



KALPATARU PROJECTS INTERNATIONAL LIMITED
(Formerly Kalpataru Power Transmission Limited)

KPIL/24-25
19th June, 2024

BSE Limited Corporate Relationship Department Phiroze Jeejeebhoy Towers Dalal Street, Fort Mumbai - 400 001 Scrip Code: 522287	National Stock Exchange of India Ltd. 'Exchange Plaza', C-1, Block 'G', Bandra-Kurla Complex Bandra (E) Mumbai – 400 051 Scrip Code: KPIL
---	--

Sub.: Business Responsibility and Sustainability Report for F.Y. 2023-24

Respected Sir(s) / Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report for Financial Year 2023-24, which also forms part of the Integrated Annual Report 2023-24, submitted to the Exchanges vide letter dated June 19, 2024.

Kindly take the same on records.

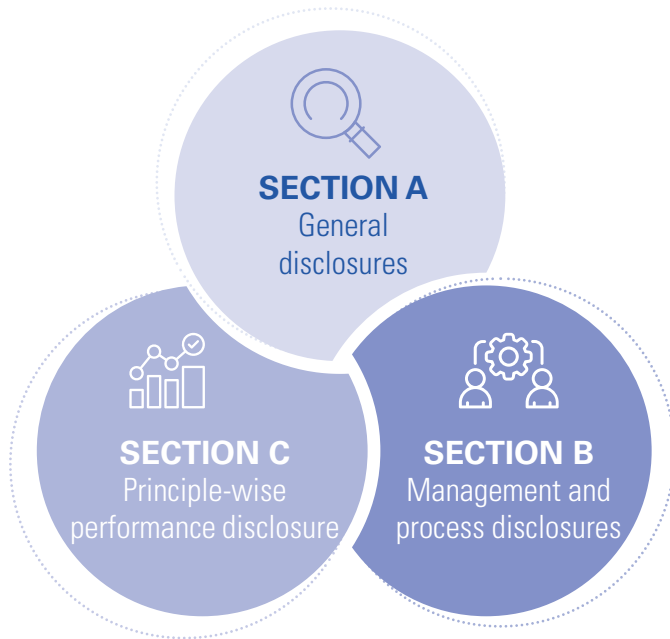
Thanking You,

Yours faithfully,
For **Kalpataru Projects International Limited**

Shweta Girotra
Company Secretary

Encl.: a/a

Business Responsibility and Sustainability Report (BRSR)



Principle 1

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

Principle 2

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

Principle 3

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

Principle 4

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

Principle 5

Businesses should respect and promote human rights

Principle 6

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

Principle 7

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

Principle 8

Businesses should promote inclusive growth and equitable development

Principle 9

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

SECTION A: General disclosures

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L40100GJ1981PLC004281
2.	Name of the Listed Entity	Kalpataru Projects International Limited
3.	Year of Incorporation	1981
4.	Registered office address	Plot No. 101, Part III, GIDC Estate, Sector 28, Gandhinagar-382028, Gujarat, India
5.	Corporate address	7 th Floor, Kalpataru Synergy, Opp. Grand Hyatt, Vakola, Santacruz (E), Mumbai 400055. India
6.	E-mail	cs@kalpataruprojects.com ; investorrelations@kalpataruprojects.com
7.	Telephone	+91-7923214000 (Board) and +91 22 30645000 (Board)
8.	Website	https://kalpataruprojects.com/
9.	Financial year for which reporting is being done	01 st April 2023 to 31 st March 2024
10.	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Ltd and BSE Ltd
11.	Paid-up Capital	Rs. 32,48,92,304/- divided into 16,24,46,152 fully paid-up equity shares each of Rs. 2/-
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Lalitkumar Tiwari (Group Chief Sustainability Officer) +91-2230641550 lalitkumar.tiwari@kalpataru.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone
14.	Name of assurance provider	TÜV SÜD South Asia Pvt. Ltd.
15.	Type of assurance obtained	Limited Assurance

II. Product/Services

16. Details of business activities (accounting for 90% of the entity's Turnover):

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Transmission & Distribution	The Company provides end-to-end solutions ranging from in-house designs, testing, procurement, fabrication, erection, installation, and commissioning of power transmission lines and sub-stations	31.9
2	Buildings & Factories	The Company provides end-to-end capabilities to execute civil works, design & build composite works, structural works, finishing works, utilities, and area development. The Company has also partnered with leading players to deliver factory projects in Automotive, FMCG, Textile, Power, Government infrastructure projects, Industrial projects, and Building Projects (Residential, Commercial, and Institutions, namely, Hospitals & Educational institutions).	28.6

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
3	Water	The Company's expertise is in designing and building Water Intake, pipeline laying, treatment, storage, supply, distribution, and operation & maintenance of projects	21.0
4	Railways	The Company offers multi-disciplinary services under its railway arm. The Company services include overhead electrification, traction substations, station buildings, railway track laying, earthwork, workshops, signalling & telecommunication (S&T), power systems, and civil works associated with railway networks and composite railway projects. The Company is also enhancing its competencies and offerings in emerging areas like dedicated rail corridors & rapid rail systems amongst others.	8.5
5	Oil & Gas	The Company undertakes EPC contracting for cross-country pipelines, terminals, and gas gathering stations for the oil and gas sector across diverse territories.	4.9
6	Urban Infrastructure	The Company offers EPC services for the design and construction of highways, bridges & flyovers, airports, metro rail corridor stations, transit terminals & hubs.	4.2

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	EPC for T&D, Water and Oil & Gas businesses	4220 (Construction of utility projects)	48.4
2	EPC for Buildings & Factories businesses	4100 (Construction of buildings)	28.6
3	EPC for Urban Infrastructure and Railways businesses	4210 (Construction of roads and railways)	12.7
4	Manufacturing of Transmission lines, Towers and Tower parts	2511 (Manufacture of structural metal products)	9.7

III. Operations

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

Location	Number of plants/project sites	Number of offices	Total
National	270	32	302
International	41	43	84

19. Markets served by the entity

a. Number of locations

S. No.	Locations	Number
1	National (Number of states)	24
2	International (Number of countries)	45

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

29.48%

c. A brief on types of customers

The Company is engaged in six diverse businesses with large customer bases.

- Transmission & Distribution:** KPIL is one of the preferred EPC companies in power transmission and distribution sector in India & abroad. Hence, the customers are mainly power utility companies (government owned or private)
- Buildings & Factories:** Grade 'A' real estate developers (Residential & commercial), government/private institutions, industrial customers
- Water:** State & Central governments and local municipal bodies/ authorities are our clients.
- Urban infra:** This business includes government and private projects.
- Railways:** Almost all projects within this business are with governments/ government controlled entities.
- Oil & Gas:** This business includes EPC contracting for cross country pipelines, terminals, and gas gathering stations for government/private companies.

IV. Employees**20. Details as at the end of Financial Year:****a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
EMPLOYEES						
1.	Permanent (D)	8,428	8,158	96.80	270	3.20
2.	Other than permanent (E)	1,453	1,431	98.49	22	1.51
3.	Total employees (D+E)	9,881	9,589	97.04	292	2.96
WORKERS						
4.	Permanent (F)	13	13	100	0	0
5.	Other than permanent (G)	12,331	12,194	98.89	137	1.11
6.	Total workers (F+G)	12,344	12,207	98.89	137	1.11

b. Differently abled employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	11	11	100	0	0
2.	Other than permanent (E)	0	0	0	0	0
3.	Total Differently abled employees (D+E)	11	11	100	0	0
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	0	0	0	0	0

21. Participation/Inclusion/Representation of women*

	Total No. (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	9	1	11.11
Key Management Personnel#	4	1	25

*As on date 31st March, 2024

Includes Managing Director & CEO and Deputy Managing Director

22. Turnover rate for permanent employees and workers

Category	FY 2024 (Turnover rate in current FY)			FY 2023 (Turnover rate in previous FY)			FY 2022 (Turnover rate in the year prior to the previous FY)		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	22.15	24.53	22.22	26.38	31.97	26.57	22.34	19.72	22.26
Permanent workers	55.6	0	55.6	14	0	14	13	0	13

Note:

- The above turnover rates consist of voluntary turnover, as well as cases of dismissal, termination, retirement and death in service. The turnover rates for FY 2023 and FY 2022 are revised for consistency, as only voluntary turnover was reported in BRSR FY 2023.
- Our voluntary turnover rate for FY 2024 is 17.99%

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Shree Shubham Logistics Limited	Subsidiary	100	No
2	Energylink (India) Limited*	Subsidiary	100	Yes
3	Punarvasu Financial Services Pvt. Ltd.	Step down Subsidiary	100	No
4	Amber Real Estate Limited*	Subsidiary	100	Yes
5	Adeshwar Infrabuild Limited*	Subsidiary	100	Yes
6	Saicharan Properties Limited*	Step down Subsidiary	100	Yes
7	Kalpataru Power DMCC UAE*	Step down Subsidiary	100	Yes
8	Kalpataru Power Transmission USA Inc*	Subsidiary	100	Yes
9	Kalpataru Power Transmission (Mauritius) Ltd.*	Subsidiary	100	Yes
10	LLC Kalpataru Power Transmission Ukraine*	Subsidiary	100	Yes
11	Kalpataru Metfab Pvt. Ltd.*	Subsidiary	100	Yes
12	Kalpataru Power Transmission Sweden AB	Subsidiary	100	No
13	JMC Mining and Quarries Limited	Subsidiary	100	No
14	Brij Bhoomi Expressway Pvt. Ltd.	Subsidiary	100	No
15	Wainganga Expressway Pvt. Ltd.	Subsidiary	100	No
16	Vindhychal Expressway Pvt. Ltd.	Subsidiary	100	No
17	Linjemontage I Grastorp AB*	Step down Subsidiary	100	Yes
18	Linjemontage AS*	Step down Subsidiary	100	Yes
19	Linjemontage Service Nordic AB*	Step down Subsidiary	100	Yes
20	Kalpataru Power Chile SpA	Subsidiary	100	No
21	Kalpataru Power Do Brasil Participacoes Ltda*	Subsidiary	100	Yes
22	Kalpataru IBN Omairah Company Ltd.*	Subsidiary	65	Yes
23	Kalpataru Power Senegal – SARL*	Subsidiary	100	Yes
24	Fasttel Engenharia S.A.*	Step down Subsidiary	100	Yes
25	Kurukshetra Expressway Pvt. Ltd.	Joint-Venture	49.57	No

Note: As on date 31st March, 2024

* The above subsidiaries partially participate in the business responsibility initiatives of the Company viz. Anti Bribery Management System

VI. CSR Details

- 24.** i. Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**
- ii. Turnover (in Rs.) - **~ 16,760 Crore**
- iii. Net worth (In Rs.) - **~ 5,750 Crore**

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 (NGBRC):**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes CSR Policy	Nil	Nil	-	Nil	Nil	-
Investors (other than Shareholders)	Yes Dividend Policy	Nil	Nil	-	Nil	Nil	-
Shareholders	Yes Code for fair disclosure	2	Nil	-	9	Nil	-
Employees and workers	Yes Grievance Redressal Policy Whistle Blower Policy	2	Nil	-	1	Nil	-
Customers	Yes Kalpataru Anti-Bribery Anti-Corruption Policy	Nil	Nil	-	Nil	Nil	-
Value Chain Partners	Yes Whistle Blower Policy	1	Nil	-	1	Nil	-
Other (please specify)	Yes Whistle Blower Policy	1	Nil	-	Nil	Nil	-

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

Note: We have undertaken a detailed Materiality Assessment in FY 2024. The material topics are updated based on the outcome of the Materiality Assessment.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Climate change and energy	Opportunity and Risk	<p>Opportunity:</p> <ul style="list-style-type: none"> a. Implementation of sustainable practices by reducing the carbon footprint helps in achieving the sustainable strategy of the Company and also promotes the brand value. b. Reducing energy consumption & conservation minimizes the utility bills & operational costs. <p>Risk:</p> <ul style="list-style-type: none"> a. High carbon emission from the operations of the Company may lead to pollution of the environment. b. Increase in energy consumption results in higher operational expenditure. c. Climate change poses significant physical and transition risks to the Company. 	<ul style="list-style-type: none"> a. Deployed electric vehicles at sites to promote sustainable transportation and reduce the carbon footprint of the Company. b. Switching to clean fuels by reducing the consumption of fossil fuels. c. Vehicle tracking and optimization of fuel consumption is practiced. d. Installation of energy efficient equipment, processes & systems to conserve energy. e. Obtain ISO 50001:2018 (Energy Management System) certification, which provides a structured framework for optimizing energy consumption and conservation of energy. f. Use of renewable energy by deploying Solar Panels or procuring RE power 	<p>Positive:</p> <p>Reduces the operational costs and addresses the climate change related physical & transition risks.</p> <p>Negative:</p> <p>Incurs additional expenditure for implementation of mitigation strategy for addressing climate change related risks.</p>
2	Biodiversity and Land Use	Opportunity	<p>Improvement of biodiversity by conducting plantation drives mitigates the air pollution and also improves the aesthetic environment.</p>		<p>Positive:</p> <p>Improvement of green area beyond compliance requirement mitigates the climate change related risks.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Resource efficiency and circularity (Includes water and waste management and recycling)	Opportunity & Risk	<p>Waste:</p> <p>Opportunity:</p> <ol style="list-style-type: none"> Implementation of sustainable waste management plan prioritizing 3R waste management hierarchy (Reduce, Reuse and Recycle) transforms into circular economy. Reduces the dependency on natural resources. <p>Risk:</p> <ol style="list-style-type: none"> Absence of adequate systems and practices for waste & wastewater management causes environmental pollution. <p>Water:</p> <p>Opportunity:</p> <ol style="list-style-type: none"> Practicing water conservation reduces the water related costs and associated risks. <p>Risk:</p> <ol style="list-style-type: none"> Non-availability of water with desired quality & quantity poses several operational risks. 	<p>Waste:</p> <ol style="list-style-type: none"> Promoted recycling & reuse of waste by producing value added products. <p>Water:</p> <ol style="list-style-type: none"> Practice rainwater harvesting for conservation of water across all operations. Achieve zero liquid discharge (ZLD) in the plant operations. Reuse of treated wastewater to reduce the freshwater consumption in the operations. Assess the operational & basin level water risks using water risk tools & implement water conservation measures to mitigate the identified risks. 	<p>Waste:</p> <p>Positive:</p> <p>Reduces the waste disposal costs and promotes circular economy.</p> <p>Negative:</p> <p>Improper disposal of waste causes environmental pollution and also attracts legal action by the regulatory agencies.</p> <p>Water:</p> <p>Positive:</p> <ol style="list-style-type: none"> Reduces the water costs. Avoid business disruption through implementation of mitigation strategy for the identified water risks. <p>Negative:</p> <p>Disruption of the operations of the Company due to non-availability of water in a timely manner.</p>
4	Pollution	Risk	<ol style="list-style-type: none"> Improper disposal of various types of hazardous materials may pollute the environment. Air pollution due to dust particles may lead to compliance issues or concerns from stakeholders. 	<ol style="list-style-type: none"> Ensure appropriate mechanisms are in place in line with the compliances of the pollution control boards. Implement Standard Operating Procedures (SOPs) to dispose the pollutants in a safe manner. Maintain & follow Material Safety Data Sheet (MSDS). Conduct regular training programs to employees & workers on best practices to prevent pollution. Implementing dust prevention and control programme 	<p>Negative:</p> <p>If pollutants are not disposed in a safe and responsible manner, it may lead to environmental pollution, leading to fines and penalties.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Human Capital Development	Opportunity	Development of employees & workers with required skills, knowledge, and expertise creates a strong workforce improving the overall productivity of the Company.		<p>Positive: Avoids business disruptions, improves productivity of the Company and ensures sustainable operations.</p>
6	Human Rights and Labour Relations	Risk	<p>a. Non-compliance to human rights laws leads to stringent action by the regulatory agencies affecting the brand value of the Company.</p> <p>b. As a part of our project execution, we engage contractors across geographies, which may lead to human rights and labour relations related risks.</p> <p>c. Adhere to International Labour Organization (ILO) guidelines (as applicable) and conventions prohibiting any kind of discrimination based on factors like race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity, religion, disability, family status, social origin.</p>	<p>a. Identification and addressing of human rights related risks by conducting human rights related due-diligence in our operations.</p> <p>b. Conduct training programs for employees, workers and contractors on human rights related laws and regulations.</p> <p>c. Adhere to International Labour Organization (ILO) guidelines (as applicable) and conventions prohibiting any kind of discrimination based on factors like race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity, religion, disability, family status, social origin.</p>	<p>Negative: Non-compliance with human rights and labour laws affects the reputation & brand value of the Company.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7	Occupational Health & Safety	Opportunity & Risk	<p>Opportunity:</p> <p>a. Prevention of workplace injuries & accidents improves the overall productivity of the Company through continuous operation of facilities by reducing absenteeism.</p> <p>b. Avoiding health & safety related accidents reduces the occupational health related costs, improves working conditions, staff morale and enhances overall reputation of the Company.</p> <p>Risk:</p> <p>a. Workplace injuries, accidents and unsafe working conditions may hamper the operations of the Company and affects the brand value of the Company.</p> <p>b. Health & safety related incidents and non-compliance to applicable laws could result in litigation and negatively impacts the brand value of the Company.</p>	<p>a. Formulated and adopted comprehensive health & safety policies, Standard Operating Procedures (SOPs).</p> <p>b. Conduct Environment Health & Safety (EHS) risk assessment and implement mitigation strategy for the identified risks.</p> <p>c. Conduct regular training programs, emergency drill and safety passport across all operations.</p> <p>d. Encourage employees to report unsafe and hazards conditions at workplace.</p> <p>e. Certified by ISO 45001:2018 (Occupational Health and Safety Management System)</p> <p>f. Achieve Behavioral based safety cultural transformation.</p>	<p>Positive:</p> <p>Mitigation of health & safety risks builds trust amongst employees & workers by ensuring them a safe workplace.</p> <p>Negative:</p> <p>Violation of health & safety laws and guidelines leads to stringent action by the regulatory agencies affecting the brand value of the Company.</p>
8	Community engagement	Opportunity	Implementation of CSR projects uplifts the marginalized/ vulnerable groups fostering harmonious relations with local communities.		<p>Positive:</p> <p>Avoids conflict with the local communities through implementation of CSR projects for uplifting of marginalized/ vulnerable groups.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9	Customer centricity	Opportunity & Risk	<p>Opportunity:</p> <ol style="list-style-type: none"> Customer centricity drives the customer satisfaction, loyalty & retention of customers. Regular interaction and addressing the concerns of the customers helps in building trust and promotes business expansion. <p>Risk: Absence of appropriate mechanism for regular feedback from the customers hampers the business growth of the Company.</p>	<ol style="list-style-type: none"> Ensure appropriate customer feedback mechanism is in place to address complaints and concerns of the customers. Effectively communicate the measures taken by the Company to meet customers' expectations and gain the trust & confidence of the customers. 	<p>Positive: Building trust & confidence in customers promotes the business expansion, revenue growth and brand value of the Company.</p> <p>Negative: If customer complaints are not addressed in timely manner, it affects the reputation and brand value of the Company through negative propaganda.</p>
10	Supply chain management	Opportunity & Risk	<p>Opportunity:</p> <ol style="list-style-type: none"> Integration of ESG criteria for supplier assessment avoids supply chain disruptions. Sustainable Supply Chain Management ensures sourcing of materials & transportation even in adverse situations and conditions. <p>Risk: Inadequate systems and practices for screening & assessment of suppliers may lead to business disruptions.</p>	<ol style="list-style-type: none"> Deploy sustainable supply chain management framework across all operations of the Company. Diversify the suppliers & logistics for sustainable procurement and transportation of materials. Conduct regular assessment and screen the suppliers based on ESG criteria. Encourage suppliers who have developed sustainable materials as their offerings 	<p>Positive: Implementation of sustainable supply chain management practices avoids business disruptions.</p> <p>Negative: Absence of appropriate systems & practices for sustainable supply chain management may hamper the operations of the Company.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
11	Sustainable products and service quality	Opportunity & Risk	<p>Opportunity: Enhancement of product quality & features helps in gaining customers trust and business development.</p> <p>Risk: Non-compliance to industrial standards and prescribed laws in product development may lead to complaints from the customers.</p>	<p>a. Enhance the product quality and features in line with the industrial standards and meeting the customers' expectations.</p> <p>b. Integrate sustainability into the product / service development.</p> <p>c. Designing service portfolio keeping in view use of RE energy instead of fossil fuel,</p> <p>d. Water conservation / harvesting practices in construction</p> <p>e. Implementing Construction & Demolition Waste Management to have circular economy</p>	<p>Positive: Diversifying product portfolio and improving product quality leads to business expansion, revenue generation and promotes brand value of the Company.</p> <p>Negative: Non-compliance to industrial standards in product development affects the brand value and reputation of the Company.</p>
12	Corporate Governance	Opportunity	Robust corporate governance framework protecting the stakeholders' interests ensures accountability, transparency, ethical corporate behavior, and fairness to all stakeholders.		<p>Positive: Implementing governance related policies and best practices ensures transparency and builds confidence to stakeholders.</p>
13	Business Ethics	Risk & Opportunity	<p>Risk: a. Violation of the Company's code of conduct compromises the business relations and erodes customer trust and confidence.</p> <p>Opportunity: a. Operating the business in an ethical & transparent manner builds confidence & trust amongst customers, investors and other stakeholders.</p>	<p>a. Conduct regular training programs on code of conduct for all employees and workers.</p> <p>b. Take stringent action in case of non-compliance of code of conduct</p> <p>c. Implemented Anti-Bribery Practices & adaptation of ISO 37001:2016 standard</p>	<p>Negative: Non-compliance with code of conduct affects the trust and reputation of the Company.</p> <p>Positive: Ensuring transparency & accountability across all business operations builds trust and confidence to all stakeholders.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
14	Data Privacy and Security	Risk	<p>a. Cyberattacks and loss of confidential information erodes the customer trust and affects the reputation of the Company.</p> <p>b. Lack of adequate prevention, detection, and remediation of data security threats incurs huge loss to the Company and also causes business disruption.</p>	<p>a. Deployment of appropriate controls to ensure data security and privacy.</p> <p>b. Proactive monitoring and analysis of any new vulnerabilities and threats.</p> <p>c. Implementation of protective measures, systems and practices to ensure privacy and data security.</p>	<p>Negative: Loss of confidential information disrupts the operations and erodes the customer trust.</p>
15	R&D, innovation and digitalization	Opportunity	Development of products through innovation & digitalization promotes resource conservation, enhancement of product quality & features leading to business expansion and diversification of product portfolio.		<p>Positive: Diversification of product portfolio facilitates business growth and expansion.</p>
16	Business continuity and risk management	Opportunity	Implementation of enterprise level risk management framework addresses the business risks and ensures business continuity even in adverse situations.		<p>Positive: Implementation of risk mitigation strategy avoids business disruption and ensures business continuity.</p>

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 National Guidelines on Responsible Business Conduct (NGRBC) Principles and Core Elements.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1 (a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
(b) Has the policy been approved by the Board? (Yes/No)	Yes	No*	Yes	Yes	Yes	No*	Yes	Yes	No*
(c) Web Link of the Policies, if available	Human Rights Policy – Available on intranet Equal Opportunity Policy Grievance Redressal Policy Kalpataru Code of Conduct Policy On Remuneration For The Directors, Key Managerial Personnel And Other Employees Dividend Distribution Policy Code of Conduct for Directors & Senior Management EHSS Policy - Available on intranet Cyber Security Policy – Available on intranet Whistle Blower Policy Related Party Transaction Policy Terms and Conditions for Appointment of Independent Directors of the Company Policy enabling Debenture Holders to claim Unclaimed Interest and / or redemption amount Policy on Determining Material Subsidiaries Corporate Social Responsibility (CSR) Policy Directors' Familiarization Programme Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information ("Code") Policy For Preservation Of Document & Archival Policy Policy On Determination Of Materiality Of Events/ Information & Disclosure Of Material Events / Information Code Of Internal Procedures And Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders Anti-Bribery and Anti-Corruption Policy Third Party Due Diligence Policy Policy On Directors' Appointment Including Criteria For Determining Qualifications, Positive Attributes, Independence Of A Director Policies & Guidelines Kalpataru Projects International Limited								
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

*Approved by the Managing Director and CEO

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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.	All the policies are compliant with respective principles of NGRBC guidelines, the Companies Act, 2013, and comply with international standards of ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 37001:2016, ISO 3834-2:2021 and EN 1090-1, and ISO/IEC 17025:2017, as applicable to respective policies.								
5 Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>We have been investing in our sustainability efforts for some years now. Our approach towards ESG has been guided by our Vision & Values, which affirms our commitment towards responsible and sustainable business practices.</p> <p>In FY 2024 our ESG strategy was formalized by adopting –</p> <p>A robust governance mechanism</p> <ul style="list-style-type: none"> • Apex Committee – Constituted of Senior Leadership, responsible for overall governance and guidance on ESG • Core/Steering Committee – A cross-functional team, responsible for identification of initiatives and projects. <p>Sustainability Goals</p> <ul style="list-style-type: none"> • Carbon Neutral by 2040 Become Carbon Neutral by 2040 for Scope 1&2 emissions of all business divisions at all locations • Water Neutral by 2032 Become Water Neutral by 2032 for all business divisions at all locations • Circular Economy by 2035 Implementing Circular Economy for Construction and Demolition Waste by 2035 								
6 Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<ul style="list-style-type: none"> • Carbon Neutral by 2040 <ul style="list-style-type: none"> - Intensity Reduction by 1.78% (Total emissions in tCO₂e/ INR in Cr of Revenue) vis-à-vis FY 2023 • Water Neutral by 2032 <ul style="list-style-type: none"> - Intensity reduction by 29.09% (Water Consumption in KL/ INR Cr of Revenue) vis-à-vis FY 2023 • Circular Economy by 2035 <ul style="list-style-type: none"> - Initiated activities for proper segregation and disposal with accounting 								

Governance, 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)

In FY 2024, Kalpataru Projects International Limited (KPIL) showcased exceptional resilience and growth amid global economic challenges, highlighted by the successful amalgamation of JMC Projects. Despite inflationary pressures and geopolitical tensions, KPIL achieved its highest-ever revenue and EBITDA, underscoring our strategic focus on high-growth sectors such as Oil & Gas, underground metro tunneling, and water projects. Our robust order book of INR 54,875 crores reinforces our commitment to value creation and establishing KPIL as a leading global EPC player.

Targets and Achievements

FY 2024 marked a year of significant achievements and strategic advancements in our ESG journey. We established comprehensive ESG governance through the formation of Apex and Steering Committees, ensuring our sustainability goals are deeply integrated into our business strategy and operations.

We have also adopted our sustainability goals in FY 2024-

- Carbon neutrality by 2040 (for Scope 1 & 2 emissions)
- Water neutrality by 2032
- Implementing circular economy for construction and demolition waste by 2035

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<p>We attained carbon neutrality for our Transmission Line International (TLI) division for FY 2023 and reduced our organization's water intensity on a revenue basis by 35% compared to FY 2022. These milestones reflect our unwavering commitment to environmental stewardship and responsible resource management.</p> <p>KPIL also achieved a 6.6% reduction in greenhouse gas (GHG) emission intensity (tCO₂e/INR Cr of Revenue) compared to FY 2022 and increased the contribution of renewable electricity to 29.2% of our total electricity consumption. Our people-first culture, supported by comprehensive wellness programs and robust training initiatives, enhances holistic well-being and skill development, ensuring our workforce is prepared to drive the Company's success. Together, we are building a legacy of impact, driving positive change for our planet, people, and prosperity.</p>									
<p>Challenges and Solutions</p> <p>Addressing ESG-related challenges requires ongoing and dedicated efforts. While we are making progress through dialogues with various agencies, including government authorities and market stakeholders, several challenges persist:</p> <ul style="list-style-type: none"> ● Regulatory landscape: The regulatory landscape is evolving in the renewable energy space and we are making efforts to leverage the opportunity and address the challenges associated with it. ● Low Carbon Materials: Adapting to low-carbon cement and steel products presents technical and market challenges that need innovative solutions and collaboration. ● Scope 3 Emissions: Achieving consensus among stakeholders on Scope 3 emission accounting is crucial for accurate reporting and requires extensive engagement. ● Supply Chain Integration: Adoption of ESG principles throughout our supply chain involves continuous and substantial efforts to engage and empower our value chain partners. <p>Additionally, as an EPC company, our project sites are increasingly susceptible to climate risks, necessitating new approaches in execution planning and risk management, including enhanced insurance strategies and improved project delivery methods. Formulating a consensus among stakeholders and implementing these solutions requires focused efforts.</p> <p>Despite these challenges, we remain steadfast in our commitment to making meaningful progress towards our sustainability goals. We will continue our relentless efforts to contribute to a sustainable future.</p>									
8	<p>Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</p> <p>Name: Mr. Manish Mohnot Designation: Managing Director & Chief Executive Officer DIN Number: 01229696</p>								
9	<p>Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.</p> <p>Yes. The Company has a well-defined ESG department which seeks inputs on decisions from the MD & CEO on various aspects of the environmental and social issues of the Company.</p>								

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									Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	The Company policies are established by the Board or the Managing Director & CEO and undergo regular reviews as required by the Board or appropriate committee. These reviews assess the policies' efficacy, leading to the implementation of any necessary modifications to ensure the policies remain effective and aligned with the Company's objectives.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Company actively ensures adherence to all relevant statutory requirements. Compliance with governing rules and regulations is systematically monitored, and any deviations are promptly addressed, reinforcing our commitment to operating within the established legal, regulatory and ethical frameworks.																	

11	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
		The Company's Quality, Environment, Occupational Health & Safety Management Systems are audited and certified by TUV SUD & ISOQAR, as per ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 Standards. Anti-Bribery Anti- Corruption Management Systems are audited and certified by BSI as per ISO 37001:2016. The Company's Tower Manufacturing Plants are certified by TUV Nord for Production Control of following products ISO 3834-2:2021, ISO/IEC 17025:2017.								

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

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/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

Not Applicable

SECTION C: Principle-wise performance disclosure



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

ESSENTIAL INDICATORS

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

S. No.	Segment	Total number of training & awareness programmes held*	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
1	Board of Directors	5	Business, strategy, risks and legal compliance	100
2	Key Managerial Personnel	10	Anti-Bribery and Anti-Corruption, Kalpataru Code of Conduct (KCoC), Occupational Health & Safety Management etc.	100
3	Employees other than BoD and KMPs	5,571	Ethical Conduct, Anti-Bribery & Anti-Corruption Practices, Functional trainings including operations, Management Systems, Behavioral & Soft Skills, Human Rights, Customer support, Environmental Management System, Occupational Health & Safety Management, Quality Management, Sustainability, Business and Strategy, Leadership, Joining and Safety Inductions etc.	86
4	Workers	34,881	Procedures and Practices, Checks, Emergency Response, Good Construction Practices and Construction / Operational Workmanship, Human Rights, Social Conditions, various programmes like Inductions, Tool Box talks, Motivating for Safe Work etc.	100

*The parameter 'Total number of training and awareness programmes held' has been disclosed in number of sessions conducted.

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						
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Penalty/ Fine	Nil	Nil	Nil	Nil	Nil	
Settlement	Nil	Nil	Nil	Nil	Nil	
Compounding fee	Nil	Nil	Nil	Nil	Nil	

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

Note: We did not have any fine / penalty / punishment / award / compounding fees / settlement amount paid in proceedings identified as material based on Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015.

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
Nil	Nil

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

Yes, the Company has an established Anti-Bribery Anti-Corruption Policy, a robust framework designed to detect and prevent corrupt activities. Aligned with ISO 37001:2016 standards, this policy applies not only to our employees but also extends to our subsidiaries, joint ventures, suppliers, contractors, NGOs, and all other entities with whom we engage in transactions, both domestically and internationally.

The policy emphasizes critical areas of vulnerability within our operations, such as gifts, hospitality, and political or charitable donations, where corruption, particularly bribery, poses a risk. To reinforce our commitment to integrity, we have implemented the Anti-Bribery Anti-Corruption Policy (ABAC) and Third-Party Due Diligence (TPDD) policies. These frameworks serve as essential tools for identifying and managing the risks associated with bribery and corruption, particularly in our interactions with government and public officials.

For further details on our policies, interested stakeholders can access them through the following web-link: https://kalpataruprojects.com/api/view-file/Corporate%20Governance_policies%20&%20Guidelines_Anti%20Bribery%20Anti%20Corruption%20Policy.pdf We remain steadfast in our dedication to upholding the highest standards of ethical conduct throughout our operations.

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

6. Details of complaints with regard to conflict of interest

	FY 2024 (Current Financial Year)		FY 2023 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	Nil	Nil	Nil

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest.

There were no cases related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest.

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Number of days of accounts payables	129.75	132.76

9. Open-ness of business

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

Parameter	Metrics	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	7.5%	7%
	b. Number of trading houses where purchases are made from	720	600
	c. Purchases from top 10 trading houses as % of total purchases from trading houses.	52%	48%
Concentration of Sales	a. Sales to dealers/ distributors as % of total sales	Given the nature of business this parameter is not applicable to KPIL.	
	b. Number of dealers/ distributors to whom sales are made		
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors		
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.7%	0.3%
	b. Sales (Sales to related parties / Total Sales)	1.2%	1.1%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	99.5%	99.5%
	d. Investments (Investments in related parties / Total Investments made)	100.0%	99.8%

LEADERSHIP INDICATORS

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Nil	Nil	-

Note: In FY 2024, we have conducted anti-bribery and anti-corruption training for our major suppliers. Additionally, we have launched a comprehensive sustainable supply chain program aimed at enhancing the sustainability performance of our entire supply chain.

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

Yes. The Company follows a practice of obtaining annual disclosures from each Director at the commencement of the financial year to address conflict of interests involving members of the Board. Additionally, Directors are required to promptly disclose any changes in their interests throughout the year.

As a part of this process, any Director with a conflict of interest is restricted from participating in discussions or voting on matters where their personal interests are involved and they are present.



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

ESSENTIAL INDICATORS

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

S. No.		FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)	Details of improvements in environmental and social impacts
1	R&D	2.61%	3.4%	Improvements include enhanced energy conservation, energy efficiency, water management, resource optimization and safety management, strengthening the overall environmental and social impact of our projects.
2	Capex	0.99%	0.6%	

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

Yes, the Company has a well-defined Supplier Code of Conduct, which incorporates different areas of what is expected of the Company's suppliers in accordance with the Group Values. The Company has laid adequate emphasis on sustainable sourcing practices such as consolidation of requirement, coordination with planning team to reduce material wastage, optimize inventory, maximize equipment efficiency and manage the life cycle cost of procured items. These steps are reinforced in the supply chain processes right from requirement gathering, vendor development, RFQ management, value engineering, awarding of the order, successful order execution, and a periodic vendor evaluation mechanism. As a part of vendor onboarding process, the Company conduct a comprehensive assessment of suppliers to determine their social, environmental & ethical performance and ensure 100% coverage of all value chain partners. The Supplier Code of Conduct covers anti-bribery requirements and HSE requirements. As part of the on-boarding process, all new suppliers must sign a declaration agreeing to follow this Code of Conduct and adhere to our anti-bribery and anti-corruption standards. KPIL also conforms to responsible sourcing with respect to emissions, safety, human rights and ethics, apart from the economic considerations as part of the sourcing procedure. The major suppliers of the Company have obtained national and international certifications with respect to environment management systems etc. Conformance to labour principles and related laws are mandatory qualification requirements for all supply and services.

Moreover, by leveraging digital technologies and data-driven strategies, KPIL enhanced its supply chain's flexibility, visibility, and responsiveness.

Moreover, KPIL adopted a global classification system "United Nations Standard Products and Services Code" for products and services used in procurement and supply chain management. This standard categorization of goods and services increases transparency for better utilization of inventory and reduce wastages. It also helps the Company to better track its procurement activities and identify areas where sustainable practices can be improved.

KPIL also automated its PR-PO activities by adopting e-Procurement platform, streamlining processes, enhancing resource efficiency, eliminating paper-based documentation and decreasing resource consumption and waste generation.

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

The Company's main material suppliers are well-known companies that have obtained essential ISO certifications related to environmental protection, product quality, and human rights protection within their organization.

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

Product	Process to safely reclaim the product*
Plastics (including packaging)	NA
E-waste	NA
Hazardous waste	NA
other waste	NA

* (NA - Not Applicable) : Since the Company is not a consumer goods company, rather an EPC Company involved in Power Transmission and Distribution, Buildings & Factories, Water, Railways, Oil & Gas and Urban Infrastructure, there is no specific product to reclaim at the end of its life. However, appropriate measures are implemented to recycle, reuse and dispose the waste generated during the course of execution on the project sites, ensuring compliance with the regulatory requirements.

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.

No

LEADERSHIP INDICATORS

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

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

LCA has not been conducted in FY2024

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

Name of Product/Service	Description of the risk / concern	Action Taken
-------------------------	-----------------------------------	--------------

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
NA	NA	NA

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

	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	NA	NA	NA	NA	NA	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
NA	NA



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

ESSENTIAL INDICATORS

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

Category	Total (A)	% of employees covered by									
		Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent Employees											
Male	8,158	8,158	100	8,158	100	0	0	8,158	100	8,158	100
Female	270	270	100	270	100	270	100	0	0	270	100
Total	8,428	8,428	100	8,428	100	270	100	8,158	100	8,428	100
Other than Permanent employees											
Male	1,431	1,431	100	1,431	100	0	0	0	0	-	-
Female	22	22	100	22	100	22	100	0	0	-	-
Total	1,453	1,453	100	1,453	100	22	100	0	0	-	-

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

Category	% of workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent workers											
Male	13	13	100	13	100	0	0	13	100	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	13	13	100	13	100	0	0	13	100	0	0
Other than Permanent workers											
Male	12,194	12,194	100	12,194	100	0	0	0	0	0	0
Female	137	137	100	137	100	137	100	0	0	0	0
Total	12,331	12,331	100	12,331	100	137	100	0	0	0	0

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Cost incurred on well- being measures as a % of total revenue of the Company	0.18%	0.31%

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

Benefits	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	100	100	Yes	100	100	Yes
Others	-	-	-	-	-	-

Note:

The above disclosure is calculated for all eligible employees/ workers.

ESI- The ESI available areas are covered with ESIC facility. However, in case of non-availability of ESIC, workmen compensation policy is subscribed.

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

Yes. The Company has taken steps to ensure that its facilities are accessible to employees with disabilities. The provision of wheelchairs and ramps makes it easier for individuals with mobility impairments to navigate the premises independently. By offering these services, the Company demonstrates its commitment to inclusivity and providing equal opportunities for all employees, regardless of their physical abilities.

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

Yes. The Company steadfastly upholds its Equal Opportunity Policy, a cornerstone of its commitment to fostering an environment of inclusivity and fairness. Central to this policy is the assurance of equal opportunities for all, without discrimination, including individuals with disabilities. By prioritizing accessibility and eliminating barriers to participation, the Company endeavors to create a workplace where every employee can thrive and contribute their unique talents and perspectives to our collective success.

For further details on our policies, interested stakeholders can access them through the following web-link: https://kalpataruprojects.com/api/view-file/Corporate%20Governance_policies%20&%20Guidelines_Equal%20Opportunity%20Policy.pdf

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

Gender	Permanent Employees		Permanent Workers	
	Return to work Rate (%)	Retention Rate* (%)	Return to work Rate (%)	Retention Rate (%)
Male	100	89.42	NA	NA
Female	100	91.66	NA	NA
Total	100	89.53	NA	NA

*Retention rate can be attributed to varied reasons.

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

1	Permanent workers	The Company has implemented a) Grievance Redressal Policy b) Whistleblower Policy and c) Anti Sexual Harassment Policy, among others. The employees / workers can raise their grievances under respective policies based on subject matter. We also have an internal portal for HR grievances (HR Helpdesk) where employees can lodge their complaints, which are handled by a dedicated team. The employees can track their complaints and resolution through the portal. For any whistleblower complain, it can be reported by calling on helpline number at +91-7923214100 or sending an email to abms@kalpataruprojects.com or by sending a complaint letter on the Company address - Kalpataru Projects International Limited, 101, Part III, G.I.D.C Estate, Sector 28, Gandhinagar -382028, Gujarat, India. Any complaint related to Sexual Harassment can be raised with any member of Internal Complaints Committee. Weblink to the policy: https://kalpataruprojects.com/api/view-file/Corporate%20Governance_policies%20&%20Guidelines_Grievance%20Redressal%20Policy.pdf
2	Other than Permanent Workers	
3	Permanent Employees	
4	Other than Permanent Employees	

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

Category	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Total employees/ workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees						
Male	8,158	0	0	7,555	0	0
Female	270	0	0	260	0	0
Total Permanent Workers						
Male	13	0	0	23	0	0
Female	0	0	0	0	0	0

Note: None of our permanent employees or workers are a part of recognized association(s) or Unions. The data presented for FY 2023 & FY 2022 in BRSR FY 2023 was covering contractual workers.

8. Details of training given to employees and workers:

Category	FY 2024 (Current Financial Year)					FY 2023 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
Permanent Employees										
Male	8,158	5,076	62	5,318	65	7,555	4,503	60	5,819	77
Female	270	104	39	180	67	260	97	37	185	71
Total	8,428	5,180	61	5,498	65	7,815	4,600	59	6,004	77
Permanent Workers										
Male	13	13	100	13	100	23	23	100	23	100
Female	0	0	0	0	0	0	0	0	0	0
Total	13	13	100	13	100	23	23	100	23	100

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

Category	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Total (A)	No (B)	% (B/A)	Total (C)	No (D)	% (D/C)
Employees						
Male	8,158	8,158	100	7,555	7,555	100
Female	270	270	100	260	260	100
Total	8,428	8,428	100	7,815	7,815	100
Workers						
Male	13	13	100	23	23	100
Female	0	0	100	0	0	100
Total	13	13	100	23	23	100

Note: All eligible employees have received performance and career development reviews. The FY2023 data has been revised on the basis of same disclosure approach.

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

Yes, the Company has successfully implemented an Occupational Health and Safety Management system, attaining certification in accordance with the ISO 45001:2018 Standard. This comprehensive system has been seamlessly integrated across all facets of the organization, reflecting our commitment to ensuring the health, safety, and well-being of our employees. By adhering to rigorous standards and protocols, we strive to create a work environment where occupational health & safety is paramount and risks are minimized, thereby fostering a culture of diligence, accountability, and continuous improvement.

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

Each business unit consistently conducts systematic activities to identify hazards arising from occupational activities on a regular basis. These hazards are then categorized according to their frequency and severity. Those deemed to pose a high severity risk are classified as critical, prompting immediate actions to minimize or eradicate them. Furthermore, even if certain risks have a lower probability, if they are perceived as critical, proactive measures are taken to mitigate their impact. This approach is applied to all operational and occupational activities that are routine and non-routine.

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 established a structured process in place. Workers undergo comprehensive awareness training at every stage, starting from identifying hazardous activities to understanding the associated risks and outcomes. Additionally, we ensure that workers have access to appropriate communication channels through various means, including daily meetings, weekly safety committee sessions led by department heads and project leadership teams. Furthermore, monthly safety committee meetings are convened to address performance evaluations and any emerging issues that may impact Environment, Health, and Safety (EHS) performance. All our employees and workers are empowered to highlight and report work related hazards to the Project/Plant Manager or EHS Officer.

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

Yes, we provide non-occupational medical and healthcare services to our employees.

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

Safety Incident/Number	Category	FY 2024	FY 2023
		(Current Financial Year)	(Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.084	0.078
Total recordable work-related injuries	Employees	0	0
	Workers	81 *	16
No. of fatalities	Employees	0	0
	Workers	2	7
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

*From FY 2024 we have revised the accounting methodology to cover RWC (Restricted Work Cases) & MTC (Medical Treatment Cases) for reporting Total recordable work-related injuries.

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

All workplace conditions undergo thorough assessments to ensure a safe and conducive environment. Should any area be deemed unsuitable for work due to safety concerns, it is immediately restricted until repairs are completed. Regular internal audits and safety walk-downs are conducted to maintain vigilance. The Company remains abreast of occupational and contagious diseases, implementing preventive measures to uphold a healthy workplace. Safety inductions are provided to workers upon joining. Additionally, monthly motivational programs are organized, wherein safety-conscious employees and workers are acknowledged and rewarded with gifts. Our senior management is deeply committed to health and safety, regularly reviewing and providing guidance on related matters.

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

Category	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	2	0	-	0	0	-
Health & Safety	2	0	-	0	0	-

14. Assessments for the year:

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

*All our facilities and manufacturing plants undergo 3 layer internal assessments- location based assessment, regional office assessment and corporate assessment. Each facility is assessed at least once in a quarter internally.

External assessment are carried out by Clients, Third Party Certification agencies, Government and regulatory authorities at regular intervals.

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.

Within the organization, there exists a structured incident investigation process, ensuring thorough examination of all incidents, dissemination of lessons learned, and prompt initiation of corrective actions across every project site. Hazard Identification & Risk Assessment (HIRA) undergoes regular review and dissemination to relevant authorities. The planned corrective actions are executed and finalized for the FY 2024. Disciplinary actions as per the corporate policies has been initiated against the violation of EHS procedures and policies. Comprehensive counselling and refresher training sessions are organized for the entire crew at designated sites, aiming to reinforce safety protocols and bolster awareness among our workforce.

Innovative initiatives include the development of a Virtual Reality training module and Learning Management System (LMS) module, strategically designed to enhance awareness and elevate training effectiveness across the organization.

LEADERSHIP INDICATORS

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

(A) Employees: Yes

(B) Workers: Yes

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

The Company routinely performs statutory compliance reviews and due diligence assessments on their value chain partners to uphold strict adherence to regulations concerning dues deduction. Ensuring comprehensive incorporation of all relevant clauses related to statutory dues within agreements with value chain partners is a priority for the Company.

3. Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Employees	0	0	0	0
Workers	2	7	2	7

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

Yes. The Company offers transition programs designed to support individuals during their transition phase, ensuring their capacity to empower them and effectively navigate the conclusion of their careers as they near retirement.

5. Details on assessment of value chain partners:

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

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

- All LTIFR incidents are duly investigated, lessons learned are disseminated and corrective actions are initiated immediately at all project sites. HIRA is revised and shared with all concerned authorities. The corrective actions planned are implemented and completed for FY 2023 & FY 2024.
- Counselling and refresher trainings sessions are arranged for the entire project team at specific sites.



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

ESSENTIAL INDICATORS

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

KPIL has a robust stakeholder identification process which is developed considering the nature of business operations and activities involved. Mapping of the internal and external stakeholders is carried out by assessing their influence, impact and importance of each stakeholder on business operations, growth and revenue generation of the Company. In order to identify the relevant stakeholders, we have developed a matrix prioritizing the key stakeholders. We practice periodical coordination, monitoring and engaging with all stakeholders fostering good relationship. The steps involved in our stakeholder identification process is elaborated below which includes stakeholder identification, review process, adopted channels for communication and frequency of engagement.

- a. **Stakeholder Identification:** The key factors considered in stakeholder identification process includes impact, interest, legitimacy, influence, and criticality. All stakeholders are covered to understand their concerns, needs, expectations and actions are prioritized by the Company accordingly.
- b. **Review Process:** The Company periodically reviews and make necessary changes in the stakeholder identification process considering changes in regulatory guidelines, business operations & services, market trends and significant changes in ESG related practices. Regular interaction with all stakeholders is carried out and feedback is taken in timely manner for addressing their concerns.
- c. **Channels of Communication:** Each stakeholder is consulted and communicated through various channels such as direct & virtual meetings, site visits, feedback surveys, focused group discussions, email communication and periodical meetings. An appropriate method is chosen considering the accessibility, number of members involved in each stakeholder group and their availability.
- d. **Frequency of Engagement:** The frequency of engagement may vary for each stakeholder group depending up on the needs and priorities that the Company identifies through review process. The timeline for stakeholder engagement and consultation may include daily, weekly, quarterly, half-yearly and annually.

Based upon the stakeholder identification process, the Company established accountability by assigning resources, roles & responsibilities, proactive & tailored engagement programs considering the needs and importance of each stakeholder. We also conduct regular awareness programs on stakeholder engagement practices to be followed for resolving their concerns and monitoring of stakeholder engagement related activities.

Several internal and external stakeholders identified by the Company are provided below:

- **Employees:** Contributes to the overall productivity, performance and to achieve sustainable vision of the Company.
- **Investors & Shareholders:** Play a significant role by influencing both financial and non-financial performance of the Company.
- **Customers:** May influence the overall growth of the Company and all products & services are designed to meet their requirements.
- **Suppliers:** Helps in distribution of materials, products and services in a timely manner.
- **Communities:** Well-being of local communities and socio-economic development prevents the conflict between local communities and the Company.
- **Governments and Regulatory Bodies:** Responsible for formulation and implementation of laws, regulations and guidelines for conducting the business operations in an ethical manner by practicing transparency and accountability.
- **Directors:** Responsible for overall direction, strategy and policy making, deploying resources and to review the progress.

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

Stakeholder group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Engagement surveys, newsletters & notices, training and development initiatives, town-halls, get-togethers, cultural events.	Quarterly	Employee engagement, Employee capability development, career progression, Reward and Recognition, fair remuneration, effective performance management and recognition, diverse, inclusive and enabling work culture, work-life balance.
Investors and Shareholders	No	Quarterly Earnings Calls, Investor Conferences, Investor meetings, Company Website, Investor Presentations, Press Releases and financial Reports, Communication of financial results via prominent newspapers, Information pertaining to Dividends, Notices and AGM communicated via e-mail.	Quarterly (In case of AGM, annually)	Financial performance, ethical, anti-bribery & anti-corruption practices, risk modeling, protection of rights of all stakeholders, robust strategy for long-term value creation.
Customers	No	Client meetings, Periodic Project, Review Meetings, Performance Reports	Quarterly	Product pricing, innovation and IT deployment, customer privacy and data protection, customer service and claim settlement, ethical, anti-bribery & anti-corruption practices, customized solutions.
Suppliers	No	Site visits and inspection, Supplier's visits, Regular interactions	Annual	Ethical, anti-bribery & anti-corruption practices, transparency, on-time settlement of invoices, fair registration & procurement process, sustained business opportunities.
Communities	Yes	Community projects, Employee volunteerism Awareness workshops, Direct and mediated interactions	Ongoing	Transparency, advancing sustainability, ethical, anti-bribery & anti-corruption practices, contribution to community welfare, healthier & safer societies.
Government and Regulatory Authorities	No	Responding to Government circulated notifications, Statutory Filings & Disclosures	As and when required	Disclosures, corporate governance, adequacy of solvency, fair & transparent reporting, timely compliances, statutory and legal compliance, support for government policy.
Senior Leadership	No	Meetings, In person discussion, Proposals, Policies, Approvals, Notifications	As and when required	Policy, KPI/Targets, capex approvals, ESG performance review.

LEADERSHIP INDICATORS

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

Consultation with all stakeholders on economic, environmental and social topics is carried out on periodical basis through direct interaction, surveys and other platforms as presented in Principle 4 Question 2. The feedback obtained from such consultations is analyzed by the respective business heads and responsible committees such as Stakeholder Relationship Committee, Corporate Social Responsibility Committee and Risk Management Committee etc. The recommendations from these Committees after review and analysis is updated to the Board during board meetings for further proceedings and decision making aligning with the sustainability and business strategy of the Company. The decisions taken by the Board and measures taken by the Company addressing the concerns which are raised through the feedback mechanism is communicated to the stakeholders.

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

Yes. The Company has identified Environment Social and Governance (ESG) related material issues relevant to the Company by conducting materiality assessment. Our holistic ESG materiality assessment approach considered the following aspects:

- Survey responses from senior management & employees of KPIL and other relevant stakeholders of the Company identified through stakeholder identification process.
- Importance and weightage given by various Sustainability frameworks on ESG material issues.
- Peer companies' priorities on ESG material issues.

Based on the survey results and assessment criteria, the prioritization of ESG material issues is carried out and incorporated into the Company's sustainability strategy and policies including goals, targets & commitments. The progress and achievements made by the Company towards sustainability strategy is reviewed on an annual basis.

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

No instances occurred.

**Principle 5: Businesses should respect and promote human rights**

ESSENTIAL INDICATORS

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

Category	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)			
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)	
		Employees					
Permanent	8,428	8,428	100	7,815	7,815	100	
Other than permanent	1,453	1,453	100	2,000	2,000	100	
Total Employees	9,881	9,881	100	9,815	9,815	100	
		Workers					
Permanent	13	13	100	23	23	100	
Other than permanent	12,331	12,331	100	13,048	13,048	100	
Total Workers	12,344	12,344	100	13,071	13,071	100	

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

Category	FY 2024 (Current Financial Year)					FY 2023 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
Employees										
Permanent										
Male	8,158	-	-	8,158	100	7,555	-	-	7,555	100
Female	270	-	-	270	100	260	-	-	260	100
Other than Permanent										
Male	1,431	-	-	1,431	100	1,991	-	-	1,991	100
Female	22	-	-	22	100	9	-	-	9	100
Workers										
Permanent										
Male	13	-	-	13	100	23	-	-	23	100
Female	0	-	-	0	NA	0	-	-	0	NA
Other than Permanent										
Male	12,194	-	-	12,194	100	12,929	-	-	12,929	100
Female	137	-	-	137	100	119	-	-	119	100

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

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (INR)	Number	Median remuneration/ salary/ wages of respective category (INR)
Board of Directors (BoD)	8	1.38 crores	1	0.54 crores
Key Managerial Personnel	3	8.61 crores	1	1.03 crores
Employees other than BoD and KMP	8,155	7.16 lacs	269	6.61 lacs
Workers	13	5.07 lacs	0	-

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Gross wages paid to females as % of total wages	2.81%	#

Note: # We have initiated the calculation for this indicator from FY 2024.

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, KPIL is committed to upholding human rights across its operations and throughout its value chain, which includes employees, workers, and other essential stakeholders. We have implemented robust systems and procedures to ensure transparency, fairness, and equality. Our Corporate Human Rights Policy outlines the responsibilities and behavioral expectations for all entities engaging with KPIL, including compliance with relevant human rights and national laws, prevention of human rights abuses, respect for the rights of individuals in affected communities, and the promotion of nondiscriminatory practices. This policy is applicable to our subsidiaries, joint ventures, suppliers, vendors, and contractors. A specific committee within KPIL is tasked with addressing any human rights issues that arise. Employees can lodge their complaints, which are handled by a dedicated team. The employees can track their complaints and resolution through the portal.

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

KPIL has a Human Rights Policy with detailed guidelines on reporting of human rights related complaints/ issues and redressal mechanisms. All employees and workers of KPIL should strictly adhere to the Human Rights and Code of Conduct policies and guidelines. These policies and guidelines are applicable to all employees and workers regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Implementation of human rights policies and principles carried out across all business operations, value chain partners and other stakeholders with whom we operate. We regularly conduct human rights related training programs to all employees and workers and periodical assessments are carried out to identify violation of human rights if any. We ensure basic human rights and freedom at workplace to all employees and workers and provide dignity, fairness, respect and equality at workplace. Any human rights related complaints/ issues such as injustice, criticism, unfairness or violation of dignity shall be reported through the site management team, one-to-one interactions, safety meetings, periodic assessment and other forums. We also have an internal portal for HR grievances (HR Helpdesk) where Employees can lodge their complaints, which are handled by a dedicated team. The employees can track their complaints and resolution through the portal.

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

	FY 2024 (Current Financial Year)		FY 2023 (Previous Financial Year)	
	Filed during the year	Pending resolution at the end of year	Filed during the year	Pending resolution at the end of year
Sexual Harassment	1	Nil	1	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil
Child Labour	Nil	Nil	Nil	Nil
Forced labour/ Involuntary labour	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	1	1
Complaints on POSH as a % of female employees/ workers	0.23	0.26
Complaints on POSH upheld	Nil	Nil

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

The Company has established a formal mechanism for addressing complaints of sexual harassment, embodied in a structured POSH committee aligned with the Company's Anti-Sexual Harassment Policy. Moreover, the Company has ensured compliance with the provisions outlined in the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

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

Yes

10. Assessments for the year:

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

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

During the FY 2024, no significant risks or concerns were found throughout the assessment, thus prompting no need for corrective actions.

LEADERSHIP INDICATORS

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

The Company has processes to address any human rights grievances or complaints, e.g., Grievance redressal policy, Prevention of Sexual Harassment at Workplace Policy, corporate Human Rights Policy etc. Further, the Company also introduced improvement measures for its employees through new policies for parental leaves, sabbatical leaves, higher education, etc.

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

Human rights due diligence was not conducted during the reporting year.

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

The Company's premises are designed to be fully accessible, ensuring that differently abled employees and visitors can navigate them comfortably and safely.

4. Details on assessment of value chain partners:

Section	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Nil
Discrimination at workplace	Nil
Child Labour	Nil
Forced Labour/Involuntary Labour	Nil
Wages	Nil
Others - please specify	Nil

Note: Value chain partners such as material suppliers, contractors are evaluated periodically. However, major material suppliers including raw material, capital machineries and high value suppliers are assessed based on Kalpataru Supplier Code of Conduct and parameters such as child labour, forced labour, sexual harassment, and discrimination. We are in the process of strengthening our data management practices to quantify the percentage of value chain partners covered in the assessment and we will be disclosing the data in the coming financial years.

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

During the FY 2024, no significant risks or concerns were found in the assessments conducted for our value chain partners based on Kalpataru Supplier Code of Conduct. Thus, prompting no need for corrective actions.



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

ESSENTIAL INDICATORS

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	47,095	47,783
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	47,095	47,783
From non-renewable sources		
Total electricity consumption (D)	1,14,201	152,613
Total fuel consumption (E)	10,24,165	7,72,296
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	11,38,366	9,24,909
Total energy consumed (A+B+C+D+E+F)	11,85,461	9,72,692
Energy Intensity per rupee of turnover (Total energy consumption in GJ/ Rs. Crore of Revenue)	70.7	67.8
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed in GJ/ Revenue from operations adjusted for PPP)	70.2	#
Energy intensity (optional)- the relevant metric may be selected by the entity- (Total energy consumed in GJ/Employee)	119.9	99

#We have initiated the calculation for this indicator from FY 2024 only.

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, assurance has been undertaken by M/s TÜV SÜD South Asia.

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.

No, none of our plants or projects sites are identified as designated consumers (DCs)

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	5,88,795	8,05,307
(ii) Groundwater	6,35,905	12,34,025
(iii) Third party water	1,410,279	9,33,178
(iv) Seawater / desalinated water	123	2,535
(v) Others	56,684	1,09,500
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	2,691,786	30,84,545
Total volume of water consumption (in kilolitres)	2,454,699	29,61,163
Water intensity per rupee of turnover (Water consumed in KL/ Rs. Crore of Revenue)	146.4	207
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption in KL / PPP adjusted revenue in Rs. Crore)	145.4	#
Water intensity (optional) – the relevant metric may be selected by the entity (Total water consumption in KL/ Employee)	248.4	302

#We have initiated the calculation for this indicator from FY 2024 only.

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, assurance has been undertaken by M/s TÜV SÜD South Asia

4. Provide the following details related to water discharged:

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	49,188	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) To Groundwater		
- No treatment	176,272	-
- With treatment – please specify level of treatment	-	-
(iii) To Seawater		
- No treatment	5.86	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties		
- No treatment	-	-
- With treatment – please specify level of treatment	11,621 - Secondary treatment	-
(v) Others		
- No treatment (Used for gardening purposes)	-	-
- With treatment – please specify level of treatment	-	-
Total water discharged (in kilolitres)	237,087	-

Note: The water discharged is the fresh water withdrawn in excess for consumption and water that doesn't require further treatment.

We were in the process of improving our data management practices in FY2023, as a result data has been shared for FY2024 only.

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, assurance has been undertaken by M/s TÜV SÜD South Asia.

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

Yes. 100% of the plant operations is Zero Liquid Discharge. All of our 4 plants (i.e., 2 in Rajasthan, 1 in Gandhinagar, 1 in Raipur) have Zero Liquid Discharge mechanism. The water is used for landscaping and toilet flushing.

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

Parameter	Please specify unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
NOx	µg/m3	33	37
SOx	µg/m3	42	44
Particulate matter (PM)	µg/m3	40	38
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	mg/m3	Nil	Nil
Others- please specify	PPM	Nil	Nil

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, assurance has been undertaken by M/s TÜV SÜD South Asia.

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

Parameter	Unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	69,933	50,494
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	22,523	30,099

Parameter	Unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Scope 1 and Scope 2 emissions intensity rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/ Rs. Crore of Revenue)	tCO2e/ PPP adjusted revenue in Rs. Crore	5.52	5.62
Total Scope 1 and Scope 2 Emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)	tCO2e/ INR in Cr	5.48	#
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	tCO2e/ employee	9.36	8.21

#We have initiated the calculation for this indicator from FY 2024 only.

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, assurance has been undertaken by M/s TÜV SÜD South Asia.

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

In FY 2024, KPIL significantly advanced its commitment to reducing greenhouse gas (GHG) emissions through strategic enhancements in renewable energy utilization and operational efficiencies. Key initiatives included:

- The installation of solar power units at our Raipur and Gandhinagar plants, with capacities of 1350 KWp and 450 KWp, respectively.
- Transitioned the fuel usage at our Raipur plant from LPG to propane gas, aligning with our strategy to minimize our carbon footprint supporting the environmental objectives.
- KPIL has installed 377 kWp of solar panels across 37 sites of all our business divisions. This initiative is expected to reduce our carbon emissions by 450 MT CO2e annually.
- KPIL has also adopted energy-efficient Brushless Direct Current (BLDC) motor fans in 216 units across our sites and worker housing, which are projected to save up to 65% in energy compared to conventional fans and contribute an additional annual reduction of 24 tons in GHG emissions.

These strategic initiatives reflect KPIL's ongoing dedication to environmental responsibility and our pursuit of innovative solutions to foster a sustainable operational framework.

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Waste generated (in MT)		
Plastic waste (A)	644.3	230.1
E-waste (B)	5.14	4.2
Bio-medical waste (C)	2.34	0.1
Construction and demolition waste (D)	36,561.9	16,936
Battery waste (E)	7.07	0.7
Radioactive waste (F)	0	0
Other hazardous waste. Please specify, if any. (G)	4,490.7	6,234.7
Other non-hazardous waste generated (H). Please specify, if any.	24,820.9	257
Total (A+B + C + D + E + F + G + H)	66,532	23,663
Waste intensity per rupee of turnover (Total waste generated in MT / Rs. Crore of Revenue)	3.97	1.65
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/PPP adjusted revenue in Rs. Crore)	3.94	#

#We have initiated the calculation for this indicator from FY 2024 only.

*As a part of continuous improvement process we have strengthened our data management practices resulting in maturity of waste management accounting.

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

Category of waste	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
(i) Recycled	29,237	20,434
(ii) Re-used	2,368	762
(iii) Other recovery operations	34	1,220
Total	31,639	22,416

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

Category of waste	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
(i) Incineration	4.7	9.5
(ii) Landfilling	30,316*	1,220
(iii) Other disposal operations	0	0
Total	30,320	1,229.5

*As a part of continuous improvement process we have strengthened our data management practices resulting in maturity of waste management accounting.

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, assurance has been undertaken by M/s TÜV SÜD South Asia.

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.

Our systems and practices are in line with the industry's best practices complying the norms of the pollution control board. We minimize the waste generation by implementation of 3R waste management hierarchy (Reduce, Reuse & Recycle), produce value added products, practice recovery of energy through combustion of waste and divert the waste going to the landfill. Our hazardous waste is managed as per the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 published by the Central Pollution Control Board. The disposal of respective categories of wastes is carried out only through the authorized agencies by the urban local body and pollution control boards. We continuously improve our products, processes & systems to reduce usage of hazardous and toxic chemicals and ensure disposal of such wastes, if any, in a safe and responsible manner.

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, specify details in the following format:

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
--------	--------------------------------	--------------------	---

The Company does not have any plants and offices in the above mention areas. Being an EPC Company, operations are carried out at the project sites where environmental approval and clearances are obtained by the clients/owners of the projects.

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

Name and brief details of the project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
---------------------------------------	----------------------	------	---	--	-------------------

Being an EPC Company, operations are carried out at the project sites where environmental impact assessments of projects are undertaken by the clients/owners of the projects.

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

Yes. The Company is compliant with the applicable laws pertaining to Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, and Environment Protection Act and rules thereunder.

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Not Applicable				

LEADERSHIP INDICATORS

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

Note: We are undertaking a comprehensive water risk assessment exercise to identify our operations in water stressed areas. We will be reporting on the same in coming years.

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

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) To Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	-	-
Total volume of water consumption (in kilolitres)	-	-
Water intensity per rupee of turnover (Water consumed / turnover)	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
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)	-	-

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

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

Note: We are in the process of calculating our Scope 3 emissions and will be reporting the same in the coming years.

Parameter	Unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)		-	-
Total Scope 3 emissions per rupee of turnover		-	-
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		-	-

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

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

Not Applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	KPIL has installed 1,350 KWp solar unit at Raipur Plant to increase use of Renewable energy	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110–121)	Reduction of GHG emission by ~1,050 tons per year
2	KPIL has installed 450 KWp solar unit at Gandhinagar Plant to increase use of Renewable energy	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110 -121)	Reduction of GHG emission by ~330 tons per year
3	KPIL has changed the Fuel used at Raipur plant from LPG to Propane gas, to curb GHG emissions. Provided dedicated storage Capacity	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110 -121)	Reduction of GHG emission by 16%
4	Automated painting booth is installed with conveyor facility at our Raipur Plant	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110-121)	Better work environment
5	Conveyour facility to shift the bundles at Gandhinagar & Raipur plant to reduce the consumption of diesel operated vehicles	Please refer the Natural Capital section of the Annual Report FY 2024 (page110-121)	Reduction of time from 5 days to 1 day
6	Hydrogeological survey and hydrological survey to install rain water harvesting structure at our Uniara Renewable Power Generation Plant (Biomass)	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110-121)	84,000 KL of rain water harvesting per year
7	BLDC or Brushless direct current motor Fans provided in our SIO sites and worker housing 216 no's', Unlike traditional fans, BLDC fans use electronic commutation to control the speed of the motor, resulting in energy savings of up to 65% compared to conventional fans. We decided to purchase BLDC Fans for our future requirements.	Please refer the Natural Capital section of the Annual Report FY 2024 (page110-121)	24 tons GHG emission reduction every year with no compromise on delivery of ir
8	The Company has installed solar power panels of 377 kWp across 37 projects to cater to energy needs in project site, stores, project office, guest-houses, worker housing etc.	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110-121)	450 tons of GHG emission reduction per year

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
9	The Company's B&F business stored around 400 lakh litres rain harvested water in the pond at IIT Tirupati Project site for the reuse of it for various construction activities, dust suppression, consolidation etc.	Please refer the Natural Capital section of the Annual Report FY 2024 (page110-121)	4,000 KL of rain water harvesting
10	The Company's B&F business has segregated and graded around 6000 M3 of construction waste and reused it for various construction activities and back filling.	Please refer the Natural Capital section of the Annual Report FY 2024 (page 110-121)	Avoided 3,484 tons CO ₂ e emissions

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

Yes, the Company has an emergency preparedness plan covering all projects sites and business operations with detailed guidelines, procedures and action plans for mitigating the risks and impacts in a timely manner. In the event of any major disruption such as process hazard, natural calamities; we have an appropriate action plan for the identified risks to respond to, mitigate the effects of, and restore the operations. We have conducted training and awareness programs to all employees and workers by providing the details of signaling mechanisms, roles & responsibilities, assembly points, medical arrangements to be followed in case of any business disruption.

We have appropriate systems, procedures and mechanisms to address various risks through implementation of emergency preparedness plan and guidelines on appropriate practices to be followed during the occurrence of any disaster.

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

There have been no reports of significant adverse environmental impacts within our value chain. To mitigate potential risks and promote sustainable practices, all vendors and service providers are required to comply with the Kalpataru Supplier Code of Conduct. These guidelines mandates adherence to environmental regulations and encompasses various standards including health and safety, labour practices, human rights, and ethical behavior. Additionally, the code enforces strict prohibitions against child and forced labour, ensures the maintenance of minimum wage requirements, supports freedom of association, and advocates for environmental conservation. These measures are integral to our commitment to responsible business conduct and sustainability.

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

The Company ensures compliance with our internal policies across our value chain. All principal material suppliers are required to certify adherence to the Kalpataru Supplier Code of Conduct, which includes commitments to environmental regulations. We are actively improving our evaluation and auditing processes to be more aligned with specific sustainability criteria and other critical material concerns. This initiative is part of our ongoing effort to enhance environmental stewardship among our value chain partners.



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

ESSENTIAL INDICATORS

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/ National)
1	Confederation of Indian Industry (CII)	National
2	Federation of Indian Chamber of Commerce and Industry (FICCI)	National
3	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
4	Indian Electrical & Electronics Manufacturers' Association (IEEMA)	National
5	Project Exports Promotion Council of India (PEPCI)	National
6	EEPC India (Engineering Exports Promotion Council)	National
7	International Pipeline & Offshore Contractors Association	National
8	Cable and Conductors Manufacturers Association of India (CCMAI)	National
9	Central Board of Irrigation and Power (CBIP)	National
10	Gujarat Chamber of Commerce and Industry (GCCCI)	State

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
Nil	Nil	Nil

LEADERSHIP INDICATORS

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

KPIL refrains from involvement in lobbying activities. Senior executives of KPIL hold memberships in industry bodies engaged in shaping public policy related to industry & business. KPIL's advocacy efforts are primarily directed towards areas of governance, economic reform, and energy security, with a steadfast commitment to advocating for the broader public good.

S. No.	Public Policy Advocated	Method resorted for such advocacy	Whether information available in public domain (Yes / No)	Frequency of Review by Board (Annually/Half yearly/Quarterly/ Others- please specify)	Relevant Web link
	None	None	None	None	None



Principle 8: Businesses should promote inclusive growth and equitable development

ESSENTIAL INDICATORS

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

Name and brief details of the project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
---------------------------------------	----------------------	----------------------	---	--	-------------------

We did not conduct SIA in FY 2024.

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
--------	--	-------	----------	---	--------------------------	---

No rehabilitation and resettlement was undertaken by the entity during the reporting year.

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

The CSR team and the Projects/Plant teams maintain regular communication with the community both at the Plant and Project site locations. This ongoing engagement with key community stakeholders ensures that grievances are addressed locally. The Plant & Site location teams serve as the primary contact for local communities, and grievance resolution primarily occurs through direct, one-on-one interactions.

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	10.48%	15.4%
Directly from within India	88.7%	#

*We have initiated the calculation for this indicator from FY 2024.

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 2024 (Current Financial Year)*	FY 2023 (Previous Financial Year)
Rural	3.80%	
Semi-urban	5.76%	
Urban	20.79%	#
Metropolitan	69.64%	

Note: *Data is of 2471 employees, who joined in FY 2024

#We have initiated the calculation for this indicator from FY 2024.

LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken
NA	NA

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

S. No.	State	Aspirational District	Amount Spent (In INR lacs)
1	Odisha	Dhenekal	7.03
2	Odisha	Koraput	6.48
3	Odisha	Gajapati	5.27
4	Odisha	Pakur	4.72
5	Odisha	Godda	4.72
6	Assam	Darrang	4.72
7	Jharkhand	Khunti	19.95

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

KPIL is one of the leading global power transmission and infrastructure EPC companies. Our procurement strategy primarily involves sourcing industry-specific, standard items from client-approved vendors. While we do not currently operate under a preferential procurement policy targeting marginalized or vulnerable groups, we are committed to ethical practices and diversity in our supply chain. In FY 2024 our procurement from MSME / small vendors was 10.48% of our total procurement.

(b) From which marginalized /vulnerable groups do you procure?

Not Applicable

(c) What percentage of total procurement (by value) does it constitute?

Not Applicable

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

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

As the Company is engaged in the EPC business, the concept of deriving and sharing benefits from intellectual properties based on traditional knowledge is not applicable to our operations.

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

Name of authority	Brief of the Case	Corrective action taken
-------------------	-------------------	-------------------------

As the Company is engaged in the EPC business, the concept of deriving and sharing benefits from intellectual properties based on traditional knowledge is not applicable to our operations.

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Kalpa Aarogya Seva (KARE)	53,072	All the CSR projects include beneficiaries from vulnerable and marginalised backgrounds, including women, children, persons with disabilities, elderly, Scheduled Caste, Scheduled Tribe, Other backward classes, etc. No bifurcation of such data was done in FY 2024
2	Kalpa Vidya Kalpa Kaushal (KVKK) and Shiksha Abhiyan	27,778	
3	Kalpa Gramoday and Unnati Abhiyan	2,727	
4	SAVIOUR and Paryavaran Abhiyan	5,194 Animals, 5,810 Beneficiaries & 800 saplings	



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

ESSENTIAL INDICATORS

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

KPIL specializes in providing industrial inputs for commercial applications and does not engage directly with end consumers. Our Company's approach to customer feedback is centered around satisfactory completion of infrastructure projects, through which we receive detailed project completion reports. These reports serve as a testament to our project execution capabilities, ethical business conduct, and strict compliance with agreed-upon specifications and contractual obligations, ensuring a high degree of customer satisfaction.

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	As an EPC company, KPILs core business activities do not require specific labeling about environmental and social parameters, safe usage, or recycling and disposal; hence, this metric is not applicable to our operations.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil	Nil	Nil
Delivery of essential services	Nil	Nil	Nil	Nil	Nil	Nil
Restrictive Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Unfair Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Other	-	-	-	-	-	-

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

	Number	Reasons for recall
Voluntary recalls	As an EPC company, KPIL does not engage in the manufacture or sale of consumer products; therefore, instances of product recalls, whether voluntary or forced due to safety issues, are not applicable to our operations.	
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, KPIL is committed to maintaining the highest standards of cybersecurity and data privacy under the guidance of our Risk Management Committee. Our comprehensive Cyber Security Assurance Framework addresses three critical areas: people, processes, and technology. To bolster awareness, we conduct ongoing online cybersecurity campaigns focusing on phishing and email security. We also ensure that our network devices, server operating systems, and hardware receive periodic upgrades to stay ahead of emerging threats. Active monitoring of security logs allows us to detect and mitigate malicious activities promptly. Data protection is rigorously enforced throughout its creation, storage, transit, and retrieval phases. Detailed policy information is available on the Company's internal portal for employee access.

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

As an EPC company focused on infrastructure development for corporate clients, KPIL does not engage in customer-facing or retail activities; therefore, issues related to advertising, product recalls, and regulatory penalties pertinent to consumer goods and services are not applicable to our operations.

7. Provide the following information relating to data breaches:

- a. **Number of instances of data breaches** - Nil
- b. **Percentage of data breaches involving personally identifiable information of customers** – Not applicable, as there were no data breaches
- c. **Impact, if any, of the data breaches** - Not applicable, as there were no data breaches

LEADERSHIP INDICATORS

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

<https://kalpataruprojects.com/investors/corporate-governance/policies-guidelines>

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

KPIL operates within the EPC sector, focusing on infrastructure development for corporate clients, and thus does not engage in consumer-facing activities that require education on the safe and responsible usage of products.

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

As an EPC company serving corporate clients, KPIL is not involved in consumer services; therefore, mechanisms to inform consumers about potential disruptions of essential services are not applicable to our operations.

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

Yes, KPIL adheres to the local legal requirements by providing detailed labeling and informational codes on our manufactured towers. This includes not only mandatory information but also client-specific details such as the client's name and the specific project for which the tower is intended. We proactively engage with our clients to gather feedback at the conclusion of each project. Customer satisfaction is formally recognized through the issuance of "Project Completion Certificates." During the financial year 2023-24, KPIL received numerous commendations and certificates from various clients, reflecting our commitment to excellence and client satisfaction across various locations of operation.



Assurance statement on third-party verification of sustainability information

Unique identification number: **4153931657**

TÜV SÜD South Asia Pvt Ltd. (hereinafter TÜV SÜD) has been engaged by Kalpataru Projects International Limited to perform a limited assurance and verification of sustainability information in the SUSTAINABILITY REPORT “BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT”, of Kalpataru Projects International Limited (hereinafter “Company”) for the period from 1st April 2023 to 31st March 2024. The verification was carried out according to the steps and methods described below.

Scope of the verification

The third-party verification was conducted to obtain limited assurance about whether the sustainability information is prepared in accordance with the reporting criteria of the Standard on International Standard on Assurance Engagements (ISAE) 3000 (hereinafter “Reporting Criteria”).

The following selected disclosures (“parts of the report”) are included in the scope of the assurance engagement for reporting year April 1, 2023 – March 31, 2024, along with comparative previous year information.

The following selective disclosures in the Report “BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT”, published at Integrated Annual Report FY 2023-24 website link

S.No.	BRSR indicator reference	Description of indicator
1.	Section A – 20-a	Employees and workers (including differently abled).
2.	Section A – 20-b	Differently abled Employees and workers.
3.	Section A – 21	Participation/Inclusion/Representation of women.
4.	Section A – 22	Turnover rate for permanent employees and workers.
5.	Section A – 25	Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct.
6.	Section C – Principle 1 – 1 (Essential Indicator)	Percentage coverage by training and awareness programmes on any of the Principles during the Financial Year.
7.	Section C – Principle 2 – 4 (Essential Indicator)	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.
8.	Section C – Principle 3 – 1 (Essential Indicator)	Details of measures for the well-being of employees and workers.
9.	Section C – Principle 3 – 2 (Essential Indicator)	Details of retirement benefits, for Current Financial Year.
10.	Section C – Principle 3 – 3 (Essential Indicator)	Accessibility to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.



11.	Section C – Principle 3 – 5 (Essential Indicator)	Return to work and Retention rates of permanent employees and workers that took parental leave.
12.	Section C – Principle 3 – 8 (Essential Indicator)	Details of training given to employees and workers.
13.	Section C – Principle 3 – 9 (Essential Indicator)	Details of performance and career development reviews of employees and worker.
14.	Section C – Principle 3 – 11 (Essential Indicator)	Details of safety related incidents.
15.	Section C – Principle 3 – 13 (Essential Indicator)	Number of Complaints on working conditions & Health safety made by employees and workers.
16.	Section C – Principle 3 – 14 (Essential Indicator)	Assessments for the year (Health and safety practices, Working Conditions).
17.	Section C – Principle 4 – 2 (Essential Indicator)	List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.
18.	Section C – Principle 5 – 1 (Essential Indicator)	Employees and workers who have been provided training on human rights issues and policies of the entity.
19.	Section C – Principle 5 – 2 (Essential Indicator)	Details of minimum wages paid to employees and workers.
20.	Section C – Principle 5 – 5 (Essential Indicator)	Internal mechanisms in place to redress grievances related to human rights issues.
21.	Section C – Principle 5 – 6 (Essential Indicator)	Number of Complaints made by employees and workers
22.	Section C – Principle 5 – 10 (Essential Indicator)	Assessments for child labour, Forced/involuntary labour, Sexual harassment, Discrimination at workplace and Wages.
23.	Section C – Principle 6 – 1 (Essential Indicator)	Details of total energy consumption and energy intensity.
24.	Section C – Principle 6 – 3 (Essential Indicator)	Details of total water consumption and water intensity.
25.	Section C – Principle 6 – 6 (Essential Indicator)	Details of air emissions (other than GHG emissions) by the entity.
26.	Section C – Principle 6 – 7 (Essential Indicator)	Details of greenhouse gas emissions (Scope 1 and Scope 2 emissions).
27.	Section C – Principle 6 – 9 (Essential Indicator)	Details of total waste generated.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the sustainability reporting, and accordingly, we do not express a conclusion on this information. It was not part of our engagement to review product- or service-related information, references to external information sources, expert opinions and future-related statements in the Report.

Responsibility of the Company

The legal representatives of the Company are responsible for the preparation of the sustainability information in accordance with the Reporting Criteria. This responsibility includes in particular the selection and use of appropriate methods for sustainability reporting, the collection



and compilation of information and the making of appropriate assumptions or, where appropriate, the making of appropriate estimates. Furthermore, the legal representatives are responsible for necessary internal controls to enable the preparation of a sustainability report that is free of material - intentional or unintentional - erroneous information.

Verification methodology and procedures performed

The verification engagement has been planned and performed in accordance with the verification methodology developed by the TÜV SÜD Group which is based upon the ISO 17029 and ISAE 3000.

The applied level of assurance was “limited assurance”. Because the level of assurance obtained in a limited assurance, the engagement is lower than in a reasonable assurance engagement, the procedures the verification team performs in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement.

The verification was based on a systematic and evidence-based assurance process limited as stated above. The selection of assurance procedures is subject to the auditor’s own judgment.

The procedures included amongst others:

- Inquiries of personnel who are responsible for the stakeholder engagement and materiality analysis to understand the reporting boundaries
- Evaluation of the design and implementation of the systems and processes for compiling, analysing, and aggregating sustainability information as well as for internal controls
- Inquiries of company’s representatives responsible for collecting, preparing and consolidating sustainability information and performing internal controls
- Analytical procedures and inspection of sustainability information as reported at group level by all locations.
- Assessment of local data collection and management procedures and control mechanisms through a sample survey at Corporate office in Mumbai, Corporate EHS department Mumbai office, Oil and Gas India office in Mumbai, T & D International office in Mumbai, Urban Infrastructure Division, India office Mumbai, Building and Factories north India office in Noida, Water and Railway Division India office in Noida, Gandhinagar Plant and Corporate HR office in Gandhinagar.

Conclusion

On the basis of the assessment procedures carried out from 28.03.2024 to 25.04.2024, Nothing has come to our attention to suggest that the Report does not meet the completeness with respect the Reporting Criteria.

Limitations

The assurance process was subject to the following limitations:

- The subject matter information covered by the engagement are described in the “scope of the engagement”. Assurance of further information included in the sustainability reporting was not performed. Accordingly, TÜV SÜD do not express a conclusion on this information.
- The assurance scope excluded forward-looking statements, product- or service-related information, external information sources and expert opinions.



Use of this Statement

The Company must reproduce the TÜV SÜD statement and possible attachments in full and without omissions, changes, or additions.

This statement is by the scope of the engagement solely intended to inform the Company as to the results of the mandated assessment. TÜV SÜD has not considered the interest of any other party in the selected sustainability information, this assurance report or the conclusions TÜV SÜD has reached. Therefore, nothing in the engagement or this statement provides third parties with any rights or claims whatsoever.

Independence and competence of the verifier

TÜV SÜD South Asia Pvt Ltd. is an independent certification and testing organization and member of the international TÜV SÜD Group, with accreditations also in the areas of social responsibility and environmental protection. The assurance team was assembled based on the knowledge, experience and qualification of the auditors. TÜV SÜD South Asia Pvt Ltd hereby declares that there is no conflict of interest with the Company.

Place, Date

3rd May 2024

Gurugram (Haryana)

A handwritten signature in blue ink, appearing to read 'Prosenjit Mitra'.

Prosenjit Mitra

DGM- Audit Services

(Business Line - Verification, Validation & Audit)

A handwritten signature in blue ink, appearing to read 'Shashank Chaudhary'.

Shashank Chaudhary

Manager- Sustainability Services