

#### **September 05, 2023**

The National Stock Exchange of India Ltd. Corporate Communications Department "Exchange Plaza", 5th Floor, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051 BSE Limited Corporate Services Department Phiroze Jeejeebhoy Towers Dalal Street, Mumbai – 400 001

> Phone: +91-11- 4472 5676 Phone: +91-120-635 5040

Scrip Symbol: RELIGARE Scrip Code: 532915

# <u>Subject: Submission of Business Responsibility and Sustainability Report for the Financial Year 2022-23</u>

Dear Sir(s),

Pursuant to the provisions of Regulation 34(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report ("BRSR") of the Company for the Financial Year 2022-23, which forms an integral part of the Annual Report of the Company for the financial year 2022-23.

The same is also available on the website of the Company i.e. <a href="https://www.religare.com/annual-reports.aspx">https://www.religare.com/annual-reports.aspx</a> .

This is for your information and records purpose.

Thanking you, For Religare Enterprises Limited

Reena Jayara Company Secretary Encl. as above



# Religare Enterprises Limited BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT [BRSR]

#### **SECTION A: GENERAL DISCLOSURE**

#### I. Details of the Listed Entity

Corporate Identity Number (CIN) of the Listed Entity	L74899DL1984PLC146935
Name of the Listed Entity	Religare Enterprises Limited (REL)
Year of incorporation	1984
Registered office address	1407,14 <sup>th</sup> Floor, Chiranjiv Tower, 43, Nehru Place, New Delhi-110019, Phone: +91-11-44725676
Corporate address	Plot No. A-3,4 & 5, Club-125, Tower-B, Sector-125, Noida, U.P-201301
E-mail	investorservices@religare.com
Telephone	+91-11-4472-5676
Website	www.religare.com
Financial year for which reporting is being done	Financial Year 2022-23 (1st April,2022 to 31st March, 2023)
Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited (NSE) and BSE Limited (BSE)
Paid-up Capital	INR 32,355.95 Lacs
	Contact Person
Name of the Person	Ms. Saloni Goel
Telephone	011-4739 2500
Email address	corporateaffairs@religare.com
	Reporting Boundary
Type of Reporting (Standalone/Consolidated Basis)	Disclosures made in this report are on a standalone basis and relates only to the Company
	Name of the Listed Entity Year of incorporation Registered office address  Corporate address  E-mail Telephone Website Financial year for which reporting is being done Name of the Stock Exchange(s) where shares are listed Paid-up Capital  Name of the Person Telephone Email address

#### II. Product/Services

14	Details of business	S. No.	Description of Main Activity	Description of Business Activity	% Turnover of the Entity
	activities	1	Financial and Insurance service	Other financial activities	79.58%
		2	Support Service to organizations	Other support services to organizations	20.42%

	Products/	S. No.	Product/Service	NIC Code*	% Of Total Turnover contributed	
15	Services sold by the entity		Investment Activity	64200	79.58%	
		2	Support Services	78300	20.42%	

<sup>\*</sup>As per National Industrial Classification – Ministry of Statistics and Programme Implementation.



### III. Operations

		Location	Number of plants	No. of Offices	Total
16	Number of locations where plants and/or operations/offices of the entity are situated:	National	NA	Delhi-2 Noida-1	3
	are situated.	International	NA	NA	0
	Market served by the entity	Locations		Numbers	
17	No. of Locations	National (No. of States)		NA	
	No. of Locations	International (No. of Countries)		NA	
	What is the contribution of exports as a percentage of the total turnover of the entity?				
		financial services the services include load	tment Company, prov nrough its subsidiarie ns for small and med alth insurance, and re	es and operating er ium-sized enterprise	ntities. These
	A brief on types of customers	Religare's subsidiaries serve a wide range of market segments, includir mass retail, affluent individuals, small and medium-sized enterprise (SMEs), and mid-sized corporations. Religare through its subsidiarie serves a large customer base in various sectors. It has served over or million policyholders in the insurance business, more than one million broking customers, over 26,000 customers in MSME finance, and over 10,000 customers in affordable housing finance. The Group has over 11,000 professionals serving a diverse customer base across India, with presence in more than 1,000 locations.			

#### IV. Employees

REL doesn't have any workers and differently abled employees. Hence the information pertaining to them are not disclosed anywhere in this Report.

18. Det	18. Details as at the end of Financial Year:									
S.No. Particulars Total (A) Male Femal										
			No. (B)	% (B/A)	No. (C)	% (C/A)				
a. Em	ployees and workers (including differently-abled)									
	Employ	/ees								
1	Permanent (D)	34	25	74%	9	26%				
2 Other than Permanent (E) NA NA NA NA										
3	Total Employees (D+E)	34	25	74%	9	26%				

19. Parti	19. Participation/Inclusion/Representation of women								
S.No.	Catagony	Total (A)	No. and % of females						
3.NO.	S.No. Category		No. (B)	% (B/A)					
1	Board of Directors	6	2	33.33%					
2	Key Management Personnel (other than Executive Directors)	2	1	50%					



20. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)									
Category	_	FY 2022-23 nover rate in current FY)  FY 2021-22 (Turnover rate in previous FY)  FY 2020-21 (Turnover rate in the year prior to previous FY)			1				
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	1 33%   44%   36%   5%   22%   10%					22%	11%	19%	

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

21	Names of holding / subsidiary / associate companies / joint ventures	S.No	Name of the holding / subsidiary / associate companies / joint ventures	Indicate whether it is a holding / Subsidiary / Associate / or 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.	Religare Finvest Limited	Subsidiary	100	No
		2.	Care Health Insurance Limited	Subsidiary	64.98	No
		3.	Religare Broking Limited	Subsidiary	100	No
		4.	Religare Insurance Limited	Subsidiary	100	No
		5.	Religare Comtrade Limited	Subsidiary	100	No
		6.	Religare Credit Advisor Private Limited	Subsidiary	99.99	No
		7.	Religare Care Foundation	Subsidiary	96.94	No
		8.	Religare Global Asset Management Inc.	Subsidiary	100	No
		9.	Religare Housing Development Finance Corporation Limited	Subsidiary	87.5	No
		10.	Religare Commodities Limited	Subsidiary	100	No
		11.	Religare Business Solutions Limited	Subsidiary	100	No
		12.	Religare Advisors Limited	Subsidiary	100	No
		13.	Religare Digital Solutions Limited	Subsidiary	100	No
		14.	*Religare Capital Markets Limited	Subsidiary	100	No
		15.	*Religare Capital Markets International (Mauratius) Limited	Subsidiary	100	No
		16.	*Religare Capital Markets (Europe) Limited	Subsidiary	100	No
		17.	*Religare Capital Markets (UK) Limited	Subsidiary	100	No
		18.	*Religare Capital Markets Corporate Finance Pte Limited	Subsidary	100	No
		19.	*Religare Capital Markets (HongKong) Limited	Subsidiary	100	No
		20.	*Tobler (UK) Limited	Subsidiary	100	No
		21.	*Kyte Management Limited	Subsidiary	100	No
		22.	*Religare Capital Markets (Singapore) Pte Limited	Subsidiary	100	No
		23.	*Bartleet Wealth Management (Private) Limited	Subsidiary	50	No
		24.	*Bartleet Asset Management (Private) Limited	Subsidiary	50	No
		25.	*Strategic Research Limited	Subsidiary	50	No



21	Names of holding / subsidiary / associate companies / joint ventures	S.No	Name of the holding / subsidiary / associate companies / joint ventures	Indicate whether it is a holding / Subsidiary / Associate / or 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)
		26.	*Bartleet Religare Securities (Private) Limited	Subsidiary	50	No
		27.	*Religare Capital Markets Inc.	Subsidiary	100	No
		28.	IBOF Investment Management Private Limited	Joint Venture	50	No

#### # Shares means equity shares

#### VI. CSR Details

22	a. Whether CSR is applicable as per section 135 of Companies Act, 2013:	Due to losses during the past three years, the company was not required to spend money under CSR for financial year 2022-2023 as prescribed under Section 135 of the Companies Act, 2013
22	Turnover (in Rs.)	INR 5,812.49 Lacs (INR 2,956.15 Lacs – FY 2022)
	Net worth (in Rs.)	INR 2,14,100.39 Lacs (INR 2,13,753.75 Lacs – FY 2022)

#### VII. Transparency and Disclosures Compliances

23	Complaints/ Grievances	Stakeholder group from	Grievance Redressal	If Yes, then provide web-link for		FY 2022-23 nt Financial `	Year	l	FY 2021-22 us Financial Y	ear/
	on any of the principles (Principles 1 to 9) under the National Guidelines on	whom complaint is received	Mechanism in Place (Yes/No)	grievance redress policy		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	
	Responsible Business Conduct	Employees	Yes	grievance@ religare.com/ rel.icc@religare. com	Nil	Nil	NA	Nil	Nil	NA
		Investors (not including shareholders)	NA	NA	NA	NA	NA	NA	NA	NA
		Shareholders*	Yes	investorservices@ religare.com	6	Nil	NA	1	Nil	NA
		Other (Whistleblower)	Yes	rel. ombudsperson@ religare.com	Nil	Nil	NA	Nil	Nil	NA
		Suppliers & Vendors	Yes	rel. ombudsperson@ religare.com	Nil	Nil	NA	Nil	Nil	NA

<sup>\*</sup>Institutional investors are included in Shareholders

<sup>\*</sup> Though, the Company holds 100% equity share capital in Religare Capital Markets Limited ("RCML"), however in the present scenario controlling through voting rights of RCML is not there with the Company. Beside this, the tripartite agreement entered into, in financial year 2011-12, between REL, RCML and RHC Holding Private Limited ("RHCHPL"), an erstwhile promoter group company for providing financial support to RCML by RHCHPL (by subscribing Preference Shares of RCML) severe long term restrictions and significant restrictive covenants on major decision making at RCML were imposed by the holder of preference shares. Accordingly in view of the above, the financial statements of RCML and its subsidiaries have been excluded from the consolidated financial statements of the Company w.e.f. October 01, 2011, in accordance with applicable accounting standards. The Company has already provided fully for the entire investment made by it into RCML in previous years.



S. No	Material issue identified	Indicate whether risk or opportunity	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.	Corporate Governance & Ethical Conduct	Risk & Opportunity	The top priorities in corporate governance are compliance with evolving regulatory requirements and disclosures, business ethics and integrity, and responsible business behaviour.  Non-adherence to ethical standards can expose financial institutions to legal fines, penalties, damaged reputation, business disruption and erosion of trust  Additionally, changes in regulatory requirements and disclosures on ESG present ESG-related risks, which would need to be addressd in a timely and appropriate manner.	<ul> <li>Internal controls are in place to strengthen compliance with Company's Code of Conduct and applicable policies, fair practice code, laws, rules &amp; regulations.</li> <li>Created awareness and imparted trainings to internal stakeholders on ethical business practices</li> <li>Effective whistleblower mechanism and grievance redressal mechanism is in place</li> <li>Efficient governance structure is in place</li> </ul>	Negative  Legal fines and penalties  Dissolution of business  ESG Ratings  Reputation in the market  Positive  Potential to attractinvestors and access capital at favourable terms  Strong corporate governance practices can lead to improve financial performance and operational efficiency
2.	Branding and Reputation	Opportunity	This leads to increase in customer loyalty, builds confidence in the market and helps better positioning	<ul> <li>Adopted a customer centric approach</li> <li>Factoring in customer feedback in decision making</li> <li>Developed strong systems/ guidelines for conflict management</li> <li>Effective corporate governance, internal controls and risk management systems in place</li> </ul>	Positive  ➤ Increased revenue and market share
3.	Data Privacy and Security System upgradation & Technology initiatives	Risk	the way companies operate bring with it associated risks, especially concerning data security and privacy.  A lack of adequate and transparent data security and privacy systems can lead to direct economic and	<ul> <li>Implemented sound information security systems and policies to manage sensitive customer data</li> <li>Training employess on the privacy policy and information security procedures regarding appropriate access use and disclosure of personal data</li> <li>Periodic info security audits conducted</li> <li>IT Strategy committee at board level to monitor upgradation and initiatives</li> </ul>	The potential additional o increased costs incurred to



24. C	verview of the e	ntity's material	responsible business conduc	t issues	
S. No	Material issue identified	Indicate whether risk or opportunity	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)
4.	Responsible Investment	Opportunity	Within responsible investment environmental, social and governance issues are considered when making investment decisions and influencing companies or assets.  Capitalise on this opportunity by offering innovative sustainable financial products through the subsidiaries, generating additional revenue streams, and assisting clients in achieving their sustainable objectives.	<ul> <li>REL strives to comply with the principles established by the United Nations Principles on Responsible Investment (UNPRI).</li> <li>Company aims to prioritise investment decisions based on principles of environmental and social responsibility, as well as high standards of corporate governance.</li> </ul>	Positive  Increase in overall business of the company as company would have more revenue to invest among its subsidiaries.
5.	Risk Management	Risk & Opportunity	Effective risk and crisis management is vital for Company's long-term financial health and is an enabler for meeting its business objectives and delivering long-term value for all its stakeholders.	company, management functions include oversight of risk function prevalent for the company and its key operating subsidiaries.	Neagtive  ➤ The presence of gaps in the company's risk management practises can result in the failure to identify and address all risks, including those related to environmental, social, and governance (ESG) factors that are pertinent to the company. These gaps have the potential to adversely affect the company's overall business operations.  Positive  ➤ Increased revenue  ➤ More access to capital
6.	Community Development	Opportunity	Community development plays a vital role in fostering an inclusive society by enhancing the well-being and promoting the growth and success of the community. Hence, we view community development as an opportunity to promote equity and socio-economic development at scale, in the country.	➤ REL at the group level, has established the Religare Care Foundation (RCF) to engage in corporate social responsibility (CSR) initiatives and develop infrastructure in various sectors, including education, sports, healthcare, vocational skills,	Positive  Helps enhance Market reach and attract talent.



24. O	verview of the e	ntity's material	responsible business conduc	t issues	
S. No	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7.	Human Capital Development	Risk & Opportunity	Risk  The challenges of attracting and retaining skilled employees can hinder the achievement of business objectives and negatively impact productivity and performance.  Opportunity  Human Capital Development enables REL to maintain employee wellbeing and inclusivity at its workplace. These actions attract and retain talent, motivate employees, and lead to increased efficiency and enhanced retention.	and career development reviews considering employee expectations and aspirations	➤ Inadequate talent management and retention practises in a

#### SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

The National Guidelines for Responsible Business Conduct (NGRBCs) as prescribed by the Ministry of Corporate Affairs advocates the following nine principles referred to as P1 to P9:

- P1 Business should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable
- P2 Businesses should provide goods and services that are safe 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 towards all its stakeholders
- P5 Businesses should respect and promote human rights
- P6 Business should respect, protect, and make efforts to restore the environment
- P7 Businesses when engaging in influencing public and regulatory policy, should do in a manner that is responsible and transparent
- P8 Businesses should support inclusive growth and equitable development
- P9 Businesses should engage with and provide value to their customers in a responsible manner

Dis	closure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Pol	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	NA	Yes	Yes	Yes	Yes	Yes	Yes	NA
	b. Has the policy been approved by the Board? (Yes/No)	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	-
	c. Web Link of the Policies, if available	The statutory Policies are available on Company's website i.e. <a href="https://www.religare.com/code-conduct.aspx">https://www.religare.com/code-conduct.aspx</a> .								
		The policies that pertain to employees are internally available on the intrane HRMS portal.						ntranet		



Disc	closure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	NA
3	Do the enlisted policies extend to your value chain partners? (Yes/No)			eblower Pol nd supplier		rs the va	lue chai	in which r	nainly cor	nprises
4	Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	regulatory guidelines, and engaging in meaningful discussions with relevant e) stakeholders. D,						llowing		
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.									
		Focus on mitigating emissions and managing waste efficiently check on environmental footprint						ciently to	keep a	
		Conduct trainings for awareness and sensitization related to go social and environmental matters within the organisation						d to gove	nance,	
		➤ Unde	ertake CS	SR initiative	s toward	ds well-b	eing of	communi	ties	
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.									
	Same are not met.	> Reducing e-waste sent to landfill, reducing paper consumption and reducing plastic waste.								
		> As part of our CSR programming, we focuses on improving the conditions of underprivileged and marginalised communities.								
Gov	ernance, Leadership and Oversight									
7	Statement by director responsible for th targets and achievements.	e busin	ess resp	onsibility	report, h	nighligh	ting ES	G relate	d challen	ges,
	REL is committed to positively impact the ein all areas of operation. Through this appropriate stakeholders and driving a sustainable sociof the company to strengthen synergies be	oroach, t ety and f	the firm i uture. Fu	s unwaver rthermore,	ing in its REL see	commit	ment to	owards c ision, mis	reating va sion, and	alue for
8	Details of the highest authority responsible for implementation		ard of Dir ompany.	ectors is re	sponsible	e for the	Busines	ss Respo	nsibility pr	actices
	and oversight of the Business Responsibility policy (ies).									
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.	1		irectors is of ESG rela			oversee	ing the d	evelopme	⊶nt and



Subject for Review	I	er	ate rtaken Boar	•	Dire	ctor		mmit	tee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	1 -	P P 2 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	effica and	During the periodic Policy review, the efficacy of these policies is also reviewed and necessary changes are made as and when necessary.					/ed				asis	as ar	nd who	en ne	eed a	arises		
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances			Compa ence t										es an	d pr	ocedu	res	to ei	nsure
	11. Has the entity carried out independent assessment/ evaluation of working of its policies by an external agency? (Yes/No). If yes, provename of the agency							P1	P2	P3	P4	P5	P6	P7	P8	P9		
										and	revi	es and ews do e to tim	one ir ne as	nterna and v	ally in when	the nece	Com	npany
12. If answer to Question (1) above	is "N	No	o" i.e.,	not	all P	rinci	ples	are c	ove	All pand from	revientime	ews do time to time policy	ne ir	and v	ally in when to be	the nece state	Com ssar ed:	npany y.
Questions										All pand	revientime by a	ews do time to time policy	ne ir	and v	ally in when	the nece	Com	panyy.
	ciples t is a	s m	nateria	ıl to it	s bu	sines	s (Ye	es/No	)	All pand from	revientime	ews do time to time policy	ne ir	and v	ally in when to be	the nece state	Com ssar ed:	panyy.
Questions  The entity does not consider the prince  The entity is not at a stage where i	ciples t is a lo)	s m	nateria	al to it	s bu	sines	s (Ye	es/No	) the	All p and from	revientime by a	ews do time to time policy	ne ir	and v	ally in when to be	the nece state	Com ssar ed:	pany y. P9
Questions  The entity does not consider the prince The entity is not at a stage where i policies on specified principles (Yes/N  The entity does not have the fina available for the task (Yes/No)	ciples t is a lo)	oi	materia	al to it	s bu	sines	s (Ye	es/No	) the	All p and from	revientime by a	ews do time to time policy	ne ir	and v	ally in when to be	the nece state	Com ssar ed:	panyy.
Questions  The entity does not consider the prince The entity is not at a stage where is policies on specified principles (Yes/N  The entity does not have the final available for the task (Yes/No)  It is planned to be done in the next fire	ciples t is a lo)	oi	materia	al to it	s bu	sines	s (Ye	es/No	) the	All p and from	revientime by a	policy P3	reas P4	and v	ally in when to be	the nece state	Com ssar ed:	npany y.
Questions  The entity does not consider the prince The entity is not at a stage where i policies on specified principles (Yes/N The entity does not have the fina	ciples t is a lo) ncial nancia	oi al y	materia le to for/huma year (	al to it ormul an al Yes/N	s but	and echni	ss (Ye	es/No	the crees	All pand from	revientime by a	P3	reas P4	and v	ally in when to be	the nece state	Com ssar ed:	pany y. P9



#### 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 programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	3	Workshops dedicated to the Company's subsidiary businesses, Rights, liabilities and duties of directors, SEBI Insider Trading Regulations and other relevant industry information for the BOD's were conducted during the FY 2022-2023.	61%
Key Management Personal  Employees other than BODs and KMPs	3	E-training are provided in ares of InfoSec, POSH, KYC & AML	100%*

<sup>\*1</sup> KMP has completed all 3 modules (InfoSec, POSH,KYC & AML). The other 2 KMPs are leadership team and excluded from these trainings/ webinars.

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.

			Moneta	ry	
	NGRBC Principle	Name of the regulatory/ enforcement/ agencies / judicial institutions	Amount (In INR)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty /Fine	-	-	Nil	-	-
Settlement	P1	Securities and Exchange Board of India	5,41,80,000	Settlement Order dated May 31, 2022 under the provisions of SEBI (Settlement Proceedings) Regulations, 2018 on the Show Cause Notice (SCN) dated November 17, 2020 issued by SEBI. This Settlement Order ends the adjudication proceedings begun by SCN dated November 17, 2020.  Detailed information is part of the Corporate Governanace Report in the Disclosures section under the heading "Details of non-compliance by the Company"	NA
Compounding Fees	-	-	Nil	-	-



Non-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)	
Imprisonment	NA	NA	NA	NA	NA	
Punishment	NA	NA	NA	NA	NA	

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

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.

Yes, Religare maintains Fraud Risk Management & Staff Accountability Policy to have internal control mechanism of reporting for fraud cases, which broadly covers misappropriation and criminal breach of trust, fraudulent encashment through forged instruments, manipulation books of accounts, illegal gratification, negligence and cash shortages, cheating & forgery, fraudulent submission of forged documents, irregularities in foreign exchange transactions. The policy covers fraud risk control measures, reporting of frauds and measures to take disciplinary actions. All employees have access to the concerned policy.

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 (Current Financial Year)	FY 2021-22 ( Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0

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

	FY 2022 (Current Fina			)21-22 nancial Year)
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

During FY 2022-23, SEBI issued a Settlement Order on May 31, 2022, after the Company and Religare Finvest Limited paid Rs. 5,41,80,000/- and Rs. 5,08,95,000/-, respectively, as directed by SEBI. This Settlement Order ends the adjudication proceedings against the Company and Religare Finvest Limited begun by SCN dated November 17, 2020.

#### LEADERSHIP INDICATORS

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

Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in value chain covered by the awareness programmes
0	0	0



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

Yes, the Company's Code of Conduct for Directors highlights and expects all of its Directors, to avoid and disclose actual and apparent conflicts of personal interest with the interest of the Company and to disclose all contractual interest, whether directly or indirectly, with the Company. All the Board Members are required to affirm the compliance with the Code of Conduct on yearly basis.

Further, Board members are also required to give disclosure of their concern / interest in other entities under Section 184 of the Companies Act, 2013 and also the parties to which such director is related to, on yearly basis and as and when there is any change in same. Directors, if interested or concerned in any transaction(s) or arrangement(s) to be entered into by the Company, does not participate in the discussion and approval of the transaction.

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

#### **ESSENTIAL INDICATORS**

 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.

Not Applicable- The company is a holding and investment company and is not involved in any manufacturing or services under the purview of BRSR

Туре	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	Details of improvement in social and environmental aspects
Research & Development (R&D)	NA	NA	Due to the nature of our company's business in the financial services sector, our R & D, CAPEX investments primarily are done by our subsidaries. Our standalone entity is not involved in the any
Capital Expenditure (CAPEX)	NA	NA	kind of dealing with customers under the scope of our business operations.

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

Not Applicable- The company is a holding and investment company and is not involved in any manufacturing or services under the purview of BRSR. The consumption of resources is limited to running the offices and therefore the Company follows sustainable sourcing practices wherever feasible.

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

Not Applicable

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.

Since the Company operates in the financial services sector and does not engage in manufacturing, this indicator is not relevant to its operations. The Company engages in various activities to manage waste generated from its offices in a sustainable manner.

Not Applicable

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.

Since the Company operates in the financial services sector, this indicator is not applicable.



#### 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?

Not Applicable

Considering the Company operates within the Financial Services sector and does not engage in the production or manufacturing of any goods, this particular indicator is not relevant.

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 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).

Not Applicable

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:

Not Applicable. As the Company operates in the financial services sector, there is no need for the reclamation of products and packaging at the end of their lifecycle.

	(Cı	FY 2022-2023 urrent Financial		FY 2021-2022 (Previous Financial Year)			
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed	
Plastics (including packaging)	NA	NA	NA	NA	NA	NA	
E-waste	NA	NA	NA	NA	NA	NA	
Hazardous waste	NA	NA	NA	NA	NA	NA	
Other waste	NA	NA	NA	NA	NA	NA	

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

Not Applicable. Considering the Company operates within the Financial Services sector and does not engage in the production or manufacturing of any products, there is no need for the reclamation of products and packaging at the end of their life cycle.

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

#### **ESSENTIAL INDICATORS**

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

Category		% of employees covered by									
	Total (A)	_				ternity Paternity enefits Benefits		-	Day Care Facilities		
		No. (B)	% (B/A)	No. (C)	%(C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)
			Pe	rmanent	Employ	/ees					
Male	25	25	100%	25	100%	NA		25	100%		
Female	9	9	100%	9	100%	9	100%	NA	·	NA^	
Total	34	34	100%	34	100%	9	26%	25	74%	NA^	

#### Note:

Fire drills are conducted quarterly to ensure the safety and well-being of employees in the event of accidents occurring within the office premises.

<sup>^</sup> Maternity Benefit Act requires that any establishment which has 50 or more employees shall have the facility of creche. REL employee count is well under 50 count, hence the facility is not applicable.



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

		FY 20	22-23 (Curren	t FY)	FY 2021-22 (Previous FY)			
Sr. No.	Benefits	No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	employees workers covered as a % of total		
1	PF	97%	NA	Y	97%	NA	Y	
2	Gratuity	100%	NA	NA	100%	NA	NA	
3	ESI	0	NA	NA	0	NA	NA	

#### Note:

Provident Fund: It is provided to all employees as per the Employee Provident Fund & Miscellaneous Provisions Act, 1952. Gratuity: It is provided to all employees as per the Payment of Gratuity Act, 1972.

ESI: It is provided to all eligible employees as per the Employees' State Insurance Act, 1948.

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

Yes. The Company has implemented accessibility measures in its office premises, including elevators, ramps, and accessibility-centric designs in common spaces like restrooms. Both of our office locations are equipped with lifts, which ensure accessibility for individuals with disabilities, including both employees and visitors. The washrooms have been designed to be accessible for individuals using wheelchairs.

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

Yes, the company has policies such as Anti-Harassment & Grievance, Prevention of Sexual Harassment, Whistle Blower Policy, Equal Employment Opportunity & Human Rights Policy. All these policies promote equal employment opportunities for employees and workers with disabilities. The Company maintains a non-discriminatory policy that prohibits discrimination on the basis of race, colour, religion, caste, gender, age, marital status, disability, nationality, or any other relevant criteria.

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

Gender	Total number of people returned after parental leave in FY	Total Number of people who took parental leave in FY	Return to work rate	Total Number of people retained for 12 months after returning from parental leave	Total number of people returned from parental leave in prior FY	Retention Rate	
	Permanent Employees & workers						
Male	1	1	100%	NA	0	NA	
Female	NA	0	NA	NA	0	NA	
Others	NA	0	NA	NA	NA	NA	
Total	1	1	100%	NA	0	NA	



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.

Category	Yes/No	Details of the mechanism in brief
Permanent Workers	NA	The company has Anti-harassment & Grievance,
Other than Permanent Workers		POSH at workplace policy that aims to prohibit, prevent, and deter acts of harassment in the
Permanent Employees	Yes	workplace. These policies clearly outline the process/ mechanism for addressing complaints
Other than Permanent Employees	NA	related to all forms of harassment and grievances. These policies are available to all employees.

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

Category	FY 2	022-23 (Current FY)		FY 2021-22 (Previous FY)			
	Total employees / workers in respective category (A)  No. of employees / workers in respective category, who are part of association(s) or Union (B)		% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	%(D/C)	
		Permanent	Employee	es			
Male	NA	NA	NA	NA	NA	NA	
Female	NA	NA	NA	NA	NA	NA	
Others	NA	NA	NA	NA	NA	NA	
Total	NA	NA	NA	NA	NA	NA	

8. Details of training given to employees and workers:

a. Details of Skill training given to employees and workers. ~	Category	FY 202	2-23 (Current FY)	)	FY 2021-22 (Previous FY)				
		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received Skill Training (B)	% (B/A)	Total employees / workers in respective category (C)	workers in respective	%(D/C)		
	Permanent Employees and workers								
	Male	25	24	96%	23	22	96%		
	Female	9	8	89%	9	8	89%		
	Others	-	-	-	-	-	-		
	Total	34	32	94%	32	30	94%		



b. Details of	Category	FY 202	2-23 (Current FY)	)	FY 20	21-22 (Previous F	-Y)		
training on Health and Safety given to employees and workers. ~ ^		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received training on Health and Safety (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received training on Health and Safety (D)	%(D/C)		
	Permanent Employees and Workers								
	Male	25	24	96%	23	22	96%		
	Female	9	8	89%	9	8	89%		
	Others	-	-	-	-	-	-		
	Total	34	32	94%	32	30	94%		

#### Note:

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

Category	FY 202	22-23 (Current FY)		FY 2021-22 (Previous FY)			
	Total employees / workers in respective category (A)  No. of employees / workers in respective category, who had a career review (B)		% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who had a career review (D)	%(D/C)	
		Permanent	Employee	es			
Male	25	23	92%	23	19	83%	
Female	9	7	78%	9	9	100%	
Others	-	-	-	-	-	-	
Total	34	30	88%	32	28	88%	

**Note-**Joiners post 1st October, 2022 are not eligible for performance review of FY 2023, hence the coverage is under 100%.

<sup>~</sup> Leadership Team (2) is excluded from these trainings/ webinars.

<sup>^</sup> Training on Health and Safety is given in the form of Health and wellness based webinars by renowned experts in the respective field. In addition to webinars, workshops on mental health are conducted to ensure the health and safety of employees in the service sector industry. These webinars & workshops are scheduled on quarterly basis as minimum frequency and offered to all employees on voluntary participation basis.



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

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No)	Yes
a.1. What is the coverage of such system?	Regular fire safety and firefighting equipment management trainings are provided to all employees as part of health and safety management initiatives. The Company's offices also conduct periodic evacuation drills.
b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	'' '
c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)	''
d. Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)	Yes

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

Safety Incident/Number	Category	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
No. of fatalities	Employees	0	0

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

REL is dedicated to ensuring the provision of a secure and healthy work environment, thereby facilitating optimal performance from its employee. The Company protects the rights of the employees and strictly adheres to health and safety protocols in line with regulatory guidelines. The office is situated in a LEED certified building, which prioritises energy efficiency, minimises water usage, and contributes to the overall improvement of the environment. The Company promotes the importance of maintaining a healthy lifestyle among the employees. To facilitate this, we have various initiatives in place, including yoga sessions aimed at reducing stress and also offer workshops related to mental health issues.

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

	FY 2022	-23 (Current Financial	Year)	FY 2021-22 (Previous Financial Year)			
	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	
Working Conditions	0	NA	-	0	NA	-	
Health & safety	0	NA	-	0	NA	-	

#### 14. Assessments for the year:

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

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



#### LEADERSHIP INDICATORS

- Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N)
  (B) Workers (Y/N).
  - a. Employees (Yes/No): Yes, the objective is to provide term-life insurance cover to all on-rolls employees in the event of untimely death while in service. In the event of unforeseen death while in service, employees are covered up to a maximum eligibility of Sum Insured (Rounded in INR Lakh) which is 2 times of CTC. Employees in senior grades may need to undergo a medical examination by the insurer to ensure policy is enforced.
  - b. Workers (Yes/No): Not Applicable
- 2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

Nil

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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment		
	Current FY 2022-23 Previous FY 2021-22		<b>Current FY 2022-23</b>	Previous FY 2021-22	
Employees	0 0		NA	NA	
Workers	NA	NA	NA	NA	

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)

No

5. Details on assessment of value chain partners:

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

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

Not Applicable

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 firmly believes that for achieving its sustainability goal of all-round growth and development, stakeholders play a key role. The Company prioritizes stakeholder identification due to their significant role in achieving the Company's goals. The initial phase of the Company's stakeholder relations entails identifying and categorizing key stakeholders based on their roles, the significant impact they have on the Company, or the significant impact the Company has on them. After identifying and prioritizing stakeholders, engagement channels are established and shared with internal teams. This allows for engagement with stakeholders to gain insight into their needs and concerns, and to develop strategies for managing and mitigating potential risks or negative impacts. The Company proactively addresses stakeholder needs and concerns, mitigates risks, and cultivates enduring relationships.

At REL, we want to create long term value for all our stakeholders by building a better, sustainable tomorrow.



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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	Multiple channels- physical and digital including quarterly/half yearly/ annual returns / filings, press releases and various communications through stock exchanges etc.	based	To inform about the performance, major developments and other relevant updates regarding the Company and its subsidiaries.
Government and regulators	No	Multiple channels- physical and digital	Need based	To provide timely information as asked, timely returns filing, recommendations/ feedback on draft policies, representations before regulators and associations for advancement and improvement of financial services industry in India
Employees	No	Multiple channels- physical and digital	1	To create a thriving, safe and inclusive workplace for its employess and providing ample opportunities for professional development and growth
Suppliers and partners	No	Multiple channels- physical and digital	Frequent and need based	To help increase reach and enhance business
Industry Associations	No	Multiple channels- physical and digital	Need based	To shape the regulatory landscape and promote sustainability through the transfer of knowledge

#### **Leadership Indicators**

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

The Company management regularly interacts with key stakeholders. The same is updated to the Board on regular basis as and where necessary.

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.

Nο

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

Not Applicable



#### PRINCIPLE 5: Businesses should respect and promote human rights

#### **Essential Indicators**

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

	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year				
Category	Total (A) No. of employees / workers covered (B)		% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)		
	Employees							
Permanent	-	-	-	-	-	-		
Other than permanent	NA	NA	NA	NA	NA	NA		
Total Employees	-	-	-	-	-	-		

Note:\*REL has a human rights policy, there is no separate training provided on such aspect to the employees.

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

Category	FY 2022-23 Current Financial Year				FY 2021-22 Previous Financial Year					
	Total (A)	Mini	al to mum age		e than ım Wage	Total (D)	Equal to I Wa		More Minir Wa	num
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E /D)	No. (F)	% (F / D)
	Permanent Employees									
Male	25	0	0%	25	100%	23	0	0%	23	100%
Female	9	0	0%	9	100%	9	0	0%	9	100%

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

		Male	Female		
	Number	Number Median remuneration/ salary/ wages of respective categories		Median remuneration/ salary/ wages of respective categories	
Directors	4	15.00	2	406.53	
KMPs	1	335.5	2	432.9	
Employees other than BoD and KMP	24	13.5	7	13.9	
Workers	NA		NA		

#### Note:

- Median remuneration/ salary/ wages in INR Lakh.
- Remuneration includes salary, allowances, leave encashment, bonus, leave travel concession, employer contribution towards NPS and perquisite and car. In addition, the employees are entitled to gratuity, employer's contribution to Provident Fund, Food Voucher and group insurance in accordance with Company's Rules.
- Remuneration mentioned above is inclusive of retirement/ separation benefits paid during the year.
- Remuneration mentioned above does not include ESOP perquisite.
- · Remuneration for Indepdent Directors means the sitting fees paid for attending the meeting of teh Board and Committes



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

Yes, the Company has delegated the responsibility to its Group head HR for addressing human rights impacts or issues caused or contributed to by the business.

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

The company has a policy on Human Rights that fosters socioeconomic empowerment through inclusive growth. This policy provides a broad framework to ensure that all employees and our associates are treated with respect and dignity and a common set of principles that apply to our business practises to respect human rights, not condone human rights violations, and avoid involvement in human rights abuses. The company endeavours to promote the recognition of basic human rights & implementation of the policy at a wide scale.

The Company is dedicated to address the grievances in a timely and culturally appropriate manner. The Group Head of Human Resources is responsible for investigating and addressing employee concerns, responding appropriately and taking corrective action in the event of any violations. No reprisal or retaliatory action shall be taken against any employee who raises concerns in accordance with this policy. The company's guiding principle is to prioritise the higher standard in cases where national law and international human rights standards differ. During any conflict, international human rights are respected to the greatest extent achievable, while strictly following and adhering to national law.

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

	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	NA	-	0	NA	-
Discrimination at Workplace	0	NA	-	0	NA	-
Child Labour	NA	NA	-	NA	NA	-
Forced Labour/ Involuntary Labour	NA	NA	-	NA	NA	-
Wages	NA	NA	-	NA	NA	-
Other human rights related issues	0	NA	-	0	NA	-

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

As part of the Whistleblower policy, Anti-harrasment and grievance policy and POSH Policy, the company has mentioned the protection of the complainant's identity. All such matters are handled in strict confidence. The company prohibits any form of retaliation against those who report legitimate concerns. Anyone involved in targeting such a person will be subject to strict disciplinary action, as per the policy and the course of the law. REL has implemented a whistle blower mechanism and developed a Whistle Blower Policy to ensure compliance with regulatory requirements. This policy serves as a framework for a responsible and secure whistle blowing/vigilance mechanism. The Company has implemented a policy to prevent sexual harassment in the workplace that complies with the guidelines of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Company has complied with the regulations pertaining to the establishment of an Internal Complaints Committee (ICC) under this act, which is responsible for addressing complaints regarding sexual harassment. These policies are applicable to all company employees, inter alia.

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

Not Applicable.



#### 9. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	NA
Forced/involuntary labor	NA
Sexual harassment	100%
Discrimination at workplace	-
Wages	NA

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

No significant risks/ concerns were observed

#### **Leadership Indicators**

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

No such grievances on Human Rights violations received by the Company.

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

Not Applicable

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

Yes, the premises/offices of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	The company expects its value chain partners to uphold and adhere the same values, beliefs, principles and ethics as followed by it in all its dealings.
Forced/involuntary labour	same values, beliefs, principles and effics as followed by it in all its dealings.
Sexual harassment	
Discrimination at workplace	
Wages	

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

No corrective actions were taken as value chain partners were not assessed



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

#### **Essential Indicators**

Registered office (Delhi) which has no notable environmental footprint and is therefore not reported under Principle 6.

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total electricity consumption (A) (GJ)	222.106	217.229
Total fuel consumption (B) (GJ)*	1.886	5.768
Energy consumption through other sources (C) (GJ)	0	0
Total energy consumption (A+B+C) (GJ)	223.992	222.997
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees) (GJ per million INR)	0.385	0.754
Energy intensity <i>(optional)</i> – the relevant metric may be selected by the entity (GJ per MT)		

<sup>\*</sup> Note- There is significant reduction on account of downsizing of Noida office space during FY 22-23

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

No

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

No site/ facility is identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by se	ource (in kilolitres)	,
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	897.67	-
(iv) Seawater / desalinated water	0	0
(v) Others (Rainwater storage)	0	0
Total volume of water withdrawal (in kilolitres) ( $i + ii + iii + iv + v$ )	897.67	0
Total volume of water consumption (in kilolitres)	299.22	0
Water intensity per rupee of turnover (Water consumed / turnover) (kl per million INR)	0.514	0
<b>Water intensity</b> <i>(optional)</i> – the relevant metric may be selected by the entity- Specific water consumption per unit of product (KI/MT)		-

Note: Noida office is a non-metered facility so its water withdrawl is estimated as per National Building Code, 2016.

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

No



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

No

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

Parameter	Please specify unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
NOx	kg	NA	NA
SOx	kg	NA	NA
Particulate matter (PM)	kg	NA	NA
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others – please specify	NA	NA	NA

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

Nο

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

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	tCO2e	0.139	0.427
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	tCO2e	44.112	43.144
Total Scope 1 and Scope 2 emissions per rupee (per million INR) of turnover	tCO2e/INR	0.076	0.147
Total Scope 1 and Scope 2 emission intensity (optional)— the relevant metric may be selected by the entity	tCO2e/MT	-	-

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

No

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

Given the nature of the business, this indicator is not applicable.

Currently, the group is not engaged in any manufacturing or marketing ativities. The current environment footprint is therefore very small. The company's only principal source of emissions is electricity and diesel (Scope 1 & Scope 2). The corporate headquarters are LEED-certified. Employees are made more aware of energy-saving practises. At REL, we actively monitor emissions and energy consumption trends in order to identify potential energy savings opportunities.



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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0.336	-
E-waste (B)*	5.338	0.644
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	0	0
Other Non-hazardous waste generated ( <i>H</i> ). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	-	-
Total (A+B + C + D + E + F + G+ H)	5.674	0.644
For each category of waste generated, total waste reco operations (in metric tonnes)	vered through recycling,	re-using or other recovery
Category of waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total	0	0
For each category of waste generated, total waste dispose	d by nature of disposal me	thod (in metric tonnes)
Category of waste		
(i) Incineration	NA	NA
(ii) Landfilling	NA	NA
(iii) Other disposal operations	5.674	0.644
Total	5.674	0.644

Note- \*The significant difference for values regarding E-waste from the last year is due to the reporting done in FY 2023 for the E-waste inventory by the entity.

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

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 waste generated at the office is collected through centralized mechanism & handed over to the waste management agency

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:

No



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
NA					

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

Yes, the entity is compliant with the applicable environmental law/ regulations/ guidelines in India. All waste of the firm is taken care as per extant rules.

#### Leadership Indicators

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
From renewable sources (in GJ)		
Total electricity consumption (A)	0	0
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)- (on-site solar installation)	0	0
Total energy consumed from renewable sources (A+B+C)	0	0
Total electricity consumption (D)	222.106	217.229
Total fuel consumption (E)	1.886*	5.768
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	223.992	222.997

<sup>\*</sup> Note- The values have been changed due to downsizing of Noida office space during FY 22-23

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

No

2. Provide the following details related to water discharged:

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water*		
- No treatment	0	0
- With treatment – please specify level of Treatment	0	0



Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of Treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of Treatment	0	0
(iv) Sent to third parties**		
- No treatment	598.45	0
- With treatment – please specify level of Treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of Treatment	0	0
Total water discharged (in kiloliters)	598.45	0

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

No

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

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

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by	y source (in kilolitres)	
(i) Others (Municipal corporations)	NA	NA
Total volume of water withdrawal (in kilolitres)	NA	NA
Total volume of water consumption (in kilolitres)	NA	NA
Water intensity per rupee of turnover (Water consumed / turnover)	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity (KI/MT)	NA	NA
Water discharge by destination a	and level of treatment (in kil	oliters)
(i). Into Surface water		
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(ii). Into Groundwater		
No treatment	NA	NA



Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
With treatment – please specify level of treatment	NA	NA
(iii). Into Seawater		
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(iv). Sent to third parties		
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(v). Others		
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
Total water discharged (in kiloliters)	NA	NA

<sup>\*</sup>Note- The offices are not located in water stressed areas.

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

No

4. Please provide details of total Scope 3 emissions & its intensity, in the following format Not applicable

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	TCO2e	-	-
Total Scope 3 emissions per rupee of turnover	TCO2e/INR	-	-
Total Scope 3 emission intensity (optional)  – the relevant metric may be selected by the entity	TCO2e/MT	-	-

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.

Currently, REL does not estimate its scope 3 emissions.

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 Company does not operate in ecologically sensitive areas, so this indicator is not applicable.

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:

No



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

Yes. The company possesses a Risk Category Manual (RCM) that is utilises to manage and regulate risks at the entity level. The Risk Control Matrices (RCMs) are designed to categorise controls as either preventive or detective in relation to risk. The assessment and documentation of risks are integral components of the business planning and evaluation process. The identification of specific process level control activities is crucial in implementing effective detective or preventive controls that address the associated risks. The aforementioned controls may undergo further examination as part of the monitoring control activities.

The Business Continuity Plan focuses on operational preparedness from an alternate location. It provides support for the REL mandate on Business Continuity Management (BCM), which is a comprehensive programme aimed at enhancing the resilience of REL. As a Core Investment Company, REL is not involved in direct business activities. Therefore, REL's business continuity plan primarily focuses on managing its information technology framework, including information and communication systems, in the event of a catastrophe. Religare adopts a comprehensive approach to IT Service continuity, encompassing multiple layers of protection.

The specified conditions such as Network outages and blackouts, external factors such as terrorist attacks, civil unrest, natural disasters (such as earthquakes, fires, floods), or any other catastrophic event will serve as event triggers for initiating the Business Continuity Plan (BCP). The purpose of this BCP plan is to outline the necessary steps for maintaining IT services at Religare in the event of a major incident.

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 impact

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.

The Corporation is a member of 3 trade and industry chamber/ associations.

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

Trade and industry chambers/associations the entity is a member of/affiliated	Reach of trade and industry chambers/ associations (state/national)
Federation of Indian Chambers of Commerce and Industry (FICCI)	National
Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
Confederation of Indian Industry (CII)	National

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

Name of Authority	Brief of the case	Corrective action taken
Nil	Nil	Nil



#### LEADERSHIP INDICATORS

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

The Company refrains from direct public advocacy but utilises its expertise to offer recommendations on standards and regulatory advancements in the financial services sector through its participation in trade bodies or associations. The Company engages in discussions with government entities, regulators, and associations to contribute to the development and progress of the financial services industry.

The Company achieves this by being a member of industry associations including FICCI, ASSOCHAM, and CII. The Company's employees and senior management participate in committees established by regulators and industry organisations.

S. no	Public policy advocated	Method resort for such advocacy	Whether the information is available in public domain? (Yes/No)	Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify	Web Link, if available
-	-	-	-	-	-

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. The Company was not obligated to take any SIA as mandated by the relevant laws.

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

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

Not Applicable. There are currently no ongoing projects that involve the implementation of Rehabilitation and Resettlement measures.

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

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

Not Applicable

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

Not Applicable. The sourcing of goods is not included in the main activities of the Company, as it does not engage in manufacturing. Therefore, it is not applicable. Sourcing is restricted to the procurement of materials necessary for the efficient functioning of the Company's offices.

	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
Directly sourced from MSMEs/ Small producers	NA	NA
Sourced directly from within the district and neighbouring districts	NA	NA



#### 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):

Not Applicable

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

Not Applicable

S. No	State	Aspirational District	Amount spent (INR)
	NA		

- 3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) - No. In the context of business, resource procurement is restricted to the purpose of sustaining offices activities.
  - (b) From which marginalized /vulnerable groups do you procure? Not Applicable
  - (c) What percentage of total procurement (by value) does it constitute? Not Applicable
- 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

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.

Name of Project	Detail Of Beneficiaries		
-	-		

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

#### **ESSENTIAL INDICATORS**

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

Not Applicable, the company being a holding and investment company does not have any direct customers under the scope of BRSR.

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

Information related to	As a percentage to total turnover	
Environment and Social parameters relevant to product	NA	
Safe and responsible usage	NA	
Recycling and/or safe disposal	NA	



#### 3. Number of consumer complaints

	FY 2022-23 Current Financial Year		FY 2021-22 Previous Financial Year	
	Received during the year	Pending resolution at the end of year	Received during the year	Pending resolution at the end of year
Data privacy	NA	NA	NA	NA
Advertising	NA	NA	NA	NA
Cyber-security	NA	NA	NA	NA
Delivery of essential services	NA	NA	NA	NA
Restrictive Trade Practices	NA	NA	NA	NA
Unfair Trade Practices	NA	NA	NA	NA
Others (Specifications, Labelling, and Packaging)	NA	NA	NA	NA

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

	Number	Reason for recall
Voluntary recalls	NA	NA
Forced recalls	NA	NA

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 Board approved Data Privacy & Data Security policy which is available on the company's intranet portal, accessible to all employees. Given the rapid technological and digital advancement, risks are inevitable. The Company has a strong risk management framework wherein risk and its mitigation are monitored by the Risk Management committee of the Company.

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 taken as there were no 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.

#### LEADERSHIP INDICATORS

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

Not Applicable- The company being a holding and investment company does not have any direct customers under the scope of BRSR.

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

Not Applicable

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. 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)

Not Applicable

- 5. Provide the following information relating to data breaches:
  - a. Number of instances of data breaches along-with impact Nil
  - b. Percentage of data breaches involving personally identifiable information of customers Nil