

25th May 2023

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

Sub: Business Responsibility and Sustainability Report

Pursuant to Regulations 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations 2015 (“Listing Regulations”), we are submitting herewith the Business Responsibility and Sustainability Report for FY 2022-23, which forms an integral part of the Annual Report FY 2022-23 submitted to the Exchanges.

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

This is for your information and record.

Thanking you,

Yours faithfully
For Nelco Limited

Girish V. Kirkinde
Company Secretary & Head - Legal

Encl: As above.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURE

I. Details of the Listed Entity

1	Corporate Identity Number (CIN) of the Listed Entity	L32200MH1940PLC003164		
2	Name of the Listed Entity	Nelco Limited		
3	Year of incorporation	1940		
4	Registered office address	EL-6, TTC Industrial Area, Electronics Zone, MIDC Mahape, Navi Mumbai 400710		
5	Corporate address	EL-6, TTC Industrial Area, Electronics Zone, MIDC Mahape, Navi Mumbai 400710		
6	Email	services@nelco.in		
7	Telephone	022 67399100		
8	Website	www.nelco.in		
9	Financial year for which reporting is being done	2022-23		
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited (BSE), National Stock Exchange of India Limited (NSE)		
11	Paid-up Capital	INR 228174610		
		Contact Person		
12	Name of the Person	Ms. Leena Thomas		
	Telephone	022 67399100		
	Email address	leena.thomas@nelco.in		
		Reporting Boundary		
13	Type of Reporting: 1. Standalone 2. Consolidated	Consolidated		
	If selected consolidated:	Sr no.	Name of the Subsidiaries/JVs/ Associate Companies	CIN Number
		1	Nelco Network Products Ltd. (NNPL)	U32309MH2016PLC285693

II. Product/Services

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

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	Satellite Communication (Satcom) services: The Company is engaged in business of providing satellite communication services using VSAT (very small aperture terminal) connectivity. The Company offers a range of innovative and customized solutions for Enterprise market including Govt sector, Maritime and Aero IFC services.	43312	Sale of equipment-54% Rental of VSAT -16% AMC services – 17% Other -13%

III. Operations

16	Number of locations where plants and/or operations/offices of the entity are situated:	Location	Number of plants	No. of Offices	Total
		National	0	11	11
		International	0	0	0
17	Market served by the entity	Locations	Numbers		
	a. No. of Locations	National (No. of States)	28		
		International (No. of Countries)	0		
	b. What is the contribution of exports as a percentage of the total turnover of the entity?*	27.36%			
	c. A brief on types of customers	Nelco provides services to the companies in various segments such as: Banking segment: Bank branches, ATMS, Managed service providers. Energy: Solar farms, Hydro farms, Wind farms, Offshore and onshore rigs Oil retail: Oil companies, Petrol Pumps Aero IFC (Inflight Communication) and Maritime communication, Manufacturing companies, Telecommunication companies, and SME segments (Small Manufacturing enterprise)			

*Revenue is generated from vendoring the services to customers located outside India

IV. Employees

18	Details as at the end of Financial Year:					
S.No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
a	Employees and workers (including differently-abled)					
Employees						
1	Permanent Employees (A)	175	155	89%	20	11%
2	Other than Permanent Employees (B)	95	91	96%	4	4%
3	Total Employees (A+B)	270	246	91%	24	9%
Workers*						
4	Permanent (C)	0	0	NA	0	NA
5	Other than Permanent (D)	0	0	NA	0	NA
6	Total Workers (C+D)	NA	NA	NA	NA	NA
b	Differently-abled employees and workers					
Employees						
7	Permanent Employees (E)	0	0	NA	0	NA
8	Other than Permanent Employees (F)	1	1	100%	0	NA
9	Total Employees (E+F)	1	1	100%	0	NA
Workers*						
10	Permanent (G)	0	0	NA	0	NA
11	Other than Permanent (H)	0	0	NA	0	NA
12	Total Differently-Abled Employees (G+H)	NA	NA	NA	NA	NA

*Nelco does not employ any contractual workers

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

*Our MD and CEO Mr. P.J. Nath is a member of BoD. CFO and CS are our KMPs.

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

20 Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)									
Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Turnover rate in the year prior to previous FY)			FY 2020-21 (Turnover rate in the year prior to previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	8%	0	8%	8%	0	8%	6%	1%	8%
Permanent Workers	NA	NA	NA	NA	NA	NA	NA	NA	NA

Holding, Subsidiary and Associate Companies (including joint ventures)

21 (a) Names of holding / subsidiary / associate companies / joint ventures				
S.No.	Name of the holding / subsidiary / associate companies / joint ventures	Holding/ Subsidiary/ Associate/ Joint Venture	% Of shares held*	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	The Tata Power Company Ltd.	Holding Company	50.04	No
2	Nelco Network Products Limited (NNPL)	Subsidiary Company	100	Yes

VI. CSR Details

22	a. Whether CSR is applicable as per section 135 of Companies Act, 2013:	Yes*
	Turnover (in ₹)	313.33 crores
	Net worth (in ₹)	104.55 lakhs

*CSR is applicable only to NNPL

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								
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	For Grievance redressal, Nelco has POSH committee, Stakeholder relationship committee, Vigil Mechanism, Whistle blower policy in place. Additionally, all Vendors are aware about TATA CoC. For every Purchase order grievance redressal email is provided for vendors. Link: https://www.tcplindia.co.in/InvestorCharter.html For Communities, Nelco grievances can be addressed at ethics@nelco.in and for customer grievances and queries Nelco provides helpline link helpdesk@nelco.in	0	0	NA	0	0	No complaints filed during the year
Investors (other than shareholders)	Investors and shareholders are the same for Nelco		NA	NA	NA	NA	NA	NA
Shareholders	Yes		4	Nil	Resolved	5	Nil	Resolved
Employees and workers	Yes		1	0	Minor field Injuries	4	0	Minor field Injuries.
Customers	Yes		0	0	Based on SLA (Service level agreement) with customers these are closed within defined SLA	0	0	Based on SLA with customers these are closed within defined SLA
Other (please specify)	NA							

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 along-with its financial implications, as per the following format.					
S.No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Operational Ecoefficiency	Opportunity	Operational Ecoefficiency will help Nelco to lower its operating cost.		Positive
2	Supply chain Management	Risk	Telecom service companies rely heavily on their suppliers to provide them with the necessary equipment and materials to operate their networks. Any disruption in the supply chain, such as delayed deliveries or product shortages, can have a significant impact on the company's operations and customer service.	Diversification of supplier-base, continual stakeholder engagement, and comprehensive supplier assessment aligned with global frameworks	Negative
3	Corporate Governance	Opportunity	A robust governance will help Nelco to achieve company's mission and create long-term value		Positive
4	Talent management and Human capital development	Opportunity	Proper talent management and skill enhancement can help Nelco to strengthen its human capital which will give Nelco a competitive edge and reduce hiring cost		Positive
5	Waste Management	Opportunity	Waste management will help Nelco to optimize its waste generation at the same time will help to reuse and recycle which can reduce operational and material cost		Positive
6	Energy Management	Opportunity	Energy Management will help Nelco to reduce the cost of operation by means of increase in efficiency, and optimized energy use		Positive

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	Climate Strategy	Opportunity	A well-defined climate strategy and integration in risk management framework can help Nelco to mitigate and adapt to potential physical and transitional risk		Positive
8	Diversity, Equity and Inclusion	Opportunity	The DE&I approach can help Nelco to promote fair treatment and full participation of all employees i.e., groups of individuals, including people of different races, ethnicities, religions, abilities, genders, and sexual orientation. A diverse, equitable and inclusive ecosystem can help Nelco to respond to challenges, retain the top talent, and meet the needs of various stakeholder in a better way.		Positive
9	Community Development	Opportunity	Community development will help Nelco to contribute to the community and enhance their social reputation		Positive
10	Human Rights	Risk	As a responsible business enterprise, Nelco has a responsibility to respect human rights, comply with relevant rules and regulations. Human right issues can have actual and potential impact in Nelco's own operations, supply chain and business relationships	Nelco adheres to the Tata code of conduct that applies to Nelco and is committed to respecting human rights as outlined in international human rights standards. Nelco has established grievance redressal mechanisms to address human rights violations	Negative

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	Occupational Health and safety	Opportunity	Better Occupational health and safety measures can prevent injury, create a better workplace by eliminating hazards and improves employee productivity. A healthy workplace can contribute positively to organization's growth and development		Positive
12	Cyber security and Data protection	Risk	Cyber security and data protection is vital for organization as data breach and cyber attack can potentially expose the organization to vulnerability leading to financial and reputational loss	<ul style="list-style-type: none"> • Cyber security and Data privacy policy as per global standards and implementation of procedural guidelines in true spirit. • Strict adherence to cyber security compliances and implementation of robust policies will help to mitigate the risk. • Nelco is certified for ISO/IEC 27001:2013, an international certification on information security management system (ISMS) 	Negative
13	Stakeholder Engagement	Opportunity	Stakeholder engagement will enhance the trust in the company and help to increase their market presence		Positive
14	Customer Relationship Management	Opportunity	Customer relationship management can help business to stay connected to customers, streamline processes, redress grievances and improve productivity		Positive

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)
15	Business continuity and Risk Management	Risk	Identification of different threats like natural catastrophe, man-made disasters, or technological bottlenecks can help Nelco to prevent and minimize potential strategic or operational losses thereafter. Failure to have a proper business continuity framework and integration in risk management can compromise the organization's resilience and sustenance	<ul style="list-style-type: none"> Nelco has established a risk management framework and policy based on which risks are identified and assessed across its business segments, The Risk Management Committee(RMC) is responsible for monitoring and reviewing the risk management plan and ensuring its effectiveness. The Company's key risks are discussed with RMC on a half yearly basis. The major risks identified by the businesses and functions are systematically addressed through mitigating actions on a continuing basis. 	Negative
16	Anti-bribery and Anti-corruption	Risk	Bribery and corruption are deceptive by nature. Each act or incident of bribery or corruption can taint not only the individuals involved, but an entire organization or process, leading to loss in reputation and brand equity	Nelco has Anti-bribery and Anti-corruption (ABAC) policy in place and it also adheres to the Tata Code of conduct which provides an ethical roadmap for all the employees. Regular trainings and checks on ABAC are also conducted to increase awareness and compliances.	Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

NGRBC Principles

PRINCIPLE 1
Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.



PRINCIPLE 2
Businesses should provide goods and service in a manner that is sustainable and safe.



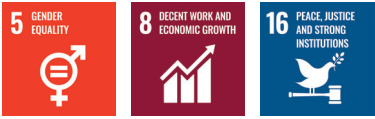
PRINCIPLE 3
Businesses should respect and promote the well-being of all employees, including those in their value chains.



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



PRINCIPLE 5
Businesses should respect and promote human rights.



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



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



PRINCIPLE 8
Businesses should promote inclusive growth and equitable development.



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



Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes										
1	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, Policies as required by the applicable statutes are approved by the Board/ Committees, and other internal policies are approved by the Managing Director & CEO of the Company.								
	c. Web Link of the Policies, if available	<p>All our policies are made available to respective stakeholders. Some of our policies are available on the Company's website at https://www.nelco.in/ for customers / suppliers etc. For employees they are available on our internal portal.</p> <p>Nelco Limited has the following policies:</p> <p>P1: Tata Group Code of Conduct (TCoC), Whistle Blower, Vigil Mechanism Policy</p> <p>P2: Safety Health & Environment (SHE),</p> <p>P3: Prevention of Sexual Harassment Policy (POSH), Occupational Health & Environment Policy, TCoC</p> <p>P4: TCoC</p> <p>P5: POSH Policy, TCoC</p> <p>P6: Safety Health & Environment (SHE), Occupational Health & Environment Policy</p> <p>P7: Code of conduct for Non-Executive Directors, Code of conduct for Prevention of Insider Trading</p> <p>P8: CSR Policy</p> <p>P9: Data Privacy and cyber security</p>								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes, the approved policies are translated into procedures.								
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes								
4	Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The policies conform to the spirit of international standards like TL 9000, ISO 27001, ISO 20000 and meet the regulatory requirements such as SEBI Listing Regulations etc. The policies reflect Tata groups commitment to improve the quality of life of the communities it serves and practice of giving back to the society.								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Yes, Nelco has developed a 5 year roadmap for their ESG journey. The company will develop ESG strategy this year to define our sustainability goals.								
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Not applicable as this is the first year of reporting of targets								
Governance, Leadership and Oversight										

7	<p>Statement by director responsible for the business responsibility report, highlighting ESG-related challenges, targets and achievements</p> <p>Climate change has emerged as one of the biggest risks faced by the humanity, with far reaching impact on the socioeconomic systems around the world. Additionally, inclusive growth and the transition to a sustainable economy have become the global agenda. Therefore, investors, regulators and other stakeholders are considering company's sustainability performance as important as its financial and operational performance. I am pleased to share with you our BRSR report which reiterates our commitment to become a sustainability leader by creating long-term value for stakeholders through an ESG-focused business strategy and roadmap.</p> <p>Our goal is not just to adhere to compliance, but to transform every aspect of our business with sustainability trends, to ensure long-term value creation. We are in this journey together and we will contribute positively to create a sustainable ecosystem.</p>										
8	<p>Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</p>	<p>Name: PJ Nath DIN: 05118177 Designation: Managing Director and CEO</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>Name: PJ Nath Designation: Managing Director and CEO</p>									
10	<p>Details of Review of NGRBCs by the Company:</p>	P1	P2	P3	P4	P5	P6	P7	P8	P9	
	<p>Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee</p>										
	<p>Performance against above policies and follow up action</p>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	<p>Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances</p>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	<p>Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)</p>										
	<p>Performance against above policies and follow up action</p>	<p>The Board of Directors and its Committees meet quarterly and as and when required. BRSR issues (if any) are discussed in respective meetings.</p>									
	<p>Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances</p>	<p>Yes, on need basis</p>									
		P1	P2	P3	P4	P5	P6	P7	P8	P9	
11	<p>Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No).</p>	No	No	No	No	No	No	No	No	No	
	<p>If yes, provide name of the agency.</p>	<p>Policies are currently evaluated internally and would be subjected to external audits as and when required.</p>									

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.

The company is governed by the TATA Code of Conduct that ensures the group's values are imbibed within its operations. The Tata Code of Conduct emphasizes the importance of ethical behaviour, accountability, and responsible business practices, and serves as a guiding document for all Nelco employees and stakeholders to uphold the Tata Group's values and maintain the highest standards of corporate governance.

Apart from TATA COC Nelco has Code of Corporate Disclosure Practices, Anti-corruption and Anti-bribery Policy, Whistle Blower policy to prevent and detect potential misconduct or unethical behaviour early, thereby mitigating risks and protecting the organization's reputation, financial stability, and legal compliance.

ESSENTIAL INDICATORS**1. Percentage coverage by training and awareness programs on any of the principles during the financial year:**

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programs
Board of Directors	1	Posh, ethics, governance	100%
Key Management Personnel	1	Posh, ethics, governance	100%
Employees other than BODs and KMPs	18	Posh, ethics, governance, TCoC	100%
Workers	NA*		

*Nelco does not employ any workers as it is a service company.

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format.**a. Monetary**

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

b. Non-Monetary

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

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.

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.**

Yes, Nelco is committed to prevent, deter and detect any bribery and other corrupt business practices. Being a Tata group company, Nelco abides by the Tata Code of Conduct (TCoC), which is a comprehensive document with an ethical roadmap for all Tata employees, companies, including third parties dealing with Nelco, thus covering 100% of its operations. Besides TCoC, Nelco also has an independent policy - Anti-bribery and Anti-corruption policy (ABAC). The guidelines in the (Anti-bribery Anti-corruption) ABAC policy supplement the TCoC. <https://www.nelco.in/pdf/Policies/ABAC%20Policy.pdf>

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

Category	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

Topic	FY 2022-23 (Current Financial Year)		FY 2021-22 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NA	NIL	NA
Number of complaints received in relation to issues of Conflict of Interest of KMPs	NIL	NA	NIL	NA

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

Not applicable, as no cases have been registered and no complaints have been received for FY23.

LEADERSHIP INDICATORS

1. **Awareness programs conducted for value chain partners on any of the principles during the financial year:**

The company engages with local service providers for procuring services of installation and Maintenance of remote VSAT terminals as well as maintenance of these. The company provides them with regular training for improving their capacity and capability for this activity. Capability building on POSH policies on any principles are conducted for the value chain partners.

Total number of training and awareness programs held	Topics/principles covered under the training and its impact	%age of persons in value chain covered by the awareness programs
8	Principle 1, Principle 4 and Principle 5	92%

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 Chairmanship of the Board is a non-executive position and separate from that of the Managing Director and Chief Executive Officer (Managing Director & CEO). The Code of Conduct for Non-Executive Directors (NEDs) and for Independent Directors (IDs) carries explicit clauses covering the avoidance of conflict of interest. Likewise, there are explicit clauses in the TCoC prohibiting any employee - including the Managing Director (MD) from accepting any position of responsibility, with or without remuneration, with any other organization without the Company's prior written approval. For MD such approval must be obtained from the Board.

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.**

Type	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	Details of improvement in social and environmental aspects
Research & Development (R&D)	0	0	-
Capital Expenditure (CAPEX)	0	0	-

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

Nelco is engaged in the telecommunication services. The criteria for procuring the materials and services is reliability, quality and price. While all the vendors are obliged to follow and sign the Tata code of conduct during onboarding, Nelco confirms to follow guidelines with respect to environment, safety, human rights and ethics in all its sourcing activities. Conformance to labour principles and related laws are mandatory qualification requirements before finalizing any supply and services.

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
a. Plastics (including packaging)	NA
b. E-Waste	The Company has its own product repair centre which maximises the product life, enables recycling and minimises waste. When a remote site is disconnected the electronic hardware and antenna are often relocated to alternative site and thereby effectively recycling the product. IT scrap and electronic waste are disposed through E-waste management service providers who are certified by Central Pollution Control Board and / the corresponding State Pollution Board.
c. Hazardous Waste	NA
d. Other Waste	NA

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 to the entity. Nelco has the authorization to collect the E-waste under the E- Waste (Management) Rules, 2016. Nelco has a plan to collect the waste from collection centers through their E-waste collection partners. Their logistics partner collects the waste from head collection centers and ships the E-waste to recycling partner Envicare Recycling Pvt Ltd.

LEADERSHIP INDICATORS

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

Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/ No) If yes provide web-link
LCA is not conducted for any of the services				

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.

Sr. No.	Name of the product	Description of the risk	Action Taken
		NA	

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2023 (Current Financial Year)	FY 2022 (Previous Financial Year)
E-waste	92%	76%

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:

Sr No.	Waste	FY 2023 (Current Financial Year)			FY 2022 (Previous Financial Year)		
		Re-used	Re-cycled	Safely disposed	Re-used	Re-cycled	Safely disposed
1	Plastics (including packaging)	NA	NA	NA	NA	NA	NA
2	E- waste (in MT)	NA	2.809	Pending for dispose	NA	2.96	0.856
3	Hazardous Waste	NA	NA	NA	NA	NA	NA
4	Other waste	NA	NA	NA	NA	NA	NA

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

Not applicable. Nelco collects its products for recycling purpose through EPRA (Extended Producers Responsibility Authorization).

PRINCIPLE 3: Businesses should respect and promote the wellbeing of all employees, including those in their value chains.

ESSENTIAL INDICATORS

1. a. Details of measures for the wellbeing of employees:

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)
Male	155	155	100%	155	100%	0	100%	0	0%	0	0%
Female	20	20	100%	20	100%	18	100%	0	0%	0	0%
Total	175	175	100%	175	100%	18	100%	0	0%	0	0%
Other than Permanent Employees											
Male	91	91	100%	91	100%	0	100%	0	0%	0	0%
Female	4	4	100%	4	100%	2	100%	0	0%	0	0%
Total	95	95	100%	95	100%	2	100%	0	0%	0	0%

b. Details of measures for the wellbeing of workers:

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	%(C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Other than Permanent Employees											
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Not applicable, Nelco does not employ any contractual workers.

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

Sr.No.	Benefits	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	NA	Y	100%	NA	NA
2	Gratuity	100%	NA	Y	100%	NA	NA
3	ESI	5%	NA	Y	5%	NA	NA
4	Others-Please Specify*- Medical Insurance after retirement	10%	NA	Y	9%	NA	NA

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

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

Partial accessibility is granted to the differently-abled people by making the ground floor accessible and providing other healthcare facilities to them. In the upcoming projects, Nelco is planning to make the whole structure accessible to the differently-abled people. Nelco has a dedicated space for Creche facility. However, there was no request for a creche facility in the current financial year. This space is also utilized as a clinic for regularly visiting the doctor at the premises.

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

Nelco adheres to the TCoC which mentions the Equal Opportunity policy.

Link: <https://www.nelco.in/investor-relation/corporate-governance.php>, Pg 9,Section D: Our Employees

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention rate	Return to work rate	Retention Rate
Male	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil

*No one went on Parental leave during FY 21-22 and 22-23. Parental leave is not included in the Leave policy

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.

Category	Yes/No	Details of the mechanism in brief
Permanent Workers	NA	Nelco does not employ any contractual workers.
Other than Permanent Workers	NA	
Permanent Employees	Yes	The Company has adopted a Whistle Blower & Vigil Mechanism Policy for establishing a mechanism for employees to report to the management concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct or ethics policy. The Vigil Mechanism provides a mechanism for employees of the Company to approach the Chief Ethics Counsellor (CEC)/Chairman of the Audit Committee of the Company for redressal.
Other than Permanent Employees	Yes	

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (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)
Permanent Employees						
Male	0	0	0%	0	0	0%
Female	0	0	0%	0	0	0%
Total	0	0	0%	0	0	0%
Permanent Workers- NA*						

No Union associations are present in Nelco.

* Nelco does not employ any contractual workers.

8. Details of training given to employees and workers:

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)			
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received Skill Training (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received Skill Training (D)	%(D/C)	
On Health and Safety Measures	Employees						
	Male	155	155	100%	152	152	100%
	Female	20	20	100%	17	17	100%
	Total	175	175	100%	169	169	100%
Workers – NA*							

On Skill Upgradation	Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received Skill Training (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received Skill Training (D)	%(D/C)
Employees							
	Male	155	155	100%	152	152	100%
	Female	20	20	100%	17	17	100%
	Total	175	175	100%	169	169	100%
Workers- NA*							

* Nelco does not employ any contractual workers.

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)			
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who had a career review (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who had a career review (D)	%(D/C)	
Employees							
	Male	155	155	100%	152	152	100%
	Female	20	20	100%	17	17	100%
	Total	175	175	100%	169	169	100%
Workers – NA*							

*Nelco does not employ any contractual workers.

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No)	Yes, Nelco has implemented an OHS policy. The policy has been published in our website and circulated internally to all concerned.
b. What is the coverage of such system?	This OHS management system is applicable to all our stakeholders working in our premises and involved in our business operations.
c. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	Nelco has online portal for reporting safety related hazards, incidents, observations. We have work permit system and SOPs which are strictly adhered to. This year, we introduced an online app to report the any safety related incidents.
d. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)	Yes, the process includes all employees and contractual workforce.
e. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)	Yes, the employees of the entity have access to non-occupational medical healthcare services.

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

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

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

Nelco gives foremost priority to health and safety. The company places particular emphasis on establishing safety standards for office safety, field safety, working at heights safety, as well as electrical and fire safety. The Apex Safety Committee regularly meet to evaluate working conditions, incident reports, and risk assessments. The Works Committee ensures that safety regulations are being adhered to in all regions. The reporting of incidents and unsafe conditions are actively encouraged, and the committee examines the reported cases and corrective measures are taken to prevent them from happening again.

Safety precautions during onboarding

Every new employee at the organization receives a safety overview as part of the onboarding procedure. The office conducts frequent fire drills and training sessions for using fire equipment. Before getting integrated into the system, all the employees need to comply with the safety induction procedure. The business maintains a planned schedule for safety training in order to establish a culture of safety among its employees.

Welfare Measures

Nelco adopts a proactive and responsible approach to safeguard the welfare of its employees. Nelco also provides doctor at the premises, medical check up facilities for employees, virtual seminars on health topics, fitness related sessions, company vehicles to commute to work.

Regular workshops, health camps are held to increase awareness on health and hygiene. Throughout Safety Week, specific awareness sessions are given to inform everyone including vendors.

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

Topic	FY 2022-23 (Current Financial Year)			FY 2021-22 (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	0	0	No complaints received.	0	0	No complaints received.
Health & Safety	1	0	Minor on field injuries.	4	0	Minor on field injuries.
Total	1	0		4	0	

14. Assessments for the year:

Topic	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	Yes, Internal audits are conducted
Working Conditions	Yes, Internal audits are conducted

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

Safety SOPs are implemented for all the contractual employees at the location/field. In order to ensure that the staff understands the dangers and take the appropriate safeguards, permit systems have been put in place. Special learning programmes, including Technical, Safety, Functional and Behavioural trainings were designed for contract employees and the Franchisee engineers. This year Nelco deployed a safety app to record the safety related incident. We are in the process of deploying the Driver safety application, which will measure driving behaviour while on the move.

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/No): Yes

Workers (Yes/No): NA

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 receives and reviews the compliance documents of the partners at the time of Invoicing process to ensure that the statutory dues have been paid. Our vendor agreement includes the clause to check the statutory dues of our vendors. The agreement also includes Nelco’s rights to conduct audit of the vendors. Nelco ensures that the vendor duly pays their statutory dues such as ESIC, PF, Professional tax etc to the authorized department on time. Cross verification is done with vendors employees for timely payment of salary. Employee compliance documents are checked. Agreement contains statutory compliances and timely filling is checked.

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:

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Employees	NIL	NIL	NIL	NIL
Workers	NA	NA	NA	NA

**Nelco does not employ any contractual workers.*

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 provides a process by which retired employees may continue working for the company as consultants based on company’s need and employee’s acceptance.

5. Details on assessment of value chain partners:

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

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.

Every employee is required to complete online training on numerous safety subjects. Relevant workers receive specialized training in electrical safety. The value chain partners that deliver services to Nelco adhere to all statutory safety standards and OHS policy of Nelco.

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:

Nelco conducted the Materiality assessment in the current financial year with the involvement of many stakeholder groups. The stakeholder engagement process entailed identifying key internal and external stakeholder groups, including leadership, employees, vendors, customers and third-party experts. After identification of the stakeholder groups, their relative importance to the business was analyzed by ascertaining their ability to influence and get influenced by Nelco’s performance and operations. The sample sizes of different respondent groups and the mode of engagement were decided based on location and availability, including one-to-one discussions and online surveys.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders/Investors	No	E-mail, Meetings, Company website, Newspaper, Advertisements	Annually	Share price, Dividends, Growth prospects
Employees	No	Employee Portal, E-mail, Company website, MD open house, Notice Boards	Ongoing	Training and awareness, Health and safety, Engagement activities, Operational Efficiency
Suppliers	Yes	E-mails, Company website, One-on-one engagement	Ongoing	Timely delivery and payments, Safety concerns, Compliances, Collaborations
Customers	No	E-mails, Survey, Helpdesk, One-on-one engagement	Ongoing	Product Quality, Product guidelines
Local Communities	No	Volunteering	Ongoing	Community Development

LEADERSHIP INDICATORS

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

The Company management regularly interacts with key stakeholders i.e. investors, customers, suppliers, employees, etc through a variety of channels and at different intervals to understand their needs, solicit their ideas for improving our financial and non-financial performance.

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

Yes, Materiality assessment which was conducted in FY 2022-23 included detailed interviews with selected stakeholder groups that helped us identify the material issues to focus on to accelerate our sustainable growth. The Materiality Assessment intends to determine environmental, social, governance topics that are central to corporate sustainability of the company. This assessment helped Nelco to highlight and prioritize the topics to draft an ESG strategy aligned to Nelco's business objectives and risks.

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

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

PRINCIPLE 5: Businesses should respect and promote human rights.

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 2022-23 (Current Financial Year)			FY 2021-22 (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	175	175	100%	169	169	100%
Other than permanent	95	95	100%	100	100	100%
Total Employees	270	270	100%	269	269	100%
Workers-NA*						

*Nelco does not employ contractual workers

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

Category	FY 2022-23 (Current Financial Year)					FY 2021-22 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (B)	% (B/A)	No. (C)	% (C/A)
Employees										
Permanent Employees										
Male	152	0	-	152	100%	152	0	-	152	100%
Female	20	0	-	20	100%	17	0	-	17	100%
Other than Permanent Employees										
Male	91	0	-	91	100%	99	0	-	99	100%
Female	4	0	-	4	100%	1	0	-	1	100%
Total	270	0	-	270	100%	269	0	-	269	100%
Workers-NA*										

* Nelco does not employ contractual workers

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

	Male		Female	
	Number	Median remuneration/salary/wages of respective category	Number	
Board of Directors (BoD)	7	12,75,000	1	12,75,000
Key Managerial Personnel*	2	59,16,768	0	0
Employees other than BoD and KMP	154	10,13,306	18	8,69,196
Workers	NA	NA	NA	NA

*MD is considered as KMP to calculate median of salaries

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

Yes, the company has POSH & Ethics, Safety and overall Audit committee responsible for addressing the human rights concerns. We have a ethics counselor who addresses the grievances with respect to human rights, etc. Such complaints are also discussed with the MD and have the timeline to be addressed in 90 days.

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

The Company respects human rights and Its policies support, respects and protects the human rights of its direct as well as indirect employees, including those of its subsidiaries. The Company has adopted a Whistle Blower & Vigil Mechanism Policy for establishing a mechanism for employees to report to the management concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct or ethics policy. The Vigil Mechanism provides a mechanism for employees of the Company to approach the Chief Ethics Counsellor (CEC)/Chairman of the Audit Committee of the Company for redressal. The POSH committee redress any complaints related to sexual harassment. POSH policy covers Associates, Franchisee engineers and vendors too. The TCoC concerns are resolved through internal review mechanism by Ethics Counsellor and Senior Management Link: <https://www.nelco.in/>

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	No cases were reported for FY 22-23	0	0	No cases were reported for FY 21-22
Discrimination at workplace	0	0				
Child Labour	0	0				
Forced Labour/ Involuntary Labour	0	0				
Wages	0	0				
Other human rights related issues	0	0				

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

As part of Whistleblower Policy and POSH Policy, the Company has a section mentioned on the protection of identity of the complainant. All matters of discrimination and harassment are dealt in strict adherence to our policy.

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

Yes. We have a human rights clause in all of our contracts with suppliers which addresses issues including child labour, forced labour, discrimination, working conditions, remuneration, and disciplinary actions. Vendors are required to follow the clauses in the agreement and also provide procedures to deal with any breaches of such policies. The

Supplier Code of Conduct is also a provision of the contract and is essential for all of our vendors. The Supplier Code of Conduct covers labour laws, workplace regulations, and human rights.

9. Assessments for the year:

Topic	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	100% We ensure that there is no violation of child labour, forced labour, sexual harassment, discrimination, minimum wages in our operations by strict adherence to the statutory laws and our policies on the same.
Forced/involuntary labor	
Sexual harassment	
Discrimination at workplace	
Wages	
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 as no major issues were reported upon which the corrective actions might be required. However, as a process we keep training new joiners and existing peoples on such requirements. No significant risk / concerns raised. However, our assessment by labour consultant, awareness on Ethics and reporting measures are continued efforts to employees and all stakeholders (EHS). We also keep training new people and existing people on such requirements as part of our process.

LEADERSHIP INDICATORS

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

Not applicable as monthly issues on human rights grievances/complaints are reported.

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

Due diligence has not been conducted. However all Locations maintain 100% compliance of the statutory provisions.

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, premises are accessible to the differently-abled people. Provisions are made for the differently-abled people on the ground floor premises. Accessibility to the differently-abled people will be considered under future Infrastructure Development Project.

4. Details on assessment of value chain partners:

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

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

Not applicable since no issues were reported to take any 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 Joules or multiples) and energy intensity, in the following format:**

	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total electricity consumption (A) (GJ)	8,135.28	8,478.59
Total fuel consumption (B) (GJ)	489.50	303.00
Energy consumption through other sources (C) (GJ)	0	0
Total energy consumption (A+B+C) (GJ)	8,624.78	8,781.60
Turnover (in INR lacs)	31,333	26,007
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees) (GJ/INR lacs)	0.275	0.338

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

PAT scheme is not applicable to Nelco.

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

	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	6,584	6,541
(iv) Seawater / desalinated water	0	0
(v) Others (Rainwater storage)	380	0
Total volume of water withdrawal (in KL) (i + ii + iii + iv + v)	6,964	6,541
Total volume of water consumption (in kilolitres)	6,964	6,541
Turnover (in INR Lacs)	31,333	26,007
Water intensity per rupee of turnover (Water consumed / turnover) (KL/INR lacs)	0.222	0.252

- B. **Indicate if any independent assessment/ evaluation/assurance has been carried out Water Withdrawal and Consumption data by an external for agency? (Yes/No)**

No

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

No, we have not implemented Zero Liquid Discharge mechanism

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

Parameter	Please specify unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
NOx	Kg	0.041	Not Available
SOx		0.057	Not Available
Particulate matter (PM)		0.253	Not Available
Persistent organic pollutants (POP)		Not Applicable	Not Applicable
Volatile organic compounds (VOC)		Not Applicable	Not Applicable
Hazardous air pollutants (HAP)		Not Applicable	Not Applicable

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

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Scope 1 emissions	tCO2e	37.19	23.02
Total Scope 2 emissions	tCO2e	1,604.46	1,648.62
Total Scope 1 & 2 emissions	tCO2e	1,641.65	1,671.63
Turnover	INR Lacs	31,333	26,007
Total Scope 1 and Scope 2 emissions per rupee of turnover	tCO2e/INR Lacs	0.052	0.064

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

NO

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)		
E-waste (B)	3.041	3.886
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (Oil Disposed) (G)	0.00033	Not available
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	0	0
Total (A+B + C + D + E + F + G+ H)	3.041	3.886
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 (E-waste)	2.809	2.96
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total	2.809	2.96
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0.8	0.856
	(Oil and Battery waste)	(E-waste)
Total	0.8	0.856

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.

All the E-Waste generated including transformer and DG used oil from our operations are disposed off through the certified e-waste vendor who is having the permission from Maharashtra Pollution Control Board (MPCB). The company prioritizes to focus on use of Restriction of Hazardous Substances (RoHS) compliant products.

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 in the following format:

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

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

Nelco did not undertake any project for which EIA was the applicable as per the laws.

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, in the following format:

Nelco is a service based company. Environmental laws are not applicable to the company.

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 agency such as pollution control boards or by courts	Corrective action taken, if any
NA				

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 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
From renewable sources in GJ		
Total electricity consumption (A)	0	0
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C) in GJ	0	0
From non-renewable sources in GJ		
Total electricity consumption (D)	8,135.28	8,478.59
Total fuel consumption (E)	489.50	303.00
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F) in GJ	8,624.78	8,781.60

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

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

- (i) Name of the area :
- (ii) Nature of operations

(iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	6,584	6,541
(iv) Seawater / desalinated water	0	0
(v) Others	380	0
Total volume of water withdrawal (in kilolitres)	6,964	6,541
Total volume of water consumption (in kilolitres)	6,964	6,541
Turnover in INR Lacs	31,333	26,007
Water intensity (optional) – the relevant metric may be selected by the entity (kL/INR Lacs)	0.222	0.252
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) Into Groundwater	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iii) Into Seawater	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to Third parties	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to Third parties	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
Total water discharged (in kilolitres)	NA	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

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

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

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

Not Applicable. Nelco has initiated its journey for sustainability and is developing its roadmap.

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

Yes,

Nelco has a Business Continuity Plan policy and procedures based on the ISMS framework in place for IT application and Infra. This policy emphasizes Nelco's need for business continuity to critical business processes that must be recovered in the event of a major disruption. The policy has been designed based on Operations need. Critical Disaster types have been identified under BCP with their typical recovery and handling methods.

BCP addresses all significant business processes and emphasize on:

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

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

Nelco did not undertake any assessment to measure the impact from its value chain.

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

No value chain partners were assessed for environmental impact.

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

ESSENTIAL INDICATORS

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

Currently, we are an active member of 2 associations as mentioned in the below table, which are Broadband India Forum (BIF) and Indian Space Association (ISpA). Managing Director & CEO of Nelco is the Chairperson of the Satcom Committee at BIF and ISpA.

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

S.No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Broadband India Forum	Member
2	Indian Space Association	Founding Member

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

Name of Authority	Brief of the case	Corrective action taken
No Such cases recorded		

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

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

No social impact assessments are conducted as of now mainly because our business does not have any major negative impact on the communities.

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

Not applicable, Nelco does not engage into projects where R&R activity is required.

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

Nelco has a mechanism to receive and address the grievances. For the local communities, we have email id's through which the people can raise their concerns. The email id's are - ethics@nelco.in and services@nelco.in it is also available on our company website.

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

	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directly sourced from MSMEs/ Small producers	15%	17%
Sourced directly from within the district and neighboring districts	85%	83%

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):

None

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

No CSR project was undertaken in aspirational district.

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

No

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

NA

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

NA

4. Details of beneficiaries of CSR Projects.

S. no	CSR Project	No of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalised group
1	E-Vidya, Nelco sponsored learning community center for school children at Thane, Maharashtra	135	100%

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

ESSENTIAL INDICATORS

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

Customer centricity is one of the important aspects for company's business. Nelco has a robust system for tracking consumer complaints and feedback. The process for managing complaints involves a comprehensive protocol that includes registering complaints, conducting a root-cause analysis by the relevant department, direct interaction with the customer through various stakeholders if required, and ultimately resolving the issue with feedback from the customer

Customer complaints are received through the following sources:

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

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

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

3. Number of consumer complaints

	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	NIL	NIL	No complaints were received in FY 22-23	NIL	NIL	No complaints were received in FY 21-22
Advertising	NIL	NIL				
Cyber-security	NIL	NIL				
Delivery of essential services	NIL	NIL				
Restrictive Trade Practices	NIL	NIL				
Unfair Trade Practices	NIL	NIL				
Others						

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

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

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

Yes, Nelco is committed to protecting sensitive information and can help to build trust and confidence in its products and services. The company establishes and maintains effective controls to manage the confidentiality, integrity, and availability of its information assets.

Policy

Nelco has in place, board approved policies on Information security, Cybersecurity and Data Privacy. The Data Privacy policy is available for both external and internal areas, whereas the Information security and Cybersecurity policy is available on Intranet. Web-link: <https://www.nelco.in/privacy-policy.php#>

Certifications

Nelco is certified for ISO/IEC 27001:2013, an international certification on Information Security Management System (ISMS)

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

No issues have been reported 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.

LEADERSHIP INDICATORS

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

Key services details may be accessed on <https://www.nelco.in/> or <https://www.nelco.in/key-services/vsat.php>

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

Nelco's solutions are not intended for individual use; rather, they are designed to deliver satellite-based communication services in a Business to Business (B2B) environment. Nelco has issued guidelines to be followed by the client while on the site, which addresses the safety aspect of the consumers. These guidelines are informed to the customers by email during the contracting stage. Nelco also communicates the safety aspects and best practices to the consumers through presentations.

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

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

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

Yes, product information over and above what is mandated as per local laws is provided to the consumers. As Nelco is providing service using technical products, display of product information on the product itself is not possible. However, these details are shared with the customer during pre-sale of the same.

Yes, Service related surveys are conducted yearly by a 3rd party agency. Company conducts a formal Customer Satisfaction (CSAT) survey every year through a reputed external market research agency. The survey covers a very large part of the customer base of the Company. The survey helps to understand the customers concerns and be more responsive to their needs. The findings of the CSAT survey are discussed with all the relevant stake holders to arrive at the action points to improve the customer satisfaction levels.

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

- a. **Number of instances of data breaches along-with impact**

NIL

- b. **Percentage of data breaches involving personally identifiable information of customers**

NIL