

# Vindhya Telelinks Limited

Regd. Office: Udyog Vihar, P.O. Chorhata, Rewa - 486 006 (M.P.), India Telephone No: (07662) 400400 \* Fax No: (07662) 400591 Email: headoffice@vtlrewa.com; Website: www.vtlrewa.com PAN NO.AAACV7757J \* CIN: L31300MP1983PLC002134 GSTIN: 23AAACV7757J1Z00

8 JUL 2024

VTL/CS/24-25/Reg-34(2)(f)

BSE Ltd. Corporate Relationship Department, 1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, P.J. Towers, Dalal Street, Fort, **MUMBAI-400 001**  The Manager, Listing Department, The National Stock Exchange of India Ltd, Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), **MUMBAI-400 051** 

# Company's Scrip Code: 517015

**Company's Scrip Code: VINDHYATEL** 

Dear Sirs,

# Sub: Business Responsibility and Sustainability Report for the financial year 2023-24 pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report ('BRSR') for the financial year 2023-24.

The BRSR Report forming part of the Annual Report is also available on the website of the Company, <u>https://www.vtlrewa.com.</u>

This is for your information and records.

Thanking you,

Yours faithfully, For Vindhya Telelinks Limited

(Dinesh Kapoor) Company Secretary

Encl: As above











Works: i) Plot No.1, Udyog Vihar, P.O. Chorhata, Rewa-486006(M.P.) ii) Plot No.1-C & 1-D, Udyog Vihar, P.O. Chorhata, Rewa-486006(M.P.)



# **BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT**

#### [Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015]

The present report has been formulated in accordance with the SEBI Guidelines for Business Responsibility and Sustainability Reporting (BRSR). Its principal aim is to enhance transparency by showcasing how businesses generate value through active contributions to a sustainable economy. The report serves to emphasize our steadfast dedication to fostering sustainable development and creating enduring value for our stakeholders.

### SECTION A: GENERAL DISCLOSURES

### I. DETAILS OF THE ENTITY

| S.<br>No. | Particulars  | Response  |  |  |  |  |  |
|-----------|--|---|--|--|--|--|--|
| 1.        | Corporate identity Number (CIN) of the Entity  | L31300MP1983PLC002134   |  |  |  |  |  |
| 2.        | Name of the Entity   | Vindhya Telelinks Limited   |  |  |  |  |  |
| 3.        | Year of incorporation  | 1983  |  |  |  |  |  |
| 4.        | Registered office address  | Udyog Vihar, P.O. Chorhata,<br>Rewa- 486006 (M.P.), India   |  |  |  |  |  |
| 5.        | Corporate address  | 5 <sup>th</sup> Floor, Signature Tower III, Tower 'C',<br>Sector 15-II, N.H-8, Near 32 <sup>nd</sup> Avenue,<br>Gurugram, Haryana - 122001, India |  |  |  |  |  |
| 6.        | E-mail   | headoffice@vtlrewa.com  |  |  |  |  |  |
| 7.        | Telephone  | +91 7662 400400   |  |  |  |  |  |
| 8.        | Website  | https://www.vtlrewa.com   |  |  |  |  |  |
| 9.        | Financial year for which reporting is being done   | 2023-24   |  |  |  |  |  |
| 10.       | Name of the Stock Exchange(s) where shares are listed  | BSE Limited (BSE)<br>National Stock Exchange of India Limited (NSE)   |  |  |  |  |  |
| 11.       | Paid-up Capital  | ₹118,508,630 (Divided into 11850863 equity shares of ₹10/- each.  |  |  |  |  |  |
| 12.       | Name and contact details (telephone, email<br>address) of the person who may be contacted<br>in case of any queries on the BRSR report   | Shri Y.S. Lodha<br>Managing Director & CEO<br>Phone: +91 9404098160<br>e-mail: headoffice@vtlrewa.com   |  |  |  |  |  |
| 13.       | Reporting boundary - Are the disclosures under<br>this report made on a standalone basis (i.e., only<br>for the entity) or on a consolidated basis (i.e. for<br>the entity and all the entities which form a part of<br>its consolidated financial statements, taken<br>together). | The disclosures under this report are made on standalone basis, unless otherwise specified.   |  |  |  |  |  |
| 14.       | Name of assurance provider   | Not Applicable  |  |  |  |  |  |
| 15.       | Type of assurance obtained   | Not Applicable  |  |  |  |  |  |

#### II. PRODUCTS/SERVICES

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

| :<br>N | S.<br>No. | Description of Main<br>Activity | Description of Business Activity  | % of Turnover<br>of the entity |
|--------|-----------|---------------------------------|---|--------------------------------|
|        | 1.        | Manufacturing                   | Electrical equipment, General Purpose and Special purpose<br>Machinery & equipment, Transport equipment | 13.78%                         |
|        | 2.        | Construction                    | Roads, Railways, Utility projects   | 86.22%                         |



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

| S.<br>No. | Product/Service   | NIC Code*       | % of total Turnover<br>contributed |
|-----------|---|-----------------|------------------------------------|
| 1.        | Manufacturing of Telecommunication Cables including Jelly Filled<br>Copper Cables, Optical Fibre Cables, Solar PV Cables, Railway<br>Signalling and Quad Cables, Power Cables and other telecom fibre<br>accessories. | 31300;<br>33201 | 13.78%                             |
| 2.        | Engineering, Procurement & Construction (EPC) business in the key infrastructure sectors viz. Telecom, Power, Water Supply & Irrigation, Gas Pipeline and System Integration.   | 45203;<br>45204 | 86.22%                             |

\* Alphabetic Index 5 digit as prescribed by The Ministry of Statistics and Programme Implementation (MOSPI) in terms of Guidance Note on BRSR Reporting issued by SEBI.

#### **III. OPERATIONS**

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

| Location      | Number of plants   | Number of offices  | Total |
|---------------|--------------------|--------------------|-------|
| National      | Cable Business - 1 | Cable Business - 2 | 3     |
|               | EPC Business - 0   | EPC Business - 8   | 8     |
| International | Nil                | Nil                | Nil   |

### 19. Markets served by the entity:

#### a) Number of locations

| Locations                        | Number   |
|----------------------------------|--|
| National (No. of States)         | The Cable Business Segment operates in 25 states and 4 Union territories, while the EPC Business Segment operates in 20 states and 4 Union Territories. This highlights a strong national market presence, reaching a substantial portion of states and strengthening the entity's overall domestic market access. |
| International (No. of Countries) | At the international level, the Cable Business Segment extends its services to 17 countries.   |

#### b) Contribution of exports:

What is the contribution of exports as a percentage of the total turnover of the entity? 1.53%

#### c) Type of Customers

| A brief on types of | The Company operates in two Business Segments, namely Cable manufacturing and EPC (Engineering, Procurement, and Construction).   |
|---------------------|---|
| customers           | Cable Manufacturing:  |
|                     | We supply high-quality Telecom and Power Cables to various customers consisting of different<br>Government Departments and Private Sector Telecom Companies who rely on our cables for<br>their communication infrastructure needs. We are proud to be a trusted supplier to these esteemed<br>government organizations.  |
|                     | In addition to government departments, we also cater to the requirements of the Railways. Our cables play a crucial role in ensuring efficient and reliable communication and power transmission within the vast railway network. By providing cables specifically designed for railway applications, we contribute to the smooth functioning of the transportation system.             |
|                     | Telecom Operators form another significant customer segment for our Cable Business. We understand the importance of seamless connectivity in today's digital age, and we supply top-notch cables that enable telecom operators to deliver reliable voice and data services to their customers. Our cables undergo rigorous testing to meet the stringent standards set by the industry. |
|                     | Furthermore, we are actively involved in the renewable energy sector by supplying Solar PV Cables. These cables are essential components of solar power installations and enable the efficient transmission of direct current generated from solar panels. By serving the renewable energy industry, we contribute to the growth of sustainable and clean energy sources.               |

| Engineering, Procurement, and Construction:   |
|---|
| EPC (Engineering, Procurement, and Construction) Business Segment boasts an impressive customer base encompassing various sectors.  |
| We are proud to be associated with the Central and State Government bodies, as our Company has successfully bid for and won several contract / tenders. The trust placed in us by government organizations highlights our ability to deliver on large-scale projects and meet stringent quality standards. Through our partnership with the government, we contribute to the development and modernization of public infrastructure in the country. |
| Public Sector Undertakings also form an integral part of our customer base. These organizations, which play a vital role in various sectors such as telecom, water, irrigation, power, oil and gas, system integration etc. rely on our expertise for their engineering and construction needs.   |
| Additionally, we serve Private Sector Corporates, catering to their diverse engineering and construction requirements. We offer customized solutions that meet the specific needs of private sector companies, enabling them to enhance their operational efficiency and achieve their project goals.   |
| Under the Company's IP-1 license for establishing a comprehensive optical fibre cable network, numerous telecom operators have been reliant on the network infrastructure developed by the Company. The network has been gradually expanded to encompass new geographical areas within India, thereby extending its coverage.   |

#### **IV. EMPLOYEES**

# 20. Details at the end of the year of financial year:

## a) Employees and workers (including differently abled):

| S.  | Particulars              | Total (A) | Male    |           | Female  |           |  |
|-----|--------------------------|-----------|---------|-----------|---------|-----------|--|
| No. |                          |           | No. (B) | % (B / A) | No. (C) | % (C / A) |  |
|     | Emp                      | oloyees   |         |           |         |           |  |
| 1.  | Permanent (D)            | 353       | 348     | 98.58%    | 5       | 1.42%     |  |
| 2.  | Other than Permanent (E) | 2247      | 2215    | 98.58%    | 32      | 1.42%     |  |
| 3.  | Total employees (D + E)  | 2600      | 2563    | 98.58%    | 37      | 1.42%     |  |
|     | We                       | orkers    |         |           |         |           |  |
| 1.  | Permanent (F)            | 99        | 99      | 100%      | 0       | 0%        |  |
| 2.  | Other than Permanent (G) | 158       | 158     | 100%      | 0       | 0%        |  |
| 3.  | Total workers (F + G)    | 257       | 257     | 100%      | 0       | 0%        |  |

### b) Differently abled Employees and workers:

| S.  | Particulars                               | Total (A)    | Male    |           | Female  |           |
|-----|---|--------------|---------|-----------|---------|-----------|
| No. |   |              | No. (B) | % (B / A) | No. (C) | % (C / A) |
|     | Differently A                             | bled Employe | es      |           |         |           |
| 1.  | Permanent (D)                             | 1            | 1       | 100%      | 0       | 0%        |
| 2.  | Other than Permanent (E)                  | 0            | 0       | 0%        | 0       | 0%        |
| 3.  | Total differently abled employees (D + E) | 1            | 1       | 100%      | 0       | 0%        |
|     | Differently                               | Abled Worke  | rs      |           |         |           |
| 1.  | Permanent (F)                             | 0            | 0       | 0%        | 0       | 0%        |
| 2.  | Other than Permanent (G)                  | 0            | 0       | 0%        | 0       | 0%        |
| 3.  | Total differently abled workers (F + G)   | 0            | 0       | 0%        | 0       | 0%        |



| Category                 | Total (A) | No. and percentage of Females |           |
|--------------------------|-----------|-------------------------------|-----------|
|                          |           | No. (B)                       | % (B / A) |
| Board of Directors       | 10        | 2                             | 20%       |
| Key Management Personnel | 3         | 0                             | 0%        |

## 22. Turnover rate for permanent employees and workers:

## (Disclose trends for the past 3 years)

| Category            |       | FY 2023-24<br>(Turnover rate in current FY) |       | FY 2022-23<br>(Turnover rate in previous FY) |        | (Turnov | FY 2021-22<br>ver rate in t<br>the previo | he year |       |
|---------------------|-------|---|-------|--|--------|---------|---|---------|-------|
|                     | Male  | Female                                      | Total | Male   | Female | Total   | Male                                      | Female  | Total |
| Permanent Employees | 5.30% | 0   | 5.30% | 3.17%  | 0      | 3.17%   | 0.80%                                     | 0       | 0.80% |
| Permanent Workers   | 4.80% | 0   | 4.80% | 1.58%  | 0      | 1.58%   | 0   | 0       | 0%    |

### V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

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

| S.<br>No. | Name of the holding /<br>subsidiary / associate<br>companies / joint ventures (A) | Indicate whether<br>holding/ Subsidiary/<br>Associate/ Joint<br>Venture | % of shares held<br>by listed entity | Does the entity indicated at<br>column A, participate in the<br>Business Responsibility<br>initiatives of the listed<br>entity? (Yes/No) |
|-----------|---|---|--------------------------------------|--|
| 1.        | August Agents Limited   | Subsidiary  | 100.00                               | No   |
| 2.        | Insilco Agents Limited  | Subsidiary  | 100.00                               | No   |
| 3.        | Laneseda Agents Limited   | Subsidiary  | 100.00                               | No   |
| 4.        | Birla Visabeira Private Limited   | Joint Venture   | 40.00                                | No   |
| 5.        | Punjab Produce Holdings Limited   | Associate   | 48.00                                | No   |
| 6.        | Universal Cables Limited  | Associate   | 23.85                                | No   |
| 7.        | Birla Corporation Limited   | Associate   | 8.29                                 | No   |

### VI. CORPORATE SOCIAL RESPONSIBILITY (CSR) DETAILS

| 24. | S.<br>No. | Requirement   | Response |
|-----|-----------|---|----------|
|     | 1.        | Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) | Yes      |
|     | 2.        | Turnover (in ₹ Lakhs)   | 4,08,653 |
|     | 3.        | Net worth (in ₹ Lakhs)  | 1,21,939 |



\*

#### VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

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

|   |  | (Curre  | FY 2023-24<br>Int Financial Y   | 'ear)   |   | FY 2022-23<br>us Financial N  | (ear)   |
|---|--|---|---|---------|---|---|---------|
| Stakeholder<br>group from<br>whom<br>complaint is<br>received | Grievance Redressal Mechanism in<br>Place (Yes/No) (If yes, then provide<br>web-link for grievance redress<br>policy)* | Number of<br>complaints<br>filed during<br>the year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks | Number of<br>complaints<br>filed during<br>the year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks |
| Communities   | Yes  | 0   | 0   | -       | 0   | 0   | -       |
| Investors<br>(other than<br>shareholders)                     | Yes<br>https://www.vtlrewa.com/investors-services.html   | 0   | 0   | -       | 0   | 0   | -       |
| Shareholders  | Yes<br>https://www.vtlrewa.com/investors-services.html   | 3   | 0   | -       | 4   | 0   | -       |
| Employees<br>and workers                                      | Yes  | 0   | 0   | -       | 0   | 0   | -       |
| Customers   | Yes  | 0   | 0   | -       | 0   | 0   | -       |
| Value Chain<br>Partners                                       | Yes  | 0   | 0   | -       | 0   | 0   | -       |
| Others(please specify)  | -  | -   | -   | -       | -   | -   | -       |

The Company has implemented a Stakeholder Management Policy to address concerns and grievances from internal and external stakeholders efficiently. For further details, refer to the Stakeholder Management Policy available at given weblink: https://www.vtlrewa.com/pdf/Stakeholder-Management-Policy.pdf.

#### 26. 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, S<br>S | Material<br>issue<br>identified | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the<br>risk / opportunity   | In case of risk, approach<br>to adapt or mitigate  | Financial implications of the risk<br>or opportunity (Indicate positive or<br>negative implications)  |
|-----------|---------------------------------|---|---|--|---|
| ÷         | Footprint of<br>operations      | Risk &<br>Opportunity                               | <b>RISK</b><br>The Company's only limited activities poses risks to the local environment and surrounding communities, including biodiversity impacts, emissions into the air, water discharges, natural resource consumption, and waste generation. Managing and accessing these environmental risks are crucial to avoid potential legal and reputational issues.<br><b>OPPORTUNITY</b><br>There are opportunities for the Company to address these risks and enhance its reputation by implementing sustainable construction practices, conducting comprehensive environmental impact assessments, engaging stakeholders, and investing in innovation and research. By embracing these opportunities, the Company to the industs, comply with regulations, and position itself as a responsible and sustainable leader in the industry.  | The Company is actively mitigating<br>the risk associated with footprints of<br>operations by:<br>Implementing robust<br>environmental management<br>systems;<br>Conducting regular<br>assessments; and<br>Adopting sustainable practices<br>through responsible resource<br>consumption, waste reduction<br>initiatives, and stakeholder<br>engagement. | <b>NEGATIVE</b><br>The financial implications of the identified risk include potential negative impacts such as increased costs for addressing environmental issues, potential fines or penalties for non-compliance with regulations, and potential legal expenses. These financial implications can lead to a decrease in profitability and cash flow if adequate measures are not taken to manage and mitigate environmental risks.<br><b>POSITIVE</b><br>Implementing sustainable construction practices and effectively managing environmental risks can enhance the Company's reputation and attractiveness to environmental risks can business opportunities, a competitive edge in obtaining new projects, and potentially higher project value. Additionally, proactive engagement with stakeholders and investment in research and innovation can drive efficiency, cost savings, and long-term financial sustainability. |
| ર્ભ       | Energy<br>Management            | Opportunity   | The identification of energy management as<br>an opportunity for the Company stems from<br>the potential benefits of enhancing overall<br>energy efficiency, diversifying energy sources,<br>and accessing alternative and renewable<br>energy. By implementing energy-efficient<br>technologies and systems, the Company can<br>reduce costs, improve operational efficiency,<br>and mitigate the risks associated with energy<br>price fluctuations. Furthermore, the<br>installation of a rooftop solar power plant<br>demonstrates the Company's commitment to<br>renewable energy, which not only reduces<br>dependence on conventional sources but also<br>aligns with sustainability goals. Embracing<br>energy management as an opportunity can<br>enhance competitiveness, contribute to a<br>greener future, and strengthen the Company's<br>environmental stewardship. |  | <b>POSITIVE</b><br>By enhancing overall energy efficiency, the Company can reduce energy consumption and associated costs, leading to potential cost savings and improved profitability. Diversifying energy sources and accessing alternative and renewable energy can also contribute to long-term financial sustainability by mitigating the risks of energy price fluctuations and reducing reliance on conventional energy sources. Additionally, investing in renewable energy management can positively impact the Company's financial performance and enhance its competitive position in the market.   |

| MP BIRLA |
|----------|
| GROUP    |

| Financial implications of the risk<br>or opportunity (Indicate positive or<br>negative implications) | <b>POSITIVE</b><br>By minimizing waste generation and promoting resource efficiency, the Company can reduce waste disposal costs, optimize material usage, and potentially generate revenue through the sale of reusable materials. Furthermore, complying with regulatory requirements mitigates the risk of fines and legal liabilities, while demonstrating a commitment to sustainable practices can enhance the Company's reputation, attract environmentally conscious clients, and contribute to long-term financial sustainability.   | NECATIVENegative impacts such as community<br>dissatisfaction, legal issues, and reputational<br>dissatisfaction, legal issues, and reputational<br>itigation expenses, and a loss of business<br>opportunities. Additionally, addressing<br>environmental and social impacts may require<br>additional investments in mitigation measures,<br>potentially impacting profitability and cash flow in<br>the short term.POSITIVE<br>By prioritizing community support. This can lead<br>  |
|--|---|---|
| In case of risk, approach<br>to adapt or mitigate  | ,   | The Company is committed to<br>mitigating the risk associated with<br>Community Development by:<br>Promoting community<br>development;<br>Respecting human rights; and<br>relations.<br>relations.  |
| Rationale for identifying the<br>risk / opportunity  | The Company has categorized waste<br>management as an opportunity by<br>implementing responsible waste<br>management practices, such as minimizing<br>waste generation and ensuring<br>environmentally responsible disposal.<br>Through meticulous waste segregation, reuse<br>of materials within its operations, and<br>responsible disposal through approved<br>vendors, the Company aims to minimize its<br>environmental footprint, conserve resources,<br>and comply with regulatory requirements. This<br>commitment to sustainable waste<br>management not only reduces potential<br>negative impacts but also presents<br>opportunities for cost savings, resource<br>efficiency, and enhanced environmental<br>stewardship. | The categorization of Community<br>Development (Human Rights & Community<br>Relations) as both a risk and an opportunity<br>stem from the potential impacts of the<br>Company's long-term construction activities<br>on local communities. Risks include<br>community dissatisfaction and potential legal<br>issues arising from environmental and social<br>impacts.<br>On the other hand, the opportunity lies in<br>engaging with stakeholders and prioritizing<br>community interests to foster positive<br>relationships, obtain a social license to<br>operate, enhance the Company's reputation,<br>and drive long-term business sustainability. |
| Indicate<br>whether risk<br>or opportunity<br>(R/O)  | Opportunity   | Risk &<br>Opportunity   |
| Material<br>issue<br>identified  | Waste<br>Management   | Community<br>Development  |
| ა. <mark>N</mark>  | <i>ю</i>  | 4.  |

VTL

| oach Financial implications of the risk<br>ate or opportunity (Indicate positive or<br>negative implications) | Company prioritizes workforce<br>h and safety by:<br>Implementing comprehensive<br>safety protocols;<br>Providing regular training<br>programs, and fostering a<br>strong safety culture;<br>Conducting risk assessments,<br>the Company's profitability and hindering its ability<br>ensuring compliance with<br>to secure future projects<br>continuously monitoring and<br>fimproving safety practices.  | <b>POSITIVE</b><br>By strategically selecting suppliers with lower carbon footprints and incorporating sustainable practices, the Company can potentially reduce costs associated with energy consumption, waste management, and compliance with environmental regulations. Furthermore, meeting the growing demand for sustainable products and services can open new market opportunities, attract environmentally conscious customers, and strengthen the Company's competitive position. Additionally, a positive environmental reputation can enhance brand value and customer loyalty, leading to increased sales and long-term financial sustainability.  |
|---|---|--|
| In case of risk, approach<br>to adapt or mitigate   | healt   |  |
| Rationale for identifying the<br>risk / opportunity   | The categorization of Workforce Health and The Company prioritizes workforce       Inter Categorization of Workforce         Safety as a risk is based on the high fatality       health and safety by:       Workplace         and injury rates in the EPC industry compared to other sectors, as well as the increased vulnerability of temporary workers due to lack vulnerability of temporary workers due to lack of training and experience. Failing to effectively manage these risks can result in human suffering, legal liabilities, and financial costs.       Norkplace         of training and experience. Failing to effectively manage these risks can result in human suffering, legal liabilities, and financial costs.       Conducting risk assessments, the Compare compliance with occupations; and costs.         costs.       Conducting risk assessments, improving safety practices. | The categorization of Materials Sourcing as<br>an opportunity is based on the potential to<br>reduce direct and indirect greenhouse gas<br>emissions and integrate value chain partner<br>considerations effectively into the Company's<br>business strategy. By strategically selecting<br>suppliers with lower carbon footprints,<br>promoting sustainable practices, and<br>incorporating responsible supply chain<br>management, the Company can enhance its<br>environmental reputation, attract<br>environmental vonscious customers, and<br>meet the growing demand for sustainable<br>products and services. This opportunity goals,<br>enhances operational efficiency, and<br>positively impacts the Company's long-term<br>financial performance. |
| Indicate<br>whether risk<br>or opportunity<br>(R/O)   | Risk  | Opportunity  |
| Material<br>issue<br>identified   | Workforce<br>Health and<br>Safety   | Materials<br>Sourcing  |
| S.<br>No.   | ່າ  | ۵  |

MP BIRLA GROUP

### 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.

| S.<br>No. |    | sclosure Questions   | P1  | P2  | P3  | P4  | P5  | P6  | P7   | P8                                       | P9  |
|-----------|----|--|---|---|---|---|---|---|--|--|---|
|           |    | Policy and m   | anager  | nent pr   | ocesse  | S   |   |   |  |  |   |
| 1.        | a) | Whether your entity's policy/policies cover<br>each principle and its core elements of the<br>NGRBCs. (Yes/No) | Yes   | Yes   | Yes   | Yes   | Yes   | Yes   | Yes  | Yes                                      | Yes   |
|           | b) | Has the policy been approved by the Board?<br>(Yes/No)   | Yes   | No  | No  | Yes   | No  | No  | Yes  | Yes                                      | No  |
|           |    | Particulars of the Policies  | Anti-Corruption or Anti-Bribery Policy                                  | Sourcing with Human Dignity Policy                              | Non-Discrimination, Diversity and Equal Opportunity Policy                                | Stakeholder Management Policy                                 | Modern Slavery Policy, Human Dignity Policy   | Sustainability Policy                                     | Policy on Responsible Advocacy                                 | Corporate Social Responsibility Policy   | Information Security Management System Policy |
|           | c) | Web Link of the Policies, if available   | https://www.vtirewa.com/pdf/Anti-Bribery-and-Anti-Corruption-Policy.pdf | https://www.vtirewa.com/pdf/VTL-Sourcing-with-Human-Dignity.pdf | https://www.vtirewa.com/pdf/Non-Discrimination-Diversity-and-Equal-Opportunity-Policy.pdf | https://www.vtlrewa.com/pdf/Stakeholder-Management-Policy.pdf | https://www.vtirewa.com/pdf/VTL-Modern-Slavery-Policy.pdf<br>https://www.vtirewa.com/pdf/VTL-Human-Dignity-Policy.pdf | https://www.vtlrewa.com/pdf/VTL-sustainability-policy.pdf | https://www.vtirewa.com/pdf/Policy-on-Responsible-Advocacy.pdf | https://www.vtlrewa.com/Policies/CSR.pdf | https://www.vtirewa.com/ISMS-Policy.pdf       |



| 2. | Whether the entity has translated the policy into procedures. (Yes / No)<br>Do the enlisted policies extend to your value chain  | descr<br>releva<br>and re | ibing clear step<br>ant policies are<br>equired SOPs a  | os and<br>comm<br>are in p  | actions<br>nunicate<br>place to   | for effected to t<br>ensur   | ective i<br>he emp<br>e imple  | mplem<br>loyees<br>menta  | entatio<br>and w<br>tion.   | n. The<br>orkers   |
|----|--|---------------------------|---|---|---|--|--|---|---|--|
| 0. | partners? (Yes/No)   | suitat                    | ole and reasor<br>ards for uniforr  | nable,  |   |  |  |   |   |  |
| 4. | Name of the national and international codes /<br>certifications/ labels / standards (e.g. Forest<br>Stewardship Council, Fairtrade, Rainforest<br>Alliance, Trustea) standards (e.g. SA 8000, OHSAS,<br>ISO, BIS) adopted by your entity and mapped to<br>each principle. |                           | ISO 9001 : 2015 - Quality Management Systems,<br>ISO/TS 22163:2017 - Quality Management Systems for International<br>Rail Industry,<br>TL 9000 (R 6.3 / 5.7H) - Quality Management Systems for<br>International Telecommunications Industry | ISO 45001 : 2018 - Occupational Health and Safety Management Systems 64 | Our Company's operations adhere to the National<br>Guidelines on Responsible Business Conduct (NGRBC) | ISO 45001 : 2018 - Occupational Health and Safety Management Systems <b>G4</b> | ISO 14001 : 2015 - Environment Management Systems<br>ISO 22301 : 2019 - Business Continuity Management Systems | Our Company's operations adhere to the National<br>Guidelines on Responsible Business Conduct (NGRBC) | Our Company's operations adhere to the National<br>Guidelines on Responsible Business Conduct (NGRBC) | ISO 27001 : 2013 - Information Security Management Systems |
|    |  |                           | icenses:  |   | 00  |  | <u> </u>   | 00  | 00  |  |
|    |  | 1. E<br>(<br>2. E         | BIS License for<br>Pt-1) : 1988<br>BIS License for<br>per IS 694:2010<br>BIS License for  | LT PV   | 'C Insul  | lated I  | lexible  | Cable   | s & Co  | rds as   |
|    |  |                           | Pt-1):1988<br>BIS License fo<br>roltages from 3<br>2):2011  | r XLPI  | E Insul   | ated I   | Power  | Cables  | s for w   | orking   |
|    |  | 1. S                      | r Product Cert<br>Solar PV Cable<br>Cable) from TU  | (As per<br>IV Rhe   | EN 506<br>inland  |  |  |   |   |  |
|    |  |                           | Electric cables f<br>,5 kV DC (As p   |   |   |  |  |   |   |  |



| 5. | Specific commitments, goals and targets set by the entity with defined timelines, if any.   |            | ing the financial year 2024-25, the Company will continue to focus the following parameters:  |
|----|---|------------|---|
|    |   | 1.         | Transitioning into green energy and reducing electricity<br>consumption from the grid: The Company aims to reduce its<br>reliance on grid electricity through various means such as<br>implementing energy-efficient technologies, optimizing energy<br>usage and exploring renewable energy sources.   |
|    |   | 2.         | <b>Monitoring and evaluating E, S, &amp; G parameters:</b> The Company intends to actively monitor and evaluate the performance and risks associated with Environmental (E), Social (S), and Governance (G) parameters. This would help the Company in identifying areas for improvement and mitigate risks associated with sustainability issues.  |
|    |   | 3.         | <b>CO2 Emission Reduction in Construction Activities:</b> To accomplish this goal, we are committed to adopting and deploying state-of-the-art technologies, practices, and processes that effectively mitigate the release of CO2 during our construction operations. Our focus is on utilizing the best available means to significantly reduce the environmental impact associated with our activities, thus contributing to the global efforts towards carbon footprint reduction and environmental sustainability. By prioritizing the reduction of CO2 emissions, we aim to demonstrate our dedication to responsible environmental stewardship in all aspects of our operations. |
| 6. | Performance of the entity against the specific<br>commitments, goals and targets along-with<br>reasons in case the same are not met | imp<br>the | e Company acknowledges its responsibility to make a positive<br>act on communities by pinpointing the main areas of focus and<br>performance towards the above commitments is monitored on a<br>ular basis, and adequate actions are taken, wherever required.  |
|    |   | The        | e performance of our goals set during FY 2022-23 stands as;   |
|    |   | 1.         | Establishing and maintaining systematic sustainability databases: The Company has established an internal database to systematically assess the sustainability issues.  |
|    |   | 2.         | <b>Reducing electricity consumption from the grid:</b> In comparison to last year, the overall consumption from grid reduced to the extent of 12%.  |
|    |   | 3.         | <b>Monitoring and evaluating E, S, &amp; G parameters:</b> The Board on an annual basis monitors and evaluates the ESG parameters.  |
|    |   | 4.         | Strengthening the training division and educating employees: The training programs has increased by 20% as compared to the last year.   |
|    |   | 5.         | <b>CO2 Emission Reduction in Construction Activities:</b> The overall reduction in the CO2 emission has been 10%. Further, it is highlighted that during FY 2023-24, the Company avoided 2,304 MT of CO2 emissions by adopting various green practices.   |
|    |   | 6.         | <b>Ensuring Full Compliance with Policies and Zero Tolerance</b><br><b>for Bribery and Unethical Practices:</b> The Zero tolerance for<br>bribery and unethical practices are fully functional and there are<br>no reported cases in the last year.   |

|    | Governance, le  | eadership and oversight   |  |  |  |  |  |  |  |
|----|---|---|--|--|--|--|--|--|--|
| 7. | Statement by director responsible for the business<br>responsibility report, highlighting ESG related<br>challenges, targets and achievements | "I am honoured to update you on our Company's progress in tackling<br>key Environmental, Social, and Governance (ESG) challenges. I am<br>proud to announce that our dedication to sustainability has resulted<br>in substantial improvements in our operations, benefiting the<br>environment, our stakeholders, and the communities we serve.   |  |  |  |  |  |  |  |
|    |   | We have actively engaged with and invested in local communities<br>through a comprehensive Corporate Social Responsibility (CSR)<br>framework. This framework encompasses diverse focus areas such<br>as animal welfare, promoting preventive healthcare and sanitation<br>facilities, training to promote sports activities, promoting education<br>including education relating to culture, special education, employment-<br>enhancing vocational skills and livelihood enhancement projects. By<br>investing in these critical areas, we actively contribute to the well-<br>being of our planet and society. |  |  |  |  |  |  |  |
|    |   | We strongly believe in the importance of continuous improvement,<br>which is why we are setting new targets for the future. Our ultimate<br>goal is to become a leading force in sustainability, not just within our<br>industry, but across all sectors. By exemplifying best practices in ESG,<br>we aim to inspire positive change and be recognized as pioneers in<br>creating a better world."   |  |  |  |  |  |  |  |
|    |   | Y.S. Lodha (Managing Director & CEO)  |  |  |  |  |  |  |  |
| 8. | Details of the highest authority responsible for<br>implementation and oversight of the Business<br>Responsibility policy(ies).               | Shri Y.S. Lodha<br>Managing Director and CEO<br>DIN: 00052861   |  |  |  |  |  |  |  |
| 9. | Board/ Director responsible for decision making<br>on sustainability related issues? (Yes / No). If yes,                                      | The primary responsibility for executing and supervising the Business Responsibility policies rests with Shri Y.S. Lodha (DIN: 00052861), who serves as the Managing Director and CEO of the Company.   |  |  |  |  |  |  |  |
|    | provide details   | The following committees of the Board of Directors are responsible to take decisions on sustainability related issues;  |  |  |  |  |  |  |  |
|    |   | <ul> <li>CSR Committee - Formulation and recommendation of the CSR<br/>policy to the Board and monitoring of CSR budget, activities and<br/>expenditure.</li> </ul>   |  |  |  |  |  |  |  |
|    |   | <ul> <li>Risk Management Committee - Supports the Board in directing<br/>the risk management process, the controls and risk tolerance. It<br/>makes recommendations related to risk mitigation and reviews<br/>the Company's risk governance system.</li> </ul>   |  |  |  |  |  |  |  |
|    |   | <ul> <li>Stakeholders Relationship Committee - Evaluates the statutory<br/>compliances and investor services concerning payment of<br/>dividend, security holders grievances etc.</li> </ul>  |  |  |  |  |  |  |  |

# 10. Details of Review of NGRBCs by the Company:

| Subject for Review  |  | Indicate whether review was undertaken<br>by Director / Committee of the Board/<br>Any other Committee<br>P1 P2 P3 P4 P5 P6 P7 P8 P9 |            |                |            |            |            |       |            |           |    |    |    | nnua<br>other |           |    |    |            |
|---|--|--|------------|----------------|------------|------------|------------|-------|------------|-----------|----|----|----|---------------|-----------|----|----|------------|
|   | P1   | P2   | <b>P</b> 3 | <b>P</b> 4     | <b>P</b> 5 | <b>P</b> 6 | <b>P</b> 7 | P8    | <b>P</b> 9 | <b>P1</b> | P2 | P3 | P4 | P5            | <b>P6</b> | P7 | P8 | <b>P</b> 9 |
| Performance against above policies and follow up action   | Yes, performance review was undertaken by Annually Board of Directors. |  |            |                |            |            |            |       |            |           |    |    |    |               |           |    |    |            |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | stati<br>princ   | utory<br>ciples  | requ       | uirem<br>revie | ents       |            | vant       | to th | ese        |           |    |    |    |               |           |    |    |            |

### 11. Independent assessment/ evaluation of the working of its policies by an external agency:

| Has the entity carried out independent   |  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | <b>P</b> 9 |  |
|--|--|----|----|----|----|----|----|----|------------|--|
| assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency. | An extensive internal management evaluation process is in place to<br>thoroughly assess all policies. Subsequently, the Board of Directors<br>approves these policies based on the outcomes of the evaluation. |    |    |    |    |    |    |    |            |  |
|  | The Company has not undertaken any external assessment<br>evaluation of the effectiveness of its policies during the report<br>period.   |    |    |    |    |    |    |    |            |  |

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

| Questions   | P1             | P2 | P3 | P4 | P5 | P6 | P7 | P8 | <b>P</b> 9 |
|---|----------------|----|----|----|----|----|----|----|------------|
| The entity does not consider the principles material to its business (Yes/No)   |                |    |    |    |    |    |    |    |            |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | 1              |    |    |    |    |    |    |    |            |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No)                         | Not Applicable |    |    |    |    |    |    |    |            |
| It is planned to be done in the next financial year (Yes/<br>No)  |                |    |    |    |    |    |    |    |            |
| Any other reason (please specify)   |                |    |    |    |    |    |    |    |            |

#### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

The purpose of this section is to assist organizations in showcasing their proficiency in integrating principles and core elements into critical processes and decisions. The Company has duly provided all mandatory disclosures as per the BRSR framework.

# 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<br>of training and<br>awareness<br>programmes held | Topics / principles covered under<br>the training and its impact  | % age of persons<br>in respective<br>category covered<br>by the awareness<br>programmes |
|--------------------------------------|---|---|---|
| Board of Directors                   | 1   | Code of Conduct and Corporate Social Responsibility   | 100%  |
| Key Managerial Personnel             | 1   | Code of Conduct and Corporate Social Responsibility   | 100%  |
| Employees other than<br>BOD and KMPs | <u>Cable Business</u><br>19                                     | Awareness of BCMS, Cable Failure, ISMS, ISO<br>9001, ISO 45001, IMS, TL9000 Alert, 5S, MSDS,<br>Fire Safety and Disaster Management, Height Work,<br>Material Handling & Placement, Child Labour,<br>Environment Pollution, Importance of Ozone Layer<br>& their Conservation, Health & Well Being,<br>Measurement Uncertainty and OJT. | 100%  |



| Segment | Total number<br>of training and<br>awareness<br>programmes held | Topics / principles covered under<br>the training and its impact   | % age of persons<br>in respective<br>category covered<br>by the awareness<br>programmes |
|---------|---|--|---|
|         | <u>EPC Business</u><br>52                                       | Code of Conduct, Knowledge on Conflict of Interest,<br>Fire Safety and Disaster Management, Work at<br>height, Scaffolding, First Aid (CPR), Safe driving,<br>Monsoon Safety, Work Permit System, Lifting<br>Operation, Shut down Safety, Excavation Safety,<br>Electrical Safety, Tools and Tackles, Material<br>Handling & Placement, Vehicle movement, DTR<br>Installation, House Keeping, Emergency Response<br>Plan, POSH Training. |   |
| Workers | <u>Cable Business</u><br>25                                     | Awareness of BCMS, Cable Failure, ISMS, ISO<br>9001, MSDS, Fire Safety, Height Work, Child<br>Labour, Environment Pollution, IMS, Importance of<br>Ozone Layer & their Conservation and OJT.   | 100%  |
|         | EPC Business<br>156   | Code of Conduct, Knowledge on Conflict of Interest,<br>Fire Safety and Disaster Management, Work at<br>height, Scaffolding, First Aid (CPR), Safe driving,<br>Monsoon Safety, Work Permit System, Lifting<br>Operation, Shut down Safety, Excavation Safety,<br>Electrical Safety, Tools and Tackles, Material<br>Handling & Placement, Vehicle movement, DTR<br>Installation, House Keeping, Emergency Response<br>Plan, POSH Training. | 89%   |

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:

| MONETARY        |                    |   |                    |                   |  |  |
|-----------------|--------------------|---|--------------------|-------------------|--|--|
| Particulars     | NGRBC<br>Principle | Name of the regulatory/<br>enforcement agencies/<br>judicial institutions | Amount<br>(In INR) | Brief of the Case | Has an appeal<br>been preferred?<br>(Yes/No) |  |
| Penalty/ Fine   | NIL                | NA  | NIL                | NA                | NA   |  |
| Settlement      | NIL                | NA  | NIL                | NA                | NA   |  |
| Compounding fee | NIL                | NA  | NIL                | NA                | NA   |  |

| NON-MONETARY |   |    |    |    |  |
|--------------|---|----|----|----|--|
| Particulars  | NGRBC         Name of the regulatory/         Brief of         Has an ap           Principle         enforcement agencies/         the Case         been prefer           judicial institutions         (Yes/No |    |    |    |  |
| Imprisonment | NIL   | NA | NA | NA |  |
| Punishment   | NIL   | NA | NA | NA |  |

The Company is dedicated to maintaining ideal ethical and legal standards in all operations. As a result, neither the Company nor its directors or key managerial personnel (KMPs) have faced fines, penalties, awards, compounding fees, or settlement amounts in any proceedings.

# 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 |  |  |  |
|--|--|--|--|
| This particular section is not applicable to the Company                         |  |  |  |

### 4. Anti-corruption or Anti-bribery policy:

| Does the entity have an anti-corruption or anti-<br>bribery policy? If yes, provide details in brief and<br>if available, provide a web-link to the policy. | Yes, the Company has developed a comprehensive Anti-Corruption<br>or Anti-Bribery Policy, showcasing our unwavering dedication to<br>maintaining the highest ethical standards throughout our business<br>operations and fostering a climate of transparency and equitable<br>business practices. This policy reflects our firm commitment to<br>establishing and enforcing robust measures to detect, prevent, and<br>combat corrupt activities, including bribery. |
|---|--|
|   | For detailed information and access to the policy, kindly visit the following web link:<br>https://www.vtlrewa.com/pdf/Anti-Bribery-and-Anti-Corruption-Policy.pdf.  |
|   | This policy serves as a guiding framework to ensure that all<br>stakeholders, including employees, partners, and suppliers, are aware<br>of our zero-tolerance approach towards corruption and bribery, and<br>can actively contribute to the maintenance of a fair and ethical<br>business environment.   |

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

| Category  | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|-----------|--|---|
| Directors | NIL                                    | NIL                                     |
| KMPs      | NIL                                    | NIL                                     |
| Employees | NIL                                    | NIL                                     |
| Workers   | NIL                                    | NIL                                     |

No disciplinary action has been taken by any law enforcement agency against any director, KMP, employees or workers of our Company for charges of bribery or corruption. Our Company maintains a zero-tolerance policy towards corruption and is dedicated to upholding the highest standards of ethical conduct and transparency in all business dealings.

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

| Particulars  | FY 2023-24<br>(Current Financial Year) |         | FY 2022-23<br>(Previous Financial Year) |         |
|--|--|---------|---|---------|
|  | Number                                 | Remarks | Number                                  | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | NIL                                    | -       | NIL                                     | -       |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | NIL                                    | -       | NIL                                     | -       |

#### 7. Corrective Actions:

# 8. Number of days of account payable ((Accounts payable \*365) / Cost of goods/services procured) in the following format:

| Particulars                         | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|-------------------------------------|--|---|
| Number of days of accounts Payables | 76.83                                  | 124.45                                  |



#### 9. Open-ness of Business

Provide details of Concentration of purchase and sales with trading houses, dealers, and related parties along -with loans and advances & investments, with related parties, in the following format:

| Parameter                   | Metrics  | FY 2023-2024<br>(Current Financial Year) | FY 2022-2023<br>(Previous Financial Year) |
|-----------------------------|--|--|---|
| Concentration of purchases* | a. Purchases from trading houses as % of total purchases                                       | -  | -   |
|                             | b. Number of trading houses where purchases are made from                                      | -  | -   |
|                             | c. Purchases from top 10 Trading<br>houses as % of total purchases<br>from trading houses      | -  | -   |
| Concentration of Sales*     | a. Sale to dealers / distributed as % of total sales   | -  | -   |
|                             | b. Number of dealers / distributions to whom sales are made                                    | -  | -   |
|                             | c. Sales to top 10 dealers /<br>distributors as % of total sales to<br>dealers / distributors  | -  | -   |
| Share of RPTs in            | a. Purchases (Purchases with<br>related parties / Total Purchases)                             | 3.68%                                    | 10.52%                                    |
|                             | b. Sales (Sales to related parties /<br>Total Sales)   | 1.30%                                    | 0.56%                                     |
|                             | c. Loans & advances (Loans &<br>advances given to related parties<br>/ Total loans & advances) | 0.00%                                    | 0.00%                                     |
|                             | d. Investments<br>(Investments in related parties /<br>Total Investments made)                 | 48.90%                                   | 63.40%                                    |

\* The Company operates in B2B model and hence, the disclosure pertaining to purchases from trading houses and/or sales through dealers/distributors is not applicable.

# 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:

| Particulars | FY 2023-2024<br>(Current Financial Year)        | FY 2022-2023<br>(Previous Financial Year) | Details of improvements in<br>environmental and social impacts                               |  |  |  |
|-------------|---|---|--|--|--|--|
| R&D         | R&D expenditure is not accounted for separately |   |  |  |  |  |
| Сарех       | 1.98%   | NIL                                       | Energy Conservation, Reduction in<br>Water Pollution and Reduction in<br>consumption of Wood |  |  |  |

#### 2. Sustainable sourcing:

| -                                 | Yes, the Company have procedures in place for sustainable sourcing.   |
|-----------------------------------|---|
| procedures in place for           |   |
| sustainable sourcing?<br>(Yes/No) | The Company has successfully incorporated a Supplier Framework with the explicit objective of fostering sustainable sourcing practices. This comprehensive framework encompasses the meticulous evaluation and selection of suppliers, primarily based on three fundamental criteria, namely: |

|   | <ul><li>Quality</li><li>Pricing</li></ul>   |
|---|---|
|   | • Delivery  |
|   | Further, suppliers are evaluated and ranked according to their performance in relation to the aforementioned parameters.  |
|   | Additionally, the Company has established Environmental Requirements for its suppliers, which are communicated to them.   |
|   | During the supplier registration process, the Company conducts an evaluation to assess their suitability. A Supplier Registration Questionnaire is sent to suppliers to gather information regarding Quality, Environment, Occupational Health & Safety, and compliance with Statutory & Regulatory Requirements. |
|   | EPC Business:   |
|   | Within the framework of the EPC Business Segment, materials are procured using two distinct channels: direct sourcing and sourcing through contractors. Throughout the sourcing process, careful attention is given to the following factors:   |
|   | <ul> <li>Standards &amp; Specifications</li> <li>Contractor Selection</li> <li>Ongoing Contractor Monitoring</li> </ul>   |
|   | By incorporating these considerations into the sourcing procedures under the EPC Business Segment, the organization ensures that materials are procured in accordance with predefined standards and specifications while maintaining a robust system for contractor evaluation and monitoring.                    |
| If yes, what percentage<br>of inputs were sourced<br>sustainably? | 100%  |

## 3. Processes in place to reclaim products for reuse, recycle and safe disposal of products at the end of life:

| Describe the  | Cable Business:   |
|---|---|
| processes in place to<br>safely reclaim your<br>products for reusing,<br>recycling and<br>disposing at the end of | The Company ensures that the cables supplied to customers possess a minimum lifespan of 25-<br>30 years. To ensure transparency and proper handling of end-of-life treatment, customers are<br>provided with a comprehensive Material Safety Data Sheet (MSDS) that contains detailed<br>information on the appropriate procedures for disposal or treatment. |
| life, for (a) Plastics<br>(including packaging)<br>(b) E-waste (c)<br>Hazardous waste and                         | Given that the cables are predominantly utilized by industrial entities, the responsibility for the effective management of end-of-life treatment lies with the customers themselves. This entails adhering to the guidelines specified in the MSDS and complying with the relevant laws and regulations in force during that period.                         |
| (d) other waste.  | Regarding waste generated within the Company, stringent measures are implemented to ensure compliance with environmental laws and consent conditions. Specific waste categories are handled as follows:   |
|   | • <b>Plastic Waste:</b> The Company responsibly sells plastic waste to authorized recyclers, thereby promoting sustainable waste management practices.  |
|   | • <b>E-Waste:</b> In line with regulatory requirements, the Company sells electronic waste exclusively to authorized recyclers, ensuring proper recycling and disposal.   |
|   | <ul> <li>Acid Batteries: The Company follows a buy-back policy with Original Equipment Manufacturers<br/>(OEMs) to ensure the safe and environmentally sound disposal of acid batteries.</li> </ul>   |
|   | <ul> <li>Hazardous Waste: All hazardous waste generated is meticulously disposed of through<br/>authorized recyclers, adhering to strict guidelines and safety protocols.</li> </ul>  |
|   | • <b>Other Non-Hazardous Waste:</b> The Company adopts a responsible approach by selling non-<br>hazardous waste to trusted vendors who can appropriately handle and utilize the materials.   |

| EPC Business:  |  |
|--|--|
| Within the EPC Business Segment, two primary waste streams are generated:  |  |
| <ul><li>Construction &amp; Demolition waste</li><li>Metallic Scrap waste</li></ul>   |  |
| These waste materials are effectively managed through well-defined procedures. Construction & Demolition waste is reused wherever possible during ongoing operations, minimizing waste generation and promoting resource efficiency. |  |
| Metallic Scrap waste on the other hand is sold exclusively to authorized vendors who possess   |  |

Metallic Scrap waste, on the other hand, is sold exclusively to authorized vendors who possess the necessary expertise and infrastructure for proper recycling, disposal and utilization of these materials.

#### 4. Extended Producer Responsibility (EPR) plan:

Whether Extended Producer Responsibility (EPR) is applicable to the<br/>entity's activities (Yes / No). If yes, whether the waste collection plan<br/>is in line with the Extended Producer Responsibility (EPR) plan<br/>submitted to Pollution Control Boards? If not, provide steps taken to<br/>address the same.Extended Producer Responsibility (EPR) is<br/>applicable and the Company has obtained EPR<br/>registration under Importer category. The waste<br/>collection plan is in line with the EPR plan<br/>submitted to Pollution Control Boards.

# 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 | % of employees covered by |               |           |               |           |               |           |                    |           |                     |           |
|----------|---------------------------|---------------|-----------|---------------|-----------|---------------|-----------|--------------------|-----------|---------------------|-----------|
|          | Total (A)                 | Health ir     | nsurance  | Accident      | insurance | Maternity     | benefits  | Paternity Benefits |           | Day Care facilities |           |
|          |                           | Number<br>(B) | % (B / A) | Number<br>(C) | % (C / A) | Number<br>(D) | % (D / A) | Number<br>(E)      | % (E / A) | Number<br>(F)       | % (F / A) |
|          |                           |               |           | F             | Permanent | employees     | S         |                    |           |                     |           |
| Male     | 348                       | 348           | 100%      | 348           | 100%      | 0             | 0%        | 0                  | 0%        | 0                   | 0%        |
| Female   | 5                         | 5             | 100%      | 5             | 100%      | 5             | 100%      | 0                  | 0%        | 0                   | 0%        |
| Total    | 353                       | 353           | 100%      | 353           | 100%      | 5             | 1.42%     | 0                  | 0%        | 0                   | 0%        |
|          |                           |               |           | Other         | than Perm | anent emp     | loyees    |                    |           |                     |           |
| Male     | 2215                      | 2212          | 99.87%    | 2212          | 99.87%    | 0             | 0%        | 0                  | 0%        | 0                   | 0%        |
| Female   | 32                        | 32            | 100%      | 32            | 100%      | 32            | 100%      | 0                  | 0%        | 0                   | 0%        |
| Total    | 2247                      | 2244          | 99.87%    | 2244          | 99.87%    | 32            | 0.01%     | 0                  | 0%        | 0                   | 0%        |

#### B) Details of measures for the well-being of workers:

| Category | % of employees covered by |               |           |               |           |                    |           |                    |           |                     |           |
|----------|---------------------------|---------------|-----------|---------------|-----------|--------------------|-----------|--------------------|-----------|---------------------|-----------|
|          | Total (A)                 | Health in     | surance   | Accident      | insurance | Maternity benefits |           | Paternity Benefits |           | Day Care facilities |           |
|          |                           | Number<br>(B) | % (B / A) | Number<br>(C) | % (C / A) | Number<br>(D)      | % (D / A) | Number<br>(E)      | % (E / A) | Number<br>(F)       | % (F / A) |
|          | Permanent workers         |               |           |               |           |                    |           |                    |           |                     |           |
| Male     | 99                        | 99            | 100%      | 99            | 100%      | 0                  | 0%        | 0                  | 0%        | 0                   | 0%        |
| Female   | 0                         | 0             | 0%        | 0             | 0%        | 0                  | 0%        | 0                  | 0%        | 0                   | 0%        |
| Total    | 99                        | 99            | 100%      | 99            | 100%      | 0                  | 0%        | 0                  | 0%        | 0                   | 0%        |
|          |                           |               |           | Other t       | than Perr | nanent w           | orkers    |                    |           |                     |           |
| Male     | 158                       | 158           | 100%      | 158           | 100%      | 0                  | 0%        | 0                  | 0%        | 0                   | 0%        |
| Female   | 0                         | 0             | 0         | 0             | 0         | 0                  | 0%        | 0                  | 0%        | 0                   | 0%        |
| Total    | 158                       | 158           | 100%      | 158           | 100%      | 0                  | 0%        | 0                  | 0%        | 0                   | 0%        |



# C) Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format -

| Particulars   | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|---|--|---|
| Cost incurred on well-being measures as a % of total revenue of the Company | 0.08%                                  | 0.04%                                   |

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

| Benefits                | (Cu  | FY 2023-24<br>rrent Financial                              | Year)   | FY 2022-23<br>(Previous Financial Year)                        |  |   |  |
|-------------------------|--|--|---|--|--|---|--|
|                         | No. of<br>employees<br>covered as<br>a % of total<br>employees | No. of<br>workers<br>covered as<br>a % of total<br>workers | Deducted<br>and<br>deposited<br>with the<br>authority<br>(Y/N/N.A.) | No. of<br>employees<br>covered as<br>a % of total<br>employees | No. of<br>workers<br>covered as<br>a % of total<br>workers | Deducted<br>and<br>deposited<br>with the<br>authority<br>(Y/N/N.A.) |  |
| PF                      | 100%   | 100%   | Yes   | 100%   | 100%   | Yes   |  |
| Gratuity                | 100%   | 100%   | Yes   | 100%   | 100%   | Yes   |  |
| ESI*                    | 11.87%   | 0%   | Yes   | 79%  | 0%   | Yes   |  |
| Others - please specify | -  | -  | -   | -  | -  | -   |  |

\* The Company has Workmen Compensation Policy in place of ESI for all the Workers.

#### 3. Accessibility of workplaces:

| accessible to differently abled<br>employees and workers, as per the<br>requirements of the Rights of Persons<br>with Disabilities Act, 2016? If not, | Yes, our premises and offices are designed to accommodate employees with disabilities.<br>Currently, we have one differently abled employee, and we've made specific accommodations in both our factory premises and the Company's township where the employee resides. |
|---|---|
| whether any steps are being taken by the entity in this regard.   | These adaptations support the employee in navigating and performing their duties comfortably and efficiently, tailored to their individual needs and capabilities.  |

#### 4. Equal Opportunity Policy:

| Does the entity have an equal<br>opportunity policy as per the Rights of<br>Persons with Disabilities Act, 2016? If | Yes, the Company has adopted an Equal Opportunity Policy that ensures individuals of all age, religion, race, region, ethnicity, gender, ability, and sexual orientation work collectively in an environment that flourishes on originality. |
|---|--|
| so, provide a web-link to the policy.   | For more information regarding the Equal Opportunity Policy, please visit the following web link:<br>https://www.vtlrewa.com/pdf/Non-Discrimination-Diversity-and-Equal-Opportunity-Policy.pdf   |
|   | This policy document outlines the principles and guidelines that the Company<br>upholds to promote equal opportunities and non-discrimination within the<br>organization.  |

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

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



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 (If yes, then give details of the mechanism in brief)   |
|-------------------------|--|
| Permanent Workers       | Yes, the Company has instituted formal and structured mechanisms to receive and handle   |
| Other than              | grievances, providing employees and workers with a platform to express their concerns.   |
| Permanent Workers       | Various channels are available for grievance submission:   |
| Permanent<br>Employees  | • <b><u>Suggestion Boxes</u></b> : These anonymous boxes enable employees and workers to submit grievances or suggestions confidentially, fostering open communication.  |
| Other than<br>Permanent | • <b>Emails:</b> An official email address is provided for employees and workers to directly communicate grievances to relevant departments or designated personnel.   |
| Employees               | <ul> <li><u>Display Boards</u>: Mobile numbers of designated personnel responsible for addressing<br/>grievances are prominently displayed on boards within the premises, ensuring easy access<br/>and communication.</li> </ul> |
|                         | • <u>Site Safety Person's Interactions:</u> Daily interactions with the Site Safety Person offer employees and workers opportunities to voice safety concerns or other relevant issues.  |
|                         | • <u>Head of HR Interactions</u> : Regular interactions with the Head of HR create an open environment for discussing and resolving grievances.  |
|                         | Upon receiving a grievance, the Company adopts a responsive approach to address it promptly. Grievances undergo thorough examination, root cause analysis, and implementation of corrective measures.                            |

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

| Category                     | (1   | FY 2023-24<br>Current Financial Year)   |           | FY 2022-23<br>(Previous Financial Year)                         |   |           |  |
|------------------------------|--|---|-----------|---|---|-----------|--|
|                              | Total<br>employees/<br>workers in<br>respective<br>category(A) | No. of employees/<br>workers in respective<br>category, who are<br>part of association(s)<br>or Union (B) | % (B / A) | Total<br>employees /<br>workers in<br>respective<br>category(C) | No. of employees/<br>workers in respective<br>category, who are<br>part of association(s)<br>or Union (D) | % (D / C) |  |
| Total Permanent<br>Employees | 353  | 142   | 40.23%    | 341   | 156   | 45.75%    |  |
| Male                         | 348  | 140   | 40.23%    | 336   | 154   | 45.83%    |  |
| Female                       | 5  | 2   | 40.00%    | 5   | 2   | 40.00%    |  |
| Total Permanent<br>Workers   | 99   | 99  | 100%      | 104   | 104   | 100%      |  |
| Male                         | 99   | 99  | 100%      | 104   | 104   | 100%      |  |
| Female                       | 0  | 0   | 0%        | 0   | 0   | 0%        |  |

The aforementioned details are exclusive to the cable business, as the employees and workers within the EPC business segment are not affiliated with any association or recognized union.

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

| Category | FY 2023-24<br>(Current Financial Year) |               |           |                        |           | FY 2022-23<br>(Previous Financial Year) |                                  |           |                         |           |
|----------|--|---------------|-----------|------------------------|-----------|---|----------------------------------|-----------|-------------------------|-----------|
|          | Total (A)                              | On Hea<br>saf |           | I On Skill upgradation |           | Total (D)                               | On Health and<br>safety measures |           | On Skill<br>upgradation |           |
|          |  | No. (B)       | % (B / A) | No. (C)                | % (C / A) |   | No. (E)                          | % (E / D) | No. (F)                 | % (F / D) |
|          |  |               |           | Em                     | ployees   |   |                                  |           |                         |           |
| Male     | 2563                                   | 2466          | 96.22%    | 1864                   | 72.73%    | 1769                                    | 1769                             | 100%      | 1769                    | 100%      |
| Female   | 37                                     | 36            | 97.30%    | 36                     | 97.30%    | 28                                      | 28                               | 100%      | 28                      | 100%      |
| Total    | 2600                                   | 2502          | 96.23%    | 1900                   | 73.08%    | 1797                                    | 1797                             | 100%      | 1797                    | 100%      |



| Category | FY 2023-24<br>(Current Financial Year) |               |           |                         |           | FY 2022-23<br>(Previous Financial Year) |                                  |           |                         |           |
|----------|--|---------------|-----------|-------------------------|-----------|---|----------------------------------|-----------|-------------------------|-----------|
|          | Total (A)                              | On Hea<br>saf |           | On Skill<br>upgradation |           | Total (D)                               | On Health and<br>safety measures |           | On Skill<br>upgradation |           |
|          |  | No. (B)       | % (B / A) | No. (C)                 | % (C / A) |   | No. (E)                          | % (E / D) | No. (F)                 | % (F / D) |
|          |  |               |           | W                       | orkers    |   |                                  |           |                         |           |
| Male     | 257                                    | 250           | 97.28%    | 250                     | 97.28%    | 251                                     | 251                              | 100%      | 231                     | 92.03%    |
| Female   | 0                                      | 0             | 0%        | 0                       | 0%        | 0                                       | 0                                | 0%        | 0                       | 0%        |
| Total    | 257                                    | 250           | 97.28%    | 250                     | 97.28%    | 251                                     | 251                              | 100%      | 231                     | 92.03%    |

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

| Category  | (Cur      | FY 2023-24<br>rent Financial | Year)     | FY 2022-23<br>(Previous Financial Year) |         |           |  |
|-----------|-----------|------------------------------|-----------|---|---------|-----------|--|
|           | Total (A) | No. (B)                      | % (B / A) | Total (C)                               | No. (D) | % (D / C) |  |
| Employees |           |                              |           |   |         |           |  |
| Male      | 2563      | 2081                         | 81.19%    | 1769                                    | 1725    | 97.51%    |  |
| Female    | 37        | 30                           | 81.08%    | 28                                      | 26      | 92.86%    |  |
| Total     | 2600      | 2111                         | 81.19%    | 1797                                    | 1751    | 97.44%    |  |
| Workers   |           |                              |           |   |         |           |  |
| Male      | 257       | 245                          | 95.33%    | 251                                     | 231     | 92.03%    |  |
| Female    | 0         | 0                            | 0%        | 0                                       | 0       | 0%        |  |
| Total     | 257       | 245                          | 95.33%    | 251                                     | 231     | 92.03%    |  |

### 10. Health and safety management system:

| S.<br>No. | Particulars  | Response   |
|-----------|--|--|
| a)        | Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). | Yes, the Company has established an occupational health and safety management system that encompasses all facets of its operations. This system includes;  |
|           | If yes, the coverage such system?  | Employee and worker health,  |
|           |  | Safety training,   |
|           |  | <ul> <li>Hazard identification and risk assessment,</li> </ul>   |
|           |  | Incident reporting,  |
|           |  | Investigation,   |
|           |  | Ongoing monitoring and improvement.  |
| b)        | What are the processes used to identify work-related hazards and assess risks on a routine and non-        | The Company places utmost importance on identifying work-related hazards<br>and assessing risks to safeguard the safety and well-being of our employees.<br>To achieve this, we implement the following processes and procedures:  |
|           | routine basis by the entity?   | a) Routine activities are monitored through work safety analysis, standard operating procedures, and operational control plans.  |
|           |  | b) Non-routine activities are supervised using a seven-type work permit<br>system, covering hazardous activities such as hot work operations,<br>cold work activities, electrical installation and maintenance, working at<br>heights, confined space entry, and heavy lifting operations. |
|           |  | The Company is committed to minimizing the risks associated with non-<br>routine activities, preventing accidents and injuries, and creating a safe<br>and healthy work environment for all the employees and workers.   |



| S.<br>No. | Particulars  | Response   |
|-----------|--|--|
| c)        | Whether you have processes for<br>workers to report the work-related<br>hazards and to remove themselves<br>from such risks. (Y/N) | The Company has established robust mechanisms for workers to report<br>work-related hazards and protect themselves from risks. These mechanisms<br>include;  |
|           |  | <ul> <li>Clear reporting channels and procedures for employees to promptly<br/>communicate hazards, near-misses, and incidents.</li> </ul>   |
|           |  | <ul> <li>Comprehensive training and resources are provided to empower<br/>workers in identifying and reporting potential hazards effectively.</li> </ul>   |
|           |  | <ul> <li>Specific policies and procedures have been implemented to safeguard<br/>workers' rights to refuse unsafe work without facing retaliation or reprisal.</li> </ul>  |
| d)        | Do the employees/ worker of the entity<br>have access to non-occupational<br>medical and healthcare services?<br>(Yes/ No)         | The Company provides access to medical and healthcare services beyond<br>those directly related to occupational illnesses or injuries. These services<br>include health insurance coverage or access to medical services through<br>third-party providers. |

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

| Safety Incident/Number                                     | Category  | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|--|-----------|--|---|
| Lost Time Injury Frequency Rate (LTIFR)                    | Employees | 0                                      | 0                                       |
| (per one million-person hours worked)                      | Workers   | 29.64                                  | 86.84                                   |
| Total recordable work-related injuries                     | Employees | 0                                      | 0                                       |
|  | Workers   | 9                                      | 25                                      |
| No. of fatalities  | Employees | 0                                      | 0                                       |
|  | Workers   | 0                                      | 0                                       |
| High consequence work-related injury or ill-health         | Employees | 0                                      | 0                                       |
| (excluding fatalities) Including in the contract workforce | Workers   | 0                                      | 0                                       |

#### 12. Measures to ensure a safe and healthy workplace:

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

The Company has implemented robust operational controls to proactively identify and mitigate potential work-related hazards and associated risks. With a steadfast commitment to ensuring a safe and healthy workplace, the following comprehensive measures have been adopted:

- Daily health and safety briefing exercises
- On-the-job safety training through Site Safety Trainings
- Toolbox Trainings
- · Display of proper safety instructions on board and signages
- · Feedback and suggestions
- · Engaging in reactive monitoring activities

These measures aim to enhance the safety and well-being of all employees, mitigating the risk of work-related accidents or illnesses.

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

| Particulars        | FY 2023-24<br>(Current Financial Year) |     |         | FY 2022-23<br>(Previous Financial Year) |   |         |
|--------------------|--|-----|---------|---|---|---------|
|                    | Filed<br>during<br>the year            |     | Remarks | Filed<br>during<br>the year             | Pending<br>resolution at<br>the end of year | Remarks |
| Working Conditions | NIL                                    | NIL | -       | NIL                                     | NIL   | -       |
| Health & Safety    | NIL                                    | NIL | -       | NIL                                     | NIL   | -       |



#### 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%  |

These assessments were conducted in-house by the Company.

#### **15. Corrective Actions:**

| Provide details of any corrective action taken or underway to address | This section is considered not applicable as there |
|---|--|
| safety-related incidents (if any) and on significant risks / concerns | 0  |
| arising from assessments of health & safety practices and working     | arouse from the assessments.                       |
| conditions.   |  |

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

#### **ESSENTIAL INDICATORS:**

#### 1. Identification of stakeholders group:

| Describe the processes<br>for identifying key<br>stakeholder groups of<br>the entity | The Company has developed a Stakeholder Engagement Framework which augments the process of identifying them. The framework has dual aspect dimension which covers the stakeholder's interest as well as stakeholder's influence. On this basis, the stakeholders are identified and the modes as well as the level of engagements are also determined. |
|--|--|
|  | Further, the Company considers the following elements while identifying stakeholder groups:  |
|  | • <b>Dependency:</b> Groups or individuals who are directly or indirectly dependent on the organisation's activities.  |
|  | • <b>Responsibility:</b> Groups or individuals to whom the organisation has, or in the future may have, legal, commercial, operational or ethical / moral responsibilities.  |
|  | • Attention: Groups or individuals who need immediate attention from the organisation about financial, wider economic, social or environmental issues.   |
|  | • <b>Influence:</b> Groups or individuals who can have an impact on the organisations or a stakeholder's strategic or operational decision-making.   |

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

| Stakeholder<br>Group   | Whether<br>identified as<br>Vulnerable &<br>Marginalized<br>Group (Yes/<br>No) | Channels of communication<br>(Email, SMS, Newspaper,<br>Pamphlets, Advertisement,<br>Community Meetings, Notice<br>Board, Website), Other   | Frequency of<br>engagement<br>(Annually/ Half<br>yearly/Quarterly/<br>others - please<br>specify) | Purpose and scope of engagement<br>including key topics and concerns<br>raised during such engagement                               |
|------------------------|--|---|---|---|
| Shareholders           | No   | <ul> <li>Annual General Meeting,</li> <li>Shareholder meets,</li> <li>Email,</li> <li>Stock Exchange (SE)<br/>intimations,</li> <li>Annual report, quarterly<br/>results, media releases<br/>and Company's website</li> </ul> | Quarterly, Half<br>yearly and annually  | Share price appreciation, dividends,<br>profitability and financial stability,<br>robust ESG practices, risks, growth<br>prospects. |
| Employees &<br>Workers | No   | <ul> <li>Emails</li> <li>Team Engagement</li> <li>Engagement through<br/>Training Programs</li> <li>Notice Board</li> </ul>   | Periodically  | Hearing of all employee concerns<br>Conducting meetings People voice<br>meeting Suggestion Schemes<br>Conducting enquiries          |



| Stakeholder<br>Group                | Whether<br>identified as<br>Vulnerable &<br>Marginalized<br>Group (Yes/<br>No) | Channels of communication<br>(Email, SMS, Newspaper,<br>Pamphlets, Advertisement,<br>Community Meetings, Notice<br>Board, Website), Other | Frequency of<br>engagement<br>(Annually/ Half<br>yearly/Quarterly/<br>others - please<br>specify) | Purpose and scope of engagement<br>including key topics and concerns<br>raised during such engagement   |
|-------------------------------------|--|---|---|---|
| Customers                           | No   | <ul> <li>Emails</li> <li>Regular Meets</li> <li>Personal Visits/Interviews</li> <li>Satisfaction Surveys</li> </ul>                       | Regular   | Queries/suggestions / assurance/<br>complaints etc.<br>Understating the customers'<br>requirements  |
| Suppliers                           | No   | <ul><li>Emails,</li><li>Supplier meetings.</li></ul>  | Regular   | Queries/suggestions/ assurance/<br>complaints etc.<br>Raising our concerns with suppliers   |
| Government<br>and<br>Regulators     | No   | <ul> <li>Reporting / Filings;</li> <li>Submissions/ Applications;</li> <li>Industry forum meets.</li> </ul>                               | On periodical<br>basis as provided<br>under relevant<br>legislations                              | In relation to Compliances with<br>applicable laws, Industry concerns,<br>changes in regulatory frameworks,<br>skill and capacity building, employment. |
| Community                           | No   | <ul><li>Periodical Meets</li><li>Personal Visits</li></ul>  | Periodically  | Under CSR projects covering<br>Community development, livelihood<br>support, Animal welfare, Sanitation etc.  |
| Board of<br>Directors               | No   | <ul><li>Emails</li><li>Regular meetings</li></ul>   | Quarterly and on any event/need basis.  | Company's business operations, planning, strategies etc.  |
| Contractors                         | No   | <ul><li>Emails</li><li>Need based meetings</li><li>Periodical Reports</li></ul>   | Periodically  | Contractual Agreements,<br>Performance evaluation, Fair<br>and timely payment, Quality and<br>performance.  |
| Industry<br>& Trade<br>Associations | No   | <ul><li>Emails</li><li>Regular meetings</li><li>Periodical Reports</li></ul>  | Periodically  | Networking opportunities and industry specific updates  |
| Trade Unions                        | No   | <ul><li>Emails</li><li>Need based meetings</li></ul>  | Requirement basis.  | Collective Bargaining, Worker welfare,<br>Change in Employment practices,<br>Labour relations   |
| Subsidiaries                        | No   | <ul><li>Emails</li><li>Need based meetings</li><li>Periodical Reports</li></ul>   | Quarterly and need basis.   | Discussions on major Investment/<br>expansion plans', Sharing of<br>performance Data, facilitate decision<br>making on major topics.                    |

#### PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

#### **ESSENTIAL INDICATORS:**

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

| Particulars          | FY 2023-24         (Current Financial Year)         Total (A)       No. of employees/ workers         workers       covered (B) |          | FY 2022-23<br>(Previous Financial Year) |           |  |           |
|----------------------|---|----------|---|-----------|--|-----------|
|                      |   |          | % (B / A)                               | Total (C) | No. of<br>employees/<br>workers<br>covered (D) | % (D / C) |
|                      |   | Employee | s                                       |           |  |           |
| Permanent            | 353   | 320      | 90.65%                                  | 341       | 341  | 100%      |
| Other than permanent | 2247  | 2220     | 98.80%                                  | 1456      | 1456   | 100%      |
| Total Employees      | 2600  | 2570     | 98.85%                                  | 1797      | 1797   | 100%      |



| Particulars          | (Cı       | FY 2023-24<br>(Current Financial Year)                           |        |           | FY 2022-23<br>(Previous Financial Year)        |           |  |
|----------------------|-----------|--|--------|-----------|--|-----------|--|
|                      | Total (A) | Total (A)No. of<br>employees/<br>workers<br>covered (B)% (B / A) |        | Total (C) | No. of<br>employees/<br>workers<br>covered (D) | % (D / C) |  |
|                      |           | Workers  |        |           |  |           |  |
| Permanent            | 99        | 90   | 90.91% | 104       | 104  | 100%      |  |
| Other than permanent | 158       | 153  | 96.84% | 147       | 147  | 100%      |  |
| Total Workers        | 257       | 243  | 94.55% | 251       | 251  | 100%      |  |

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

| Category                | FY 2023-24<br>(Current Financial Year) |                          |           |                           | FY 2022-23<br>(Previous Financial Year) |           |                |           |                 |           |
|-------------------------|--|--------------------------|-----------|---------------------------|---|-----------|----------------|-----------|-----------------|-----------|
|                         | Total (A)                              | Equal to<br>Minimum Wage |           | More than<br>Minimum Wage |   | Total (D) | Equa<br>Minimu |           | More<br>Minimur |           |
|                         |  | No. (B)                  | % (B / A) | No. (C)                   | % (C / A)                               |           | No. (E)        | % (E / D) | No. (F)         | % (F / D) |
|                         |  |                          |           | Em                        | ployees                                 |           |                |           |                 |           |
| Permanent               | 353                                    | 0                        | 0%        | 353                       | 100%                                    | 341       | 0              | 0%        | 341             | 100%      |
| Male                    | 348                                    | 0                        | 0%        | 348                       | 100%                                    | 336       | 0              | 0%        | 336             | 100%      |
| Female                  | 5                                      | 0                        | 0%        | 5                         | 100%                                    | 5         | 0              | 0%        | 5               | 100%      |
| Other than<br>Permanent | 2247                                   | 0                        | 0%        | 2247                      | 100%                                    | 1456      | 0              | 0%        | 1456            | 100%      |
| Male                    | 2215                                   | 0                        | 0%        | 2215                      | 100%                                    | 1433      | 0              | 0%        | 1433            | 100%      |
| Female                  | 32                                     | 0                        | 0%        | 32                        | 100%                                    | 23        | 0              | 0%        | 23              | 100%      |
|                         |  |                          |           | W                         | orkers                                  |           |                |           |                 |           |
| Permanent               | 99                                     | 0                        | 0%        | 99                        | 100%                                    | 104       | 0              | 0%        | 104             | 100%      |
| Male                    | 99                                     | 0                        | 0%        | 99                        | 100%                                    | 104       | 0              | 0%        | 104             | 100%      |
| Female                  | 0                                      | 0                        | 0%        | 0                         | 0%                                      | 0         | 0              | 0%        | 0               | 0%        |
| Other than<br>Permanent | 158                                    | 0                        | 0%        | 158                       | 100%                                    | 147       | 0              | 0%        | 147             | 100%      |
| Male                    | 158                                    | 0                        | 0%        | 158                       | 100%                                    | 147       | 0              | 0%        | 147             | 100%      |
| Female                  | 0                                      | 0                        | 0%        | 0                         | 0%                                      | 0         | 0              | 0%        | 0               | 0%        |

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

#### a. Median Remuneration/wages

| Category                         | Male   |  | Female |  |
|----------------------------------|--------|--|--------|--|
|                                  | Number | Median remuneration/<br>salary/wages of<br>respective category | Number | Median remuneration/<br>salary/wages of<br>respective category |
| Board of Directors (BoD)         | 8      | 12.85  | 2      | 12.00  |
| Key Managerial Personnel (KMP)   | 3      | 84.47  | 0      | 0  |
| Employees other than BoD and KMP | 371*   | 7.34   | 5      | 7.43   |
| Workers                          | 266*   | 2.93   | 0      | 0  |

\* Includes employees/workers who have ceased to be associated with the Company during the year.



#### b. Gross wages paid to Female as % of total wages paid by the entity, in the following format:

| Particulars                                     | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|---|--|---|
| Gross wages paid to females as % of total wages | 0.95%                                  | 1.15%                                   |

#### 4. Focal point for addressing human rights:

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)

- Cable Business Head of Human Resources serves as the focal point for addressing any human rights impacts or issues arising from the business's operations.
- EPC Business Project Monitoring Committee is designated as the focal point for addressing human rights issues

#### 5. Internal mechanisms in place to redress grievances related to human rights issues:

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

The Company has established an internal grievance redressal mechanism accompanied by a clearly defined Code of Discipline. Individuals can directly report violations to either the Project Monitoring Committee or the Head of Human Resources within this framework.

Upon receiving a complaint, the designated focal point, in conjunction with the Human Resources department, conducts a thorough investigation. Prompt and appropriate remedial actions are then implemented to effectively address the situation.

Moreover, the Company maintains transparent channels of communication with stakeholders, including local communities, civil society organizations, and relevant government agencies. This proactive approach ensures the timely and efficient resolution of human rights grievances, fostering a harmonious and responsible relationship with all stakeholders.

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

| Category                            | (Cu                         | FY 2023-24<br>urrent Financial Ye           | ear)    | FY 2022-23<br>(Previous Financial Year) |   |         |
|-------------------------------------|-----------------------------|---|---------|---|---|---------|
|                                     | Filed<br>during<br>the year | Pending<br>resolution at<br>the end of year | Remarks | Filed<br>during<br>the year             | Pending<br>resolution at<br>the end of year | Remarks |
| Sexual Harassment                   | NIL                         | NIL   | -       | NIL                                     | NIL   | -       |
| Discrimination at workplace         | NIL                         | NIL   | -       | NIL                                     | NIL   | -       |
| Child Labour                        | NIL                         | NIL   | -       | NIL                                     | NIL   | -       |
| Forced Labour/Involuntary<br>Labour | NIL                         | NIL   | -       | NIL                                     | NIL   | -       |
| Wages                               | NIL                         | NIL   | -       | NIL                                     | NIL   | -       |
| Other human rights related issues   | NIL                         | NIL   | -       | NIL                                     | NIL   | -       |

# 7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

| Particulars   | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|---|--|---|
| Total Complaints reported under Sexual Harassment on of<br>Women at Workplace (Prevention, Prohibition and Redressal)<br>Act, 2013 (POSH) | NIL                                    | NIL                                     |
| Complaints on POSH as a % of female employees / workers   | NIL                                    | NIL                                     |
| Complaints on POSH upheld   | NIL                                    | NIL                                     |



#### 8. Mechanism to prevent adverse consequences to the complainant in discrimination and harassment cases.

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

The Company is firmly committed to maintaining a workplace environment that is free from all forms of harassment, including sexual harassment. To ensure compliance with this commitment, the Company maintains a strict Code of Conduct for Sites and Project Operations, which requires the reporting of all harassment concerns and ensures prompt resolution of any complaints received.

Moreover, the Company has established internal committees across various locations to investigate allegations of sexual harassment and recommend appropriate action, as necessary. Additionally, regular awareness and training sessions are conducted to ensure that employees are fully aware of the nuances of sexual harassment and the relevant redressal mechanisms.

#### 9. Human rights requirements forming part of your business agreements and contracts:

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

Yes, the Company diligently ensures the inclusion of specific human rights requirements within its business contracts. These requirements encompass the following:

- 1. Sellers, vendors, and suppliers are obligated to provide an Anti-Corruption Undertaking.
- 2. Suppliers are required to abstain from employing child labour in any of their manufacturing or general activities conducted within the factory premises.
- 3. Suppliers are expected to diligently comprehend and faithfully adhere to safety and environmental protocols.

In addition to the aforementioned clauses, other contextual and necessity-based requirements are also incorporated into the business contracts.

#### 10. Assessments for the year:

| Category   | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|--|---|
| Child labour   | 100 %   |
| Forced/involuntary labour                            | 100 %   |
| Sexual harassment                                    | 100 %   |
| Discrimination at workplace                          | 100 %   |
| Wages  | 100 %   |
| Others - Employees well-being and working conditions | 100 %   |

The assessments on the above-mentioned parameters were conducted in-house by the Company.

#### 11. Corrective Actions to address significant risks / concerns arising from the assessments:

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

The Company's self-assessment and customer diligence have not identified any notable risks or concerns. It remains steady in its commitment to human rights, having implemented a comprehensive framework addressing significant risks like forced labour, child labour, sexual harassment, discrimination, and wages.

This framework includes periodic evaluations to detect potential violations and regular employee training to enhance awareness and prevent such incidents.

Should violations occur, the Company swiftly implements corrective actions, including work suspension, contract termination, or legal measures as necessary.

Additionally, continuous assessment and enhancement of policies and procedures are undertaken to ensure the maintenance of human rights standards across all operations.



VTL

#### **ESSENTIAL INDICATORS:**

Note: The revenue from operations under the various listed parameters has been adjusted for PPP based on the latest PPP conversion factor published by the IMF- for India. For the years ended March 31, 2024 and March 31, 2023, it is 22.401 and 22.167, respectively.

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

| Parameter   | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|---|--|---|
| From renewable sources  | (ourrent i manoiar real)               | (Frevious Financial Fear)               |
|   |  | 1                                       |
| Total electricity consumption (A)   | 9,756 GJ                               | 10,387 GJ                               |
| Total fuel consumption (B)  | -                                      | -                                       |
| Energy consumption through other sources (C)  | -                                      | -                                       |
| Total energy consumption (A+B+C)  | 9,756 GJ                               | 10,387 GJ                               |
| From non-renewable sources  |  |   |
| Total electricity consumption (D)   | 41,476 GJ                              | 46,310 GJ                               |
| Total fuel consumption (E)  | 216 GJ                                 | 1,838 GJ                                |
| Energy consumption through other sources (F)  | -                                      | -                                       |
| Total energy consumed from non-renewable sources<br>(D+E+F)   | 41,692 GJ                              | 48,148 GJ                               |
| Total energy consumed (A+B+C+D+E+F)   | 51,448 GJ                              | 58,535 GJ                               |
| Energy intensity per rupee of turnover<br>(Total energy consumed / Revenue from operations)   | 8.9 GJ                                 | 7.7 GJ                                  |
| Energy intensity per rupee of turnover adjusted for<br>Purchasing Power Parity (PPP)<br>(Total water consumption / Revenue from operations<br>adjusted for PPP) | 0.40 GJ                                | 0.34 GJ                                 |
| Energy intensity in terms of physical output  | 0.0749 GJ/Km                           | 0.0792 GJ/Km                            |
| Energy intensity (optional) - the relevant metric may be selected by the entity   | -                                      | -                                       |

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

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.

This particular section is not applicable, as the Company has not been identified as designated consumer under Performance, Achieve and Trade (PAT) Scheme of the Government of India.

70



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

| Parameter  | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|--|--|---|
| Water withdrawal by source (in kilolitres)   |  |   |
| (i) Surface water  | Nil                                    | Nil                                     |
| (ii) Groundwater   | 1,63,190                               | 1,31,192                                |
| (iii) Third party water  | Nil                                    | Nil                                     |
| (iv) Seawater / desalinated water  | Nil                                    | Nil                                     |
| (v) Others   | Nil                                    | Nil                                     |
| Total volume of water withdrawal (in kilolitres)<br>(i + ii + iii + iv + v)  | 1,63,190                               | 1,31,192                                |
| Total volume of water consumption (in kilolitres)  | 1,63,190                               | 1,31,192                                |
| Water intensity per rupee of turnover<br>(Total water consumption / Revenue from operations)   | 28.14 KL/Million Rs.                   | 20.7 KL/Million Rs.                     |
| Water intensity per rupee of turnover adjusted for<br>Purchasing Power Parity (PPP)<br>(Total water consumption / Revenue from operations<br>adjusted for PPP) | 1.26 KL/Million Rs.                    | 0.92 KL/Million Rs.                     |
| Water intensity in terms of physical output  | 0.237 KL/Km Cable                      | 0.214 KL/Km Cable                       |
| Water intensity (optional) - the relevant metric may be selected by the entity   | -                                      | -                                       |

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

#### 4. Provide the following details related to water discharged: Not Applicable

| Parameter   | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|---|--|---|
| 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 kilolitres)                                | -                                      | -                                       |

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. Mechanism for Zero Liquid Discharge:

| Has the entity implemented a<br>mechanism for Zero Liquid<br>Discharge? If yes, provide details of<br>its coverage and implementation. |   |
|--|---|
|  | Water usage primarily for cooling purposes operates in a closed loop, eliminating industrial effluent release into the environment.               |
|  | Furthermore, domestic wastewater is treated in a Sewage Treatment Plant (STP), with the treated water utilized for horticultural purposes onsite. |
|  | This reflects the Company's commitment to sustainable and environmentally responsible water management practices.                                 |

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

| Parameter                           | Please<br>specify unit | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|-------------------------------------|------------------------|--|---|
| NOx                                 | -                      | NIL                                    | NIL                                     |
| Sox                                 | -                      | NIL                                    | NIL                                     |
| Particulate matter (PM)             | -                      | NIL                                    | NIL                                     |
| Persistent organic pollutants (POP) | -                      | NIL                                    | NIL                                     |
| Volatile organic compounds (VOC)    | -                      | NIL                                    | NIL                                     |
| Hazardous air pollutants (HAP)      | -                      | NIL                                    | NIL                                     |
| Others - please specify             | -                      | NIL                                    | NIL                                     |

# 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.

The Company has not conducted any independent assessment, evaluation or assurance by an external agency. Nevertheless, the Company monitors ambient air quality on a quarterly basis through a National Accreditation Board for Testing and Calibration Laboratories (NABL) accredited agency.

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

| Parameter   | Unit                            | FY 2023-24<br>(Current<br>Financial Year) | FY 2022-23<br>(Previous<br>Financial Year) |
|---|---------------------------------|---|--|
| <b>Total Scope 1 emissions</b><br>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)  | Metric tonnes of CO2 equivalent | 15  | 128  |
| <b>Total Scope 2 emissions</b><br>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)  | Metric tonnes of CO2 equivalent | 12,096                                    | 13,387                                     |
| Total Scope 1 and Scope 2 emissions intensity per<br>rupee of turnover<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue<br>from operations)  | MT/Million Rs.                  | 2.09                                      | 1.77                                       |
| Total Scope 1 and Scope 2 emission intensity per rupee<br>of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue<br>from operations adjusted for PPP) | MT/Million Rs.                  | 0.093                                     | 0.079                                      |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output  | MT/Km Cable                     | 0.018                                     | 0.018                                      |
| Total Scope 1 and Scope 2 emission intensity<br>(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.



The Company has not conducted any independent assessment, evaluation or assurance by an external agency. Nevertheless, the Company does perform quarterly monitoring of ambient air quality through an agency accredited by the National Accreditation Board for Testing and Calibration Laboratories (NABL).

#### 8. Project related to reducing Green House Gas emission:

| Does the entity have any project<br>related to reducing Green House<br>Gas emission? If yes, then provide | The Company has recognised the significance of moving towards Renewable energy<br>and therefore has established a rooftop solar power plant with a capacity of 2 MW,<br>which has significantly aided in reducing its carbon footprint. |          |
|---|---|----------|
| details.  | CO2 emissions savings by the Company  |          |
|   | FY 2022-23  | 2,452 MT |
|   | FY 2023-24  | 2,304 MT |
|   | Further, the Company is going ahead with Power Purchase Agreement for an additional dedicated power supply from 1.5 MW Wind-Solar Hybrid power plant which will further reduce GHG emissions to a greater extent.                       |          |

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

| Parameter  | FY 2023-24<br>(Current<br>Financial Year) | FY 2022-23<br>(Previous<br>Financial Year) |
|--|---|--|
| Total Waste generated (in metric tonnes)   |   |  |
| Plastic waste (A)  | 221                                       | 445  |
| E-waste (B)  | -   | -  |
| Bio-medical waste (C)  | -   | -  |
| Construction and demolition waste (D)  | -   | -  |
| Battery waste (E)  | 19.61                                     | -  |
| Radioactive waste (F)  | -   | -  |
| Other Hazardous waste. Please specify, if any Used Oil (G)   | 5.74                                      | 4.8  |
| Other Non-hazardous waste generated <b>(H)</b> . Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)        | 1,028                                     | 608  |
| Total (A+ B + C + D + E + F + G + H)   | 1,274.35                                  | 1,057.8                                    |
| Waste intensity per rupee of turnover.<br>(Total waste generated / Revenue from operations)  | 0.220<br>MT/Million Rs.                   | 0.139<br>MT/Million Rs.                    |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated /Revenue from operations adjusted for PPP) | 0.00981<br>MT/Million Rs.                 | 0.00619<br>MT/Million Rs.                  |
| Waste intensity in terms of Physical output  | 0.00185<br>MT/Km Cable                    | 0.00143<br>MT/Km Cable                     |
| Waste intensity (optional) - the relevant metric may be selected by the entity   | -   | -  |
| For each category of waste generated, total waste recovered through recycling, (in metric tonnes)  | re-using or other rec                     | covery operations                          |
| Category of waste  |   |  |
| (i) Recycled   | 1,274.35                                  | 1,057.8                                    |
| (ii) Re-used   | -   | -  |
| (iii) Other recovery operations  | -   | -  |
| Total  | 1,274.35                                  | 1,057.8                                    |
| For each category of waste generated, total waste disposed by nature of disp   | osal method (in me                        | etric tonnes)                              |
| Category of waste  |   |  |
| (i) Incineration   | -   | -  |
| (ii) Landfilling   | -   | -  |
| (iii) Other disposal operations  | 1,274.35                                  | 1,057.8                                    |
| Total  | 1,274.35                                  | 1,057.8                                    |



The plastic and other hazardous waste produced by the Company is vendored to a registered recycler, while other nonhazardous waste is similarly sold for recycling, wherever feasible. Appropriate waste disposal methods are there for the effective waste management. Major quantity of the waste is sold to the registered vendors.

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. The assessment has been carried out in-house by the Company.

#### 10. Waste management practices adopted in the establishment:

| Briefly describe the waste management practices adopted in your establishments. Describe the  | The Company has instituted a comprehensive waste management program to minimize waste generation and ensure environmentally responsible waste handling practices.   |
|---|---|
| strategy adopted by your Company<br>to reduce usage of hazardous and<br>toxic chemicals in your products<br>and processes and the practices<br>adopted to manage such wastes. | <ul> <li>Cable Business:</li> <li>Storage, collection, and disposal of hazardous waste adhere to consent conditions.</li> <li>Disposal handled by authorized recyclers approved by the Central Pollution Control Board (CPCB).</li> <li>Solid waste is similarly disposed of in compliance with Consent Conditions.</li> </ul>  |
|   | <ul> <li>EPC Business:</li> <li>This segment prioritizes proper waste segregation, with segregated materials reused internally where possible to minimize waste and promote efficient resource usage.</li> <li>Any waste not reused internally is sent to approved vendors for responsible handling and management.</li> <li>These practices underscore the Company's commitment to sustainable waste management and reducing our environmental footprint.</li> </ul> |

11. 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:

|  |  | Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |  |  |  |
|--|--|---|--|--|--|
| The Company does not have any offices or operational sites in the vicinity of any ecologically sensitive area. |  |   |  |  |  |

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

| S.<br>No. | Name and brief details of project                             | EIA<br>Notification<br>No. | Date | Whether conducted<br>by independent<br>external agency<br>(Yes / No) | Results<br>communicated<br>in public domain<br>(Yes / No) | Relevant<br>Web link |
|-----------|---|----------------------------|------|--|---|----------------------|
|           | Not Applicable.   |                            |      |  |   |                      |
|           | No projects were undertaken by the entity which required EIA. |                            |      |  |   |                      |

13. 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 Company is compliant with all applicable environmental law/ regulations/ guidelines in India.



# 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) Affiliations with trade and industry chambers/ associations:

Number of affiliations with trade and industry chambers/ associations.

The Company is affiliated with five (5) trade and industry chambers/associations.

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

| S.<br>No. | Name of the trade and industry chambers/ associations               | Reach of trade and industry chambers/<br>associations (State/National) |
|-----------|---|--|
| 1.        | Indian Electrical and Electronics Manufacturers Association (IEEMA) | National   |
| 2.        | Engineering Export Promotion Council of India (EEPC)                | National   |
| 3.        | Telecom Equipment and Services Export Promotion Council (TEPC)      | National   |
| 4.        | Federation of Indian Export Organisations (FIEO)                    | National   |
| 5.        | Bombay Chamber of Commerce & Industry (BCCI)                        | State  |

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

| Name of authority Brief of the case |  | Corrective action taken |
|-------------------------------------|--|-------------------------|
| Not Applicable                      |  |                         |

#### PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

#### **ESSENTIAL INDICATORS:**

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

| Name and brief details of project   | SIA<br>Notification<br>No. | Date of notification | Whether conducted by<br>independent external<br>agency (Yes / No) | Results communicated<br>in public domain<br>(Yes / No) | Relevant<br>Web link |
|---|----------------------------|----------------------|---|--|----------------------|
| This section is not applicable to the Company as there were no projects that required SIA to be undertaken under Law. |                            |                      |   |  |                      |

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

|  | Name of Project<br>for which R&R<br>is ongoing | State | District | No. of Project<br>Affected Families<br>(PAFs) | % of PAFs<br>covered by R&R | Amounts paid to<br>PAFs in the FY<br>(In INR) |
|--|--|-------|----------|---|-----------------------------|---|
|  |  |       |          |   |                             |   |

This section is not applicable to the Company as there were no projects that required Rehabilitation and Resettlement (R&R).

#### 3. Community redressal mechanism:

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

The implementation of an effective Grievance Redressal Mechanism (GRM) is crucial for building strong community bonds and obtaining the necessary social license to conduct community-focused initiatives.

To provide a platform for community members to voice their concerns, the Company has established an accessible and efficient grievance redressal mechanism. Local employees actively engage with the community, seeking out grievances and addressing them promptly.

Upon receiving feedback or complaints, the Company conducts a thorough investigation, leaving no detail unchecked. This diligent process ensures all relevant information is gathered, allowing the Company to determine appropriate corrective actions swiftly.

By maintaining a responsive and transparent approach, the Company aims to cultivate trust, open communication, and mutual respect within the community. This ensures that community concerns are acknowledged and addressed satisfactorily.



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

| Category                                     | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|--|--|---|
| Directly sourced from MSMEs/ small producers | 27.57%                                 | 28.74%                                  |
| Sourced directly from within India           | 98.84%                                 | 91.59%                                  |

# 5. Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost.

| Location     | FY 2023-2024<br>(Current Year) | FY 2022-2023<br>(Previous Year) |
|--------------|--------------------------------|---------------------------------|
| Rural        | -                              | -                               |
| Semi- Urban  | -                              | -                               |
| Urban        | 44.58%                         | 47.69%                          |
| Metropolitan | 55.42%                         | 52.30%                          |

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

#### **ESSENTIAL INDICATORS:**

#### 1. Consumer Complaints and feedback:

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

The Company has implemented various channels through which customers can easily communicate their concerns and engage with the Company. The Company strives to maintain open lines of communication with its customers, promptly address their concerns, and continuously enhance its services based on customer feedback through the following mechanisms;

#### Online support:

The contact information for all branches and marketing offices of the Company can be found on its website at https://www.vtlrewa.com/contact.html.

#### **Dedicated Accounts Manager:**

The Company has taken the initiative to assign a dedicated accounts manager to key customers. This personalized support ensures that the specific requirements, grievances, and expectations of these customers are effectively addressed.

#### **Brief Procedure:**

- When a customer complaint is received, it is promptly conveyed to the sales department in Rewa.
- The details of the complaint are duly recorded in a customer complaint register, enabling a systematic approach to resolution.
- The Company takes immediate corrective and preventive actions to address the complaint and ensures that the customer is kept informed about the steps taken to resolve the issue.

#### Annual Consumer Satisfaction Survey:

To gauge the satisfaction levels of its customers, the Company conducts an annual consumer satisfaction survey. This survey allows customers to provide feedback on their experiences, enabling the Company to identify areas for improvement and effectively address any issues raised by its customers.

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

| Category  | As a percentage to total turnover |  |
|---|-----------------------------------|--|
| Environmental and social parameters relevant to the product | 100%                              |  |
| Safe and responsible usage                                  | 100%                              |  |
| Recycling and/or safe disposal                              | Not applicable                    |  |



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

| Category                       | FY 2023-24<br>(Current Financial Year) |   |         | FY 2022-23<br>(Previous Financial Year) |   |         |
|--------------------------------|--|---|---------|---|---|---------|
|                                | Received<br>during<br>the year         | Pending<br>resolution at<br>the end of year | Remarks | Received<br>during<br>the year          | Pending<br>resolution at<br>the end of year | Remarks |
| 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:

| Particulars       | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | NIL    | NA                 |
| Forced recalls    | NIL    | NA                 |

#### 5. Cyber security policy:

# 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 implemented a robust Information Security Management Policy, affirming its dedication to preserving the confidentiality, integrity, and availability of information.

This document provides comprehensive details about the Company's practices and procedures for ensuring the security of information assets, reinforcing its commitment to safeguarding valuable information from unauthorized access, disclosure, alteration, or destruction.

For detailed insights into the Information Security Management Policy, please refer to the Policy document accessible at the following link: https://www.vtlrewa.com/ISMS-Policy.pdf.

Also, the Company has achieved ISO 27001 certification for its Information Security Management System to demonstrate commitment towards highest standards of information security.

# 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

This particular section is not applicable to the Company

### 7. Provide the following information relating to data breaches:

| Particulars  | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Year) |
|--|--|-------------------------------|
| Number of instances of data breaches   | NIL                                    | NIL                           |
| Percentage of data breaches involving personally identifiable information of customers | NIL                                    | NIL                           |
| Impact, if any, of the data breaches   | NA                                     | NA                            |