,287              | 100% | 1                  | 100% | -                     | - | -                      | - |  |  |

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

| Particulars  | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|--|--------------------------------------|---------------------------------------|
| Cost incurred on wellbeing measures as a % of total revenue of the company | 0.044%                               | 0.082%                                |

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

|                        | FY 23-2  | 24 (Current Finan                                       | cial Year)  | FY 22-23 (Previous Financial Year)                             |   |   |  |
|------------------------|--|---|---|--|---|---|--|
| Benefits               | No. of<br>Employees<br>covered as<br>a % of total<br>Employees | No. of Workers<br>covered as<br>a % of total<br>Workers | Deducted and<br>deposited with<br>the authority<br>(Y/N/N.A.) | No. of<br>Employees<br>covered as<br>a % of total<br>Employees | No. of Workers<br>covered as<br>a % of total<br>Workers | Deducted and<br>deposited with<br>the authority<br>(Y/N/N.A.) |  |
| PF                     | 100%   | 100%  | Y   | 100%   | 100%  | Y   |  |
| Gratuity               | 100%   | 100%  | Y   | 100%   | 100%  | Y   |  |
| ESI*                   | NA   | NA  | NA  | NA   | NA  | NA  |  |
| Others - Please Sp     | pecify   |   |   |  |   |   |  |
| Felicitation<br>Scheme | citation 100% NA   |   | NA  | NA   | NA  | NA  |  |
| NPS                    | 5.68%  | -   | Y   | 4.75%  | -   | Y   |  |

<sup>\*</sup>The facilities and branches of the Company are either exempted from or not covered under ESIC Scheme.

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, our office and manufacturing unit are accessible to differently abled Employees and Workers.

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

Yes, we emphasize on treating every individual with dignity and respect inside our organisation and also within our supply chain. We also ensure that Human Rights Policy is strictly adhered in our premises and also encourage our supply chain partners to comply with our policy.

 $\underline{https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Human\%20Rights\%20Policy-new-2023.pdf.}$ 

5. Return to work and Retention rates of permanent Employees and Workers that took parental leave.

|        | Permanent                          | Employees | Permanent Workers   |                |  |  |
|--------|------------------------------------|-----------|---------------------|----------------|--|--|
| Gender | Return to work rate Retention rate |           | Return to work rate | Retention rate |  |  |
| Male   | -                                  | -         | -                   | -              |  |  |
| Female | -                                  | -         | -                   | -              |  |  |
| Total  | -                                  | -         | -                   | -              |  |  |

None of the Employees were on maternal leave in the last 3 financial years (including FY 23-24).

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

|                                | Yes/No (If Yes, then give details of the mechanism in brief)  |
|--------------------------------|---|
| Permanent Employees            | Yes*, we are having a grievance redressal mechanism which is elaborated   |
| Other than Permanent Employees | in our Code of conduct through which Employees & Workers can raise their  |
| Permanent Workers              | concerns and which are addressed at the earliest.  Employees & Workers will promptly report to the Management about any   |
| Other than Permanent Workers   | actual or possible violation of the Code of Conduct, or any event he or she becomes aware of that could affect the business or reputation of any unit of our Company to the appropriate person(s) as defined in the policy. |

<sup>\*</sup>Detailed redressal mechanism can be viewed in specific policies whose link is https://www.elecon.com/investors/policies

https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code%20of%20Conduct-new-2023.pdf https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Human%20Rights%20Policy-new-2023.pdf

## 7. Membership of Employees and Worker in association(s) or Unions recognised by the listed entity:

| Category | FY 23-2  | 4 (Current Financial   | Year)        | FY 22-23 (Previous Financial Year)                               |  |           |  |  |  |  |  |
|----------|--|--|--------------|--|--|-----------|--|--|--|--|--|
|          | Total<br>Employees /<br>Workers in<br>respective<br>category (A) | No. of Employees / Workers in respective category, who are part of association(s) or Union (B) | % (B / A)    | Total<br>Employees /<br>Workers in<br>respective<br>category (C) | No. of Employees / Workers in respective category, who are part of association(s) or Union (D) | % (D / C) |  |  |  |  |  |
|          |  | Total Pe   | rmanent Empl | oyees  |  |           |  |  |  |  |  |
| Male     | -  | -  | -            | -  | -  | -         |  |  |  |  |  |
| Female   | -  | -  | -            | -  | -  | -         |  |  |  |  |  |
|          | Total Permanent Workers  |  |              |  |  |           |  |  |  |  |  |
| Male     | -  | -  | -            | -  | -  | -         |  |  |  |  |  |
| Female   | -  | -  | -            | -  | -  | -         |  |  |  |  |  |

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

| Category | FY 23-24 (Current Financial Year) |         |                               |         |           | FY 22-23 (Previous Financial Year) |                               |           |                         |           |
|----------|-----------------------------------|---------|-------------------------------|---------|-----------|------------------------------------|-------------------------------|-----------|-------------------------|-----------|
|          | Total (A)                         |         | olth and On Skill upgradation |         |           | Total<br>(D)                       | On Health and safety measures |           | On Skill<br>upgradation |           |
|          |                                   | No. (B) | % (B / A)                     | No. (C) | % (C / A) |                                    | No. (E)                       | % (E / D) | No. (F)                 | % (F / D) |
|          |                                   |         |                               | Е       | mployees  |                                    |                               |           |                         |           |
| Male     | 665                               | 648     | 97%                           | 545     | 82%       | 613                                | 250                           | 41%       | 450                     | 73%       |
| Female   | 22                                | 22      | 100%                          | 15      | 68%       | 18                                 | 18                            | 100%      | 12                      | 67%       |
| Total    | 687                               | 670     | 97%                           | 560     | 81%       | 631                                | 268                           | 42%       | 462                     | 73%       |
|          |                                   |         |                               |         | Workers   |                                    |                               |           |                         |           |
| Male     | 1,286                             | 1,286   | 100%                          | 349     | 28%       | 1,185                              | 462                           | 39%       | 683                     | 58%       |
| Female   | 1                                 | 1       | 100%                          | -       | -         | -                                  | -                             | -         | -                       | -         |
| Total    | 1,287                             | 1,287   | 100%                          | 349     | 28%       | 1,185                              | 462                           | 39%       | 683                     | 58%       |

## 9. Details of performance and career development reviews of Employees and Workers:

| Category   | FY 23-24 (Current Financial Year) |         |           | FY 22-23 (Previous Financial Year) |         |           |  |  |  |
|------------|-----------------------------------|---------|-----------|------------------------------------|---------|-----------|--|--|--|
|            | Total (A)                         | No. (B) | % (B / A) | Total (C)                          | No. (D) | % (D / C) |  |  |  |
| Employees* |                                   |         |           |                                    |         |           |  |  |  |
| Male       | 665                               | 640     | 96%       | 613                                | 551     | 90%       |  |  |  |
| Female     | 22                                | 20      | 91%       | 18                                 | 17      | 94%       |  |  |  |
| Total      | 687                               | 660*    | 95%       | 631                                | 568*    | 90%       |  |  |  |

| Workers |   |   |   |   |   |   |  |
|---------|---|---|---|---|---|---|--|
| Male    | - | - | - | - | - | - |  |
| Female  | - | - | - | - | - | - |  |
| Total   | - | - | - | - | - | - |  |

<sup>\*</sup> Only employees joining before the cut-off date are eligible for performance review.

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

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

Yes, At Elecon, safety is ingrained as a fundamental value rather than just a priority. To mitigate safety incidents and emphasize the importance of well-being, we take proactive and preventive measures. These include safety audits, emergency preparedness plans, fire safety protocols, comprehensive training, and targeted initiatives. Our dedication to preventing injuries and occupational illnesses is reflected in our adherence to ISO 45001:2018 standards and similar guidelines, which we promote throughout our organization. This comprehensive occupational health and safety management system underscores our commitment to ensuring a safe and healthy work environment for all employees. The detailed policy is available at <a href="https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/EHS%20">https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/EHS%20</a> policy-2023.pdf.

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

To ensure comprehensive risk management across our offices and manufacturing facility, we have implemented a systematic risk management procedure. This includes active involvement from engineers, production-in-charge personnel, and members of the Environment Health & Safety (EHS) team in conducting risk assessments and managing identified risks. Documentation, approval, and communication of risk mitigation plans to relevant stakeholders are integral steps in our risk management process. Our operations are guided by safety observations, rectification plans, and procedures encompassing Hazard Identification & Risk Assessment for all activities, contractor safety management, and regular external audits to maintain a safe and compliant workplace.

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

Yes, We have a structured risk management approach in place to ensure safety across our offices and manufacturing facility. This involves engineers, production supervisors, and EHS team members actively participating in risk assessments and managing identified risks. Documenting, approving, and communicating risk mitigation plans to stakeholders is crucial. Our operations are guided by safety observations, rectification plans, and procedures covering Hazard Identification & Risk Assessment, contractor safety management, and routine external audits for workplace safety compliance.

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

Yes, all workers, including their dependent family members, have access to an external multispecialty reputed hospital in close proximity to our premises. This hospital is equipped with the latest facilities and infrastructure to provide comprehensive non-occupational medical and healthcare services. Additionally, we conduct awareness programs conducted by experts on various topics such as good health habits, heart attack, varicose veins, orthopedic pain, and more to educate and empower our employees and their families.

Furthermore, all our employees are covered under a group health insurance policy that ensures access to a wide range of non-occupational medical and healthcare services. This coverage reinforces our commitment to supporting the well-being and health needs of our workforce and their loved ones.

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

| Safety Incident/Number                             | Category  | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|--|-----------|--------------------------------------|---------------------------------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one   | Employees | -                                    | -                                     |
| million-person hours worked)                       | Workers   | 0.20                                 | -                                     |
| Total recordable work-related injuries             | Employees | -                                    | 1                                     |
|  | Workers   | 1                                    | 1                                     |
| No. of fatalities                                  | Employees | -                                    | -                                     |
|  | Workers   | -                                    | -                                     |
| High consequence work-related injury or ill-health | Employees | -                                    | -                                     |
| (excluding fatalities)                             | Workers   | -                                    | -                                     |

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

The entity maintains a safe and healthy workplace through a range of measures. These include routine safety audits, emergency preparedness plans, fire safety measures, and comprehensive training programs. Hazards are promptly identified, and risk levels are mitigated to acceptable standards, with controls regularly reviewed and deviations addressed promptly. Adherence to safety protocols is closely monitored, with a focus on hazard elimination. Additionally, periodic training and awareness sessions reinforce safety practices, fostering a culture of safety across all operations. This holistic approach ensures that the entity prioritizes the well-being of its employees and creates a conducive environment for productive and safe work.

## 13. Number of Complaints on the following made by Employees and Workers:

|                       | FY 23-24                 | 4 (Current Financ                              | ial Year) | FY 22-23 (Previous Financial Year) |  |         |  |
|-----------------------|--------------------------|--|-----------|------------------------------------|--|---------|--|
|                       | Filed during<br>the year | Pending<br>resolution at<br>the end of<br>year | Remarks   | Filed during<br>the year           | Pending<br>resolution at<br>the end of<br>year | Remarks |  |
| Working<br>Conditions | -                        | -  | NA        | -                                  | -  | NA      |  |
| Health & Safety       | -                        | -  | NA        | -                                  | -  | NA      |  |

#### 14. Assessments for the year:

|                           | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|---------------------------|---|
| Health & safety practices | 100*  |
| Working Conditions        | 100*  |

<sup>\*</sup>Third party assessments are carried out viz. IMS audit by TUV Rheinland. We also undertake external safety audit every two years as per new amendment in BIS 14489 and, approved accredited laboratories carry out workplace condition monitoring on quarterly basis.

# 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.

Our actions are addressed in form of Kaizens and Poka-yoke based on recommendations received by assessments in order to mitigate the risk & concerns arising at working locations proactively with horizontal deployment.

#### PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

### 1. Describe the processes for identifying key stakeholder groups of the entity.

Through our Stakeholder Engagement and Materiality Assessment process, we have identified important internal and external groups of stakeholders. These stakeholders play an important role in activities related to Elecon and can help our company shape a sustainable future.

#### List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

| Stakeholder Group | Whether<br>identified as<br>Vulnerable &<br>Marginalized<br>Group (Yes/No) | Channels of<br>communication (Email,<br>SMS, Newspaper,<br>Pamphlets, Advertisement,<br>Community Meetings,<br>Notice Board, Website),<br>Other | Frequency of<br>engagement<br>(Annually/ Half<br>yearly/ Quarterly<br>/ others – please<br>specify) | Purpose and scope of<br>engagement including<br>key topics and concerns<br>raised during such<br>engagement                   |
|-------------------|--|---|---|---|
| Customers         | No   | Direct engagement,<br>Customer satisfaction<br>survey, Customer feedback  | As and when required  | To ensure product quality and safety, high customer satisfaction  |
| Shareholders      | No   | Email, SMS, Newspaper<br>advertisement, website   | Annually/ Half<br>yearly/ Quarterly   | Annual Financial Statements and other related information, awareness programme on requirement for dematerialization of shares |

| Employees                  | No | Meetings, Email, SMS,<br>Intranet, Posters, Slogans | Monthly/Quarterly<br>meetings and<br>continuous<br>communications | Engagement Initiatives,<br>Trainings and Policy<br>updates, Occupational<br>Health & Safety and<br>other Department<br>updates |
|----------------------------|----|---|---|--|
| Regulators &<br>Government | No | Direct engagement                                   | As and when required  | To comply with applicable regulations  |
| Communities                | No | Direct engagement, CSR<br>partners                  | As and when required  | To have an overview on the implementation and success of the projects  |
| Vendors                    | No | Regular supplier and contractor meets               | As and when required  | To resolve supplier and contractor concerns and encourage suppliers to adhere to Elecon's policies                             |

## 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 23-2   | 4 (Current Finance                              | cial Year) | FY 22-23 (Previous Financial Year) |   |           |
|-------------------------|-----------|---|------------|------------------------------------|---|-----------|
|                         | Total (A) | No. of<br>Employees<br>/ Workers<br>covered (B) | % (B/A)    | Total (C)                          | No. of<br>Employees<br>/ Workers<br>covered (D) | % (D / C) |
|                         |           |   | Employees  |                                    |   |           |
| Permanent               |           |   |            |                                    |   |           |
| Other than<br>Permanent | 687       | 687   | 100        | 631                                | 143   | 23        |
| Total Employee          | 687       | 687   | 100        | 631                                | 143   | 23        |
|                         |           |   | Workers    |                                    |   |           |
| Permanent               |           |   |            |                                    |   |           |
| Other than<br>Permanent | 1,287     | 1,287   | 100        | 1,185                              | -   | -         |
| Total Workers           | 1,287     | 1,287   | 100        | 1,185                              | -   | -         |

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

| Category | ı  | FY 23-24 (C | urrent Fin     | ancial Year               | )            | FY 22-23 (Previous Financial Year) |         |              |                            |              |
|----------|--|-------------|----------------|---------------------------|--------------|------------------------------------|---------|--------------|----------------------------|--------------|
|          | Total (A)                                    |             | Minimum<br>ige | More than<br>Minimum Wage |              | Total (D) Equal to Minimum<br>Wage |         |              | More than<br>Minimum Wage\ |              |
|          |  | No. (B)     | %<br>(B / A)   | No. (C)                   | %<br>(C / A) |                                    | No. (E) | %<br>(E / D) | No. (F)                    | %<br>(F / D) |
|          |  | E           | mployees       | (Permanen                 | t and Oth    | er than Per                        | manent) |              |                            |              |
| Male     | 665  | -           | -              | 665                       | 100          | 613                                | -       | -            | 613                        | 100          |
| Female   | 22   | -           | -              | 22                        | 100          | 18                                 | -       | -            | 18                         | 100          |
|          | Workers (Permanent and Other than Permanent) |             |                |                           |              |                                    |         |              |                            |              |
| Male     | 1,286  | 64          | 4.90           | 1,222                     | 95.10        | 1,185                              | 57      | 4.81         | 1,128                      | 95.18        |
| Female   | 1  | -           | -              | 1                         | 100          | -                                  | -       | -            | -                          | -            |

## 3. Details of remuneration/salary/wages, in the following format\*:

### a. Median remuneration / wages:

|                                  |        | Male  | Female |  |  |
|----------------------------------|--------|---|--------|--|--|
|                                  | Number | Median remuneration/<br>salary/wages of respective<br>category (in ₹) | Number | Median remuneration/<br>salary/ wages of respective<br>category (in ₹) |  |
| Board of Directors (BoD)         | 7      | 12,36,000*  | 1      | 12,84,000*   |  |
| Key Managerial Personnel         | 1      | 57,89,676   | 1      | 23,20,344  |  |
| Employees other than BoD and KMP | 663    | 7,12,116  | 21     | 7,47,024   |  |
| Workers                          | 1,286  | 2,40,600  | 1      | 4,20,516   |  |

<sup>\*</sup> It is inclusive of remuneration, sitting fees with commission payable to the Directors for FY 2023-24.

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

| Particulars                                     | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|---|--------------------------------------|---------------------------------------|
| Gross wages paid to females as % of total wages | 3.30                                 | 3.01                                  |

The percentage is calculated basis CTC(inclusive of Gratuity) of female Employees (Permanent & Other than Permanent) to that of total CTC of Employees (Permanent & Other than Permanent).

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 HR Department and respective Business Heads are responsible for addressing human rights-related issues.

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

Yes. The HR Department is the focal point of contact for any human rights issue. A cross-functional team is formed to verify and investigate if an issue is reported. After identifying and resolving the issue, a report is prepared, and all business heads are made aware of it for precautionary measures. In case of any severe human rights issues, the Board is presented with the report findings and further action to avoid repetition.

6. Number of Complaints on the following made by Employees and Workers:

| Category                             | FY 23-24 (Current Financial Year) |   |         | FY 22-23 (Previous Financial Year) |   |         |  |
|--------------------------------------|-----------------------------------|---|---------|------------------------------------|---|---------|--|
|                                      | Filed during<br>the year          | Pending<br>resolution at the<br>end of year | Remarks | Filed during<br>the year           | Pending<br>resolution at the<br>end of year | Remarks |  |
| Sexual Harassment                    | -                                 | -   | NA      | -                                  | -   | NA      |  |
| Discrimination at workplace          | -                                 | -   | NA      | -                                  | -   | NA      |  |
| Child Labour                         | -                                 | -   | NA      | -                                  | -   | NA      |  |
| Forced Labour/<br>Involuntary Labour | -                                 | -   | NA      | -                                  | -   | NA      |  |
| Wages                                | -                                 | -   | NA      | -                                  | -   | NA      |  |
| Other human rights related issues    | -                                 | -   | NA      | -                                  | -   | NA      |  |

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

| Particulars  | FY 23-24 (Current Financial Year) | FY 22-23 (Previous Financial Year) |
|--|-----------------------------------|------------------------------------|
| Total Complaints reported under Sexual<br>Harassment on of Women at Workplace<br>(Prevention, Prohibition and Redressal)<br>Act, 2013 (POSH) | _                                 | -                                  |

| Complaints on POSH as a % of female employees / workers | - | - |
|---|---|---|
| Complaints on POSH upheld                               | - | - |

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

We are dedicated towards preventing harassment in the workplace, particularly sexual harassment, and have zero tolerance for such behavior. We support reporting any concerns about harassment and take complaints about it or any unpleasant or uncomfortable behavior seriously. Committee have been established to investigate complaints of sexual harassment and to suggest appropriate action where necessary.

We have a Prevention of Sexual Harassment (POSH) Policy and Human Rights Policy that defines the mechanism of resolving any discrimination and harassment case, which has set quidelines for members of the grievance redressal mechanism.

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

Yes, we encourage our suppliers to adhere with our Supplier Code of Conduct and other policies. Our Supplier Code of Conduct can be viewed at <a href="https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Supplier%20Code%20">https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Supplier%20Code%20</a> of%20Conduct-2023.pdf.

## 10. Assessments for the year:

|                                   | % of plants and offices that were assessed (by entity or statutory authorities or third parties)                            |
|-----------------------------------|---|
| Child Labour                      | 100%. Our HR team takes a survey by randomly selecting employees and  |
| Forced Labour/Involuntary Labour  | contractors for evaluation. An external auditor verifies and assesses the   |
| Sexual Harassment                 | processes followed by our HR team. Regulatory inspectors also veri<br>processes being followed in our manufacturing plants. |
| Discrimination at workplace       |   |
| Wages                             |   |
| Other human rights related issues |   |

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

There were no significant risks / concerns arising from the human rights assessments.

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

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

| Parameter  | FY 23-24 (Current Financial Year)    | FY 22-23 (Previous Financial Year) |  |  |
|--|--------------------------------------|------------------------------------|--|--|
| From renewable sources (Giga Joules)   |                                      |                                    |  |  |
| Total electricity consumption (A)  | 41,306.60                            | 35,998.90                          |  |  |
| Total fuel consumption ((B)  | -                                    | -                                  |  |  |
| Energy consumption through other sources (C)   | 13,990.20*                           | 13,703.80*                         |  |  |
| Total energy consumption (A+B+C)   | 55,296.80*                           | 49,702.70                          |  |  |
| Fr   | om non-renewable sources (Giga Joule | s)                                 |  |  |
| Total electricity consumption (D)  | 50,751.20                            | 42,822.42                          |  |  |
| Total fuel consumption (E)   | 32,161.10                            | 36,003.14                          |  |  |
| Energy consumption through other sources (F)   | <del>-</del>                         | -                                  |  |  |
| Total energy consumption from non-renewable sources(D+E+F)                                 | 82,912.30                            | 78,825.56                          |  |  |
| Total energy consumption (A+B+C+D+E+F)   | 1,38,209.10                          | 1,28,528.26                        |  |  |
| Energy intensity per rupee of turnover (Total energy consumption/ revenue from operations) | 0.86                                 | 1.07#                              |  |  |

| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)*** ((GJ/Lakh of adjusted turnover) | 19.35 | 24.57 |
|---|-------|-------|
| Energy intensity in terms of physical output  | NA**  | NA    |
| Energy intensity (optional) – the relevant metric may be selected by the entity   | -     | -     |

<sup>\*</sup>Small part of our solar rooftop electricity generated is supplied to the grid and the same is not included in this calculation as the value is not significant.

#The intensity figures from last year have been revised following the correction of a decimal error.

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

No Such assessment or evaluation has been carried out during the year.

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

Not Applicable, as we do not have any recognized sites/facilities as a Designated Consumer (DC) under Perform, Achieve & Trade scheme.

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

| Parameter   | FY 23-24 (Current Financial Year) | FY 22-23 (Previous Financial Year) |  |  |
|---|-----------------------------------|------------------------------------|--|--|
| Water withdrawal by source (in kilolitres)  |                                   |                                    |  |  |
| (i) Surface water   | -                                 | -                                  |  |  |
| (ii) Groundwater*   | 2,02,164.09                       | 1,55,261.00                        |  |  |
| (iii) Third party water   | -                                 | -                                  |  |  |
| (iv) Seawater / desalinated water   | -                                 | -                                  |  |  |
| (v) Others  | -                                 | -                                  |  |  |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)  | 2,02,164.09                       | 1,55,261.00                        |  |  |
| Total volume of water consumption (in kilolitres)   | 2,02,164.09*                      | 1,55,261.00*                       |  |  |
| Water intensity per rupee of turnover<br>(Water consumed / revenue from<br>operations) (KL/Lakh)  | 1.26                              | 1.30**                             |  |  |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) | 28.31                             | 29.68                              |  |  |
| Water intensity in terms of physical output   | NA                                | NA                                 |  |  |
| Water intensity (optional) – the relevant metric may be selected by the entity  | -                                 | -                                  |  |  |

<sup>\*74,121</sup> kilolitres consumption of recycled water is not considered in this calculation as per the definition in the regulation.

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

No such assessment or evaluation is being carried out during the year.

<sup>\*\*</sup>Intensity, in terms of physical output, is not applicable due to the diverse range of products manufactured, majority of measured in numbers rather than tonnage, making it challenging to track in standardized units.

<sup>\*\*\*</sup>Purchasing power parity (PPP) conversion factor is 22.4 for the year 2022 as per IMF data available at <a href="https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/ADVEC/SAQ/IND">https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/ADVEC/SAQ/IND</a>.

<sup>\*\*</sup> The intensity figures from last year have been revised following the correction of a decimal error.

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

| Parameter   | FY 23-24 (Current Financial Year) | FY 22-23 (Previous Financial Year) |  |
|---|-----------------------------------|------------------------------------|--|
| Water discharge by destination and level of treatment (in kilolitres) |                                   |                                    |  |
| (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                  | -                                 | -                                  |  |
| Total water discharged (in kilolitres)                                | -                                 | -                                  |  |

<sup>\*</sup> Our units implement initiatives to conserve freshwater by recycling treated wastewater, ensuring ZLD (Zero Liquid Discharge).

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

No

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

Yes. Our water stewardship strategy revolves around optimizing water usage to minimize intake while maximizing efficiency. Across all our company-owned facilities and offices, we prioritize water conservation and recycling efforts, aiming for Zero Liquid Discharge (ZLD). Following treatment, all wastewater is recycled to support the preservation and expansion of our green spaces. Moreover, we've implemented rainwater harvesting systems across our extensive industrial site, channeling collected rainwater into designated pits to replenish our groundwater levels.

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

| Parameter                           | Please Specify Unit | FY 23-24*<br>(Current Financial Year) | FY 22-23**<br>(Previous Financial Year) |
|-------------------------------------|---------------------|---------------------------------------|---|
| NOx                                 | mg/Nm3              | 0.17                                  | 15.41                                   |
| SOx                                 | mg/Nm3              | 0.16                                  | 9.63                                    |
| Particulate matter (PM)             | mg/Nm3              | 19.30                                 | 26.00                                   |
| Persistent organic pollutants (POP) | mg/Nm3              | Not Available                         | Not Available                           |
| Volatile organic compounds (VOC)    | mg/Nm3              | Not Available                         | Not Available                           |
| Hazardous air pollutants (HAP)      | mg/Nm3              | Not Available                         | Not Available                           |
| Others – please specify             | mg/Nm3              | Not Available                         | Not Available                           |

<sup>\*</sup> This year we have calculated air emissions for 10 stacks with highest Diesel consumption in FY2023 using CPCB Standards. We shall gradually increase the number of locations in FY2024.

<sup>\*\*</sup>Last year the values were measured quarterly and an average of it was mentioned. The location of measurement is the factory gate of our manufacturing unit.

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

Yes, independent assessment has been carried out by external third-party agency. This agency is National Accreditation Board for Testing and Calibration Laboratories (NABL) accredited and Ministry of Environment, Forest and Climate Change (MoEF) approved.

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

| Parameter  | Units           | FY 23-24 (Current<br>Financial Year) | FY 22-23 (Previous<br>Financial Year) |
|--|-----------------|--------------------------------------|---------------------------------------|
| <b>Total Scope 1 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)  | MtCO2e          | 2,213.45                             | 2,060.90                              |
| <b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)  | MtCO2e          | 10,943.85                            | 8,445.53                              |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)   | MtCO2e/INR Lakh | 0.08                                 | 0.09                                  |
| Total Scope 1 and Scope 2 emissions per rupee of<br>turnover adjusted for Purchasing Power Parity (PPP)<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue<br>from operations adjusted for PPP) | MtCO2e/INR Lakh | 1.72                                 | 2.01*                                 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output   | -               | NA                                   | NA                                    |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity  | -               | -                                    | -                                     |

<sup>\*</sup>The intensity figures from last year have been revised following the correction of a decimal error.

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

No such independent assessment is being carried out during the year ending 31st March 2024.

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

Yes, this year we have set up a 2 MW capacity of solar rooftop, significantly contributing to our organization's sustainability efforts by reducing greenhouse gas emissions. Additionally, to achieve net-zero emissions in our operations, we've established our own windfarm, which generates electricity supplied to the grid. We receive credits for the units contributed, effectively reducing our electricity bills. Our renewable energy infrastructure boasts a total installed capacity of 4.7 MW in solar rooftop and 13.85 MW in windfarms. Through the utilization of these renewable sources, we've successfully avoided CO2 emissions.

We are committed to reducing our greenhouse gas emissions in alignment with the Science-Based Targets initiative (SBTi), target validation will get done this year. Our emission reduction target will be established based on identified decarbonization strategies, including the adoption of renewable energy, enhancing energy efficiency, and implementing fuel-switching measures.

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

| Parameter                                | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial<br>Year) |
|--|--------------------------------------|--|
| Total Waste generated (in metric tonnes) |                                      |  |
| Plastic waste (A)                        | 10.99                                | 0.59                                     |
| E-waste (B)                              | -                                    | -  |
| Bio-medical waste (C)                    | -                                    | -  |
| Construction and demolition waste (D)    | -                                    | -  |
| Battery waste (E)                        | 2.41                                 | 7.26                                     |

| Radioactive waste (F)   | -         | -         |
|---|-----------|-----------|
| Other Hazardous waste. Please specify, if any. (G)  | 156.34    | 142.89    |
| Other Non-hazardous waste generated <b>(H)</b> Please specify, if any (Break-up by composition i.e., by materials relevant to the sector)           | 10,773.12 | 10,465.31 |
| Total (A + B + C + D + E + F + G + H)   | 10,942.85 | 10,615.05 |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)   | 0.07      | 0.09      |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) | 1.53      | 2.03      |
| Waste intensity in terms of physical output   | NA        | NA        |
| Waste intensity (optional) – the relevant metric may be selected by the entity  | -         | -         |

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

| Parameter                       | FY 23-24 (Current Financial Year) | FY 22-23 (Previous Financial Year) |  |
|---------------------------------|-----------------------------------|------------------------------------|--|
| Category of Waste               |                                   |                                    |  |
| (i) Recycled                    | 4,874.84                          | 5,050.86                           |  |
| (ii) Re-used                    | 6,067.85                          | 5,565.06                           |  |
| (iii) Other recovery operations | -                                 | -                                  |  |
| Total*                          | 10,942.69                         | 10,615.92                          |  |

<sup>\*</sup>Waste recovery is done internally as well as through authorized recyclers.

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

| Parameter                        | FY 23-24 (Current Financial Year) | FY 22-23 (Previous Financial Year) |  |
|----------------------------------|-----------------------------------|------------------------------------|--|
| Category of Waste                |                                   |                                    |  |
| (i) Incineration                 | 0.16                              | 0.10                               |  |
| (ii) Landfilling                 | -                                 | -                                  |  |
| (iii) Other disposal operations* | -                                 | -                                  |  |
| Total                            | 0.16                              | 0.10                               |  |

<sup>\*</sup> This year, our plastic waste encompasses not only packaging materials, as last year, but also includes plastic accessories and consumables which are in the form of hard plastics.

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. During our ISO 14001 external audit, the waste collection procedure and data is verified as a part of the process.

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.

We closely monitor waste management techniques. Automated machining of gear parts addresses this issue by minimizing the amount of metal scrap generated. We generate a substantial amount of metal scrap, which is then reused in our foundry shop to make castings. Hazardous waste (used oil) contaminated empty containers (carboys, tins, cans, etc.) are disposed of to an approved recycler in accordance with regulatory requirements. Our foundry produces a substantial volume of burnt sand, which is used by recyclers in the infrastructure and building industries.

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:

| Sr. 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. |
|-----------------|--------------------------------|--------------------|---|
| N   - 4   A   ! | -l-l                           |                    |   |

Not Applicable, as our plants/ offices are not situated in ecological sensitive areas where environmental approval/ clearance is required.

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

| Name and brief deta<br>project   | ils of EIA<br>Notification<br>No. | Date | Whether conducted<br>by independent<br>external agency<br>(Yes/No) | Results<br>communicated in<br>public domain<br>(Yes/No) | Relevant<br>Web link |
|--|-----------------------------------|------|--|---|----------------------|
| Environmental impact assessments are not applicable to us, and we have not performed the same during the financial |                                   |      |  |   |                      |

Environmental impact assessments are not applicable to us, and we have not performed the same during the financial year ending 31st March, 2024.

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:

| Sr. No.    | Specify the law /<br>regulation / guidelines<br>which was not complied<br>with  | Provide details of the non-compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action<br>taken, if any |  |  |
|------------|---|---------------------------------------|---|------------------------------------|--|--|
| Not applic | Not applicable, as we have not violated any ruled mentioned in the Water (Prevention and Control of Pollution) Act. Air |                                       |   |                                    |  |  |

Not applicable, as we have not violated any ruled mentioned in the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act for the year ending 31st March, 2024.

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

1. a. Number of affiliations with trade and industry chambers/associations.

We are associated with 9 trade and Industry chambers/associations.

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.

| Sr.<br>No. | Name of the trade and industry chambers/ associations  | Reach of trade and industry chambers/<br>associations (State/National) |
|------------|--|--|
| 1.         | Confederation of Indian Industry (CII)                 | National   |
| 2.         | Federation Gujarat Industries (FGI)                    | State  |
| 3.         | Gujarat Chamber of Commerce & Industry (GCCI)          | State  |
| 4.         | Central Gujarat Chamber of Commerce & Industry (CGCCI) | State  |
| 5.         | Indo-German Chamber of Commerce (IGCC)                 | National   |
| 6.         | EEPC India   | National   |
| 7.         | Vitthal Udyognagar Industries Association              | Local  |
| 8.         | Indian Institute of Materials Management               | National   |
| 9.         | Quality Circle Federation of India (QCFI)              | National   |

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

| Name of Authority Brief of the Case  |                        | Corrective Action Taken |  |  |  |
|--|------------------------|-------------------------|--|--|--|
| Not applicable, as no such adverse order is received from any authority for which corrective action must be taken by |                        |                         |  |  |  |
| our Company for the year en  | ding 31st March, 2024. |                         |  |  |  |

### PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

 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<br>Notification<br>No. | Date of<br>notification | Whether<br>conducted by<br>independent<br>external agency<br>(Yes / No) | Results<br>communicated<br>in public<br>domain<br>(Yes/No) | Relevant<br>Web link |  |  |
|-----------------------------------|----------------------------|-------------------------|---|--|----------------------|--|--|
| Not Applicable                    |                            |                         |   |  |                      |  |  |

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

| Sr. No.        | Name of Project<br>for which R&R is<br>ongoing |  | District | No. of Project<br>Affected<br>Families (PAFs) | % of PAFs<br>covered by<br>R&R | Amounts paid<br>to PAFs in the<br>FY (In ₹) |  |
|----------------|--|--|----------|---|--------------------------------|---|--|
| Not Applicable |  |  |          |   |                                |   |  |

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

We have grievance redressal mechanism in our Human Rights Policy. Our Board level CSR Committee is responsible to redresses any community related grievances.

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

|   | FY 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|---|--------------------------------------|---------------------------------------|
| Directly sourced from MSMEs/ small producers                        | 62.00                                | 51.60                                 |
| Sourced directly from within the district and neighboring districts | 50.01                                | 49.02                                 |

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 23-24<br>(Current Financial Year) | FY 22-23<br>(Previous Financial Year) |
|--------------|--------------------------------------|---------------------------------------|
| Rural        | -                                    | -                                     |
| Semi-Urban   | 86.40                                | 88.00                                 |
| Urban        | 0.60                                 | 0.80                                  |
| Metropolitan | 13.00                                | 11.20                                 |

The percentage is calculated basis CTC (inclusive of Gratuity) of employees and workers to that of total CTC.

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

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

We have divided our operational geography amongst branches. Each branch is responsible for customers in their respective geography. We have deployed service personnel in each of our geography. Our service personnel are technically sound and are being given regular training.

Our customers can raise issues or complaints in the respective branches or online in our central Customer Resolution Management. These details are made available in our handbook to every customer. After lodging of a complaint, we deploy our competent personnel to resolve the complaint. After resolution, the service personnel shall inform the customer of the preventive action to be taken to avoid further complaints and safe operations of our equipment.

Complaints are reported to all concern HOD's/CEO/Vice President on Monthly basis and a Management Review Meeting (M.R.M.) is carried out every six months.

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

|   | As a percentage to total turnover |
|---|-----------------------------------|
| Environmental and social parameters relevant to the product | 82.05                             |
| Safe and responsible usage                                  | 100.00                            |
| Recycling and/or safe disposal                              | 82.05                             |

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

|                                | FY                             | 23-24 (Current                          | Financial Year)   | FY 22-23 (Previous Financial Year |  |  |
|--------------------------------|--------------------------------|---|---|-----------------------------------|--|--|
| Sr. No.                        | Received<br>during<br>the year | Pending<br>resolution at<br>end of year | Remarks   | Received<br>during the<br>year    | Pending<br>resolution<br>at end of<br>year | Remarks  |
| Data privacy                   | -                              | -                                       | -   | -                                 | -  | -  |
| Advertising                    | -                              | -                                       | -   | -                                 | -  | -  |
| Cyber-security                 | -                              | -                                       | -   | -                                 | -  | -  |
| Delivery of essential services | -                              | -                                       | -   | -                                 | -  | -  |
| Restrictive Trade<br>Practices | -                              | -                                       | -   | -                                 | -  | -  |
| Unfair Trade<br>Practices      | -                              | -                                       | -   | -                                 | -  | -  |
| Other                          | 359                            | 15                                      | Our consumers<br>contacted our service<br>team for training and<br>operations of our<br>products. | 263                               | 3  | Our consumers<br>contacted our<br>service team<br>for training and<br>operations of<br>our products. |

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

|                   | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | NIL    |                    |
| 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, we secure our digital data and maintain privacy through various mechanisms. We have our own internal IT policy which is adhered to.

 $\frac{https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Data\%20Privacy\%20and\%20Cyber\%20}{Security\%20Policy-2023.pdf}.$ 

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

Nil

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

| a. Number of instances of data breaches                                       | Nil                       |
|---|---------------------------|
| b. Percentage of data breaches involving personally identifiable of customers | nformation Not Applicable |
| c. Impact, if any, of the data breaches                                       | Not Applicable            |