

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (BRSR) 2021-22

SECTION A: GENERAL DISCLOSURES

Part 1- Details of the listed entity

1. Corporate Identity Number (CIN) of the entity: L27300HR1995PLC083037
2. Name of the listed entity: Sona BLW Precision Forgings Limited (“Sona Comstar”)
3. Year of incorporation: 27th October, 1995
4. Registered office address: Sona Enclave, Village Begumpur Khatola, Sector 35 Gurgaon, Haryana 122004
5. Corporate address: Sona Enclave, Village Begumpur Khatola, Sector 35 Gurgaon, Haryana 122004
6. E-mail: investor@sonacomstar.com
7. Telephone: 91-1244768200
8. Website: <https://sonacomstar.com/>
9. Financial Year for which reporting is being done: 2021-2022
10. Name of the Stock Exchange (s) where shares are listed:

The Equity Shares of the Company are listed on the following Stock Exchanges w.e.f. 24th June 2021:

1. BSE Limited (BSE) Floor 25, P. J. Towers, Dalal Street, Mumbai – 400 001
 2. National Stock Exchange of India Limited, Exchange Plaza, C-1, Block G, Bandra-Kurla Complex, Bandra (East), Mumbai – 400 051
- 11. Paid-up Capital:** INR 5,843,527,100 divided into 584,352,710 equity shares of INR 10/- each
- 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. Ajay Pratap Singh, Company Secretary
Telephone: +91 124 476 8200
Email Id: investor@sonacomstar.com
- 13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together)?**
Standalone

Part 2- Products/services

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

S.No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Motor vehicles, trailers, semi-trailers and other Transport Vehicles	97.44%

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

S. No.	Product/Service	NIC Code (2008)	% of total Turnover contributed
1.	Differential gears	29301	29%
2.	Differential assembly	29301	30%
3.	Motors & Motor sub-assemblies	29304	38%
4.	Others	29301	3%

Part 3- Operations

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

Location	Number of plants	Number of offices	Total
Gurgaon	3	1	4
Manesar	1	-	1
Pune	1	-	1
Chennai	1	1	2

17. Markets served by the entity:

a. Number of locations:

Locations	Number
National (No. of States)	Pan-India
International (No. of Countries)	North America, Europe, Asia (excluding India)

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

56%

c. A brief on type of customers:

We are in a B2B business, and our products cater to the requirement of the automotive OEMs and Tier-1 suppliers globally across North America, Europe, India, and Asia (excl. India) for the application across different vehicle segments such as conventional and electric passenger vehicles, commercial vehicles, off highway vehicles and electric two & three wheelers. We earn about 82% of our revenues from direct supplies to global OEMs.

Part 4- Employees**18. Details as at the end of Financial Year 2021-22:**

S. Employees and workers (including differently abled) No.		
1.	Total number of permanent male employees	913
2.	Total number of permanent female employees	31
3.	Total number of male employees other than permanent	0
4.	Total number of female employees other than permanent	0
5.	Total number of permanent male workers	290
6.	Total number of permanent female workers	8
7.	Total number of male workers other than permanent	2214
8.	Total number of female workers other than permanent	13
Total		3,469

S. Differently abled Employees and workers

No.		
1.	Total number of differently abled permanent male employees	1
2.	Total number of differently abled permanent female employees	0
3.	Total number of differently abled male employees other than permanent	0
4.	Total number of differently abled female employees other than permanent	0
5.	Total number of differently abled permanent male workers	0
6.	Total number of differently abled permanent female workers	0
7.	Total number of differently abled male workers other than permanent	1
8.	Total number of differently abled female workers other than permanent	0
Total		2

Part 5- Holding, Subsidiary and Associate Companies (including joint ventures)**21. Names of holding / subsidiary / associate companies / joint ventures:**

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 in column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
Comstar Automotive Technology Services Private Limited	Subsidiary	100	No
Comstar Automotive USA LLC.	Subsidiary	100	No
Comstar Automotive Hongkong Limited	Subsidiary	100	No
Comestel Automotive Technologies Mexicana Limited	Subsidiary	100	No
Comstar Automotive (Hangzhou) Co. Ltd	Subsidiary	100	No
Comstar Hong Kong Mexico No1 LLC	Subsidiary	100	No
Comenergia Automotive Technologies Mexicana, S. DE R.L. DE C.V	Subsidiary	100	No
Comestel Automotive Technologies Mexicana, S. DE R.L. DE C.V	Subsidiary	100	No
Sona Comstar eDrive Private Limited	Subsidiary	100	No

*Including shares held by subsidiaries of the listed entity

19. Representation/inclusion/participation of women:

1.	Total members of Board of Directors	8
2.	Total female members of Board of Directors	1
3.	Total Key Management Personnel*	3
4.	Total female Key Management Personnel	0

*Key Managerial Personnel means as per section 2(51) of the Companies Act, 2013

20. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years):**Financial Year 2021-22**

(Turnover rate in current Financial Year)	Male	Female	Total
Permanent Employees	12.20%	14.81%	12.28%
Permanent Workers	5.37%	11.76%	5.55%

Financial Year 2020-21

(Turnover rate in previous Financial Year)	Male	Female	Total
Permanent Employees	7.37%	17.39%	7.65%
Permanent Workers	3.85%	-	3.74%

Financial Year 2019-20

(Turnover rate in the year prior to the previous Financial Year)	Male	Female	Total
Permanent Employees	9.84%	18.18%	10.07%
Permanent Workers	0.94%	-	0.91%

Annexure-K

Part 6- CSR Details

22. CSR Details

- Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- Turnover (in INR): 19,390.49 million
- Net worth (in INR): 18,994.31 million

Part 7- Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	Financial Year 2021-2022			Financial Year 2020-2021		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes, https://sonacomstar.com/policies-and-codes	Nil	Nil	Feedback from beneficiaries is taken	Nil	Nil	Feedback from beneficiaries is taken
Investors (other than shareholders)	NA	NA	NA	The Company doesn't have investors other than its shareholders	NA	NA	The Company doesn't have investors other than its shareholders
Shareholders	Yes, https://sonacomstar.com/policies-and-codes	656	Nil	All complaints of the Company were resolved by the Company and its RTA within time. Status of all the complaints received and resolved can be found on a quarter-on-quarter basis on the website of BSE and NSE. For BSE: https://www.bseindia.com/stock-share-price/sona-blw-precision-forgings-ltd/sonacoms/543300/ For NSE: https://www.nseindia.com/get-quotes/equity?sym-bol=SONACOMS	Nil	Nil	The Company have separate e-mail id i.e. investor@sonacomstar.com for shareholders for sending their queries and grievances.
Employees and workers	Yes, the Company has a mail id for reporting any grievance and complaints for workers at the policy is available at https://sonacomstar.com/policies-and-codes	Nil	Nil	-	Nil	Nil	-
Customers	Yes, https://sonacomstar.com/policies-and-codes	Nil	Nil	-	Nil	Nil	-
Value Chain Partners	Yes, https://sonacomstar.com/policies-and-codes	Nil	Nil	-	Nil	Nil	-

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Energy Management	Risk and Opportunity	Sona Comstar is buying 100% of our energy requirements from the grid. We don't control the input mix of power in the grid. Therefore we have decided to improve our energy mix and efficiency through the steps mentioned in the approach.	<p>1. We have put up roof top solar power generating capacity of 1505.8 kWp in our plants at Gurgaon, Manesar and Chennai.</p> <p>2. We will be adding roof top solar power generating capacity in the upcoming Chakan (Pune) plant.</p> <p>3. We are also constantly working on improving the energy intensity per rupee of revenue.</p>	Positive: Reduced GHG emissions and less sensitivity to changes in cost of fossil fuel.
2.	Low Carbon Mobility	Opportunity	Sona Comstar believes that electrified mobility is necessary to reduce the GHG emissions arising from automobiles and for a greener planet. It has therefore embarked on a journey to increase its revenue from battery electric vehicles (BEV) and focused its R&D efforts towards developing drive motors, controllers and transmission solutions for different types of electric vehicles.	N.A	Positive: Sona Comstar derived 25% of its sales from BEV during Financial Year 2021-22 against 14% during Financial Year 2020-21.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Principles of National Guidelines on Responsible Business Conduct

- P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable
- P2 Businesses should provide goods and services in a manner that is sustainable and safe
- P3 Businesses should respect and promote the well-being of all employees, including those in their value chains.
- P4 Businesses should respect the interests of and be responsive to all its stakeholders.
- P5 Businesses should respect and promote human rights
- P6 Businesses should respect and make efforts to protect and restore the environment.
- P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- P8 Businesses should promote inclusive growth and equitable development.
- P9 Businesses should engage with and provide value to their consumers in a responsible manner.

Annexure-K

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)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	https://sonacomstar.com								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name 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.	IATF 16949, ISO 14001, ISO 45001, ISO 50001, TPM, ENMS, ASES, VQE								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	N	N	N	N	N	N	N	N	N
6. Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met	N	N	N	N	N	N	N	N	N
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)									
<p>At Sona Comstar, sustainability is at the core of everything we do, in line with our purpose to be leaders of automotive technology products. We have our sights set firmly on helping to bring the future of mobility to global consumers faster as we consistently deliver best-in-class products that exceed consumer expectations, which helps us to build lasting bonds within the automotive industry. We are working towards ensuring a brighter and more sustainable future: one that will be innovation oriented.</p> <p>We are constantly working to reduce our environmental footprint by allocating as many financial resources as possible to research projects, innovations and technology development aimed at making the process an environmental asset. A sustained focus on resource management and efficiency improvements will enable the company to attain its environmental goals. Technology initiatives such as solar plants, ZLD plants, installation of LED lights, technology incubation, energy efficient motors will help us to reduce the environmental footprint. Apart from this, adherence to all the environmental rules and regulations will strengthen commitment to make our business sustainable.</p> <p>Simultaneously, we intend to streamline our societal commitment, transforming the company into a valued and responsible neighbor in its community. We have undertaken various CSR initiatives for development of society including but not limited to education, environmental sustainability, health care and sanitation. Further, the Company is partnering with the institutions of eminence in various technological incubations projects targeted to focus on green mobility which is likely to reduce the usage of fossil fuels.</p> <p>Sona Comstar also intends to create shared value for all the stakeholders. By empowering our stakeholders to make the best use of resources, we are strategically bridging progress and sustainability for all.</p>									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).					DIN: 07698495 Name: Mr. Vivek Vikram Singh Designation: Managing Director & Group CEO Telephone No.: +91-124-4768200 Email-id: investor@sonacomstar.com				
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.		Yes, the Board of Directors have constituted ESG Committee for implementation of Environment, Social and Governance framework across its operations.							
10. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? * (Yes/No). If yes, provide the name of the agency.		Y	Y	Y	Y	Y	Y	Y	Y
* The Policies on Quality, Safety, Health and Environment are subject to internal and external audits as part of the certification process and ongoing periodic assessments. Other policies are periodically evaluated for their efficacy through Internal Audit mechanism.									

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
11. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated: NA									
The entity does not consider the Principles material to its business (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

12. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action					Yes										Quarterly/	Annually		
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances										The Company complies with all the applicable statutory requirements					Quarterly/Annually			

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section will focus on the principle wise performance disclosures of Sona Comstar. Please verify the pre-filled information, if any, and add details to the blank spaces.

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 programs on any of the Principles during the financial year:

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programs
Board of Directors (BOD)	3	Training conducted on business ethics and transparency (Principle 1). E.g.: SEBI (Prohibition of Insider Trading) Regulations, 2015, Anti-corruption and Bribery refresher training, Anti Money Laundering and Code of Conduct of the Company	12.50%
Key Managerial Personnel (KMPs)	3	2 Training courses conducted on orientation session on SEBI (Prohibition of Insider Trading) Regulations, 2015, Anti-corruption and Bribery refresher training, Anti Money Laundering and Code of Conduct of the Company	100.00%
Employees other than BOD and KMPs	203	Trainings conducted on Code of Business Conduct, Anti-Corruption and Bribery policy, Trade Compliance policy and Anti Money Laundering and Business Sustainability training covering Ethics Policy, Anti-Corruption policy, code of conduct policy, environment, health, and safety, working conditions, plants do's and don'ts, HIRA, LOTO safety, waste disposal, human rights, social responsibility, financial accuracy, and record keeping, etc.	86.33%
Workers	226	Trainings were conducted around related safety related trainings such as plants dos and don'ts, HIRA, LOTO safety, waste disposal, etc.	66%

Annexure-K

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

(Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

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

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

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
-	-
-	-

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.

Sona Comstar has an Anti-Corruption Compliance Policy, Whistle-Blower Policy, Code of conduct for the Board and Senior Management and Code of Conduct for Employees and Vendors. The policies are available on the website of the Company at: <https://sonacomstar.com/policies-and-codes>.

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

	Financial Year 2021-22	Financial Year 2020-2021
Directors	-	-
KMPs	-	-
Employees	-	-
Workers	-	-

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

	Financial Year 2021-22		Financial Year 2020-2021	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	-	-	-	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	-	-	-	-

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.

Nil

Leadership indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
21	APQP/ PPAP / SPC/FMEA/Control Plan/ CSR/ IATF/ VSME/ OEE/ QMS/ Environment	73%

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.

Sona Comstar's Board approved policies and procedures are in place to avoid/ manage conflict of interests such as Code of Conduct for Directors and Senior Management, Policy on Related Party Transactions, Policy for determining Material Subsidiaries, Code on Fair Disclosure of Unpublished Price Sensitive Information, Code of Conduct for prevention of insider trading, Policy for determining Materiality, and Whistle Blower Policy. The Company undertakes training and awareness sessions on ethical business practices, including sessions to avoid or manage the instances of conflict of interests in an appropriate manner.

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.

	Financial Year (2021-2022)	Financial Year (2020-2021)	Details of improvements in environmental and social impacts
R&D	98%	93%	Development of new technologies and products for energy-efficient drivetrain and powertrain for electric vehicles
Capex	86%	88%	Development of new technologies and products for energy-efficient drivetrain and powertrain for electric vehicles, and setting up of manufacturing capacity for these products

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

Yes, Sona Comstar has a Green Procurement Guideline with a dedicated Environment Declaration. The Company's supplier selection, assessment and evaluation process includes elements of sustainability. This includes initial supplier survey, continuous risk assessments and periodic audits.

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

27.7 % of raw material consumed by the Company comes from recycled sources. Under our green procurement guideline we plan to capture elements of sustainability in our standard purchase contracts and our suppliers would be expected to adhere to it.

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

Our products are integrated into automobiles being produced by our customers and therefore cannot be reclaimed separately.

Annexure-K

4. Whether Extended Producer Responsibility (EPR) is applicable to 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.

Not Applicable.

Leadership indicators

1. Has Sona Comstar 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-

The Company have not conducted life cycle perspective assessments.

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.

Not assessed.

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	
	Financial Year 2021-22	Financial Year 2020-21
Steel and Casting	27.7%	25.8%

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

	Financial Year 2021-22			Financial Year 2020-21		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

5. Details of reclaimed products and their packaging materials (as percentage of products sold) for each product category as per the format below:

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

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

Essential indicators

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

Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	913	913	100%	913	100%	NA	NA	Nil	Nil	NA	NA
Female	31	31	100%	31	100%	31	100%	NA	NA	16	52%
Total	944	944	100%	944	100%	31	100%	Nil	Nil	16	52%
Other than Permanent employees											
Male											
Female						NA					
Total											

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

Category	Total (A)	% of employees covered by									
		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)
Permanent employees											
Male	290	290	100%	290	100%	NA	NA	Nil	Nil	NA	NA
Female	8	8	100%	8	100%	8	100%	NA	NA	8	100%
Total	298	298	100%	298	100%	8	100%	Nil	Nil	8	100%
Other than Permanent employees											
Male	2214	2214	100%	2214	100%	NA	NA	Nil	Nil	NA	NA
Female	13	13	100%	13	100%	9	69%	NA	NA	5	38%
Total	2227	2227	100%	2227	100%	9	69%	Nil	Nil	5	38%

2. Details of retirement benefits, for Current Financial Year and Previous Financial Year, in the following format:

Benefits	Financial Year 2021-22			Financial Year 2020-21		
	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	100.0%	100.0%	Y	100.0%	100.0%	Y
Gratuity	100.0%	100.0%	Y	100.0%	100.0%	Y
ESI	100.0%	100.0%	Y	100.0%	100.0%	Y
NPS	9.11%	Nil	Y	9.09%	Nil	Y
Superannuation	0.82%	Nil	Y	0.82%	Nil	Y

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.

Sona Comstar is in the process of making all the required offices/premises friendly to differently abled employees and workers.

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

Sona Comstar is an equal opportunity employer and has a Code of Conduct for its employees available at <https://sonacomstar.com/policies-and-codes>.

5. Details on return to work and retention rates of permanent employees and workers that took parental leave, in the following format:

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-	-	-	-
Female	-	-	-	-
Total	-	-	-	-

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

	Yes/No	Grievance mechanism*
Permanent Workers	Yes	HR Help Desk, Grievance Redressal Register and
Other than Permanent Workers	Yes	e-mail id for reporting POSH related complaints and
Permanent Employees	Yes	strong whistle blower mechanism in place to address
Other than Permanent Employees	Yes	complaints or issues raised.

*The Company has POSH Committee to redress the POSH related complaints of employees and workers.

Annexure-K

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

Category	Financial Year 2021-2022			Financial Year 2020-2021		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	944	Nil	Nil	869	Nil	Nil
Male	913	Nil	Nil	846	Nil	Nil
Female	31	Nil	Nil	23	Nil	Nil
Total Permanent Workers	298	43	14.43%	315	44	13.97%
Male	290	43	14.83%	306	44	14.38%
Female	8	-	Nil	9	-	Nil

8. Details of training given to employees and workers, in the following format:

Category	Financial Year 2021-22					Financial Year 2020-21				
	Total (A)	On Health & safety measures		On Skill upgradation		Total (D)	On Health & safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	913	803	87.95%	881	96.50%	846	594	69.23%	832	96.97%
Female	31	30	96.77%	29	93.55%	23	18	72.00%	24	96.00%
Total	944	833	88.24%	910	96.40%	869	612	69.31%	856	96.94%
Workers										
Male	2504	2057	82.15%	1730	69.09%	2213	2118	95.71%	1612	72.84%
Female	21	16	76.19%	12	57.14%	29	22	75.86%	12	41.38%
Total	2525	2073	82.10%	1742	69%	2242	2140	95.45%	1624	72.44%

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

Category	Financial Year 2021-22			Financial Year 2020-21		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	913	913	100%	846	846	100%
Female	31	31	100%	23	23	100%
Total	944	944	100%	869	869	100%
Workers						
Male	290	43	15%	306	44	14%
Female	8	Nil	Nil	9	Nil	Nil
Total	298	43	14%	315	44	14%

Note: Performance and career development reviews are conducted only for permanent employees and permanent workers.

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?

Sona Comstar is compliant with ISO 45001: Occupational Health and Safety (OH&S) management system and 100% of the facilities are covered it.

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

Sona Comstar has implemented Hazard Identification and Risk Assessment (HIRA) system for identifying workplace hazards, undertaking risk assessment, implementing necessary controls as per the level of risk, and eliminating or minimizing the identified risks.

The Company identifies all the potential work-related incidents through the hazard identification process and conducts likelihood assessment to estimate the frequency or probability of occurrence. Risk reduction measures are implemented to prevent incidents (reduce likelihood of occurrence) or to control incidents (limit the extent and duration of a hazardous event) and to mitigate the adverse effects or consequence. In addition to this Sona Comstar has also prepared an Emergency Preparedness Plan, Mock Drill Record Evaluation Checklist, Aspect Register and COVID-19 - Standard Operating Procedure Manual to minimize work-related hazards.

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

Yes, various mechanisms have been implemented to report work-related hazards as per ISO 45001: a) Safety Patrol, b) Risk assessment, and c) Near miss report.

To mitigate work-related hazards, the company conducts emergency mock drills and safety drills as well as engages in capacity building and awareness sessions to equip its employees and workers with safety protocols and risk management steps.

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

Yes, Sona Comstar ensures overall wellbeing of its employees and workers by providing health insurance, term insurance, accident insurance, regular health check-up, COVID-19 vaccination camps for its employees, and workshops for mental wellbeing of employees.

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

Safety Incident/Number	Category	Financial Year 2021-22	Financial Year 2020-2021
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.17	0.41
Total recordable work-related injuries	Employees	0	0
	Workers	1	2
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

Sona Comstar has adopted a Management Policy on Quality, Environment, Occupational Health and Safety which depicts its commitment to prevent injury or any health hazard for all of its stakeholders. The company has taken safety measures to address any injury/accident at the workplace. When performing work on specified machines, LOTO (Lockout Tagout) procedures have been reinforced for all maintenance staff to avoid unforeseen events and increase the workforce productivity. An action plan is prepared w.r.t any accident occurred on worksite and measures to avoid future similar accident. Training and awareness sessions are also conducted such as fire safety, Codebeamer tool training, NC handling, Chemical safety, Road safety, Core & shaft operation, DOJO 8 Steps training covering, 5S, 5 Senses relevance while working on shopfloor, Specific Process Operations Module on Forging, Heat Treatment, Quality Inspection, Packaging, Trolley Movement, etc.

Our COVID Procedures:

Sona Comstar have also taken active measures to promote health and safety and social distancing efforts, including providing PPEs, masks, hand sanitizers, and gloves to employees in our manufacturing facilities, staggered working shifts at our manufacturing and assembly plants and working closely with health authorities for obtaining approvals to commence operations at our plants and to lay down and enforce covid safety guidelines and protocols. In addition, as part of company's risk management policy, the company developed a mobile phone based application "SONA health app" for its employees to report their health status on a daily basis and also implemented a safety SOP applicable for the employees travelling between workplace and home, inside shop safety management practices including vendor safety management and measures

Annexure-K

to check vehicles entering and leaving its premises and employees returning to the workplace after easing of lockdown. To ensure that the employees who stayed back at the manufacturing units were provided with a safe working environment, sensor based contactless taps for drinking water & sensor-based soap dispenser, separators on eating tables in common canteen area, training on Covid safety SOP before entering plant was mandatory to have covid appropriate behavior, dry ration distribution, immunity kit distribution and vaccination drives were conducted to support the people for safe business plant operations.

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

Particulars	Financial Year 2021-2022			Financial Year 2020-2021		
	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	-	-	-	-	-	-
Health & Safety	-	-	-	-	-	-

14. Assessments for the year:

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

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

No actions were required as zero incidents were reported.

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, the Company provides medical, accidental and term life insurance to its employee and workers. Further, the Company benefits like provident fund, gratuity, superannuation and employees' deposit linked insurance, as applicable, are settled on a priority basis in the event of death.

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

Sona Comstar ensures its onsite value chain partners comply with the required physical operation statutory requirements and all offsite value chain partners also the Comply with Company's code of conduct.

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:

Particulars	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	
	Financial Year 2021-2022 (Current Financial Year)	Financial Year 2020-2021 (Previous Financial Year)	Financial Year 2021-2022 (Current Financial Year)	Financial Year 2020-2021 (Previous Financial Year)
Employers	-	-	-	-
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)

Capacity building and training for skill upgradation are made available to employees.

5. Details on assessment of value chain partners:

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

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.

Sona Comstar has a code of conduct for its vendors which specifies that they have to be compliant with health and safety practices and working conditions as mandated by Sona Comstar.

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.

Yes, the Company as part of its ESG framework has identified the stakeholder group and intends to with them for their betterment.

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
Board	No	Email, Meetings, Personnel Visits, Notice and Agenda of Meetings	Quarterly and as per the requirement of Companies Act, 2013 and SEBI (LODR) Regulations, 2015	Role and responsibility of Board of Directors defined under the Companies Act, 2013 and SEBI (LODR) Regulations, 2015. Therefore, the Board and its committees meet from time to time to discuss and approve the statutory requirements.
Employees	No	Training, Conferences, Website, E-mails, Meetings	Continuous	Proposing measures to increase employee competency at work as well as promote work-life balance
Customers	No	Personal visits, Mass media & digital communications, E-mails, Plant visits & social media	Continuous	Customer stewardship in terms of transparency, informed choices, Customer-centric design and innovation
Communities & NGOs & Schools/ Institutes & Hospitals	No	CSR activities, Meetings and briefings, Impact assessment surveys, Official communication channels, including emails, advertisements, Publications, Websites, and social media	Need to engage basis	Implementing community initiatives and helping them to attain a better standard of living. For making a difference in society and creation an impact through our CSR initiatives.
Suppliers & Dealers	No	Supplier & vendor meets, Workshops & trainings, Policies, IT-enabled information sharing tools and recognition platforms, Dialogue on the industry initiatives, Training course	Continuous training is provided. A supplier meet is conducted once in 2 years. Purchase Team - Meeting with supplier as per requirement. Offline or online	Training, quality improvement, capacity building measures, safety related training as per new clauses under ISO 14000 Suppliers meet to discuss vision and mission, business plan, supplier awards.

Annexure-K

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
Investors	No	Training, Conferences, Annual Report, Notices, E-mail, Investor Meetings, General Meetings, Corporate Announcements, Newspaper Advertisements, Press Release, Investor Presentation, Quarterly & Annual Results, Corporate website	Quarterly and as per the requirement of Companies Act, 2013 and SEBI (LODR) Regulations, 2015	Discuss Company's financial performance and strategic priorities. Pursuant to Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company's website https://www.sonacomstar.com/ contains a dedicated functional segment 'INVESTOR RELATIONS' where all the information meant for the shareholders is available, including information on directors, financial statements, annual reports, codes and policies, etc.
Government & Regulators	No	Official communication channels, Regulatory audits/ inspections, Environmental compliance, Policy intervention, good governance, Statutory Corporate Filings	As per the Statutory Requirements	Report and compliances on Legal and Regulatory Requirements.

Leadership indicators

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

The consultation with various stakeholders usually happens through the management team. These consultations are part of regular interactions with these stakeholders and the board is apprised of the important issues.

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

Yes. The Company conducted materiality assessment incorporating the views of both internal and external stakeholders and identified the material topics for the company. For instance, energy management is one such issue. With respect to this, the plants already have received ISO 14001 certification. Also, the energy demand per unit produced has been optimized through different processes such as ensuring batch time optimization. These initiatives were in line with the Energy Management Policy.

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

Although none of the stakeholder group is identified as vulnerable/marginalized, the Company does engage with some stakeholder groups to understand their needs and provide the support to the extent possible e.g. the Company engages with the local community in Gurgaon and Chennai to improve the infrastructure and facilities in the Government Schools to improve the standard of education and participation of students including girl child.

Principle 5: Businesses should respect and promote human rights.

Essential indicators

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

Category	Financial Year 2021-22			Financial Year 2020-21		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	944	579	61.33%	869	118	13.58%
Other than permanent	0	0	0	0	0	0
Total Employees	944	579	61.33%	869	118	13.58%
Workers						
Permanent	298	43	14.43%	315	44	13.97%
Other than permanent	2227	1566	70.32%	1927	1132	58.74%
Total Employees	2525	1609	63.72%	2242	1176	52.45%

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

Particulars	Financial Year 2021-22				Financial Year 2020-21					
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
	No. (B)	% (B / A)	No. (C)	% (C / A)	No. (E)	% (E / D)	No. (F)	% (F / D)		
Employees										
Permanent	944	0	0%	944	100%	869	0	0	869	100%
Male	913	0	0%	913	100%	846	0	0	846	100%
Female	31	0	0%	31	100%	23	0	0	23	100%
Other than Permanent	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent	298	0	0%	298	100%	315	0	0%	315	100%
Male	290	0	0%	290	100%	306	0	0%	306	100%
Female	8	0	0%	8	100%	9	0	0%	9	100%
Other than Permanent	2227	424	19%	1803	81%	1927	433	22%	1494	78%
Male	2214	419	19%	1795	81%	1907	422	22%	1485	78%
Female	13	5	38%	8	62%	20	11	55%	9	45%

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)	8	63,60,000	1	6,30,000
Key Managerial Personnel	3	2,40,85,675	0	-
Employees other than BoD and KMP (Permanent)	910	1,266,939	31	1,804,503
Workers (Permanent)	290	837,506	8	869,234

*Doesn't include ESOP perquisite value

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.

For all locations of the Company (except Chennai):

- Nodal: Mr. Amin Rao
- Designation: General Manager (HR)
- E-mail ID: speakup.sbpl@sonacomstar.com

For Chennai:

- Nodal: Mr. Umapathy E
- Designation: Senior Manager (EHS & ER)
- E-mail id: speakup.sbpl@sonacomstar.com

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

Sona Comstar's Code of Conduct Board and Senior Management strongly deters wrongdoings and promote equal opportunities for all at workplace. The Code ensures there is no discrimination or harassment in the workplace and appropriate grievance mechanism is in place. In addition to this, the company has policies such as:

- POSH Policy
- Code of Conduct for Employees
- Code of Conduct for Vendors
- Nomination and Remuneration Policy for Directors, Key Managerial Personnel and Other Employees
- Policy to Promote Diversity on the Board of Directors

Annexure-K

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

	Financial Year 2021-22			Financial Year 2020-21		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	-	-	-	-	-	-
Discrimination at workplace	-	-	-	-	-	-
Child Labor	-	-	-	-	-	-
Forced Labor/ Involuntary labor	-	-	-	-	-	-
Wages	-	-	-	-	-	-
Other human rights related issues	-	-	-	-	-	-

7. Are there mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases? Describe, if applicable.

Sona Comstar has a "Prevention of Sexual Harassment Policy" which is being overseen by Internal Complaints Committee (ICC) constituted for each location in India under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Internal Complaints Committee ("ICC" or "Committee") shall meet at regular intervals to create awareness against Sexual Harassment and to ensure prevention and prohibition of Sexual Harassment at Workplace. However, in case, any Complaint is reported pertaining to Sexual Harassment, the ICC shall hold emergency meeting immediately as per its discretion within 3 working days and will proceed further in accordance with the provisions of the Act and the Rules as it may deem fit for the proper redressal of the matter. The grievance, if any, arising out of Whistle-Blower Policy and Code of Conduct is being reviewed by Audit Committee of the Board.

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

Yes. Sona Comstar has a code of conduct for its vendors which includes aspects of human rights pertaining to their operations and conduct of business, and all vendors need to comply with the code as part of the agreement/contract.

9. Please provide details on assessments for the year, in the following format:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	100%*
Forced/involuntary labor	100%*
Sexual harassment	100%*
Discrimination at workplace	100%*
Wages	100%*
Others – please specify	

* The above assessment done by the Company internally from time to time.

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

Any risks arising from the assessment are duly taken care by committees comprising of both internal and external stakeholders.

Leadership indicators

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

The Company strives to uphold the basic principles of human rights in all its operations. This is in alignment with its codes and policies. The company regularly sensitizes its employees on the Code of Conduct, Human Rights, and Freedom to form associations through various training and awareness programs. The Company is also updating many of its customers on these compliance as part of contractual framework with them.

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

Sona Comstar complies with all the required labor laws and is OHSAS 18001 certified. It provides training to its employees at the time of induction about the code of conduct which covers human rights issues such as child labor, gender diversity, workplace discrimination, etc. A background verification is conducted by a third party for all its employees.

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

Sona Comstar is in the process of making all the required offices/premises friendly to differently abled visitors.

4. Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Child labor	-
Forced/involuntary labor	-
Sexual harassment	-
Discrimination at workplace	-
Wages	-
Others – please specify	-

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

N/A

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:

Sona Comstar has its manufacturing plants over 4 locations in India: Gurgaon, Manesar, Pune and Chennai.

Parameter	Financial Year 2021-2022	Financial Year 2020-2021
	MWh	MWh
Total electricity consumption (A)	50,068.21	40,917.25
Total fuel consumption (B)	815.94	335.97
Energy consumption through other sources. (C) Solar	1,423.98	546.84
Total energy consumption (A+B+C)	52,308.14	41,800.07
Energy intensity per rupee of turnover (Total energy consumption in units/ turnover in rupees)	0.003	0.003
Sales in INR Mn.	18,419	13,254

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

No

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

Parameter	Financial Year 2021-2022	Financial Year 2020-2021
Water withdrawal by source (in kiloliters)		
(i) Surface water	-	-
(ii) Groundwater	-	1,459.00
(iii) Third party water	71,237.92	55,964.85
(iv) Seawater / desalinated water	0	0
(v) Others	26,855.38	20,291.03
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	98,093.31	77,714.88
Total volume of water consumption (in kiloliters)	97,848.31	77,499.88
Water intensity per rupee of turnover (Water consumed / turnover)	00*	00*

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.

*numbers rounded off to two decimal points.

Annexure-K

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

Yes. Sona Comstar has a Zero Liquid Discharge (ZLD) plant at their Gurgaon site having a capacity of 50 KLD (Kilo Liter per day). MBR and Conditioning Unit with High Recovery RO Membrane based Recycling System is installed in the ZLD plant to treat High TDS water.

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

Sona Comstar has its manufacturing plants over 4 locations in India: Gurgaon, Manesar, Pune and Chennai.

Gurgaon

Parameter	Please specify unit	Financial Year 2021-2022	Financial Year 2020-2021
DG SETS STACKS PARAMETER (Avg.)			
	AIR QUALITY STANDARD 2009 (mg/Nm³)		
PM	75	34.28	55.88
SOX	NS	25.08	40.34
NOX	710	159.9	341
CO	150	62.97	86.53
HC	100	17.81	23.4

WORK ZONE (INDOOR AIR QUALITY) FROM (Avg)

	Std.Limits (As per*OSHA) mg/Nm ³	Financial Year 2021-2022	Financial Year 2020-2021
PM	15	0.49	0.57
SOX	13	0.02	0.02
NOX	9	0.04	0.05
CO	55	1.21	0.74

Pune

Parameter	Please specify unit	Financial Year 2021-2022	Financial Year 2020-2021
DG SETS STACKS PARAMETER (AVG.)			
	STANDARD		
PM- Total Particulate Matter	<150 mg/Nm ²	77.32	71.81
SO ₂ - Sulphur Dioxide	mg/Nm ²	79.89	71.81
	<120 Kg/day	1.54	1.38
Nox- Oxide of Nitrogen	<800 ppm	25.51	26.25
CO- Carbon Monoxide	<150 mg/Nm ²	31.00	32.15
HC- Hydrocarbon	<100 mg/Nm ²	29.95	31.50

WORK ZONE AIR MONITORING. AVG.

	STANDARD AS PER FACTORY ACT, 1948	Financial Year 2021-2022	Financial Year 2020-2021
SPM- Suspended Particular Matter.	µg/m ³	48.45	37.65
SO ₂ - Sulphur Dioxide	<5000 µg/m ³	21.10	20.45
NO _x - Oxides of Nitrogen	<6000 µg/m ³	24.30	21.75
CO- Carbon Monoxide	<55 ppm	2.73	2.46
RSPM- Respirable Suspended Particulate Matter	<5000 µg/m ³	26.55	18.40
CO ₂ - Carbon Dioxide	<5000 ppm	134.50	95.50

Manesar

Parameter	Please specify unit	Financial Year 2021-2022	Financial Year 2020-2021
DG SETS STACKS PARAMETER (AVG.)			
	AIR QUALITY STANDARD 2009 (gm/kwh)		
PM	75	24.4	27.18
SOX	NS	-	-
NOX	710	118.9	120.11
CO	150	42.3	46.83
HC	100	10.76	10.81

WORK ZONE INDOOR AIR QUALITY(Avg.)

	Std.Limits (As per*OSHA) mg/Nm3	Financial Year 2021-2022	Financial Year 2020-2021
PM	15	0.35	0.49
SOX	13	0.01	0.02
NOX	9	0.03	0.04
CO	55	1.12	1.14

Chennai

Parameter	Std.Limits (As per*OSHA) mg/Nm3	Financial Year 2021-2022	Financial Year 2020-2021
PM	15	2.1	2.2
SOX	13	5	4
NOX	9	6	6

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

Sona Comstar has its manufacturing plants over 4 locations in India: Gurugram, Manesar, Pune and Chennai.

Parameter	Unit	Financial Year 2021-2022	Financial Year 2020-2021
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	776	431
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	39,554	32,325
Total Scope-1 emissions per rupee of turnover.	Metric tonnes per rupee-	0.00*	0.0*
Total Scope 2 emissions per rupee of turnover.	Metric tonnes per rupee-	0.005*	0.00*

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.

*numbers rounded off to two decimal points.

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

Yes, augmenting onsite solar generation facility. Total Solar capacity increased to 1505.8 kWp in Financial Year 2021-22 from 458.8 kWp Financial Year 2020-21.

Annexure-K

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

Parameter	Financial Year 2021-22	Financial Year 2020-21
Total Waste generated (in metric tons) (Current Financial Year)		
Total Waste generated (in metric tons)		
Plastic waste (A)	72.91	52.70
E-waste (B)	2.97	1.57
Bio-medical waste (C)	0.96	1.24
Construction and demolition waste (D)	-	-
Battery waste (E)	10.69	2.66
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	197.42	45.56
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	13,176.12	9,895.57
Total (A+B + C + D + E + F + G + H)	13,461.07	9,999.29
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)		
Category of waste (Non-Hazards)		
(i) Recycled	13,263.63	9,953.72
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	13,263.63	9,953.72
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)		
Category of waste (Hazards)		
(i) Incineration	149.79	36.82
(ii) Landfilling	45.45	8.75
(iii) Other disposal operations	2.20	-
Total	197.44	45.57

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.

Disposed through Govt. Authorized agency Gujarat Enviro Protection & Infrastructure Private Limited (GEPIL)

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 recycles its Hazardous & Non-Hazardous waste product through authorized recyclers. Further, all relevant plant locations have Wastewater Treatment Plant (WWTP) which is combination of Effluent treatment plant (ETP) and Sewage treatment plant (STP).

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

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

None of the company plants are around ecologically sensitive areas.

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

Not Applicable

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
-	-	-	-	-	-

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

Yes, Sona Comstar is compliant with all the applicable environmental laws.

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

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	Financial Year 2021-2022	Financial Year 2020-2021
	MWh	MWh
From renewable sources		
Total electricity consumption (A)	1,423.98	546.84
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	1,423.98	546.84
From non-renewable sources		
Total electricity consumption (D)	50,068.21	40,917.25
Total fuel consumption (E)	815.94	335.97
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	50,884.15	41,253.23

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

2. Provide the following details related to water discharged:

Parameter	Financial Year 2021-2022
Water discharge by destination and level of treatment (In Kilolitres)	
i) To Surface water	-
- No treatment	-
- With treatment – please specify level of treatment	-
(ii) To Groundwater	-
- No treatment	-
- With treatment – please specify level of treatment	-
(iii) To Seawater	-
- No treatment	-
- With treatment – please specify level of treatment	-
(iv) Sent to third-parties	-
- No treatment	-
- With treatment – please specify level of treatment	-
v) Others	-
- No treatment	-
- With treatment – please specify level of treatment	-
Total water discharged (In Kiloliters)	-

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.

Sona Comstar uses water extensively in making parts that require material transformation at high temperatures. To minimize water discharges, it has established water treatment systems such as ETP (Effluent Treatment Plants) and Zero Liquid Discharge (ZLD) plants that enable its recovery, which are present in all its manufacturing locations. Hence, water discharge by Sona Comstar is negligible.

3. Water withdrawal, consumption and discharge in areas of water stress (in kiloliters):

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

- Name of the area: Gurgaon and Chennai
- Nature of operations: Manufacturing
- Water withdrawal, consumption, and discharge in the following format:

Annexure-K

Gurgaon

Parameter	Financial Year 2021-2022	Financial Year 2020-2021
Water withdrawal by source (in kiloliters)		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	52,563	41,049
(iv) Seawater / desalinated water	-	-
(v) Others	2518	6045
Total volume of water withdrawal (in kiloliters)	55,081	47,094
Total volume of water consumption (in kiloliters)	55081	47094
Water intensity per rupee of turnover (Water consumed / turnover)	0.00*	0.00*

*numbers rounded off to two decimal points.

Chennai

Parameter	Financial Year 2021-2022	Financial Year 2020-2021
Water withdrawal by source (in kiloliters)		
(i) Surface water	0	0
(ii) Groundwater	0	1459
(iii) Third party water	16348	12870
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	16348	14329
Total volume of water consumption (in kilolitres)	16103	14114
Water intensity per rupee of turnover (Water consumed / turnover)	0.00*	0.00*

*numbers rounded off to two decimal points.

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

The Company is currently not measuring Scope 3 emissions.

Parameter	Unit	Financial Year 2021-2022	Financial Year 2020-2021
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tons of CO ₂ equivalent	-	-
Total Scope 3 emissions per rupee of turnover		-	-
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		-	-

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

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.

Not Applicable, as the company doesn't have any operations in ecologically sensitive areas,

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:

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Solar Plant	1505.8 kWp	Reduction in GHG emissions
2.	ZLD Plant	50 KLD Capacity	Reduction in freshwater intake
3.	Replacement of Fluorescent light into LED lights of 80 no.s	-	35910 kWh savings/Year

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
4.	Installation of VFD for Air compressor - 4	-	Installed on March 2022. Savings to be calculated in upcoming months.
5.	Installation of Energy efficient IE3 motors	-	9763 kWh Savings/year

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

Sona Comstar has an emergency procedure integrated into its management system for dealing with emergency situations, minimize hazards to environment and human health. A list of potential emergency situations has been identified and the roles and responsibilities of all concerned personnel are also defined to handle the emergencies effectively. The safety officer is responsible for mock drills which are conducted at 6 months intervals whereas safety drills are conducted at 2 months intervals or as per plan to evaluate emergency preparedness. Training and awareness sessions are conducted for the employees and emergency handling teams to prepare them for actual emergency situations.

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?

Nil

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

Nil

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.

Four

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.	Automotive Component Manufacturers Association (ACMA)	National
3.	Association of Indian Forging Industry (AIFI)	National
4.	Gurgaon Chamber of Commerce and Industries (GCCCI)	State

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

There have been no instances of anti-competitive behavior undertaken by the Company and therefore there are no corrective actions taken or underway by the regulatory authorities against the Company.

Leadership indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others - please specify)	Web Link, if available
-	-	-	-	-	-

Annexure-K

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.

Not Applicable.

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
-	-	-	-	-	-

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

Not Applicable.

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

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

The community grievances, if any can be submitted at the security desk. Any complaint so received is forwarded to Admin department for further action.

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

	Financial Year 2021-2022	Financial Year 2020-2021
Directly sourced from MSMEs/ small producers	47.66%	42.70%
Sourced directly from within the district and neighboring districts	38.78%	38.17%

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) (Financial Year 2022)
1.	Gujarat	Ahmedabad	2.50 mn
2.	Delhi	Southwest Delhi	5.00 mn
3.	Pan-India	Pan-India	4.00 mn
4.	Haryana	Gurugram	4.65 mn
5.	Tamil Nadu	Chengalpattu, Kancheepuram	7.09 mn
6.	Delhi	South West Delhi	8.00 mn
7.	Delhi, Haryana	South Delhi, South West Delhi, Gurgaon	4.60 mn
8.	Haryana	Gurugram	2.50 mn
9.	Pan-India	Pan-India	1.06 mn
10.	Madhya Pradesh	Gwalior	0.66 mn
11.	Haryana	Gurugram	0.04 mn

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

No

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

Not Applicable

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

Not Applicable

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

Not Applicable

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

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.

Not Applicable

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.	SONA COMSTAR--SAMRIDH BHARAT PROGRAMT: Collaboration with IIM-A for constructing a floor for technology business incubators	Technology Entrepreneurs, Incubators	-
2.	SONA COMSTAR--SAMRIDH BHARAT PROGRAM: Partnered with FITT for innovations, which create safe, convenient and eco-friendly mobility	Technology Entrepreneurs, Incubators	-
3.	SONA COMSTAR--SWASTH BHARAT PROGRAM: Distribution of cooked meals, dry ration packets, essentials, meals, hygiene kits in various pockets of Localities/ Villages/Districts to the communities affected by Covid-19	Communities, people, migrant labour and workers affected by COVID-19 pandemic (approximately 457,000 meals)	-
4.	PROGRAM-SAKSHAM BHARAT: Construction and maintenance of basic infrastructure in Govt. Higher Secondary School, Chennai.	Students	-
5.	SONA COMSTAR-SAKSHAM BHARAT PROGRAM: Renovation and building of boundary walls and toilets installation of solar panels in Govt. Sr. Sec. School, Gurgaon	More than 1000 students	-
6.	SONA COMSTAR--SWASTH BHARAT PROGRAM: Aakash Healthcare Private Limited-Setting up of Pediatric ICU	General Public	-
7.	SONA COMSTAR-SWASTH BHARAT PROGRAM: Supply of BiPaP machines to various hospitals	General Public	-
8.	SONA COMSTAR-SWASTH BHARAT PROGRAM: Setting up 100 Bedded COVID Care Centre and related activities	The facility remained operational for 3 months and it catered to around 230 patients from Gurugram and nearby areas during the period it was operational	-
9.	SONA COMSTAR--SURAKSHIT BHARAT PROGRAM: Assist the families/ dependents of armed forces/war veterans	War veterans and their families	-
10.	SONA COMSTAR-SWASTH BHARAT PROGRAM: Providing Oxygen concentrators to Rajmata Vijaya Raje Scindia Centre for Development	General Public	-
11.	SONA COMSTAR--SWASTH BHARAT PROGRAM: Primary Health Care- Infrastructure for vaccination camps	General Public	-

Annexure-K

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.

Sona Comstar is a B2B company and sells its products predominantly to large OEMs. Sona Comstar ensures on time delivery in full to all its customers based upon the schedules shared by them. In case of any complaints, customers can raise the complaint with the Company SPOC or send their complaints in mail to the company.

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

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

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

	Financial Year 2021-22		Remarks	Financial Year 2020-2021		Remarks
	Received during the year	Pending resolution at the end of year		Received during the year	Pending resolution at the end of year	
Data privacy	Nil	Nil	-	Nil	Nil	-
Advertising	Nil	Nil	-	Nil	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	Nil	Nil	-	Nil	Nil	-
Restrictive Trade Practices	Nil	Nil	-	Nil	Nil	-
Unfair Trade Practices	Nil	Nil	-	Nil	Nil	-
Other	Nil	Nil	-	Nil	Nil	-

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

	Number	Reasons for recall
Voluntary recalls	Nil	Nil
Forced recalls	Nil	Nil

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.

Sona Comstar has established information security policy to protect itself against the cyber security and data privacy risks and ensure appropriate procedures to mitigate these risks in a timely manner. The approach is based on the International Standard ISO/IEC 27001 INFORMATION SECURITY MANAGEMENT. Sona Comstar has implemented a framework in the Third-Party Risk Management for all vendors to comply with the IT security procedures as per Sona Comstar guidelines which is also part of their Non-Disclosure Agreement.

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.

Not Applicable.

Leadership indicators

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

All information is accessible on the company's website: <https://sonacomstar.com/> SONA LinkedIn page also offers information and regular updates for the products and services.

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

Sona Comstar is a B2B company and sells its products to larger OEMs predominantly. Sona Comstar while entering the business with its customers make a declaration that they are REACH or IMDS compliant. They also perform business validation compliance as part of product development. This gives assurance to the customers about the product composition and safety. Further, for safe shipping of products, dimension and weight of packaging are mutually signed off by Sona Comstar and customer as per the global standards.

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

Not applicable.

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

Not Applicable

5. 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)

No

6. Provide the following information relating to data breaches:

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

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