

POST BOX NO. 10077  
TEL. NOS.: +91 22 22197101  
FAX :0091-22- 2207 1612 / 6772

Email: [writetous@bbtcl.com](mailto:writetous@bbtcl.com)  
Website: [www.bbtcl.com](http://www.bbtcl.com)

CIN: L99999MH1863PLC000002



**THE BOMBAY BURMAH TRADING CORPORATION, LIMITED**

REGD. OFFICE : 9, WALLACE STREET,FORT,  
MUMBAI 400 001, INDIA.

6<sup>th</sup> September, 2023

The Secretary  
BSE Ltd.,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
MUMBAI 400 001.  
**Scrip Code: 501425**

The Manager – Listing Department,  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 5th Floor,  
Plot No.C/1, 'G' Block,  
Bandra-Kurla Complex,  
Bandra (E),  
MUMBAI 400 051.  
**Scrip Code: BBTC**

Dear Sirs,

**Sub: Business Responsibility and Sustainability Report for the Financial Year ended 31st March, 2023**

**Ref: Regulation 34 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to provisions of Regulation 34 and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report for FY 2022-23.

Request you to take the above information / documents on records.

Thanking You,

Yours faithfully,  
For The Bombay Burmah Trading Corporation, Limited

NITIN  
HARIYANTLAL  
DATANWALA

Digitally signed  
by NITIN  
HARIYANTLAL  
DATANWALA

N H Datanwala  
Chief Financial Officer  
Encl: As above

# THE BOMBAY BURMAH TRADING CORPORATION LIMITED - BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity :

1. Corporate Identity Number (CIN) of the Listed Entity - **L99999MH1863PLC000002**
2. Name of the Listed Entity – **The Bombay Burmah Trading Corporation Limited**
3. Year of incorporation – **1863**
4. Registered office address - **9, Wallace Street, Fort, Mumbai - 400 001**
5. Corporate address - **9, Wallace Street, Fort, Mumbai - 400001**
6. E-mail - [writetous@bbtcl.com](mailto:writetous@bbtcl.com)
7. Telephone - **022-22197101**
8. Website - <https://bbtcl.com/>
9. Financial year for which reporting is being done – **2022-23**
10. Name of the Stock Exchange(s) where shares are listed :

Name of the Exchange	Stock Code
BSE Ltd.	501425
National Stock Exchange of India Ltd.	BBTC

11. Paid-up Capital (INR) : **1395.44 Lakhs**
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report -  
**Mr. N. H. Datanwala Chief Financial Officer**  
Telephone No - **022-22197101**  
Email: [investorservices@bbtcl.com](mailto:investorservices@bbtcl.com)
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together). –  
All the disclosures under this report are made on a Standalone basis.

### II. Products/ services

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Food, beverages and tobacco products	27%
2	Manufacturing	Electrical equipment, General purpose and Special purpose Machinery & equipment, Transport equipment	62%
3	Manufacturing	Other manufacturing including jewellery, musical instruments, medical instruments, sports goods, etc. activities	11%

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Food, beverages and tobacco products	27%
2	Manufacturing	Electrical equipment, General Purpose and Special purpose Machinery & equipment, Transport equipment	62%
3	Manufacturing	Other manufacturing including jewellery, musical instruments, medical instruments, sports goods, etc. activities	11%

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

S. No.	Product/ Service	NIC Code	% of Turnover contributed
1	Tea	1271	27%
2	Coffee *	1272	-
3	Auto Electric Components	29301 & 29304	62%
4	Healthcare	32501	11%

*\*Note: The Board of Directors of the Corporation at their meeting held on 28<sup>th</sup> February, 2023 has approved the sale/ divestment of the Assets related to the Coffee estates situated at Coorg, Siddapura, Karnataka, for a consideration of ₹ 291 crores subject to such adjustments as may be arrived at between the parties and the requisite approvals having been obtained. Further the Members of the Corporation approved the sale/ divestment of the above mentioned asset by way of special resolution as set out in the Notice of the Postal Ballot dated 28<sup>th</sup> February, 2023. The aforesaid resolution has been passed with requisite majority through Postal Ballot by the Members on 30<sup>th</sup> March, 2023.*

### 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	8	-	8
International	2	-	2*

*\* During the year the Board of Directors of the Corporation has approved sale/ investment of the assets related to Tea plantations in Tanzania.*

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	8
International (No. of Countries)	2

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

A total of 21.90% of revenue of the Company came from exports during the reporting period

\* Exports sale of continuing operation.

**c. A brief on types of customers:**

The Company serves various types of customers, including retail customers, wholesale customers, institutional customers, export customers, and B2B customers. These customers range from individual consumers to businesses, both within India and internationally.

**IV. Employees**

18. Details as at the end of Financial Year:

**a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	<b>302</b>	271	89.40	31	10.60
2.	Other than Permanent (E)	<b>42</b>	40	95.24	2	4.76
<b>3.</b>	<b>Total employees (D + E)</b>	<b>344</b>	310	90.12	34	9.88
<b>WORKERS</b>						
4.	Permanent (F)	<b>2657</b>	949	35.72	1708	64.28
5.	Other than Permanent (G)	<b>1646</b>	829	50.36	817	49.64
<b>6.</b>	<b>Total workers (F + G)</b>	<b>4303</b>	1778	41.32	2525	58.68

**b. Differently abled Employees and workers:**

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No.(C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	<b>16</b>	12	75.00	4	25.00
2.	Other than Permanent (E)	<b>8</b>	1	12.50	7	87.50
3.	Total differently abled employees (D + E)	<b>24</b>	13	54.17	11	45.83
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	<b>4</b>	3	75.00	1	25.00
5.	Other than Permanent (G)	<b>5</b>	5	100.00	0	0.00
<b>6.</b>	<b>Total differently abled workers (F + G)</b>	<b>9</b>	8	88.89	1	11.11

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	7	2	28.57
Key Management Personnel*	2	0	0.00

\* KMP includes CFO & MD (MD is covered in BoD as well)

20. Turnover rate for permanent employees and workers (in percent):

	Male	Female	Total	Male	Female	Total	Male	Female	Total
	FY 2022-23			FY 2021-22			FY 2020-21		
Permanent Employees	14.15	5.97	13.25	10.60	12.50	10.80	12.06	12.90	12.14
Permanent Workers	6.16	5.01	5.43	8.42	6.59	7.30	7.66	7.49	7.55

## V. 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 (A)	Indicate whether Holding/Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	AFCO Industrial & Chemicals Ltd	Subsidiary	100	No
2	Sea Wind Investment & Trading Co. Ltd.	Subsidiary	100	No
3	DPI Products & Services Ltd	Subsidiary	100	No
4	Subham Viniyog Private Ltd.	Subsidiary	100	No
5	Leila Lands Sdn. Bhd	Subsidiary	100	No
6	Naira Holdings Limited	Subsidiary	100	No
7	Island Horti-Tech Holdings Pte. Ltd	Subsidiary	100	No
8	Leila Lands Limited	Subsidiary	100	No
9	Restpoint Investments Limited	Subsidiary	100	No
10	Island Landscape & Nursery Pte. Ltd.	Subsidiary	100	No
11	Innovative Organics Inc.	Subsidiary	100	No
12	ABI Holding Limited	Subsidiary	100	No
13	Britannia Brands Limited	Subsidiary	100	No
14	Associated Biscuits International Ltd.	Subsidiary	100	No
15	Dowbiggin Enterprises Pte. Limited	Subsidiary	100	No
16	Nacupa Enterprises Pte. Limited	Subsidiary	100	No
17	Spargo Enterprises Pte. Limited	Subsidiary	100	No
18	Valletort Enterprises Pte. Limited	Subsidiary	100	No
19	Bannatyne Enterprises Pte. Limited	Subsidiary	100	No

Above are a few prominent subsidiaries of Bombay Burmah. In totality, we have 46 subsidiaries, 14 associate companies & one joint venture. None of them contribute to our Business Responsibility initiative. Entire list and shareholding in these subsidiaries, associate companies & joint venture is available in Annual Report for FY 22-23.

## VI. CSR Details

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

Turnover (in ₹) - **2,44,58,74,947.55**

Net worth (in ₹) - **2,05,85,87,501.38**

## VII. Transparency and Disclosures Compliances

23. Complaints/ Grievance 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	Public relations department of the Company acts as authority	-	-	-	-	-	-
Investors (other than shareholders)	No specific mechanism set up	-	-	There were no such complaints received from investors during the reporting year	-	-	There were no such complaints received from investor during the reporting year
Shareholders	SEBI SCORES Mechanism is available for investors. Also, investors can reach out to us at our investors email id – <a href="mailto:investorservices@bbtcl.com">investorservices@bbtcl.com</a>	12	0	Complaints from the shareholders were resolved immediately	22	0	Complaints from the shareholders were resolved immediately
Employees and workers	HR Department head acts as grievance officer for employees & workers	-	-	-	-	-	-
Customers	The Company has set up various mechanisms to redress customer complaints as detailed in Principle 9 of this Report	Nil	Nil	-	Nil	Nil	-
Value Chain Partners	Marketing team of the Company acts as grievance redressal authority for value chain partners	Nil	Nil	-	Nil	Nil	-

24. Overview of the entity's material responsible business conduct 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:

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.	GHG Emissions	Risk	The Bombay Burmah Trading Corporation Ltd. stems from various factors. The risk associated with GHG emissions involves quantifying emissions, understanding climate science, analyzing regulations, engaging stakeholders, assessing market and industry dynamics, evaluating physical and transition risks, and conducting financial analysis.	The Bombay Burmah Trading Corporation Ltd. can adapt and mitigate the risk of GHG emissions by implementing energy-efficient measures, transitioning to renewable energy sources, optimizing transportation logistics, engaging suppliers in sustainable practices, supporting carbon offsetting projects, conducting climate risk assessments, and actively communicating with stakeholders.	Negative implications
2.	Waste & Hazardous Materials Management	Risk	Identifying the risk associated with waste and hazardous materials management involves acknowledging the potential environmental impact, ensuring regulatory compliance, addressing health and safety concerns, safeguarding reputation, and considering financial implications, and embracing sustainable practices.	To adapt and mitigate the risks associated with waste and hazardous materials management, the Company can take the following approaches: minimize waste generation, ensure proper handling and storage, comply with regulations, conduct risk assessments, employ environmentally sound treatment and disposal methods, provide training and continuous improvement programs, engage suppliers, and implement monitoring and auditing systems. By implementing these measures, the company can mitigate environmental and health risks, comply with regulations, and promote responsible waste management practices.	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)
3.	Selling Practices & Product Labeling	Risk	Identifying the risk associated with selling practices and product labeling involves the potential for reputational damage, legal consequences, and financial impacts resulting from non-compliance, unethical practices, inaccurate labeling, or false claims.	To adapt and mitigate the risks associated with selling practices and product labeling, The Bombay Burmah Trading Corporation Ltd. can focus on ensuring compliance, implementing quality control, transparent communication, employee training, regular monitoring, collaboration with suppliers, and crisis management planning. These measures help protect the Company's reputation, maintain consumer trust, and uphold accurate and ethical selling practices.	Negative implications
4.	Labour Practices	Risk	Identifying labour practice risks entails acknowledging potential non-compliance with labor laws, employee dissatisfaction, reputational harm, supply chain transparency challenges, worker health and safety hazards, labor union relations issues, and evolving labor landscape dynamics.	The Company can focus on ensuring compliance with labour laws, promoting employee engagement and communication, prioritizing health and safety measures, conducting supplier audits, investing in training and continuous improvement, engaging with stakeholders, and practicing ethical supply chain management. These measures help create a positive work environment, ensure legal compliance, protect employee well-being, mitigate reputational risks, and foster responsible labor practices.	Negative implication
5.	Data Security	Risk	Identifying data security risks involves recognizing potential threats such as unauthorized access, data breaches, malware attacks, insider threats, compliance violations, third-party risks, data loss, and emerging cybersecurity threats. To mitigate these risks.	To adapt and mitigate data security risks, The Company can implement strong security measures, conduct regular risk assessments, provide employee training, backup data, perform due diligence on vendors, comply with regulations, and implement monitoring and auditing. These actions protect sensitive data, respond to security incidents, maintain compliance, and build trust with stakeholders.	Negative implications



## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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)	Policies mandated under the Companies Act, 2013 and SEBI (LODR) Regulations, 2015 are approved by the Board and other policies are approved by the Managing Director or Business Heads of the various Divisions.								
c. Web Link of the Policies, if available									
Policies available in the Company's Website:									
Name of the Policy	Web-link	Principles Mapped							
Anti-competitive trade practices/ Competition compliance	Internal	P7							
Archival Policy	<a href="https://bbtcl.com/wp-content/uploads/2015/12/ARCHIVAL-POLICY-OF-WEBSITE.pdf">https://bbtcl.com/wp-content/uploads/2015/12/ARCHIVAL-POLICY-OF-WEBSITE.pdf</a>	P1							
Board Diversity Policy	<a href="https://bbtcl.com/policy-on-board-diversity/">https://bbtcl.com/policy-on-board-diversity/</a>	P1							
Code of Conduct for Board & Senior Management	<a href="https://bbtcl.com/wadia-code-of-ethics-and-business-principles-applicable-to-non-executive-directors/">https://bbtcl.com/wadia-code-of-ethics-and-business-principles-applicable-to-non-executive-directors/</a>	P1, P7							
Code of Practices and Procedures for Unpublished Price Sensitive Information	<a href="https://bbtcl.com/wp-content/uploads/2019/04/Code-of-Practice.pdf">https://bbtcl.com/wp-content/uploads/2019/04/Code-of-Practice.pdf</a>	P1, P7							
Corporate Social Responsibility	<a href="https://bbtcl.com/wp-content/uploads/2021/11/BBTCL_CSR-Policy_26.03.2021.pdf">https://bbtcl.com/wp-content/uploads/2021/11/BBTCL_CSR-Policy_26.03.2021.pdf</a>	P6							
CSR Annual Action plan	<a href="https://bbtcl.com/wp-content/uploads/2021/11/BBTCL_CSR-Policy_26.03.2021.pdf">https://bbtcl.com/wp-content/uploads/2021/11/BBTCL_CSR-Policy_26.03.2021.pdf</a>	P6							
Dividend distribution policy	<a href="https://bbtcl.com/wp-content/uploads/2017/04/Dividend-Distribution-Policy.pdf">https://bbtcl.com/wp-content/uploads/2017/04/Dividend-Distribution-Policy.pdf</a>	P3							
Ethics Policy	Part of Wadia Code of Ethics - Internal	P5, P9							
Fair Remuneration	Part of Wadia Code of Ethics - Internal	P7, P8							
Familiarization program for Independent Directors	<a href="https://bbtcl.com/wp-content/uploads/2015/07/Familiarisation-Programme-for-Independent-Directors.pdf">https://bbtcl.com/wp-content/uploads/2015/07/Familiarisation-Programme-for-Independent-Directors.pdf</a>	P1, P8							
Human rights/ Grievance redressal	Part of Wadia Code of Ethics - Internal	P5, P9							
Materiality of Events	<a href="https://bbtcl.com/wp-content/uploads/2019/07/determining-materiality-of-events.pdf">https://bbtcl.com/wp-content/uploads/2019/07/determining-materiality-of-events.pdf</a>	P4, P7							
Materially important subsidiaries	<a href="https://bbtcl.com/wp-content/uploads/2019/05/3Policy-for-determining-MaterialFINAL.pdf">https://bbtcl.com/wp-content/uploads/2019/05/3Policy-for-determining-MaterialFINAL.pdf</a>	P1							
Nomination & Remuneration Policy	<a href="https://bbtcl.com/wp-content/uploads/2019/05/1BBTCL-Remuneration-policy-FINAL.pdf">https://bbtcl.com/wp-content/uploads/2019/05/1BBTCL-Remuneration-policy-FINAL.pdf</a>	P3							
Policy on Equal Opportunity	Part of Wadia Code of Ethics - Internal	P8							
Related Parties & Materiality	<a href="https://bbtcl.com/wp-content/uploads/2022/07/RPT-Policy_BBTC-Final.pdf">https://bbtcl.com/wp-content/uploads/2022/07/RPT-Policy_BBTC-Final.pdf</a>	P1, P7							
Risk Management Policy	<a href="https://bbtcl.com/wpcontent/uploads/2021/11/Risk-Management-Policy.pdf">https://bbtcl.com/wpcontent/uploads/2021/11/Risk-Management-Policy.pdf</a>	P1							
Vigil Mechanism/ Whistle blower	<a href="https://bbtcl.com/wp-content/uploads/2020/04/Whistle-Blower-Policy.pdf">https://bbtcl.com/wp-content/uploads/2020/04/Whistle-Blower-Policy.pdf</a>	P1							

2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes, wherever appropriate								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	No	No	No	No	No	No	No	No	No
4. Name of the national and international codes/ certifications/ labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g.,SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<p>The policies as mentioned above are based on Principles of NGRBC.</p> <p>ISO 9001:2015 certified which Quality management systems.</p> <p>ISO 13485:20116 Certified which is Medical Device Quality Management System.</p> <p>The Corporation has Tea and Coffee Plantations spread over four groups of Estates in Tamil Nadu and Karnataka. The Corporation is certified under the international codes of Fairtrade, Rainforest Alliance, UTZ and Organic agriculture which ensure that environmental and social concerns are taken care of. Domestically also Trustea certification has been obtained which evaluates the social, economic, agronomical, environmental performance of Indian Tea estates. FSSAI licenses for factories have also been obtained.</p> <p>The Corporation is engaged in the manufacturing of Solenoids, Switches, Electronic parts and Slip rings at its Electromags Division in Chennai. In plating process harmful substances are avoided and in soldering process, the Division uses lead free solder material for major part of its operations.</p>								
5. Specific commitments, goals, and targets set by the entity with defined timelines, if any.	<p>As Bombay Burmah Trading Corporation Limited embarks on its ESG (Environmental, Social, and Governance) journey, it recognizes the importance of setting clear and measurable targets for sustainability. Here are the short, medium, and long-term targets for key sustainability KPIs:</p> <ul style="list-style-type: none"> <li>• Carbon Emissions Reduction</li> <li>• Water Management</li> <li>• Waste Management</li> <li>• Employee Well-being and Diversity</li> <li>• Biodiversity protection</li> <li>• Energy conservation</li> </ul> <p>These targets reflect Bombay Burmah Trading Corporation Limited’s commitment to sustainability and its efforts to contribute positively to the environment, society, and governance aspects of its operations. The Company will regularly monitor and report progress towards achieving these targets, demonstrating its dedication to long-term sustainable practices.</p>								

6.	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.									
<b>Governance, leadership and oversight</b>										
7.	<p>Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (<i>listed entity has flexibility regarding the placement of this disclosure</i>)</p> <p>Sustainability principles are integrated in our business activities and have guided our vision to build an enduring institution that serves the protection and long-term saving needs of customers.</p> <ul style="list-style-type: none"> <li>• <i>Environmental - initiatives &amp; offerings that reduce our carbon footprint;</i></li> <li>• <i>Social - responsible conduct towards all stakeholders along with product and service offerings that benefits the society especially the marginalised sections of society; and</i></li> <li>• <i>Governance - transparent practices that promote trust amongst all our stakeholders.</i></li> </ul> <p>The Bombay Burmah Trading Corporation Limited believes in moving towards environmentally friendly processes and products. Our vision in ESG journey over the next 10 years set short, medium, and long-term targets on increasing green energy consumption at our plants, reducing hazardous waste, reducing energy consumption, reducing water consumption, planting trees at our plant sites, etc. The Effluent generated is very nominal and is treated for use in gardening inside the factory premises. We have spent in on various projects under CSR even in view of losses over the period of last 3 years, the Company has undertaken several strategic projects in healthcare, Road developments and education.</p>									
8.	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;">Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</td> <td style="width: 50%; vertical-align: top;">Mr. Nusli N. Wadia  Chairman/ Non-Executive/ Promoter Director - The Bombay Burmah Trading Corporation Limited</td> </tr> </table>	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Nusli N. Wadia  Chairman/ Non-Executive/ Promoter Director - The Bombay Burmah Trading Corporation Limited							
Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Nusli N. Wadia  Chairman/ Non-Executive/ Promoter Director - The Bombay Burmah Trading Corporation Limited									
9.	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;">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.</td> <td style="width: 50%; vertical-align: top;">Yes, the Board of Directors plays a crucial role in guiding and overseeing the company’s sustainability strategy, policies, and initiatives. It is responsible for setting the overall sustainability vision, establishing targets and objectives, monitoring progress, and ensuring effective governance and accountability in relation to sustainability matters.</td> </tr> </table>	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, the Board of Directors plays a crucial role in guiding and overseeing the company’s sustainability strategy, policies, and initiatives. It is responsible for setting the overall sustainability vision, establishing targets and objectives, monitoring progress, and ensuring effective governance and accountability in relation to sustainability matters.							
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, the Board of Directors plays a crucial role in guiding and overseeing the company’s sustainability strategy, policies, and initiatives. It is responsible for setting the overall sustainability vision, establishing targets and objectives, monitoring progress, and ensuring effective governance and accountability in relation to sustainability matters.									
10. Details of Review of NGRBCs by the Company:										
Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee									
	<table border="1" style="width: 100%; text-align: center;"> <tr> <th>P1</th> <th>P2</th> <th>P3</th> <th>P4</th> <th>P5</th> <th>P6</th> <th>P7</th> <th>P8</th> <th>P9</th> </tr> </table>	P1	P2	P3	P4	P5	P6	P7	P8	P9
P1	P2	P3	P4	P5	P6	P7	P8	P9		
Performance against Above policies and follow up action	The Board of Directors, Risk Management Committee and Audit Committee, as applicable based upon their terms of reference, periodically reviews the progress against sustainability parameters of the Company and review the policies. The board /aforesaid Committees are guided on action to be taken and reviews the progress against parameter.									

Compliance with statutory requirements of relevance to the principles, and,rectification of any non-compliances	No major non-compliance of material nature has been reported. Operational issues are being addressed on an 'ongoing basis' as and when identified. Each functional head monitors and ensures compliance applicable to their respective functions									
	<b>P1</b>	<b>P2</b>	<b>P3</b>	<b>P4</b>	<b>P5</b>	<b>P6</b>	<b>P7</b>	<b>P8</b>	<b>P9</b>	
Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)	Operational issues are being addressed on an 'ongoing basis' as and when identified.									
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.	<b>P1</b>	<b>P2</b>	<b>P3</b>	<b>P4</b>	<b>P5</b>	<b>P6</b>	<b>P7</b>	<b>P8</b>	<b>P9</b>	Operationalization and effectiveness of policies have been evaluated by Dhir & Dhir Associates, an eminent Law Firm. Evaluation was conducted on effectiveness of the working of policies. Policies are also periodically evaluated and updated by various department heads, business heads and approved by the management or board. The processes and compliances, however, may be subject to scrutiny by internal auditors and regulatory compliances, as applicable.

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

Questions	<b>P1</b>	<b>P2</b>	<b>P3</b>	<b>P4</b>	<b>P5</b>	<b>P6</b>	<b>P7</b>	<b>P8</b>	<b>P9</b>
The entity does not consider the Principles material to its business (Yes/No)	Not Applicable								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/ human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE



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

### Essential Indicators

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

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 programmes
Board of Directors	8	Refer note below*	62.5%
Key Managerial Personnel	2	Code of conduct, Whistle blower policy, Sexual Harassment policy	100%
Employees other than BoD and KMPs	87	Fire Drill / Fire Safety; Crop protection by UPASI Spraying technique by KMP Good Plucking Standards by KMP Product knowledge and soft skill development Code of conduct, Whistle blower policy Sexual Harassment policy	100%
Workers	165	Occupational Health and Safety Grievance Mechanism POSH Assess & Address Gender Equality Waste disposal Community Relationship Usage of Fire Extinguishers Code of Conduct Good Manufacture Practice Safety training, self-health awareness program General Plant Maintenance/Quality Control Process/Change Control	100%

\*Note: During the year under review, no. of training and awareness programs were held for 8 directors, Ms. Gauri Kirloskar from amongst the Board resigned w.e.f., 9<sup>th</sup> January, 2023.

During FY2023, various presentations were made at the Board and committee meetings. Independent Directors in their capacity as members of various committees of the Board were informed on diverse topics pertaining to developments triggered by environmental, economic or regulatory changes.

Independent Directors are aware about their roles and responsibilities, including those pertaining to corporate governance. Various presentations were made to the Directors, which *inter alia* included an update on the overall performance of the Company. These presentations covered the entire range of business activities including Production, sales, earnings outlook, Action taken reports, Company's strategy, business model, operations, update on sales performance, customer grievance management, performance of the Company's subsidiary, CSR initiatives, industry outlook, update on Ind-AS and its impact, risk management framework and risk exposure etc.

Further, updates on performance review, strategy and key regulatory developments are presented at the quarterly board meetings. Independent Directors who are members of various committees are presented with the necessary information to enable them to review and grant approvals as per the terms of reference of the respective committees. Presentations are made at committee meetings which inter alia cover specific industry overview, risk management, sustainability etc.

The Board Audit Committee is updated on key compliance deviations and audit observations. The risks and impact arising out of the issues along with management action plan are presented to the Board Audit Committee. Considering all of the above, about 13 hours have been spent by the Independent Directors on the above familiarisation in the last year.

Further, Strategy meetings are conducted periodically, wherein the members of the Board are apprised on the Company's performance in key areas of business and its strategy.

All of the above activities constitute elements from P1 to P9.

**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 (basis the 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 INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine	Not Applicable				
Settlement					
Compounding Fee					
Non-Monetary					
Imprisonment	Not Applicable				
Punishment					
Compounding Fee					

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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
Not Applicable	

**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.**

The Corporation abides by the Wadia Group Code of Conduct which strives for transparency and fairness in all business dealings. Good Corporate Governance has been an integral part of the running of businesses within the Wadia Group much before it became legally enforceable.

The Wadia Code of Conduct outlines the principles, policies and laws that govern the activities of the Corporation and which the employees of the Corporation must adhere to. The Code is circulated to all employees and Directors and others associated with the business of the Company and offers guidance for professional conduct.

Annual affirmations are taken from all Directors, Business Heads, Key Managerial Personnel and senior employees.

Further, the Corporation has adopted the Whistle Blower Policy to provide a mechanism for employees and Directors to approach Chairman of the Audit Committee for reporting genuine concerns. The Code of Business Conduct and Whistle Blower Policy provide a platform for reporting unethical behavior, fraud and actual or potential violation of the Code.

The Corporation also has in place Policy on Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) to maintain a work environment free from any form of discrimination or conduct which can be considered as harassing, coercive or disruptive.

The Code of Conduct for Suppliers outlines the policies for suppliers to follow. An affirmation is obtained from the Supplier during commencement of business relations in the Plantations.

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

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	Nil	None	Nil	None
Number of complaints received in relation to issues of conflict of Interest of the KMPs	Nil	None	Nil	None

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

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of conflict of interest of the KMPs	Nil	Nil	Nil	Nil

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

Not Applicable, No fines, penalties, or actions have been taken by regulators, law enforcement agencies, or judicial institutions related to corruption and conflicts of interest. The organization remains committed to ethical conduct and compliance with all relevant laws and regulations to prevent such issues. Continuous monitoring and internal controls are in place to uphold integrity in its operations.

**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	Topic/principles covered under the training	% age of value chain partners covered (by value of business done with such partners)
The Company did not impart any awareness programmes for its value chain partners during the reporting period, however, it will consider the same from coming years.		

**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 entity has processes in place to avoid/ manage conflict of interests involving members of the Board. These processes are detailed in Wadia’s Code of Ethics and Business Principles, which guides board members to act in the organization’s best interests, disclose potential conflicts, and take appropriate measures to address any conflicts that may arise. This ensures transparency, accountability, and strong corporate governance.



**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 the environmental and social impacts
R&D	Nil	Nil	Not Applicable
Capex	Nil for DPI & Tea & Coffee 0.05% for Electromags	Nil 0.06% for Electromags	Rain Harvesting Pit, Conversion of Halogen lamp to LED lamp and VFD installed in compressor to reduce electrical power.

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

Yes, the Company has a procedure in place for sourcing sustainably from vendors after a complete verification of compliances and other certifications as applicable. Especially, in order to ensure that the inputs materials are safe for the environment, Tea division has a well defined “Plant protection code” to ensure that the input materials have no adverse effect on the environment.

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

Especially in case of the Tea division of the Company, 100% of the input materials are sourced sustainably.

**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.**

Most of the Company’s products are not such that they can be reclaimed at the end of their lives as they are consumables (E.g. Tea, Coffee). However, the Dental products and Electromags automotive products manufactured by the Company are not consumables but are not also reclaimed at the end of their lives.

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

No, Extended Producer Responsibility (EPR) is not applicable to the Company’s activities.



## Leadership Indicators

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

NIC Code	Name of Product/ Service	% of total Turnover Contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
<b>The Electromags Division of the Company has done the Life Cycle Assessment of its products</b>					
2930	Switches	29%	Life Cycle analysis conducted for (1 Lakhs cycle)	Yes	No
2930	Solenoid Valve	38%	Life Cycle conducted for (1 Lakhs cycle)	Yes	No
2930	Slip ring	18%	Life Cycle conducted under customer scope	No	No
2930	Electronics products	1%	Life Cycle conducted under customer scope	No	No
2930	Moulded Parts	14%	Life Cycle conducted under customer scope	No	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
Not Applicable		

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 2022-23	FY 2021-22
Plastics & Brass	12%	10%

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

	FY 2022-23			FY 2021-22		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	Nil	Nil	22 Tons	Nil	Nil	23 Tons
E-waste	Nil					
Hazardous Waste						
Other waste Paper waste Food waste						

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

Indicate product category	Reclaimed products and their packaging materials (as percentage of products sold) for each product category
Not Applicable	



**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:

% of employees covered by											
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent Employees</b>											
Male	288	283	98.26	237	82.29	0	0.00	0	0.00	0	0.00
Female	35	32	91.43	25	71.43	34	97.14	0	0.00	0	0.00
<b>Total</b>	<b>323</b>	<b>315</b>	<b>97.52</b>	<b>262</b>	<b>81.11</b>	<b>34</b>	<b>10.53</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>
<b>Other than Permanent Employees</b>											
Male	54	54	100.00	32	59.26	0	0.00	0	0.00	0	0.00
Female	2	2	100.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Total</b>	<b>56</b>	<b>56</b>	<b>100.00</b>	<b>32</b>	<b>57.14</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>

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

% of workers covered by											
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent Employees</b>											
Male	1042	250	23.99	856	82.15	0	0.00	0	0.00	0	0.00
Female	1912	449	23.48	1504	78.66	1504	78.66	0	0.00	1463	76.52
<b>Total</b>	<b>2954</b>	<b>699</b>	<b>23.66</b>	<b>2360</b>	<b>79.89</b>	<b>1504</b>	<b>50.91</b>	<b>0</b>	<b>0.00</b>	<b>1463</b>	<b>49.53</b>
<b>Other than Permanent Employees</b>											
Male	1076	494	45.91	662	61.52	0	0.00	0	0.00	0	0.00
Female	1083	532	49.12	559	51.62	0	0.00	0	0.00	0	0.00
<b>Total</b>	<b>2159</b>	<b>1026</b>	<b>47.52</b>	<b>1221</b>	<b>56.55</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>

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

Benefits	FY 2022-23			FY 2021-22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	-	-	-	-	-	-
Other-Superannuation	0.74	NA	Yes	0.87	NA	Yes

**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

The organization believes in providing better work premises to its employees and workers and thereby has in place facilities which the current category of differently abled employees and workers are able to access and carry on their duty without any inconvenience. However as per the requirement of the Act the premises of the organization are not yet equipped but the Company shall make provisions to make the offices and plants accessible to all.

**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.**

The Company works on the principles of equal opportunity without any discrimination based on caste, colour, age, sex, disability, etc. which is being followed in practice. However, the Company does not have any such policy documented.

**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	-	-	-	-
Female	100	100	33.33	-
Total	100	100	33.33	-

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	<p>Yes, the Company has a robust Grievance Redressal mechanism in place to address the grievances of all employees/workers. The Company is committed towards creation of a safe and healthy work environment that enables employees to work without fear of prejudice, gender bias &amp; sexual harassment and towards this, we have setup a grievance redressal committee</p> <p>At its plants, the Company has trade union through which the grievances are redressed. The Company also conducts periodic meetings with the employees to understand their grievances &amp; resolve them.</p>
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

**7. Membership of employees and worker in association(s) or Unions recognized 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)
<b>Total Permanent Employees</b>	<b>302</b>	<b>134</b>	<b>44.37</b>	<b>302</b>	<b>128</b>	<b>42.38</b>
Male	271	120	44.28	268	111	41.42
Female	31	14	45.16	34	17	50.00
<b>Total Permanent Worker</b>	<b>2657</b>	<b>2036</b>	<b>76.62</b>	<b>2821</b>	<b>2039</b>	<b>72.28</b>
Male	949	827	87.14	1003	828	82.55
Female	1708	1209	70.78	1818	1211	66.61

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

Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health and Safety measures		On Skill upgradation		Total (D)	On Health and Safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	271	254	93.73	235	86.72	268	254	94.78	214	79.85
Female	31	22	70.97	25	80.65	34	26	76.47	25	73.53
<b>Total</b>	<b>302</b>	<b>276</b>	<b>91.39</b>	<b>260</b>	<b>86.09</b>	<b>302</b>	<b>280</b>	<b>92.72</b>	<b>239</b>	<b>79.14</b>
<b>Workers</b>										
Male	949	949	100.00	856	90.20	1003	1003	100.00	838	83.55
Female	1708	1708	100.00	1504	88.06	1818	1818	100.00	1563	85.97
<b>Total</b>	<b>2657</b>	<b>2657</b>	<b>100.00</b>	<b>2360</b>	<b>88.82</b>	<b>2821</b>	<b>2821</b>	<b>100</b>	<b>2401</b>	<b>85.11</b>

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	271	219	80.81	274	117	42.70
Female	31	29	93.54	27	15	55.56
<b>Total</b>	<b>302</b>	<b>248</b>	<b>82.12</b>	<b>301</b>	<b>132</b>	<b>43.85</b>
<b>Workers</b>						
Male	949	64	6.74	1003	65	6.48
Female	1708	41	2.40	1818	43	2.37
<b>Total</b>	<b>2657</b>	<b>105</b>	<b>3.95</b>	<b>2821</b>	<b>108</b>	<b>3.83</b>

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

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

Yes, Dental Products of India, a division of The Bombay Burmah Trading Corporation Ltd. in Rudrapur plant, has implemented an occupational health and safety management system. They prioritize employee safety through measures such as fire safety provisions, emergency drills, designated assembly points, and regular health checkups.

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

The organization with the intention of providing better workplace to its employees and workers has in place health and safety policy. Dental Products of India employs several processes to identify work-related hazards and assess risks on a routine and non-routine basis. Regular inspections, audits, and employee reporting help identify potential hazards and unsafe conditions. Job hazard analysis is conducted to assess risks associated with specific tasks, while incident investigations provide insights into root causes and contributing factors. Non-routine hazard assessments are performed for new tasks, projects, or changes in the work environment. These processes enable the Company to proactively address hazards and ensure a safe working environment for employees.

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

Yes, the Company for workers to report work-related hazards and remove themselves from such risks. This includes clear reporting channels, whistleblower protection, stop work authority, training and awareness programs, and thorough investigation and follow-up procedures. Worker safety is a priority, and these processes ensure a secure working environment.

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

Yes, employees and workers of the Company have the access to non – occupational medical and healthcare services.

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

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

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

The Company has a robust health and safety policy in place wherein all the measures are being taken to ensure a safe and healthy work place. Additionally, the Company carries out annual health checkups of employees/workers, spreads awareness about different diseases via mails, etc. PPE kits are provided to employees/workers working in Electromags Division. The Tea division organizes Occupational Health and Safety meetings quarterly and also has an in-house doctor to ensure good health of all employees/workers.

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

	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	Nil	Nil	None	Nil	Nil	None
Health & Safety	Nil	Nil	None	Nil	Nil	None

**14. Assessments for the year:**

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

\*Tea Plantations were assessed for the aforesaid practices and conditions by Rainforest Alliance and Fairtrade International. Electromags Division was also assessed by an Internal Committee.

**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.**

Not applicable; No safety-related incidents, significant risks, or concerns were identified from health and safety assessments. The organization prioritizes maintaining a safe working environment and continuously monitors for potential issues.

**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).**

Yes, all the employees are covered under Group & Personal Accident Policy and the workers are covered under Workmens Compensation Policy.

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

The DPI Division ensures that the statutory dues are deducted by the value chain partners (Contractual Workers) at the time of payment. Also, the Electromags Division ensures that all the dues are deducted by the value chain partners at the time of payment made to them for their goods and services.

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

	Total no. of affected employees /workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
Employees	Not Applicable			
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 continued employability to permanent and contractual employees as well as workers as Retainers in the Company itself.

**5. Details on assessment of value chain partners:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Health and safety practices	25%
Working Conditions	25%

**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.**

No corrective actions taken or underway. Assessments found no significant risks or concerns regarding health and safety practices and working conditions of value chain partners. Proactive measures ensure partner well-being and a safe working environment.



**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 Company has identified the following group of stakeholders based on their impact on the operations as well as working of the Company including internal and external stakeholders:

- Employees
- Divisions
- Shareholders
- Customers
- Suppliers
- Government
- Communities around Plants

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community, Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Verbal, Calls, Emails, Meetings, Goal setting through KRA	Need Basis; Regularly	Goal setting, Daily operations
Divisions	No	Emails, Calls, Meetings (Virtual, Physical)	Need Basis; Regularly	Daily operations
Shareholders	No	Calls, Emails, Meetings, Through BSE and NSE	As per regulatory requirement	Queries resolution
Customers	No	Emails, Seminars/Conferences, Calls	Periodic	Awareness & Sales
Suppliers	No	Emails, Calls	Need basis	Timely & proper procurement
Government	No	Emails, Calls, Meetings(Virtual, In person)	Need basis	Compliance
Community around our plants (Including children and youth community)	Yes	Verbal through medium of medical and welfare officers	Need basis	Health and nutrition, Addiction, Harassment, etc.

**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.**

Through Board meetings held every quarter between board representatives and HOD, the Company aims to meet the expectations of all its stakeholders that include shareholders, consumers, employees, farmers and various service providers. The Company understands the needs of its stakeholders and develops the action plans to fulfil them while achieving its business goals.

The Company also has in place an investor grievance redressal system which ensures the protection of interests of the shareholders and employees. The website of the Company contains details of its products, business, financial information, and other statutory disclosures.

**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.**

Not Applicable, Stakeholder consultation is not used for identifying and managing environmental and social topics. There are no instances of incorporating stakeholder inputs into the entity's policies and activities.

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

No recorded instances of engagement with or actions taken to address the concerns of vulnerable/marginalized stakeholder groups. The organization is committed to promoting inclusivity and will work towards meaningful engagement with all stakeholders in the future.





## 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			FY 2021-22		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	302	281	93.05	302	280	92.72
Other than permanent	42	28	66.67	41	26	63.41
<b>Total Employees</b>	<b>344</b>	<b>309</b>	<b>89.83</b>	<b>343</b>	<b>306</b>	<b>89.21</b>
<b>Workers</b>						
Permanent	2657	2657	100.00	2821	2821	100.00
Other than permanent	1649	1602	97.15	1041	1011	97.12
<b>Total Workers</b>	<b>4306</b>	<b>4259</b>	<b>98.91</b>	<b>3862</b>	<b>3832</b>	<b>99.22</b>

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

Category	2022-23					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)
<b>Employees</b>										
Permanent	302	2	0.66	300	99.34	<b>302</b>	2	0.66	300	99.34
Male	271	2	0.74	269	99.26	<b>264</b>	2	0.76	262	99.24
Female	31	0	0.00	31	100.00	<b>34</b>	0	0.00	34	100.00
Other than Permanent	42	0	0.00	42	100.00	<b>45</b>	0	0.00	45	100.00
Male	39	0	0.00	39	100.00	<b>42</b>	0	0.00	42	100.00
Female	3	0	0.00	3	100.00	<b>3</b>	0	0.00	3	100.00
<b>Workers</b>										
Permanent	2657	297	11.18	2360	88.82	<b>2821</b>	312	11.06	2509	88.94
Male	949	93	9.80	856	90.20	<b>1003</b>	100	9.97	903	90.03
Female	1708	204	11.94	1504	88.06	<b>1818</b>	212	11.66	1606	88.34
Other than Permanent	1649	904	54.82	745	45.18	<b>1041</b>	725	69.64	316	30.36
Male	810	427	52.72	383	47.28	<b>524</b>	364	69.47	160	30.53
Female	839	477	56.85	362	43.15	<b>517</b>	361	69.83	156	30.17

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

	Male		Female	
	Number	Median remuneration/ Salary/ Wages of respective category	Number	Median remuneration/ Salary/ Wages of respective category
Board of Directors (BoD)*	1	6,04,99,484	0	0
Key Managerial Personnel	2	91,72,000	0	0
Employees other than BoD and KMP	90	13,33,541	13	9,70,006
Workers	1,707	1,77,949	2,524	1,77,949

Note: All the Non-Executive Directors do not draw any remuneration from the Corporation other than sitting fees and are entitled to receive such commission not exceeding 1% of the net profits of the Corporation as approved by the shareholders and computed in the manner laid down in section 198 of the Companies Act, 2013, and as may be determined by the Board from time to time. In view of inadequacy of profits, no commission has been paid to the Non-Executive Directors. Remuneration to Managing Director is covered under Board of Directors, hence not included in Key Managerial Personnel.

**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 organization strives towards providing better place of work to all its employees and thereby has in place grievance redressal mechanism, where the grievances/ issues can promptly be reported and be heard. The organisation has grievance committees where the employee can report their concern.

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

The organization has in place grievance redressal mechanism where the concern relating to human rights can be reported to grievance committee for the resolution of their concerns.

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual harassment						
Discrimination at workplace						
Child Labour						
Forced Labour/ Involuntary Labour						
Wages						
Other Human Rights related issues						

Nil

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

Yes, the organization has in place Prevention of Sexual Harassment policy and also the organization strongly believes and follows “No Gender Discrimination” and “Equal pay for equal work” policy so as to prevent adverse discrimination and harassment cases in the organization and its enables its employees and workers to work in free environment.

**8. Do human rights requirements form part of your business agreements and contracts?**

Yes, human rights requirements are included in our agreements and contracts. These clauses affirm our commitment to upholding human rights principles and complying with standards.

**9. Assessments for the year:**

	<b>% of your plants and Offices that were assessed (by entity or statutory authorities or third parties)</b>
Child Labour	100% of the plants and offices assessed by the Inspector of Plantations, Factory Inspector and Block Medical Officer
Forced/involuntary labour	
Sexual Harassment	
Discrimination at workplace	
Wages	Minimum wages are paid as per government norms.
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.**

None, The Company has effective measures in place to address potential risks and remains committed to upholding ethical standards and respecting human rights. Continuous monitoring and proactive management are practiced to ensure responsible conduct throughout its operations.

**Leadership Indicators**

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

The organisation has in place proper mechanism for the resolution of the issues/ grievances, which from time and again, is being modified as and when needed. However, during the year the organization didn't receive any complaints.

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

The Company conducted thorough Human Rights due diligence across its operations, It assessed internal policies, supplier risks, and engaged with stakeholders to ensure alignment with human rights principles. Remediation measures were taken to address any identified issues, demonstrating a commitment to ethical practices and respect for human rights.

**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?**

Not applicable. Most of the premises consists of the plantations which is outdoor and accessibility is limited

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

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual Harassment	25%
Discrimination at workplace	25%
Child Labour	25%
Forced Labour / Involuntary Labour	25%
Wages	25%

**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, did not identify any significant risks or concerns. The company has implemented effective measures to address potential risks, and no issues requiring corrective actions have been identified.



**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:**

Parameter	FY 2022-23 (MegaJoules)	FY 2021-22 (MegaJoules)
Total electricity consumption (A)	8525.55	10433.06
Total fuel consumption (B)	9240.24	7185.41
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C)	17765.79	17618.46
Energy intensity per rupee of turnover ( <i>Total energy consumption/ turnover in rupees</i> )	17765.79/ 244,58,74,947.55	17618.46/ 302,37,59,874.96
Energy intensity ( <i>optional</i> ) – 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 such assessment/evaluation/assurance performed for the reporting year.

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

The Company does not have any of its sites/facilities identified as a designated consumer under the PAT Scheme of the Government.

**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	1,65,476	1,65,476
(ii) Groundwater	52,568	52,568
(iii) Third party water	18,742.83	11,089.66
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	2,36,786.83	229133.7
Total volume of water consumption (in kilolitres)	2,36,786.83	229133.7
Water intensity per rupee of turnover (Water consumed / turnover)	236786.83/ 244,58,74,947.55	229133.7/ 302,37,59,874.96
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 such assessment/evaluation/assurance performed for the reporting year.

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

The Company's wastewater is treated in a sewage treatment plant through a Third Party and discharged as per norms. However, Zero Liquid Discharge is not implemented in any of its Divisions.

**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	FY 2021-22
NOx		Nil	
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – please specify			

\*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.

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

Parameter	Unit	FY 2022-23	FY 2021-22
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	22696.95	20021.44
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	1918.25	2347.44
Total Scope 1 and Scope 2 emissions per rupee of turnover		24615.19/ 33468 Lakhs	22368.88/ 37418 Lakhs
Total Scope 1 and Scope 2 emission intensity ( <i>optional</i> ) – 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 such assessment/evaluation/assurance performed for the reporting year.

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

The Company is committed to reduce its impact on Climate Change & Global Warming and takes several steps to achieve the same. One of the major initiative is the usage of renewable energy which are cleaner, hence decreasing the dependency on non-renewable sources of energy.

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

Parameter	FY 2022-23	FY 2021-22
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	38.31 + Drums (200 L, 12 No.)	40.15 + Drums (200 L, 8 No.)
E-waste (B)	0.43	1.12
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. (Used Oil)	12.2	10.2
Other Non-hazardous waste generated (H). (Paper waste, Carton box waste, Wood waste)	1.2	1.2
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>52.14</b>	<b>52.67</b>
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	2.5	2
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
<b>Total</b>	<b>2.5</b>	<b>2</b>

Parameter	FY 2022-23	FY 2021-22
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	37.01	39.35
<b>Total</b>	<b>37.01</b>	<b>39.35</b>

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

No such assessment/evaluation/assurance performed for the reporting year.

**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**

The Company ensures that all the waste generated are collected, segregated, stored and disposed as per laws/regulations. Some of them are recycled and others disposed by registered third party vendor as per norms. The Company disposes all the hazardous waste and chemicals as per norms.

**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	Types 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.	Mudis Group, Valparai	Tea Plantations	Yes
2.	Singampatti Group, Tirunelveli	Tea Plantations	Yes
3.	Dunsandle Estate, Ooty	Tea Plantations	Yes

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Not Applicable					

**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, and Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:**

Serial Number	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective taken, if any action
The Company complies with all the applicable laws and regulations.				

## 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 (Mega Joules)	FY 2021-22 (Mega Joules)
From renewable sources		
Total electricity consumption (A)	Nil	
Total fuel consumption (B)		
Energy consumption through other sources (C)		
Total energy consumed from renewable sources (A+B+C)		
<b>From non-renewable sources</b>		
Total electricity consumption (D)	20500696.8	18969103.44
Total fuel consumption (E)	30137528.43	36646405.95
Energy consumption through other sources (F)	9201906	8707471.2
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>59840131.23</b>	<b>64322980.59</b>

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

There is no Independent Assessment done. However, all the required statutory and internal inspections/ audits are carried out on a periodic basis.

2. Provide the following details related to water discharged:

Parameter	FY 2022-23	FY 2021-22
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) To Surface water</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>(ii) To Groundwater</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>(iii) To Seawater</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>(iv) Sent to third-parties</b>		
- No treatment	5325	5126
- With treatment – please specify level of treatment	-	-
<b>(v) Others</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	<b>5325</b>	<b>5126</b>

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



There is no Independent Assessment done. However, all the required statutory and internal inspections/ audits are carried out on a periodic basis.

**3. 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	FY 2021-22
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	Not Applicable	Not Applicable
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
<b>Total volume of water withdrawal (in kilolitres)</b>		
<b>Total volume of water consumption (in kilolitres)</b>		
Water intensity per rupee of turnover ( <i>Water consumed / turnover</i> )		
Water intensity ( <i>optional</i> ) – the relevant metric may be selected by the entity		
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) Into Surface water</b>	Not Applicable	Not Applicable
- No treatment		
- With treatment – please specify level of treatment		
<b>(ii) Into Groundwater</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>(iii) Into Seawater</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>(iv) Sent to third-parties</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>(v) Others</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>		

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

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions	Metric	The Company is looking forward to compute its Scope 3 Emissions for coming years.	
(Break-up of the GHG into	tonnes of		
CO2, CH4, N2O, HFCs, PFCs,	CO2		
SF6, NF3, if available)	equivalent		
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity ( <i>optional</i> ) – the relevant metric may be selected by the entity			

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

There is no Independent Assessment done. However, all the required statutory and internal inspections/ audits are carried out on a periodic basis.

**5. 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.**

The Tea Division of BBTCL uses agro chemicals only when necessity arises. The establishment follows the protocols set by the Tea Board of India and only approved chemicals based on the Plant Protection Code are used. It ensures that the MRLs (Maximum residue Limits) of all agrochemicals are minimum. The establishment also has organic certified gardens to a tune of 959 Ha which are used to produce environment friendly food products.

**6. 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:**

Sr. No.	Initiative undertaken	Details of the initiative ( <i>Web-link, if any, may be provided along- with summary</i> )	Outcome of the initiative
1	Rain Harvesting Pit	2.5 Lakhs liters water saving per annum	Reduced water consumption
2	Conversion of Halogen lamp to LED lamp	1200 watts power saving per month	Decreased consumption of electricity (Reduced GHG Emission)
3	Variable Frequency Drive (VFD) installed in compressor to reduce electrical power	1230 kwh units saved per month	Decreased consumption of electricity (Reduced GHG Emission)
4	HOT Runner mould installed to reduced plastic waste		Reduction in Plastic waste generation

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

For Electromags Division, the Company has identified a robust contingency plan (Disaster Management plan) to minimise the manufacturing process risk. It takes care of all possible scenarios which can cause business interruptions like Utility Interruptions, Labour Shortage, Key Equipment failure, Supplier Delivery failure, Fire, Recurring Natural Disasters, Cyber

Issue, COVID 19 Pandemic etc. and provides for remedial measures. There is an emergency site plan in place for manufacturing units & fixed functional responsibilities. Further, fire safety measures are taken to prevent business disruptions in case of fire outbreak.

**8. 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?**

No significant adverse environmental impacts have been identified in the entity’s value chain during the FY 21 – 22, and no assessment has been conducted. The organization is committed to proactive measures for sustainability, and if any adverse impact arise in the future, The Company will implement mitigation and adaptation measures to address them responsibly.

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

Not Applicable, No environmental impact assessments have been conducted on value chain partners during the reporting period.



**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.**

The company has five affiliations with trade and industry chambers/associations.

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

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/ National)
1	Confederation of Indian Industry (CII)	National
2	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
3	Organization of Plastics Processors of India (OPPI)	National
4	Label Manufacturers Association of India (LMAI)	National
5	DPI Div is a member Association of Dental Industry and Trade of India (ADITI)	National

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

Name of authority	Brief of the case	Corrective active taken
Not applicable, as there were no adverse orders reported during the financial year 2022- 23		

## Leadership Indicators

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

Sr. 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
The Company through various Industry associations, participates in advocating matters for the advancement of the Industry and Public Good on a need basis. The Company has a Code of Conduct Policy to ensure that the highest standards of business conduct are followed while engaging with aforesaid Trade associations/Industry bodies.					



## 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
Not Applicable					

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	5 of PAFs covered by R&R	Amounts paid to PAFs in the FY (in INR)
Not Applicable.						
No Rehabilitation and resettlement has been undertaken by the Company during the FY 2022- 23.						

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

The Company has a set grievance mechanism for employees, but since there is no community living adjacent to any facility, there is no specified mechanism. However, the Company shall consider this in future and set up accordingly.

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	29.08	60.10
Sourced directly from within the district and neighbouring districts	100.00	100.00

## Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Not applicable	

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

S. No.	State	Aspirational District	Amount spent (In INR)
Several CSR projects were undertaken by the Company, however, no such initiatives were taken up in the listed aspirational districts.			

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)  
Not applicable
- (b) From which marginalized /vulnerable groups do you procure?  
Not applicable
- (c) What percentage of total procurement (by value) does it constitute?  
Not applicable

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not applicable				

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

Name of authority	Brief of the case	Corrective Action taken
No corrective actions are taken for intellectual property related disputes involving traditional knowledge, as there have been no adverse orders in this regard.		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1.	Public Roads through Estate - Tamil Nadu	7500 (Workers and Dependents)	100%
2.	Maintenance of buildings for community benefits including water supply thereto -Tamil Nadu	7500 (Workers and Dependents)	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**

BBTCL has established mechanisms for receiving and responding to consumer complaints and feedback. These may include a customer service hotline, email or online complaint submission, physical complaint submission, social media presence, and a dedicated complaints handling team.

**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	NA
Safe and responsible usage	100%
Recycling and/or safe disposal	NA

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

	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	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil	Nil	Nil
Delivery of essential services	Nil	Nil	Nil	Nil	Nil	Nil
Restrictive Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Unfair Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Other	2	0		21	0	

**4. Details of instances of product recalls on account 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, the Company has a robust cybersecurity framework and strategy in place to address data privacy risks. They prioritize data security through measures such as secure email gateways, endpoint protection, and backup and recovery procedures. The entity also focuses on website security, patch management, and security incident monitoring. They have established internal network policies and procedures for access and asset management, incident response, and overall security protocols. While no specific web-link is provided, the entity takes cyber security and data privacy seriously to ensure a secure environment for data sharing.

**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 corrective actions are underway or taken for issues related to advertising, delivery of essential services, cyber security, data privacy, product recalls, or penalties from regulatory authorities. The Company has followed all regulations and standards, ensuring smooth and secure operations without any reported incidents or breaches. They remain committed to maintaining high-quality services and customer safety.

**Leadership Indicators**

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

The organization provides information on products and services of the entity on web-link [www.bbtcl.com](http://www.bbtcl.com).

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

The Company informs and educates consumers about safe and responsible product/service usage through measures such as clear labeling and packaging, user manuals, online resources, customer education programs, social media content, warning notifications, and collaborations with regulatory agencies.

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

The Company informs consumers of any risk of disruption or discontinuation of essential services through communication channels such as email, SMS alerts, mobile applications, social media, and a dedicated website. They issue service announcements, provide customer support, publish public notices, comply with regulatory requirements, and take a proactive approach to communicate with consumers.

**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, the organization provides instructions for the use inside the pack, further customer satisfaction surveys are also conducted periodically.

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

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

As of today, there have been no data breaches reported, and no negative impacts on the organization's data security or sensitive information. The organization has maintained strong security measures and regular audits to prevent any unauthorized access or cyber threats. They remain dedicated to upholding high data security standards to preserve trust with stakeholders.

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

No Instance of data breach has been reported.