

July 17, 2023

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor,
Plot No. C-1, G Block,
Bandra Kurla Complex, Bandra (East)
Mumbai - 400 051.

BSE Limited

Phirozee Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Sub.: Submission of Business Responsibility and Sustainability Report for FY2022-23

Ref.: Scrip ID - STLTECH/ Scrip Code - 532374

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for the financial year ended 31 March 2023, which forms part of Annual Report for FY2022-23.

The same is also being uploaded on the website of the Company at <https://www.stl.tech/>

Kindly take the same on record.

Thanking you.

Yours faithfully,

For **Sterlite Technologies Limited**

Amit Deshpande

General Counsel & Company Secretary (ACS 17551)

Encl.: As above.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Company	L31300PN2000PLC202408
2	Name of the Company	STERLITE TECHNOLOGIES LTD.
3	Year of Incorporation	March 24, 2000
4	Registered office address	4 th Floor, Godrej Millennium, Koregaon Road 9, STS 12/1, Pune-411001, Maharashtra
5	Corporate office address	Godrej Millenium 9, Koregaon Road, Pune - 411 001 Maharashtra, India
6	E-mail id	stl.communications@sterlite.com stl.communications@stl.tech
7	Telephone	+91 20 30514000
8	Website	https://www.stl.tech/
9	Financial year for which reporting is being done	April 1, 2022 to March 31, 2023 (FY 2022-23)
10	Name of the Stock Exchange(s) where shares are listed	1) National Stock Exchange of India Limited (NSE) 2) BSE Limited (BSE)
11	Paid-up capital	79.72 crores
12	Name and contact details of the person who may be contacted in case of any queries on the BRSR report	Anjali Byce, Chief Human Resources Officer +91-20-30514000; anjali.byce@sterlite.com anjali.byce@stl.tech
13	Reporting Boundary	Standalone

II. Products/services

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

S. No	Description of main activity	Description of business activity	% Of turnover
1	STL is a leading global optical company. Telecom operators, cloud companies, citizen networks, and large enterprises recognize and rely on STL for advanced capabilities in optical connectivity	Optical Networking Business	70.05%
2	Global services offers system integration services in ICT space by integrating different technological products, networks, data centre and applications.	Global Service Business	25.22%
3	The Optical Connectivity Solution, has been created to help telecom operators, ISPs, citizen networks, and major corporations build out networks more quickly, more effectively, and more affordably. We are offering end-to-end functionality, including optical fibre components, pre-connectorized kits, and post-sales support.	Optical Interconnect	4.73%

15. 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	Optical fibre cable	2731	44.83%
2	Optical fibre	2310	16.24%
3	Copper telecom cables	2732	8.99%
4	Optical fibre cable laying services	4321	25.22%
5	Optical interconnect	2620	4.73%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	6	3	9
International	0	0	0

17. Markets served by the entity**a. Number of locations**

Locations	Number
National (No. of states)	28
International (No. of countries)	100

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

45%

c. A brief on types of customers

STL manufacturing facilities serve diverse customers across the entire value chain-

- Telecom companies
- Cloud companies
- Internet Service Providers
- Large enterprises

IV. Employees**18. Details as on March 31, 2023****a. Employees and workers (including differently abled)**

S. No. Particulars	Total (A)	Male		Female		Other	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	%(D/A)
EMPLOYEES							
1 Permanent (D)	1,591	1,408	88.50%	183	11.50%	0	0%
2 Other than permanent (E)	923	878	95.12%	44	4.77%	1	0.11%
3 Total employees (D+E)	2,514	2,286	90.93%	227	9.03%	1	0.04%
WORKERS							
1 Permanent (F)	32	26	81.25%	6	18.75%	0	0%
2 Other than permanent (G)	3,126	2,665	85.25%	461	14.75%	0	0%
3 Total workers (F+G)	3,158	2,691	85.21%	467	14.79%	0	0%

b. Differently abled employees and workers

S. No. Particulars	Total (A)	Male		Female		Other	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No.(D)	%(D/A)
DIFFERENTLY ABLED EMPLOYEES							
1 Permanent (D)	4	3	75.00%	1	25.00%	0	0.00%
2 Other than permanent (E)	0	0	0.00%	0	0.00%	0	0.00%
3 Total differently abled employees (D+E)	4	3	75.00%	1	25.00%	0	0.00%
DIFFERENTLY ABLED WORKERS							
1 Permanent (F)	0	0	0.00%	0	0.00%	0	0.00%
2 Other than permanent (G)	5	5	100%	0	0.00%	0	0.00%
3 Total differently abled workers (F+G)	5	5	100%	0	0.00%	0	0.00%

19. Participation/inclusion/representation of women

	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors	7	1	14.28%
Key Management Personnel	3	0	0.00%

20. Turnover rate for permanent employees and workers

	FY 2022-23				FY 2021-22				FY 2020-21			
	Male	Female	Other	Total	Male	Female	Other	Total	Male	Female	Other	Total
Permanent Employees	20%	32%	0	21%	23%	35%	0	25%	-	-	-	-
Permanent Workers	19%	17%	0	19%	0	0	0	0	-	-	-	-

V. Holding, subsidiary and associate companies (including joint ventures)

21.

a. Names of holding / subsidiary / associate companies / joint ventures:

S. No.	Name of Holding/Subsidiary/ Associate Companies/Joint Venture (A)	Indicate whether Holding/ Subsidiary/ Associate/Joint Venture	% Of shares held by listed entity	Does the entity indicated in column A, participate in the Business Responsibility initiatives of listed entity? (Yes/No)
1	Twin Star Overseas Limited, Mauritius (Immediate holding company)	Holding	52.54%	No
2	Jiangsu Sterlite Fiber Technology Co. Ltd.	Subsidiary	100%	Yes
3	Sterlite Global Ventures (Mauritius) Limited	Subsidiary	100%	No
4	Sterlite Technologies UK Ventures Limited	Subsidiary	100%	No
5	Speedon Network Limited	Subsidiary	100%	No
6	Sterlite Telesystems Limited	Subsidiary	100%	No
7	Elitecore Technologies (Mauritius) Limited	Subsidiary	100%	No
8	Elitecore Technologies SDN BHD. (Malaysia)	Subsidiary	100%	No
9	Sterlite (Shanghai) Trading Company Limited	Subsidiary	100%	No
10	Sterlite Tech Holding Inc.	Subsidiary	100%	No
11	Sterlite Technologies Inc.	Subsidiary	100%	Yes
12	Metallurgica Bresciana S.p.A	Subsidiary	100%	Yes
13	Sterlite Innovative Solutions Limited	Subsidiary	100%	No
14	STL Digital Limited (earlier "Sterlite Tech Connectivity Solutions Limited")	Subsidiary	100%	Yes
15	Sterlite Tech Cables Solutions Limited	Subsidiary	100%	Yes
16	Vulcan Data Centre Solutions Limited	Subsidiary	100%	Yes
17	PT Sterlite Technologies Indonesia	Subsidiary	100%	No
18	Sterlite Technologies Pty. Ltd	Subsidiary	100%	No
19	Sterlite Technologies DMCC	Subsidiary	100%	No
20	STL Optical Interconnect S.p.A.	Subsidiary	100%	Yes
21	Optotec S.p.A.	Subsidiary	100%	Yes
22	Optotec International S.A.	Subsidiary	100%	No
23	STL Edge Networks Inc.	Subsidiary	100%	No
24	STL Networks Limited	Subsidiary	100%	No
25	STL Tech Solutions Limited, UK	Subsidiary	100%	Yes
26	STL UK Holdco Limited, UK	Subsidiary	100%	No
27	STL Digital Inc. (USA)	Subsidiary	100%	No
28	Clearcomm Group Limited, UK	Subsidiary	80%	Yes
29	STL Optical Tech Limited	Subsidiary	100%	No
30	STL Network Services Inc., US	Subsidiary	100%	No
31	STL Solutions Germany GmbH	Subsidiary	100%	No
32	Sterlite Condu spar Industrial Ltda	Joint venture	50%	No
33	STL Digital UK Limited	Subsidiary	100%	No

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

(ii) Turnover (in ₹) - 5349.68 crores

(iii) Net worth (in ₹) - 1883.08 crores

VII. Transparency and Disclosures Compliances

23. Complaints/grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGRBC)

Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct								
Stakeholder group from whom complaint is received	Grievance redressal mechanism in place (Yes/No)	(if Yes, then provide web-link for grievance redress policy)	FY 2022-23			FY 2021-22		
			Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Investors (other than shareholders)	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Shareholders	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	596	0	-	442	0	-
Customers	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Value Chain Partners	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Employees and workers	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Other (Quality Complaint)	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	58	7	-	72	9	-
Other (Delivery)	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	10	0	-	0	0	-

24. 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, as per the following format:

S.No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate.	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Carbon pricing	R	Carbon pricing mechanisms are being implemented to encourage companies to reduce their carbon footprint	STL has taken a goal to be Net zero and is working towards reducing its carbon footprint	Negative Implications
2	Sustainable supply chain	O	Customers and investors are increasingly demanding that companies adopt sustainable practices throughout their supply chains	STL is identifying and assessing the sustainability of its suppliers and taking steps to ensure that they meet our sustainability standards	Positive Implications
3	Climate-related regulations	R	Worldwide regulations are being implemented to promote energy efficiency and reduce greenhouse gas emissions	STL is investing energy efficiency measures and exploring possibilities of renewable energy	Positive Implications
4	Raw material availability	R	Disruptions in supply chain are being observed leading to uncertain raw material availability and volatility in prices.	STL is working towards increasing its local procurement to minimise these disruptions	Negative Implications
5	Health and safety risks	R	Companies must ensure the health and safety of their employees, particularly those working in hazardous or high-risk environments.	STL is consistently assessing the health and safety risks associated with its operations and implement appropriate measures to protect its employees	Negative Implications
6	Innovation	O	Companies that fail to innovate and adopt new technologies and business models risk falling behind and losing market share	STL is investing in research and development to develop new sustainable technologies and business models	Positive Implications
7	Resource efficiency	O	With global increase in prices of raw materials, there is an increased focus on achieving the resource efficiency.	STL is taking active measures to achieve the resource efficiency for raw materials, energy, water and materials management	Positive Implications
8	Cyber security	R	As companies become more reliant on technology, they face increasing cybersecurity risks	STL strives to implement robust cybersecurity measures to protect its data, systems, and operations from cyber-attacks and data breaches	Negative Implications

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	Data privacy	R	Companies must also comply with data privacy regulations to protect the personal data of their customers and employees	STL ensures that it complies with data privacy regulations in India and take steps to protect personal data from unauthorised access	Negative Implications
10	Labour and human rights	R	Companies face risks associated with labour and human rights violations in their supply chains, such as forced labour, child labour, and unsafe working conditions.	STL assesses its suppliers' labour and human rights practices and works with them to improve conditions and eliminate any violations	Negative Implications
11	Diversity and inclusion	R	Companies that lack diversity and inclusivity risk reputational damage and loss of talent	STL continually assesses its diversity and inclusion policies and practices and work to promote diversity and inclusivity within our workforce	Positive Implications

SECTION B: MANAGEMENT AND PROCESS DISCLOSURE

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

Disclosure Question	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
POLICY AND MANAGEMENT PROCESSES									
1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	N	Y	N	Y	Y	Y	Y
c. Web link of the policies, if available	Code of Conduct https://www.stl.tech/pdf/coc/Sterilite_Conduct_Final.pdf	Sustainable sourcing policy https://www.stl.tech/pdf/coc/Sustainable%20policy.pdf Conflict free sourcing policy https://www.stl.tech/pdf/coc/Conflict%20Free%20Sourcing%20Policy.pdf	Employee well-being policy https://www.stl.tech/pdf/coc/Employee-well-being-policy.pdf	Sterilite Business partner code of conduct https://www.stl.tech/pdf/coc/Sterilite%20Business%20Partner%20Code%20of%20Conduct.pdf	Human Rights Policy https://www.stl.tech/pdf/coc/Human-Rights-Policy-V_2_0.pdf	Waste Management Policy https://www.stl.tech/pdf/coc/Waste-Management-Policy.pdf Water Management Policy https://www.stl.tech/pdf/coc/Water-Management-Policy.pdf	Code of Conduct https://www.stl.tech/pdf/coc/Sterilite_Code_of_Conduct_Final.pdf	CSR Policy https://www.stl.tech/pdf/coc/corporate-social-responsibility-policy-2021.pdf	Privacy Policy https://stl.tech/privacy-policy/
2. Whether the entity has translated the policy into procedures (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/ No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name the national and international codes/ certifications/ labels/ standards	-	ISO 14001 certified all Indian plants ISO 45001 certified all Indian plants	-	-	SA8000 Certified OFC-Rakholi and SCB-Dadra plants	ISO 14001 Certified all Indian plants ISO 14021 (Zero Liquid Discharge) Certified all Indian plants	-	-	ISO 27001 Certified all Indian plants
5. Specific commitments, goals and targets set by the entity with defined timelines, if any	Principle 6 1. Net-zero emissions by 2030 2. Ensuring water positivity across STL locations globally by 2030 3. Zero waste to landfill at manufacturing plants by 2030 4. 100% of Lifecycle assessment of products by 2030 Principle 8 1. Transforming 5 million lives by 2025 2. Replenishing 5 million cubic meters of water in communities by 2025 3. Undertaking 5 million plantations by 2025								
6. Performance of the entity against specific commitments, goals and targets	Principle 6 1. Goal: Net-zero emissions by 2030. Performance: we have committed to Science Based Target Initiatives in FY23 2. Goal: Ensuring water positivity across STL locations globally by 2030. Performance: All plants are Zero liquid discharge certified 3. Goal: Zero waste to landfill at manufacturing plants by 2030. Performance: All plants are Zero waste to landfill certified 4. Goal:100% of Lifecycle assessment of products by 2030. Performance: LCA model and reports have been prepared for 11 products Principle 8 1. Goal: Transforming 5 million lives by 2025. Performance: Transforming 3 million lives 2. Goal: Replenishing 5 million cubic meters of water in communities by 2025. Performance:1.69 million cubic meters of water replenished 3. Goal: Undertaking 5 million plantations by 2025. Performance: 2.8 L plantation done and being maintained								

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)

Owing to massive paradigm shift over the last couple of years due to the pandemic and economic downturn, the way societies and businesses strategise and operate has changed. As these changes in socioeconomic archetypes continue to get stronger across the globe, the role of Environmental, Social and Governance (ESG) adherence in amplifying the interests of the Triple Bottom Line is intensifying. Climate change concerns, sustainable development and other environmental, social and governance (ESG) concerns have become a key agenda of every discussion across government and corporate boardrooms, globally.

Our ESG goals include sustainable sourcing and manufacturing practices, net-zero emissions, ensuring water positivity across STL locations globally, zero waste to landfill at manufacturing plants, lifecycle assessment of products and green product development. To ensure transformation that is sustainable, action on ESG must be taken across the value chain as well as in communities. We are doing so by working with partners - up and down stream to minimise packaging, waste and furthermore, mitigating global issues like gender inequality, lack of quality healthcare and digital education for marginalised communities and conserving the environment. Above all, we are focused on bridging the digital divide in communities we serve and operate, worldwide.

We have made steady progress in our net zero emissions goal by 2030. Likewise, our other ESG goals such as Zero Waste to Landfill (ZWL), Zero Liquid Discharge (ZLD) and becoming water positive

by 2030, 100% sustainable sourcing by 2030 are well on track. Further, we have designed and implemented digital-driven social impact programmes, strengthened through partnerships across education, healthcare and the environment. Through products like STL Garv and projects like Bharatnet, Mahanet and others, we have facilitated universal and affordable internet access across rural regions. Moreover, we have made significant progress on the ambitious 5-5-5 million goals we set out to accomplish by the year 2025. These involve transforming five million lives from marginalised communities, undertaking five million plantations, and replenishing a similar amount of water in water stressed communities.

All of the above-mentioned initiatives and actions are founded on the belief that ESG is imperative in today's dynamic world. We have the expertise to make a lasting difference and stay committed to leveraging it to create a greener, safer and more inclusive world beyond tomorrow.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility & Sustainability (BRSR) Policy

Name - Ankit Agarwal

Designation-Managing Director

9. Does the entity have a specified committee of the board/ director responsible for decision making on sustainability related issues? (Yes/ No). If yes, provide details

Yes, our company has a Sustainability and Corporate Social Responsibility committee. It is accountable to the Board of Directors. The committee's primary role is to assist the company in meeting its environmental, social and governance obligations and monitor the implementation of the CSR and ESG policies.

10. Details of Review of the National Guidelines on Responsible Business Conduct (NGRBC) by the company:

Subject for Review	Indicate whether review was undertaken Frequency: Annually (A) / by Director / Committee of the Board/ Half yearly (H) / Quarterly (Q) / Any other Committee 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 & follow up action	Director									Annually								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Committee of the Board									Quarterly								

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
Y	Y	Y	Y	Y	Y	Y	N	Y

Yes, the working of the above policies except CSR policy was verified by Intertek during SA 8000 audit for STL's Dadra and Rakholi plant.

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

Not applicable. All principles are covered by policies.

SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

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

PRINCIPLE 1- BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

Essential Indicators

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

Segment	Total number of training and awareness programmes held*	Topics/ principles covered under the training audits impact	% of persons in respective category covered by the awareness programmes*
Board of Directors	0	0	0
Key Managerial Personnel (KMP)	6	1. Senior Leadership Development 2. Competency Capability building 3. Compliance (POSH, CoC+ BCP & IP +Infosec)	100%
Employees other than BoD and KMPs	486	1. Capability Building 2. Hi-Po development programmes 3. Sales development programmes	97%
Workers	63	Discrimination, Remuneration, Health & Safety, Working Hours, Disciplinary practices etc (covering 9 elements of SA8000)	100%

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	0	0	0	0	-
Settlement	0	0	0	0	-
Compounding fee	0	0	0	0	-
Non-Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment	0	0	0	0	-
Punishment	0	0	0	0	-

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
NA	NA
NA	NA
NA	NA

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

STL's Code of Conduct and Ethics cover its anti-corruption or anti-bribery policy. STL prohibits indulging into illicit practices like, offer to pay, make payments, promise to pay, or issue authorisation to pay any money, gift, or anything of value to a government officer, customers, vendors, consultants, and other stakeholders. that is perceived as intended, directly or indirectly, to improperly influence any business decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud.

https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf

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

	FY 22-23	FY 21-22
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

6. Details of complaints about conflict of interest

	FY 22-23		FY 21-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	-	0	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	-	0	-

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

None

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
170	Child Labour, Forced Labour, Health & Safety, Freedom of association & right to collective Bargaining, Discrimination, Disciplinary Practices, Working Hours, Remuneration & Management Systems	6.41%

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

Yes, the Board members disclose their interest in other entities (directorship/ownership, etc.) at the beginning of the year. Further, Board members also inform the company about any change in interests during the year. In case there is any proposal in which any of the Board member is interested, he/she did not participate in voting on the same.

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.**

	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impact
R&D	54.69%	0	1. Process improvement and scrap reduction for optical fibre and optical fibre cable manufacturing 2. Development of 'green' cabling solutions that have less embedded carbon and reduce operational carbon for our customers. 3. Development of multi-core fibre technology that is novel and 4x less material intensive than traditional fibre
Capex	1.94%	0.01%	1. ESG data management software 2. Installation of latest IGBT technology Riello UPS 3. Kaeser air compressor units

2.

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

Yes.

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

6.41%

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**

Type of Waste	Name of Policy/ Process	Policy/ Process Description
Plastics (including packaging)	Waste Management Policy	Fibre spools containing fresh fibre manufactured at the optical fibre (OF) plants are dispatched to captive plants for consumption. These new spools are received at the optical fibre cable plants. Post consumption of fibre, the spools are cleaned and sent back to OF plants for re-use.
E-waste	Waste Management Policy	-
Hazardous waste	Waste Management Policy	-
Other waste	Waste Management Policy	-

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

Yes, EPR is applicable. No, the Extended Producer Responsibility (EPR) certification is in progress.

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 (FY 22-23)	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.
27310	Yogalite 144F Optical Fiber Cable	0.11%	Cradle to gate	Yes	No
27310	Celesta 432F	0.89%	Cradle to gate	Yes	No
27310	48F NLD	0.00%	Cradle to gate	Yes	No
27310	36F COF215	0.44%	Cradle to gate	Yes	No
27310	48F Micro Cable	0.24%	Cradle to gate	Yes	No
27310	24F ADSS	0.04%	Cradle to gate	Yes	No

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
None	-	-

3. 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:

Type of Waste	FY 2022-23			FY 2021-22		
	Re-Used	Recycled	Safely Disposed (Metric Tonnes)	Re-Used	Recycled	Safely Disposed (Metric Tonnes)
Plastics (including packaging)	700	-	-	662	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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	1408	1408	100.00%	1408	100.00%	-	-	1408	100.00%	791	56.17%
Female	183	183	100.00%	183	100.00%	183	100.00%	-	-	92	50.27%
Other	0	0	0.00%	0	0.00%	-	-	-	-	0	0.00%
Total	1591	1591	100%	1591	100%	183	11.50%	1408	88.50%	883	55.49%
OTHER THAN PERMANENT EMPLOYEES											
Male	878	878	100.00%	878	100.00%	-	-	721	82.00%	120	14.00%
Female	44	44	100.00%	44	100.00%	44	100.00%	-	-	4	9.00%
Other	1	1	100.00%	1	100.00%	-	-	-	-	-	-
Total	923	923	100.00%	923	100.00%	44	4.78%	721	78.12%	124	13.43%

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
PERMANENT WORKERS											
Male	26	26	100.00%	26	100.00%	-	-	26	100.00%	0	0.00%
Female	6	6	100.00%	6	100.00%	6	100.00%	-	-	0	0.00%
Other	0	0	0.00%	0	0.00%	-	-	-	-	0	0.00%
Total	32	32	100.00%	32	100.00%	6	18.75%	26	81.25%	0	0.00%
OTHER THAN PERMANENT WORKERS											
Male	2665	2665	100.00%	2665	100.00%	-	-	32	1.20%	2622	98.39%
Female	461	461	100.00%	461	100.00%	461	100.00%	-	-	449	97.40%
Other	0	0	0.00%	0	0.00%	-	-	-	-	0	0.00%
Total	3126	3126	100.00%	3126	100.00%	461	14.75%	32	1.02%	3071	98.24%

2. Details of retirement benefits for the current and previous financial year

Benefits	FY 2022-23			FY 2021-22		
	No. of employees covered (as a % of total employee)	No. of workers covered (as a % of total workers)	Deducted & deposited with the authority (Yes/No/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 (Yes/No/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	1.5%	100%	Yes	2.7%	100%	Yes
Others- Please Specify	-	-	-	-	-	-

3. Accessibility of workplaces

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

Yes, the premises/offices are accessible to differently abled employees

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; https://www.stl.tech/pdf/coc/Human-Rights-Policy-V_2_0.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%	94%	-	-
Female	100%	95%	-	-
Other	0%	0%	-	-
Total	100%	94%	-	-

* There are none in permanent workers who have availed parental leave, hence not applicable.

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent employees	Yes, we are committed to implement and adhere to the best ethical and business practices across our operations globally. This, however, is not achievable without the assistance of their stakeholders and employees.
Other than permanent employees	
Permanent workers	All the employees are expected to uphold the code of business conduct and ethics. Our company's whistle-blower policy is designed to allow employees, off-roll employees and workers as well as business partners to voice concerns about any malpractice, impropriety, abuse, or misconduct at an early and appropriate stage, without fear of persecution, discrimination, or disadvantage. The policy has also been extended to external stakeholders such as vendors, customers, and others.
Other than permanent workers	We have a prevention of sexual harassment committee (PSHC) that oversees all complaints. Annual trainings are also provided to employees to ensure they are aware of various aspects that are covered under POSH and can raise concerns through the right channels. To enable a healthy work environment, our company launched STL Care in February 2021 to cater to wellness, primarily mental, and emotional well-being of our employees.

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

Category	FY 2022-23			FY 2021-22		
	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	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0
Total Permanent Workers	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0

8. Details of training given to employees and workers

Category	FY 2022-23					FY 2021-22				
	Total (A)	On health & safety/wellness measures		On skill upgradation		Total (D)	On health and safety measures/wellness		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. F	% (F/D)
EMPLOYEES										
Male	2286	2148	93.96%	1857	81.23%	3059	2065	67.51%	2899	94.77%
Female	227	172	75.77%	167	73.57%	434	172	39.63%	370	85.25%
Other	1	1	100.00%	0	0.00%	1	1	100.00%	0	0.00%
Total	2514	2321	92.32%	2024	80.51%	3494	2238	64.05%	3269	93.56%
WORKERS										
Male	2691	2689	99.93%	2678	99.52%	2925	2925	100.00%	2916	99.69%
Female	467	467	100.00%	459	98.29%	277	277	100.00%	276	99.64%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Total	3158	3156	99.94%	3137	99.34%	3202	3202	100.00%	3192	99.69%

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
EMPLOYEES						
Male	2286	2059	90.07%	3059	2477	81.97%
Female	227	213	93.84%	434	309	71.20%
Other	1	1	100.00%	1	1	100.00%
Total	2514	2273	90.41%	3494	2787	79.77%
WORKERS						
Male	2691	64	2.38%	2925	15	0.51%
Female	467	17	3.64%	277	4	1.44%
Other	0	0	0.00%	0	0	0.00%
Total	3158	81	2.56%	3202	19	0.59%

10.

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, our company has well-organised occupational Health & Safety management system implemented and maintained as per the company’s procedures and legal requirements. The roles and responsibilities of the team are defined, and regular monitoring is carried out through management reviews. All the manufacturing facilities are ISO 45001 and 14001 certified.

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

We are an ISO 45001 certified organisation. We have an internal tool to assess risks associated with the processes and risk assessment is done on a project basis (routine & non-routine basis). All manufacturing processes are governed by a Quality, Environment, Health and Safety policy (QEHS) and each area is also monitored through an ISO 14001 certified Environment Management System and ISO 45001 Occupational Health and Safety management system. This helps the company to maintain a high environmental and safety standard across its facilities as well as identify gaps and proactively mitigate them through appropriate action.

Policies such as Quality, Environment, Health and Safety policy, Hazard Identification and Risk Assessment (HIRA) and standard operating processes are available to workers for awareness concerning hazards, risks and injury or ill health while

working. Work-related incidents are investigated via accident and investigation procedures. It was also noted that the plant implementation committee for each manufacturing units is responsible for implementing initiatives such as Programme Abhay for bringing about cultural transformation in current EHS practices and further optimise it.

Key processes/ Standard Operating Procedures (SOPs) used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity are as follows:

- Occupational safety hazards and risks are identified for all activities and control measures as per procedure. It is mandatory for any process to undergo a risk assessment, and in case of non-routine or dangerous work, a Permit to Work (PTW) is required for initiation.
- Hazard identification and risk assessment are implemented regularly for all routine and non-routine activities.
- Work-related incidents are investigated via accident and investigation procedures.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)

Yes

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

Yes

11. Details of safety related incidents

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.21	0
	Workers	0.10	0.40
Total recordable work-related injuries	Employees	1	0
	Workers	1	4
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

Our company has launched **STL Care** programme, in February 2021 to cater to wellness, primarily mental, and emotional well-being for their employees. The programme comprises policies and efforts that encourage people to adopt healthy lifestyles and achieve professional success. **Our company has an employee-wellbeing policy as well.**

<https://www.stl.tech/pdf/Employee-well-being-policy.pdf>

We have put in place several systems and processes that provide our employees with a safe work environment without any fear of injury or adverse effects on their health. To ensure complete readiness for the unlikely event of an emergency, we work on three fronts:

- First, our technological foundation and compliance guarantee that the systems have a solid base by enforcing strict standards that oversee every procedure.
- Second, leadership and management systems supervise the implementation of these policies.
- Last, but not the least, consistent awareness is ensured through the transmission of information, and behavior.

Policies such as Quality, Environment, Health and Safety policy, HIRA and standard operating processes are available to workers for awareness concerning hazards, risks and injury or ill health while working. Work-related incidents are investigated via accident and investigation procedures.

13. Number of complaints on working conditions and health and safety made by employees and workers

Category	FY 2022-23			FY 2021-22		
	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	0	0	-	0	0	-
Health & Safety	0	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 & Safety practices	100%
Working conditions	100%

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 and safety practices and working conditions.

All manufacturing processes at STL are governed by a QEHS policy and every process is also monitored through an ISO 14001 certified Environment Management System and ISO 45001 Occupational Health and Safety management system. This helps the company maintain high environmental and safety standards across its facilities, proactively identify gaps and mitigate them through appropriate action.

A Hazard Identification and Risk Assessment (HIRA), Hazard and Operability Study (HAZOP) and standard operating processes are available to workers for awareness concerning hazards, risks and injury or ill health while working. Work-related incidents are investigated via accident and investigation procedures.

Further, the plant implementation committee for each manufacturing units is responsible for implementing initiatives such as Programme Abhay for bringing about cultural transformation is current EHS practices and further optimising it.

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)?**

Employees	Yes
Workers	Yes

2. 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 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
Employees	0	0	0	0
Workers	0	0	0	0

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

No

4. Details on assessment of value chain partners:

% of value chain partners (by value of business done with such partners) that were assessed

Health & Safety practices	6.41%
Working Conditions	6.41%

5. 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.

Periodic audits are conducted. Corrective and preventive actions tracked to its closure on regular basis.

We also conduct audits at vendors' premises with regard to environmental, health and safety expectations, and track its compliance.

PRINCIPLE 4- BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

Essential Indicators

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

The stakeholder identification and engagement process are well documented and implemented through the STL Sustainability programme. Stakeholder perspectives are essential for the company, and we regularly engage with stakeholders to understand and actively respond to their

2. Each stakeholder groups.

Key Stakeholders	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Email	Quarterly	Feedback, grievances, talent management
Customers	No	Email	Quarterly	Feedback, grievances, new product development
Suppliers and vendors	No	Others	Quarterly	Supplier satisfaction, material compliance, joint development, mutual value creation
NGOs	No	Email	Quarterly	Development projects according to the identified needs, support to social causes
Leadership	No	Email	Quarterly	Economic value creation, ESG disclosures, sector and programme related
Investors	No	Others	Quarterly	Economic value creation, ESG disclosures, sector and programme related

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.

We respond to issues identified as material and demonstrates these actions through our policies, objectives, indicators and performance targets. The organisation and its stakeholders can use the reported information as a reasonable basis for their opinions and decision-making. Our company has taken various initiatives towards delivering environmentally friendly services along with occupational health and safety, appropriate measures for emergency handling, control and risk management in its operations. The responses to material aspects are fairly articulated in the report, i.e. disclosures on STL’s policies and management systems including governance. In our view, the level at which the report adheres to this principle is very good.

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

Yes, stakeholder consultation is used to support the identification and management of environmental, and

concerns. We therefore ensure ongoing and effective communication with our stakeholders. Stakeholders include organisations and individuals impacted by or capable of influencing the operations. Our company has identified - employees, customers, suppliers and vendors, investors, leadership and non-governmental organisations (NGOs) as our stakeholders. The identification of stakeholders helps us in categorising material issues based on our ESG priorities. The company uses well-established direct and indirect mechanisms, to source continuous and unbiased feedback from stakeholders.

social topics. Materiality assessment is done annually to incorporate the inputs from stakeholders.

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

The following are some of the examples of our engagement and actions:

The Jeewan Jyoti women empowerment programme- the Jeewan Jyoti women empowerment programme has grown into a compelling platform for women to achieve their aspirations. This programme has allowed these women, who were once shrouded in patriarchal societies, to lead economic growth in their villages through entrepreneurship, management skills and facilitating micro-financing linkages.

Digital equalizer and improved learning (DEIL) programme -We have a long-standing commitment to providing marginalised communities with quality education has helped increase basic digital literacy through continuous skill-building assistance and technical support not just for students, but also their families and school faculty. Our company launched DEIL programme. The programme aims to benefit over 1,00,000 beneficiaries annually across 300 educational institutions in Aurangabad, Nandurbar (Maharashtra, India) and Silvassa (Union Territory of Dadra and Nagar Haveli)

PRINCIPLE 5 - BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS**Essential Indicator**

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 2022-23			FY 2021-22		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
EMPLOYEES						
Permanent	1591	1541	96.86%	2627	2340	89.07%
Other than permanent	923	839	90.90%	867	636	73.36%
Total employees	2514	2380	94.67%	3494	2976	85.17%
WORKERS						
Permanent	32	32	100.00%	18	15	83.33%
Other than Permanent	3126	3108	99.42%	3184	2	0.06%
Total workers	3158	3140	99.43%	3202	17	0.53%

2. Details of minimum wages paid to employees and workers:

Category	FY 2022-23					FY 2021-22				
	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	1591	0	0.00%	1591	100.00%	2627	0	0.00%	2627	100.00%
Male	1408	0	0.00%	1408	100.00%	2256	0	0.00%	2256	100.00%
Female	183	0	0.00%	183	100.00%	371	0	0.00%	371	100.00%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Non-permanent	923	0	0.00%	923	100.00%	867	0	0.00%	867	100.00%
Male	878	0	0.00%	878	100.00%	803	0	0.00%	803	100.00%
Female	44	0	0.00%	44	100.00%	63	0	0.00%	63	100.00%
Other	1	0	0.00%	1	100.00%	1	0	0.00%	1	100.00%
WORKERS										
Permanent	32	0	0.00%	32	100.00%	18	0	0.00%	18	100.00%
Male	26	0	0.00%	26	100.00%	15	0	0.00%	15	100.00%
Female	6	0	0.00%	6	100.00%	3	0	0.00%	3	100.00%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Non-permanent	3126	214	6.86%	2912	93.15%	3184	6	0.19%	3178	99.8%
Male	2665	81	3.04%	2584	96.96%	2910	6	0.21%	2904	99.79%
Female	461	133	28.85%	328	71.14%	274	0	0.00%	274	100.00%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%

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

	Male		Female		Other	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	6	₹45.85 Lakh	1	₹46.65 Lakh	0	0
KMP (other than BoD)	3 [^]	₹97.11 Lakh	0	0	0	0
Employees other than BoD & KMP*	1402 [#]	₹8.68 Lakh	182 [#]	₹7.02 Lakh	0	0
Workers	26 [*]	₹2.09 Lakh	6 [*]	₹1.25 Lakh	0	0

*This number only include salary of permanent workers.

This number only include salary of permanent employees

[^] 1 of the board member is included in KMP

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, HR department headed by the Chief HR Officer: oversees the policies on human rights and fair labour practices. This ensure implementation of Human Rights or issues caused or contributed to by the business as per applicable guidelines.

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

All the employees are expected to uphold the code of business conduct and ethics. Our company’s whistle-

blower policy is designed to allow employees, off-roll employees and workers as well as business partners to voice concerns about any malpractice, impropriety, abuse, or misconduct at an early and appropriate stage, without fear of persecution, discrimination, or disadvantage. The policy has also been extended to external stakeholders such as vendors, customers, and others.

To enable a healthy work environment, our company launched STL Care in February 2021 to cater to wellness, primarily mental, and emotional well-being of our employees.

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

Category	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual harassment	1*	0	-	1	0	The complaint filed has been resolved
Discrimination at workplace	0	0	-	0	0	-
Child labour	0	0	-	0	0	-
Forced/Involuntary Labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other issues	0	0	-	0	0	-

* This complaint was closed in April 2023.

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

Our company is committed to maintaining a fair and productive environment for all its employees at various levels in the organisation, free of sexual harassment and discrimination on the basis of gender. Our policy on Prevention of Sexual Harassment is framed in line with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 ('POSH Act'). We have also set up Prevention of Sexual Harassment Committee, which is in compliance with the requirement of the POSH Act, to redress the complaints received regarding sexual harassment which

has formalised a free and fair enquiry process with clear timeline. During the financial year, the company received one complaint under the POSH Act

If an employee raises a genuine concern under this policy, they will not be at risk of losing their job nor will they suffer from any form of retribution as a result. Further, we also ensure protection of confidentiality and anonymity of the complainant to the fullest extent possible with an objective to conduct an adequate review.

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

Yes

9. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	66.66%
Forced/ involuntary labour	66.66%
Sexual harassment	66.66%
Discrimination at workplace	66.66%
Wages	66.66%
Others – please specify	-

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

Not applicable.

Leadership Indicators

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

Our company is committed to providing a safe and positive work environment. In keeping with this philosophy, the organisation envisages an open-door policy. Employees also have access to several forums where they can highlight matters or concerns faced at the workplace. This is achieved through a well-established and robust grievance resolution mechanism comprising Stakeholders' Relationship Committee and resolution hubs.

While working with partners, we also ensure that no human rights are violated. We undertake supplier assessments and audits regularly to ensure our suppliers adhere to our values and policies regarding environmental issues including waste disposal, human rights, fair labour and anti-corruption. We also uphold the highest standards when it comes to the sourcing

of raw materials and do supplier due diligence for the same.

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

Human rights and fair labour practices, do not only feature on our list of top material topics, but are also driven by partners across our value chain. We have policies and ensure adherence to the standards we follow as well as audit our facilities and partners on these parameters periodically.

We ensure a secure working environment at our plants. Our Rakholi and Dadra facilities have been SA8000:2014 certified. Remaining Indian plants have completed phase 1 audit under SA8000.

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

Yes

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	6.41%
Discrimination at workplace	6.41%
Child labour	6.41%
Forces labour/ Involuntary labour	6.41%
Wages	6.41%
Others – please specify	-

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

No such corrective action has been taken.

PRINCIPLE 6- BUSINESS SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

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

Parameter	FY2022-23 (in KJ)	FY 2021-22 (in KJ)
Total electricity consumption (A)	9,47,27,60,45,467	9,37,13,54,63,940
Total fuel consumption (B)	1,50,03,50,03,265	1,46,84,44,76,704
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C)	10,97,31,10,48,732	10,83,97,99,40,644
Energy intensity per rupee of turnover (total energy consumption/ turnover in rupees)	20.51 KJ/INR	21.59 KJ/INR
Energy intensity(Optional) the relevant metric may be selected by the entity	-	-

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

No

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

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

Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Ground water	1,17,967	1,20,740
(iii) Third party water	5,12,116	5,04,079
(iv) Seawater/Desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	6,30,083	6,24,819
Total volume of water consumption (in kilolitres)	6,29,514	6,17,144
Water intensity per rupee of turnover (water consumed / turnover in rupees)	0.000012 KL/INR	0.000012 KL/INR
Water 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.

No

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

Yes, 100% of our Indian manufacturing units are zero-liquid discharge certified. Effluent treatment (ETP) and multi-effective evaporator (MEE) plants are installed, in addition to several in-plant modifications to our processes help we ensure this. A detailed study of parameters has been done on the wastewater before its treatment in the ETP which has in turn helped reduce the load on the plant. The process includes wastewater from the scrubber process, silicon tetrachloride (SiCl₄), and softener plants collected at the ETP. Through chemical treatments, solid particles and chlorine in the water are removed and then fed with steam in the MEE plant through a three-stage centrifuging process to remove salt in the water. This recycled water is again

used in the boiler and scrubber processes. Effluent and sewage treatment plants have helped us ensure zero liquid discharge at all our plants in Aurangabad, which is traditionally a drought-prone region.

Zero liquid discharge (ZLD) Certified plants includes.

Shendra draw plant, Shendra glass plant, Waluj plant, Rakholi plant and Dadra plant.

The Zero Liquid Discharge certification has been done by DQS with reference to Circular Water Management, Compliances, and ISO 14021:2016 Environmental labels and declarations (Type II environmental labelling – verifying implementation and overseeing certification). The certification was preceded by a detailed audit and documentation exercise that found STL's ZLD performance in consonance with globally accepted standards.

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

Parameter	Please specify unit	FY2022-23	FY2021-22
NOx	MT	1.29	-
SOx	MT	0.51	-
Particulate matter (PM)	MT	60.33	-
Persistent organic pollutants (POP)	NA	-	-
Volatile organic compounds (VOC)	NA	-	-
Hazardous air pollutants (HAP)	NA	-	-
Others- please specify	NA	-	-

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

No

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

Parameter	Unit	FY2022-23	FY2021-22
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)	gCO ₂ e	8,91,31,81,510	9,10,61,49,809
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)	gCO ₂ e	2,13,05,22,99,990	2,05,55,93,78,278
Total Scope 1 and Scope 2 emissions per rupee of turnover	gCO ₂ /₹	4.15	4.28
Total Scope 1 and Scope 2 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. - No

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

Initiatives undertaken by our company for optimisation and efficiency are as follows:

- Installation of latest IGBT technology UPS, which provides 95% efficiency compared to old rectifier technology with below 90% efficiency).
- Replacement of overhead pumps of chilled water circulation with submersible single pump, having almost half of the power rating.
- Roof top green solar energy of 625kwp installed.

- Aluminum air pipelines installed have low friction during flow of air thereby resulting in high efficiency of compressor and low air losses.
- Centralised utilities building going live, expected energy saving by 10 to 15%
- Latest technology & highly efficient equipment selection with 100% redundancy (Dry transformer/ UPS/RMU/Type Tested panels/HVAC/Cooling Towers/Pumps)
- New PEB shed with roof sky light design to reduce daytime plant lighting load
- Revamp the chilled water circulation pumping system with submersible improving reliability of system.

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

Parameter	FY2022-23	FY2021-22
Total waste generated (in metric tonnes)		
Plastic waste (A)	4,412	4,840
E-waste (B)	9	11
Bio-medical waste (C)	0.03	0.034
Construction and demolition waste (D)	0	0
Battery for (E)	65	8
Radioactive waste (F)	0	0
Other hazardous waste. Please specify, if any. (G)	8,934	7,532
Other non-hazardous waste generated (H). Please specify, if any.	32,803	28,835
Total (A+B+C+D+E+F+G+H)	46,223	41,226

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

Category of waste		
(i) Recycled	40,478	38,347
(ii) Re-used	4,663	1,831
(iii) Other recovery operations (safely disposed)	-	-
Total	45,141	40,177

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

Category of waste		
(i) Incineration	85	97
(ii) Landfilling	997	952
(iii) Other disposal operations	-	-
Total	1,082	1,049

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, Zero waste to landfill certificate was issued by TUV SUD to all plants.

9. 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.

Waste management is one of the most fundamental ways we drive our sustainability agenda. Our approach to waste management is to eliminate waste and optimally use available resources. We ensure that the vendors we choose to do business with are also environmentally conscious and are approved by the Pollution Control Board. We ensure all our employees and workers are well-informed about the importance of recycling and waste segregation at the corporate office and the manufacturing facility. We aim to have all our plants across the globe certified with Zero Waste to Landfills (ZWL) over the next few years.

We also monitor our hazardous and non-hazardous waste, monthly. While we ensure our processes comply with stringent waste management rules in the countries we operate, we also verify the approaches our recyclers adopt. This assures us that they are operating according to the prescribed laws and our byproducts or waste are further reused, promoting a circular economy, especially for optic fibre, cables and LSZH.

Our company has started using co-processing in partnership with cement companies as one of the

disposal and management solutions, which helps convert waste to energy. Further, we have prioritised opportunities for reusing waste by enhancing the usage of what was generated from our operations as a resource for our industry or others. Reusing waste helps save natural resources while manufacturing new products, as well as generating revenue in due course of operations. This entire initiative also involves monitoring each type of waste generated, its source, and so on. This is essential to increase process efficiency and identify preventive mechanisms to reduce generation. This entire effort has helped our company become the world's first integrated optic fibre and cables manufacturer to be Zero Waste to Landfill (ZWL) certified for 100% of its manufacturing units that are operational for over a year. It has helped us optimize resource utilisation and operate in a more efficient and eco-friendly manner by treating waste as a resource; which is at the crux of our waste management approach.

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

Not applicable.

11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in FY 2022

Name and brief details of project	EIA Notification Number	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes/No)	Relevant Web Links
NA	NA	NA	NA	NA	NA

12. 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.

Yes, STL is compliant with the applicable environmental law/ regulations/ guidelines in India.

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2022-23	FY 2021-22
From renewable sources (KJ)		
Total electricity consumption (A)	1,0,207,22,400	40,91,91,840
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	1,02,07,22,400	40,91,91,840
From non-renewable sources (KJ)		
Total electricity consumption (D)	9,47,27,60,45,467	9,37,13,54,63,940
Total fuel consumption (E)	1,50,03,50,03,265	1,46,844,76,704
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	10,97,31,10,48,732	10,83,97,99,40,644

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

No

2. 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.

NA

3. 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	Solar panel installation at Rakholi plant	The company has installed a 625 KWP capacity rooftop solar power system at Rakholi	It will generate roughly 7,76,000 units of electricity annually
2	Ensuring zero liquid/effluent discharge into communities	Water audits were conducted for all Indian plants. Water conservation and harvesting measure were identified for each plant as part of the audit. To ensure zero discharge, a detailed study of parameters has been done on the wastewater before its treatment in the ETP which has in turn helped reduce the load on the plant. https://www.stl.tech/esg/	Each of our manufacturing units in Aurangabad and Silvassa are all zero-liquid discharge certified. Effluent treatment (ETP) and multi-effective evaporator (MEE) plants installed, in addition to several in-plant modifications to our processes help us ensure this.
3	Ensuring 100% manufacturing facilities to be Zero Waste to Landfill certified	We ensure our processes comply with stringent waste management rules in the countries we operate. We also verify the approaches our recyclers adopt. This assures us that they are operating according to the prescribed laws and our by-products or waste are further reused, promoting a circular economy. https://www.stl.tech/esg/	100% of STL manufacturing units, which are operational for over a year, are Zero Waste to Landfill certified for diverting between 97% to 100% of waste from landfills.

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

Acute and chronic climate-related risk to our company's assets is evaluated as part of our business continuity and disaster management plan. Types of climate-related risks include local incidents like water shortage, temperature rise, building fires, natural calamities, catastrophic events, or national incidents like pandemic illnesses, in addition to others. We have a robust business continuity programme to monitor those risks and have in place measures to help ensure continued reliability.

5. 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.

As we aim to evolve and advance in our ESG journey, we continuously strive to build partnerships across our value chain with vendors who we identify and are aware of their environmental, social and regulatory risks. Currently, there is no significant adverse impact to the environment arising from the value chain. Further, we aim to have 100% sustainable sourcing by 2030.

PRINCIPLE 7- BUSINESS, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

Essential Indicator

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

Thirteen

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	CII	National
2	FICCI	National
3	ASSOCHAM	National
4	TEPC	National
5	TEMA	National
6	BIF	National
7	DIPA	National
8	ITU-APT	National
9	SIDM	National
10	PAFI	National

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

None

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
1	Advocacy on BharatNet for more government investment, Robust Standards, Make in India and EoDB	Engagement with government stakeholders and media advocacy through independent credible platform and independently.	Yes	Quarterly*	-
2	Amendment to ROW policy	Engagement with government stakeholders through independent credible platform and independently	Yes	Quarterly*	-
3	Enterprise Network	Engagement with government stakeholders through independent credible platform and independently	Yes	Quarterly*	-
4	GST reform to avail cross utilisation of GST input Tax Credit	Engagement with government stakeholders through independent credible platform and independently	Yes	Quarterly*	-
5	Extension of end-use benefits of raw material of OF	Engagement with government stakeholders through independent credible platform and independently	Yes	Quarterly*	-

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
6	Mandatory testing for OF and OFC	Engagement with government stakeholders through independent credible platform and independently	Yes	Quarterly*	-
7	Anti Dumping Duty on SMOF	Engagement with government stakeholders through independent credible platform and independently	No	Quarterly*	-
8	Availing SPECS incentives on CAPEX of SiCl4 manufacturing	Direct engagement with government stakeholders	No	Quarterly*	-
9	Extension of Fail-safe and High-speed Fixed Optical and 4/ 5G Mobile Defence Networks Connectivity to forward areas	Engagement with government stakeholders and advocacy through independent credible platform & independently	Yes	Quarterly*	-
10	Development of Dual Use Digital ICT infrastructure along land and sea frontiers	Engagement with government stakeholders and advocacy through independent credible platform & independently	Yes	Quarterly*	-
11	Security, surveillance and management of defence stations through smart systems	Engagement with government stakeholders and advocacy through independent credible platform & independently	Yes	Quarterly*	-

* Reviewed quarterly by MD and senior management.

PRINCIPLE 8-BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

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

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

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

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

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

GRIEVANCE REDRESSAL SYSTEM

- We have a dedicated email toll-free number to receive community complaints and maintain a copy of the physical register at the programme site where possible.
- Once the complaint is received from the community members, within 24 hours it is directed to the respective programme manager. These complaints shall be resolved within 5 working days and the team should report back on the central team along with a detailed report on the complaint resolution.
- Central team shall prepare a monthly report on the complaints received during the month by 10th of following month.

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

	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers	43.14%	-
Sourced directly from within the district and neighbouring districts	8.33%	-

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)

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 ₹)
1	Maharashtra	Gadchiroli	69,93,357
2	Maharashtra	Nadurbar	1,28,46,730

3. Details of beneficiaries of CSR projects

S. No.	CSR Projects (in FY 2022-23)	No. of persons benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalised groups
1	Jeewan Jyoti Women Empowerment Programme	1,735	100%
2	Digital Equalizer and Inclusive Learning Programme	1,10,996	100%
3	Mobile Medical Unit	9,06,797	100%
4	Holistic Water Programme	80,000	100%
5	Liver Transplant	32	100%
6	Employee Volunteering	4,191	100%

PRINCIPLE 9- BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

Essential Indicators

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

The mechanism to receive and respond to consumer complaints has been provided below.

- ▶ Customer raises concern on mail/ phone to account manager.
- ▶ Account manager raises case in salesforce. The case comes to QA team.
- ▶ QA Team give acknowledgement of receipt of complaint within 24 working hrs.
- ▶ QA teams ask for details like batch ID, images, video of the problem for analysis.
- ▶ Account manager shares the details, QA team shares the containment action within 48Hrs.
- ▶ Account Manager plans the sample/ site visit if required.
- ▶ QA Team analyzes the case with CFT team (based on images, videos, samples, site visit)
- ▶ QA Team validates the complaint as valid and invalid.
- ▶ QA team shares the analysis report with the account manager.
- ▶ For invalid cases, if the customer is convinced, the case is closed in system. If the customer is not convinced, then respond to the queries till they are convinced and then the case is closed.
- ▶ For valid cases, share the CAPA and have agreement on the RCA
- ▶ Raise request for claim settlement.
- ▶ Once approved, send the credit note/ replacement.

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	0
Safe and responsible usage	0
Recycling and/or safe disposal	0

3. Number of consumer complaints:

	FY 2022-23		Remarks	FY 2021-22		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other (Quality Complaints)	58	7	-	72	9	-
Other (Delivery)	10	0	-	0	0	-

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

	Number	Reasons for recall
Voluntary recalls	0	0
Forced recalls	0	0

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, STL has a documented Information Security and Cyber Security policy which has cyber security framework as well. Risk Assessment is carried out periodic basis - at least annually and with major changes. Privacy policy is available on corporate website [URL:https://www.stl.tech/privacy.php](https://www.stl.tech/privacy.php)

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.

All the complaints were satisfactorily addressed, and no corrective actions were undertaken.

Leadership Indicators

1. Channels / platforms where information on products and services of the company can be accessed

STL Corporate Website: www.stl.tech

2. Provide the following information relating to data breaches:

a. Number of instances of data breaches along-with impact: ZERO

b. Percentage of data breaches involving personally identifiable information of customer: ZERO