



NAVA /SECTL /168/2024-25

July 16, 2024

Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No.C/1, G Block  
Bandra Kurla Complex, Bandra (E)  
MUMBAI – 400 051  
**NSE Symbol: 'NAVA'**

Dept. of Corp. Services  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street  
MUMBAI – 400 001

**Scrip Code: '513023' / 'NAVA'**

Dear Sir,

**Sub: Submission of Business Responsibility and Sustainability Report (BRSR) for FY 2023-24**

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Pursuant to regulation 34(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, please find enclosed copy of BRSR for the Financial year 2023-24 which forms an integral part of the Annual report-2023-24.

The BRSR along with the Annual Report is made available on Company's website at <https://www.navalimited.com/investors/financials/annual-reports/>

Kindly take the same on record and acknowledge the receipt.

Thanking you,

Yours faithfully,  
for NAVA LIMITED

VSN Raju  
Company Secretary  
& Vice President

Encl: as above

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

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

The following report has been compiled in accordance with the guidelines established by the Securities and Exchange Board of India (SEBI) for Business Responsibility and Sustainability Reporting (BRSR). Its primary objective is to enhance transparency by showcasing how enterprises contribute to a sustainable economy while generating value. This report underscores our steadfast commitment to creating long-term value for our stakeholders while concurrently fostering sustainable development.

## SECTION A: GENERAL DISCLOSURES

### I. DETAILS OF THE ENTITY

S.No	Particulars	Response
1.	Corporate identity Number (CIN) of the Entity	L27101TG1972PLC001549
2.	Name of the Entity	NAVA LIMITED (formerly Nava Bharat Ventures Limited)
3.	Year of incorporation	1972
4.	Registered office address	Nava Bharat Chambers, 6-3-1109/1 Raj Bhavan Road, Hyderabad, TG 500082 India
5.	Corporate office address	Silicon House, 8-2-318/1, Road No.14, Banjara Hills, Hyderabad 500034, Telangana
6.	E-mail	investorservices@navalimited.com
7.	Telephone	+91 40 2340 3501, 4034 5999
8.	Website	http://www.navalimited.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), National Stock Exchange of India Limited (NSE)
11.	Paid-up Capital	INR 290,327,014 (including amount of forfeited shares) (Divided into 14,51,00,638 equity shares of Re. 2/- each.)
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. VSN Raju, Company Secretary & Vice President Telephone No: 040 23403501 Email: vsn.raju@navalimited.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	The disclosures under this report are made on standalone basis, unless otherwise specified.
14.	Name of assurance provider	None
15.	Type of assurance obtained	Not Applicable

### II. PRODUCTS/SERVICES

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

S.No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Metal and metal products	58.78
2.	Electricity, gas, steam and air condition supply	Electric power generation, transmission and distribution	27.62

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

S.No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Manufacturing of Ferro Alloys	24104	58.78
2.	Generation of energy through coal	35102	27.62



### III. OPERATIONS

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

Location	Number of plants	Number of offices	Number of Branches	Total
National	7 (3 plants are non-operational)	6	0	13
International	NIL	NIL	NIL	NIL

#### 19. Markets served by the entity:

##### a) Number of locations

Locations	Number
National (No. of States)	The Company operates and serves across multiple locations. Currently, we have a strong presence in 10 key regions across India. These regions include Maharashtra, Gujarat, Karnataka, Tamil Nadu, Andhra Pradesh, Pondicherry, Chhattisgarh, Odisha West Bengal, and Telangana.
International (No. of Countries)	The Company extends its operations and services beyond national borders, serving customers in multiple international markets. Presently, we have a presence in six countries, namely Japan, Taiwan, Nigeria, Sri Lanka, USA and Egypt.

##### b) Contribution of exports:

What is the contribution of exports as a percentage of the total turnover of the entity?	32.49%
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##### c) Type of Customers

A brief on types of customers	<p>Nava's customer profile encompasses a broad spectrum which includes:</p> <ul style="list-style-type: none"> <li>• Corporates: We serve both public and private corporations</li> <li>• Domestic and Foreign customers: Our customer base extends beyond the borders of India, enabling us to cater to the needs of customers from different countries.</li> <li>• Energy Customers: We provide power to both captive users within our operations and through open access, thereby contributing to the energy requirements of other businesses.</li> </ul>
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### IV. EMPLOYEES

#### 20. Details at the end of the year of Financial Year:

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

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>Employees</b>						
	Permanent (D)	508	500	98.4%	8	1.5%
	Other than Permanent (E)	0	-	-	-	-
	Total employees (D + E)	508	500	98.4%	8	1.5%
<b>Workers</b>						
	Permanent (F)	85	85	100%	0	-
	Other than Permanent (G)	1667	1591	95.4%	76	4.55%
	Total workers (F + G)	1752	1676	95.66%	76	4.33%



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

S.No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>Differently Abled Employees</b>						
	Permanent (D)	0	-	-	-	-
	Other than Permanent (E)	0	-	-	-	-
	Total differently abled employees (D + E)	0	-	-	-	-
<b>Differently Abled Workers</b>						
	Permanent (F)	0	-	-	-	-
	Other than Permanent (G)	0	-	-	-	-
	Total differently abled workers (F + G)	0	-	-	-	-

**21. Participation/Inclusion/Representation of women:**

Category	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors*	8	1	12.5
Key Management Personnel#	2	0	-

\*BOD includes CEO and MD

# KMP includes CFO and CS

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

(Disclose trends for the past 3 years)

	FY 2023-24 (Turnover rate in current FY)			FY 2022-23 (Turnover rate in previous FY)			FY 2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	7.7%	13.3%	7.8%	7.6%	0%	6.4%	5.5%	0%	4.6%
Permanent Workers	2.4%	0%	2.4%	5.5%	0%	5.5%	1.1%	0%	1.1%

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

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Nava Bharat Projects Limited	Subsidiary	100%	No
2	Nava Bharat Energy India Limited	Subsidiary	100%	No
3	Brahmani Infratech Private Limited	Subsidiary	86.53%	No
4	Nava Bharat (Singapore) Pte. Limited	Subsidiary	100%	No
5	Maamba Collieries Limited*	Subsidiary	65%	No
6	Nava Energy Pte. Limited	Subsidiary	100%	No
7	Nava Energy Zambia Limited*	Subsidiary	100%	No
8	Nava Agro Pte. Limited	Subsidiary	100%	No
9	Kawambwa Sugar Ltd.*	Subsidiary	100%	No
10	Nava Avocado Ltd*	Subsidiary	100%	No
11	Nava Holding Pte. Ltd.	Subsidiary	100%	No
12	Tiash Pte. Limited*	Subsidiary	65%	No
13	Compai Pharma Pte. Ltd.*	Subsidiary	65%	No
14	Compai Healthcare SDN. BHD.*	Subsidiary	65%	No
15	The Iron Suites Pte. Ltd.*	Subsidiary	65%	No
16	Nava Resources Cl.	Subsidiary	100%	No

\*Step-down subsidiaries

## VI. CORPORATE SOCIAL RESPONSIBILITY (CSR) DETAILS

24.

S.No.	Requirement	31.03.2024
1.	Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
2.	Turnover (in Rs. Lakhs)	1,46,758.05
3.	Net worth (in Rs. Lakhs)	3,66,193.38

## 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:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	None	0	0	None
Investors (other than shareholders)	Yes	0	0	None	0	0	None
Shareholders	Yes	12	0	All the Complaints were resolved in the same quarter itself and hence there are no pending complaints at the end of the year March 31, 2024	11	0	None
Employees and workers	Yes	0	0	None	0	0	None
Customers	Yes	3	0	Issues were resolved during joint inspection	3	0	None
Value Chain Partners	Yes	0	0	None	0	0	None

Weblink – Grievance Redressal Mechanism <https://www.navalimited.com/contact-us/>



**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. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Energy Management	Risk	Ferro alloy production involves energy-intensive processes like smelting, refining, and alloying metals. These facilities heavily depend on easily accessible but non-renewable energy sources such as coal or natural gas. This reliance exposes the company to risks associated with price volatility and supply disruptions in these energy markets.	To effectively manage the risks associated with energy management, the company is undertaking the following approaches: <ul style="list-style-type: none"> <li>• Energy Efficiency Initiatives: Substituting HPSV fittings with LED lighting in boiler and cooling towers. Installing new aerodynamic and energy-efficient FRP blades. Introducing Variable Frequency Drive for the Green Briquette Screen to enhance electrical energy efficiency.</li> <li>• Embracing energy-efficient technologies, upgrading equipment, and optimizing processes to decrease energy usage and lessen dependence on non-renewable energy source.</li> </ul>	Negative
2.	Waste & Materials Management	Opportunity	The production of ferro alloys and power entails the creation of considerable waste, posing potential risks to the environment and human well-being. Nevertheless, viewing this challenge as an opportunity, the company aims to demonstrate its dedication to sustainability through efficient waste management strategies, which can enhance its competitive edge. Leveraging its strategic location near coal mines and employing Fluidized Bed Combustion (FBC) technology, the company optimizes the utilization of low-grade coal waste.	-	Positive

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Ecological Impacts	Risk	The company's operations depend extensively on natural resources like manganese ore, chrome ore, and coal, which can exert substantial pressure on biodiversity. Furthermore, emissions of pollutants into the air, soil, and water during production processes underscore the inherent ecological threats posed by the company's activities.	<p>To address the ecological risks associated with the company's operations, the following approach is being adopted:</p> <p><b>Environmental Assessments:</b> Comprehensive environmental assessments are conducted to meticulously identify and assess the potential ecological impacts arising from the company's operations. These assessments delve into the effects on biodiversity, ecosystems, and natural resources, providing crucial insights into the environmental footprint of the company's activities.</p> <p><b>Biodiversity Conservation:</b> Robust measures are implemented to safeguard and preserve biodiversity within and surrounding the company's operational zones. This encompasses various initiatives, including the establishment of protected areas, the execution of habitat restoration programs, and the promotion of sustainable land use practices.</p>	Negative
4.	Employee Health & Safety	Risk	The manufacturing and power generation processes entail significant risks to employee safety. These industries involve working with heavy machinery, exposure to hazardous materials, and challenging conditions, increasing the likelihood of accidents, injuries, and long-term health issues for workers. As a consequence of these risks, the company may face regulatory penalties, negative publicity, reduced employee morale and productivity, and increased healthcare and compensation costs.	<p>To mitigate the risks associated with employee health and safety, the company is implementing the following approach:</p> <p><b>Safety Training and Education:</b> The Company Provides comprehensive safety training programs to employees. They receive thorough safety training, including regular briefings, hazard recognition, and emergency response protocols, to equip them with the necessary competencies for safe task execution.</p> <p><b>Safety Equipment and Infrastructure:</b> The company invests in suitable safety gear, equipment, and infrastructure to reduce accident risks. This encompasses regular maintenance and inspections of machinery and facilities to uphold safe working conditions.</p> <p><b>Risk Assessments and Controls:</b> Conducting regular risk assessments to identify potential hazards and implementing controls to mitigate them. This may involve redesigning processes, implementing engineering controls, and establishing safety protocols and procedures</p>	Negative

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5.	Responsible Sourcing	Risk	Nava primarily sources its raw materials from coal mining companies in India. However, increased coal prices and reduced coal availability have forced the company to cut back its operations. With diminishing coal supplies due to insufficient coal linkage, the plant had to obtain coal from alternative mines, resulting in higher transportation costs and efforts. These external factors can significantly impact the company, leading to operational disruptions and challenges in maintaining continuity. And, relying on suppliers who may face regulatory penalties for their environmental or social practices introduces further risk.	To address the risks associated with responsible sourcing, the company is implementing the following approach:  Enhancing Supply Chain Transparency: Enforcing measures to improve visibility and traceability throughout the supply chain. This encompasses thorough supplier due diligence, ensuring adherence to environmental and social standards, and monitoring sustainability performance among key suppliers.  Strategies for Risk Management: Formulating approaches to mitigate potential environmental and social risks within the supply chain. This could entail supplier diversification, establishing contingency plans, and fostering dialogue with suppliers to promote responsible practices.	Negative





## 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. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1.	a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)  Particulars of the policy	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c) Web Link of the Policies, if available	The Nava's Policies can be accessed through <a href="https://www.navalimited.com/investors/policies/brsr/">https://www.navalimited.com/investors/policies/brsr/</a>  Further, certain policies of the Company are accessible via the internal platform specifically provided for internal usage.								
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Yes, Nava has translated the policies into procedures in the following manner; <ul style="list-style-type: none"> <li>• Clear steps and actions for effective implementation are described.</li> <li>• Relevant policies are communicated to the employees and workers and</li> <li>• SOPs are in place to ensure implementation</li> </ul>								
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Not all the enlisted policies may extend to our value chain partners.  Nava ensures that its suppliers/contractors comply with the law of the land by getting such clauses incorporated in their respective Purchase orders/contracts/agreements and terms and conditions of the tenders.								
4.	Name of the national and international codes / certifications/ labels / standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Our Company's operations adhere to the National Guidelines on Responsible Business Conduct (NGRBC)	ISO 9001:2015 – Quality Management System ISO 14001:2015 – Environmental Management System	ISO 45001:2018 – Occupational Health & Safety Management System	Our Company's operations adhere to the National Guidelines on Responsible Business Conduct (NGRBC)	ISO 14001:2015 – Environmental Management System ISO 50001:2018 – Energy Management System	Our Company's operations adhere to the National Guidelines on Responsible Business Conduct (NGRBC)	Our Company's operations adhere to the National Guidelines on Responsible Business Conduct (NGRBC)	Our Company's operations adhere to the National Guidelines on Responsible Business Conduct (NGRBC)	ISO 9001:2015 – Quality Management System



S. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9	
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	1.	Reducing electricity consumption from the grid: The company aims to reduce its reliance on grid electricity by a three percentage (3 %) on a year-on-year basis. This reduction could be achieved through various means such as implementing energy-efficient technologies, optimizing energy usage, and exploring renewable energy sources. Additionally, the company wishes to transition towards consuming electricity from renewable sources, further emphasizing its commitment to sustainable practices.	2.	Enhancing Product Environmental and Social Impacts through Increased Capex and R&D Investments: The company plans to increase its capital expenditure (Capex) and research and development (R&D) investments in specific technologies aimed at enhancing the environmental and social impacts of its products. The objective is to achieve a minimum improvement of three percentage (3%) in these impacts for the year 2025. By prioritizing these investments, the company aims to drive innovation and develop solutions that contribute to sustainability and positively benefit the environment and society.	3.	Strengthening the training division and educating employees: The company plans to enhance its training division to educate all employees and workers on issues related to Environmental, Social, and Governance (E, S & G) practices. By March 2025, all employees will receive training on the actions and initiatives undertaken by the organization to address these issues effectively.	4.	Sustainable Sourcing and assessment of Suppliers: The company is actively planning to ensure sustainable sourcing and responsible supplier management through ongoing monitoring and assessment. By implementing a robust assessment framework, conducting regular evaluations, and analysing supplier data, the company aims to identify areas for improvement and drive positive change.		
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met	In response to all the specific commitment goals set by the Company with respect to ESG, the performance for the same is mentioned below:									
		1.	Reducing electricity consumption from the grid: Nava has successfully reduced its consumption of grid electricity by approximately 16% in the financial year 2023-24, effectively meeting its predetermined commitments, goals, and targets in this regard.	2.	Enhancing Product Environmental and Social Impacts through Increased Capex and R&D Investments: The company is committed to enhancing the environmental and social impact of its products by increasing investments in capital expenditure and research and development. It has allocated 6.81% of its budget to capital expenditure, focusing on sustainability. While no external R&D funding is allocated, in-house efforts are actively enhancing product quality and responsibility.	3.	Strengthening the training division and educating employees: The company provided training and education to all employees on various topics, including health and safety, waste management, equipment usage, energy management awareness, and other pertinent areas.	4.	Sustainable Sourcing and assessment of Suppliers: Nava mainly sources its raw materials from coal mining companies in India. The company has implemented a rigorous procedure for sustainable sourcing, requiring mandatory evaluation of all new and existing supply chain partners based on environmental, health, safety, and sustainability criteria before their inclusion.		

S. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Governance, leadership and oversight										
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements	<p>As the Director responsible for the Business Responsibility and Sustainability Report at NAVA LIMITED, I am pleased to underscore NAVA's steadfast dedication to Environmental, Social, and Governance (ESG) principles. At NAVA, the integration of ESG considerations into our business operations is paramount, as we believe it is essential for achieving long-term success and resilience.</p> <p><b>Environmental Stewardship:</b></p> <p>We acknowledge the critical importance of minimizing our ecological footprint and conserving natural resources. NAVA has instituted comprehensive measures to reduce energy consumption, promote sustainable waste management practices, and mitigate environmental risks. Our commitment extends to adopting innovative technologies and sustainable practices aimed at addressing climate change and fostering a greener future.</p> <p><b>Social Responsibility:</b></p> <p>In alignment with our commitment to inclusivity, employee and community engagement, NAVA actively supports a variety of initiatives. Our Corporate Social Responsibility (CSR) activities are focused on advancing education, particularly for children, women, and individuals with different abilities. We aim to empower communities through the enhancement of vocational skills and the creation of employment opportunities. Furthermore, we are dedicated to improving healthcare access and preventive measures to promote overall well-being. Our contributions to combating hunger, poverty, and malnutrition are in harmony with broader societal objectives.</p> <p><b>Governance and Ethics:</b></p> <p>NAVA adheres to the highest standards of governance, ethics, transparency, and accountability to build trust among stakeholders. Primarily sourcing raw materials from Indian coal mining companies, NAVA enforces a stringent sustainable sourcing procedure. This includes mandatory evaluations of all supply chain partners based on environmental, health, safety, and sustainability criteria. Our governance framework ensures efficient risk management, stakeholder engagement, and regulatory compliance. We are dedicated to continuously improving our governance practices to maintain integrity and responsible business conduct.</p> <p>As the Director responsible for the Business Responsibility Report, I am proud to assert that NAVA is thoroughly aligned with ESG principles. We consistently strive for excellence by setting ambitious goals designed to drive positive change and foster sustainability. Through the transparent disclosure of our sustainability performance and future objectives, we aspire to inspire others and contribute to a more sustainable and inclusive world.</p> <p>We remain unwavering in our commitment to our ESG journey and eagerly anticipate contributing to a brighter and more sustainable future for all.</p> <p>Mr. P. Trivikrama Prasad, Managing Director (DIN: 00006887)</p>								
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	<p>The highest authority responsible for the implementation and oversight of the Business Responsibility policies has been given to Mr. P. Trivikrama Prasad, Managing Director of the Company</p>								



S. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9												
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details	<p>Risk Management Committee has been tasked with decision-making authority on all aspects related to sustainability issues.</p> <p>The Committee shall oversee the development and implementation of sustainability-related policies, procedures, and programs. This includes but is not limited to the management of the company's environmental impact, social responsibility, and governance practices.</p> <p><b>Nava's Risk Management Committee comprises of:</b></p> <table border="1"> <thead> <tr> <th>Name</th> <th>Position on the Committee</th> <th>Designation</th> </tr> </thead> <tbody> <tr> <td>Mr Ashwin Devineni (DIN: 00007540)</td> <td>Chairman of the Committee</td> <td>Director &amp; CEO</td> </tr> <tr> <td>Mr G R K Prasad (DIN: 00006852)</td> <td>Member</td> <td>Executive Director</td> </tr> <tr> <td>Mrs B Shanti Sree (DIN: 07092258)</td> <td>Member</td> <td>Independent Women Director</td> </tr> </tbody> </table>									Name	Position on the Committee	Designation	Mr Ashwin Devineni (DIN: 00007540)	Chairman of the Committee	Director & CEO	Mr G R K Prasad (DIN: 00006852)	Member	Executive Director	Mrs B Shanti Sree (DIN: 07092258)	Member	Independent Women Director
Name	Position on the Committee	Designation																				
Mr Ashwin Devineni (DIN: 00007540)	Chairman of the Committee	Director & CEO																				
Mr G R K Prasad (DIN: 00006852)	Member	Executive Director																				
Mrs B Shanti Sree (DIN: 07092258)	Member	Independent Women Director																				

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

Subject for Review	Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee									Frequency (Annually/Half yearly/Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Yes, performance against enlisted policies and necessarily follow up actions are duly reviewed by the Risk Management Committee.									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes, we comply with statutory requirements relevant to the principles with regard to Statutory requirements and review was undertaken by the Board of Directors.									Quarterly								

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

	P1	P2	P3	P4	P5	P6	P7	P8	P9
Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	All the policies of Nava are evaluated internally, and such policies are developed as a result of detailed consultations and research on the best practices adopted by organisations across the industry.								

**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	P9
<p>The entity does not consider the Principles material to its business (Yes/No)</p> <p>The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)</p> <p>The entity does not have the financial or/ human and technical resources available for the task (Yes/No)</p> <p>It is planned to be done in the next financial year (Yes/No)</p> <p>Any other reason (please specify)</p>	This section does not apply to Nava since it has already implemented comprehensive policies that encompass all the necessary aspects outlined in each of the 9 principles.								

**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. Efforts are underway to disclose leadership indicators for forthcoming fiscal years.

**PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE**



**ESSENTIAL INDICATORS:**

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors (BOD)	1	The entire Board and KMPs were trained on all the requirements of the BRSR principles.	100%
Key Managerial Personnel (KMP)	1		100%
Employees other than BOD and KMPs	257	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Skill Upgradation</li> <li>• Nava generally provides functional as well as behavioural training as per the Company’s policies and Standing Orders.</li> <li>• POSH</li> </ul>	92%
Workers	1800		100%

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

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

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
This particular section is not applicable to Nava.	

4. Anti-corruption or Anti-bribery policy:

Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.	<p>Yes, Nava has developed a comprehensive Anti-Corruption or Anti-Bribery Policy.</p> <ul style="list-style-type: none"> <li>The Audit Committee oversees assessment procedures and internal controls, ensuring policy effectiveness.</li> <li>A dedicated mechanism handles bribery and corruption complaints, offering a confidential reporting system for employees to report concerns without fear of retaliation.</li> <li>Training covers anti-corruption issues, reinforcing our zero-tolerance approach and dedication to integrity and fairness.</li> </ul> <p>For detailed information and access to the policy, kindly visit the following web link: <a href="https://www.navalimited.com/investors/policies/brsr/">https://www.navalimited.com/investors/policies/brsr/</a></p>
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5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directors KMPs Employees Workers	There was no disciplinary action that has been taken against any director, KMP, employees or workers of Nava by any law enforcement agency for charges of bribery or corruption.	

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

	FY 2023-24 (Current Financial Year)		FY 2022-23 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

**7. Corrective Actions:**

Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest	There have been no fines, penalties or actions taken by regulators, law enforcement agencies, or judicial institutions related to cases of corruption and conflicts of interest, hence this section is not applicable to the Nava.
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**8. Number of days of accounts payables (Accounts payable \*365) / Cost of goods/services procured) in the following format:**

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Number of days of accounts payables	26	37

**9. Open-ness of business**

Provide details of concentration of purchases 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 -24 (Current Financial Year)	FY 2022 -23 (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 houses as % of total purchases 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 / distributors as % of total sales to dealers / distributors	-	-
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	NIL	NIL
	b. Sales (Sales to related parties / Total Sales)	NIL	NIL
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	100%	100%
	d. Investments (Investments in related parties / Total Investments made)	85.04%	88.19%



**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:**

(Amounts in Lakhs)

	FY 2023 - 24 (Current Financial Year)	FY 2023 - 24 (Current Financial Year)	Details of improvements in environmental and social impacts
R&D	Nil	Nil	<ul style="list-style-type: none"> <li>GCP Dust, a by-product of Si-Mn alloy production, contains valuable minerals like Manganese, Silica, and Iron. Previously difficult to recover due to its fine size, we've developed an in-house method to recycle it by agglomerating with Mn ore fines.</li> <li>Recognized for our efforts, we've been granted a patent by the Intellectual Property of India in FY 23-24.</li> </ul>
Capex Paloncha Unit	Ferro Alloy Plant: 69.55	Ferro Alloy Plant: 42.83	<ul style="list-style-type: none"> <li>The old dust extraction arrangement installed at Raw Material Handling System was replaced with higher capacity system for improving the environmental condition. It is upgraded to 40,000 m3/hr from 10,000 m3/hr and the collection points are increased from 4 Nos to 18 Nos. The equipment was procured from M/s Thermax, one of the reputed manufacturers in India.</li> </ul>
	Captive Power Plant: 42.22	Captive Power Plant: Nil	<ul style="list-style-type: none"> <li>Crushed coal storage shed at CHP-1 is extended, balance 2 No. of bays. To control fugitive dust emissions and Air pollution in the surroundings during crushed coal stocking and reclaiming.</li> </ul>
Capex Odisha Unit	Ferro Alloy Plant: 1.13	Ferro Alloy Plant: Nil	<ul style="list-style-type: none"> <li>Online Opacity Monitor for GCP II: To measurement of the emission with respect to particulate matter.</li> </ul>
	Captive Power Plant: 65.98	Captive Power Plant: 60.33	<ul style="list-style-type: none"> <li>Ammonia Detector/Monitoring System installed at ESP area to monitor the Ammonia in air.</li> <li>Fluoride Analyzer/Monitoring System at waste water pond-1 to analyses the fluoride in the water.</li> <li>Dry Fog System install at Truck toppling area to reduce fugitive dust of coal.</li> <li>Coal storage shed is extend about 2,000 MT of crushed Coal will be stored in the shed to increase the availability of dry crushed coal during monsoon season.</li> <li>Storing the coal under the shed is to control fugitive dust emissions and Air' pollution / dust nuisance in the surroundings.</li> </ul>



**2. Sustainable sourcing:**

Does the entity have procedures in place for sustainable sourcing? (Yes/ No)	<p>Yes,</p> <p>Nava mainly sources its raw materials from coal mining companies in India.</p> <p>It has established a comprehensive procedure for sustainable sourcing, whereby all new and existing supply chain partners are obligatory evaluated on environmental, health and safety, and sustainability parameters before being onboarded.</p> <p>Additionally, Nava's Supplier/Vendor Code of Conduct (COC) encompasses criteria related to EHS and Human Rights that must be adhered to by value chain partners (including supply chain partners), who are required to sign the COC as part of the contractual documentation.</p> <p>The mandatory evaluation of supply chain partners based on environmental, health and safety, and sustainability parameters ensures that Nava engages with partners who share a common vision of environmental stewardship and ethical practices.</p>
If yes, what percentage of inputs were sourced sustainably?	100%

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

Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.	<p>Nava does not manufacture any reusable products.</p> <p>However, in the process of manufacturing ferro alloys, the slag generated is effectively repurposed by transforming it into alloy bricks. By repurposing the slag into alloy bricks, Nava ensures that valuable resources are not wasted and instead contributes to the overall efficiency and sustainability of its manufacturing operations.</p>
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**4. Extended Producer Responsibility (EPR) plan:**

Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.	Given the nature of Nava's operations, the concept of Extended Producer Responsibility (EPR) is not applicable.
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**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 Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	500	47	9.4 %	500	100%	0	-	0	-	0	-
Female	8	-	-	8	100%	8	100%	0	-	0	-
Total	508	47	9.25%	508	100%	8	1.57%	0	-	0	-
<b>Other than Permanent employees</b>											
Male	0	-	-	-	-	-	-	-	-	-	-
Female	0	-	-	-	-	-	-	-	-	-	-
Total	0	-	-	-	-	-	-	-	-	-	-

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

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	85	43	50.5%	85	100%	-	-	-	-	-	-
Female	0	-	-	0	100%	-	-	-	-	-	-
Total	85	43	50.5%	85	100%	-	-	-	-	-	-
Other than Permanent workers											
Male	1591	1591	100%	1591	100%	-	-	-	-	-	-
Female	76	76	100%	76	100%	76	100%	-	-	-	-
Total	1667	1667	100%	1667	100%	76	4.5%	-	-	-	-

**C) Spending on measures towards well-being of employees and workers (including permanent and other than permanent)**

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company.	0.18%	0.16%

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

Benefits	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Yes
Gratuity	100%	100%	Y	100%	100%	NA
ESI	9.25%	50.6%	Y	5.4%	55.6%	Yes
Others:						
a) Superannuation	31.9%	-	Y	28.1%	-	Yes
b) National Pension System	2.4%	-	Y	2.5%	-	Yes

**3. Accessibility of workplaces:**

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.	<p>The industry functions within challenging parameters, making it impractical to accommodate employees and workers with varying abilities due to operational demands. Specific tasks, physical requirements, or environmental conditions within the industry pose significant challenges for individuals with diverse abilities, rendering effective accommodation difficult to achieve.</p> <p>The industry's requirements may entail tasks demanding particular physical prowess, dexterity, or sensory abilities that are not readily adaptable for individuals with diverse capabilities. Moreover, safety hazards or other constraints within the work environment can impede efforts to guarantee equal opportunities and accessibility for those with disabilities.</p>
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**4. Equal Opportunity Policy:**

Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.	<p>While there is no distinct written policy specifically addressing this matter, Nava ensures that the principles of non-discrimination and equal treatment are integral to the company's Employees Code of Conduct. This code serves as a benchmark for expected conduct and provides guidance for all employees.</p> <p>The Nava's Employees Code of Conduct can be accessed with the following link: <a href="https://www.navalimited.com/investors/policies/brsr/">https://www.navalimited.com/investors/policies/brsr/</a></p>
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**5. Return to work and Retention rates of permanent employees and workers that took parental leave:**

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	100%	100%
Female	100%	100%	100%	100%
Total	100%	100%	100%	100%

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, Nava provides employees and workers with multiple avenues to voice their grievances and concerns. Apart from the Prevention of Sexual Harassment (POSH) committee and the Whistle Blower platform, employees have access to various forums such as Business HR intervention, team meetings, quarterly business updates, and sessions with the CEO to raise grievances and provide suggestions.
Other than Permanent Workers	
Permanent Employees	<p>The redressal mechanism employed by Nava encompasses several key elements to ensure a fair and effective resolution. These elements include:</p> <ul style="list-style-type: none"> <li>• Detailed discussion: The concerned individual engages in thorough discussions to understand the specifics and complexities of the grievance, facilitating a transparent exchange of information.</li> <li>• Investigation and assessment: The issue undergoes a comprehensive investigation and evaluation process, which may include gathering evidence, interviewing relevant parties, and analysing the situation from multiple perspectives to ensure an equitable assessment.</li> <li>• Corrective actions: Following the investigation, appropriate corrective actions are implemented. These measures are designed to address the identified issues, rectify any misconduct, and prevent recurrence of similar incidents.</li> </ul> <p>Through the implementation of this grievance redressal mechanism, Nava underscores its commitment to fostering a supportive and inclusive work environment where employees are encouraged to voice concerns openly.</p>
Other than Permanent Employees	

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

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	508	0	-	517	0	-
Male	500	0	-	510	0	-
Female	8	0	-	7	0	-
Total Permanent Workers	85	49	57.6%	89	51	57.30%
Male	85	49	57.6%	89	51	57.30%
Female	0	0	-	0	-	-

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

Category	FY 2023-24 (Current Financial Year)					FY 2022-23 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	542	495	91%	497	91.6%	543	424	78%	445	82%
Female	1	1	100%	1	100%	1	1	100%	1	100%
Total	543	496	91%	498	91.7%	544	425	78%	446	82%
<b>Workers</b>										
Male	1298	949	73%	564	43%	1662	1399	84%	1485	89%
Female	56	28	50%	21	38%	108	58	54%	60	56%
Total	1354	977	72%	585	43%	1770	1457	82%	1545	87%

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

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	500	489	97.8%	510	444	87%
Female	8	6	75%	7	7	100%
Total	508	495	97.44%	517	451	87.23%
<b>Workers</b>						
Male	85	85	100%	1701	1531	90%
Female	0	0	0	110	110	100%
Total	85	85	100%	1811	1641	90.61%

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

S.No	Particulars	Response
a)	Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage such system?	<p>Nava prioritizes the well-being and safety of its employees as a fundamental aspect of its operations.</p> <p>To uphold this commitment, Nava has implemented robust and compliant protocols across all areas of operation, ensuring the safety of everyone involved.</p> <ul style="list-style-type: none"> <li>• Employee Well-being and Safety: Nava places the highest priority on the well-being and safety of its employees, making it a core aspect of its operations.</li> <li>• Robust Protocols: The company has established comprehensive and compliant safety protocols to protect its workforce.</li> <li>• Safe and Healthy Work Environment: Nava is dedicated to creating and maintaining a work environment that prioritizes employee health and safety.</li> <li>• International Standards: The occupational health, safety, and environmental management system at Nava adheres to international standards, reflecting the company's commitment to excellence.</li> <li>• Continuous Improvement: Nava's focus on health and safety goes beyond compliance, emphasizing continuous improvement and operational excellence.</li> <li>• Culture of Safety: By fostering a culture of safety and promoting adherence to international standards, Nava ensures a secure work environment where employees can thrive.</li> </ul>
b)	What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	<p>Nava conducts routine safety drills to assess the effectiveness of its safety protocols and identify potential risks that may arise during work-related operations. Additionally, Nava maintains regular interaction with on-site personnel to gather feedback and evaluate any hazards they have encountered or anticipated. This feedback is thoroughly analysed to identify potential risks and develop appropriate strategies for mitigating them.</p> <ul style="list-style-type: none"> <li>• Routine Safety Drills</li> <li>• Feedback from On-site Personnel</li> <li>• Risk Analysis and Mitigation</li> <li>• Proactive Safety Measures</li> </ul>

S.No	Particulars	Response
c)	Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)	Nava is committed to maintaining a safe working environment by actively monitoring and addressing work-related hazards. The company emphasizes identifying potential risks and taking swift corrective actions. Nava values worker feedback on safety issues, using it to improve and implement risk mitigation measures. This proactive approach fosters a culture of safety, empowering employees to report concerns and contribute to ongoing safety improvements. Through these efforts, Nava ensures a healthy and secure workplace.
d)	Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)	Nava ensures that all its sites have access to non-occupational medical services, provided either on-site or through partnerships with reputable nearby medical entities. This availability addresses employees' health needs beyond occupational requirements, demonstrating the company's commitment to their overall well-being.  Furthermore, Nava places great importance on training its personnel to respond effectively to on-site medical emergencies. Comprehensive training programs prepare employees to handle medical situations and provide appropriate assistance until professional help arrives. These measures contribute to a safe and supportive work environment, where employees are confident in their ability to manage emergencies and receive necessary medical attention.

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

Safety Incident/Number	Category	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	Nil	Nil
	Workers	Nil	Nil
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	Nil	Nil
No. of fatalities	Employees	Nil	Nil
	Workers	01	Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

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

Describe the measures taken by the entity to ensure a safe and healthy workplace.	<p>At Nava, employee health and safety are top priorities. To ensure a safe working environment, especially in our manufacturing facilities, we have implemented the following measures:</p> <ul style="list-style-type: none"> <li>• <b>Safety Policy and Systems:</b> We have a comprehensive safety policy covering competence, communication, insurance, first aid, training, occupational health, inspections, audits, procurement, contractor control, and risk assessments to identify and address potential risks.</li> <li>• <b>Compliance with Statutory Requirements:</b> Nava adheres to all relevant health and safety regulations, maintaining proactive processes for hazard identification, risk control, and opportunity assessment for continuous improvement.</li> <li>• <b>Training and Induction:</b> We provide thorough safety training for new employees, covering general and job-specific safety measures, including working at height, confined space entry, emergency response, and refresher courses.</li> <li>• <b>Safety Committee:</b> Our Safety Committee collaborates with management to achieve Health, Safety, and Environment (HSE) Policy objectives, address safety concerns, promote awareness, and conduct training and promotional activities.</li> </ul> <p>These initiatives demonstrate Nava's commitment to safety, proactive hazard management, and regulatory compliance, fostering a secure and healthy workplace.</p>
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**13. Number of Complaints on the following made by employees and workers:**

	FY (2023-24) Current Financial Year			FY (2022-23) Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions Health & Safety	There were no complaints on the said parameters during the reporting period as well as the previous year.					

**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%

\*Nava's plants hold ISO 45001:2018 certification for Occupational Health & Safety Management Systems.

SS Engineers conducted a health and safety audit at Paloncha Plant in compliance with statutory requirements on June 26, 2023. And Samal Care Hospital in Banarhpāl, an NABL accredited facility, conducted the Periodical Medical Examination (PME-2023) for all employees and workers at the Odisha Operation.

**15. Corrective Actions:**

<p>Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health &amp; safety practices and working conditions.</p>	<p>After conducting assessments of health and safety practices, as well as working conditions, at Nava, the following corrective actions were taken:</p> <ul style="list-style-type: none"> <li>• <b>Installation of Fire Hydrant Systems:</b> Fire hydrant systems were provided at different elevations in hazardous areas to effectively prevent fire incidents. These systems serve as proactive measures to mitigate the risk of fire and ensure the safety of personnel and assets.</li> <li>• <b>Provision of Handrails:</b> Handrails were installed for all staircases and tapping platforms to enhance safety and prevent accidents related to falls or slips. This measure promotes stability and provides support for employees and contractors, reducing the risk of injuries.</li> <li>• <b>Eye Vision and Colour Vision Testing:</b> As a part of ensuring the well-being of staff and contract workers, all individuals underwent eye vision and colour vision tests. This practice helps identify any potential visual impairments that could impact their safety or job performance, allowing for appropriate measures or accommodations to be implemented.</li> <li>• <b>Implementation of Safety Work Permit System:</b> A safety work permit system was implemented for all non-routine works. This system ensures that necessary safety measures and precautions are followed during such tasks, reducing the likelihood of accidents or incidents. The implementation of the system is strictly enforced without any deviations, emphasizing the importance of adherence to safety protocols.</li> <li>• <b>Dust Extraction Systems and Maintenance:</b> Dust extraction systems were put in place to control dust emissions generated from conveyor transfers. These systems help mitigate the health risks associated with dust exposure and maintain a cleaner working environment. Regular maintenance and prompt replacement of damaged dust bags ensure optimal functioning and minimize dust leakages.</li> </ul> <p>By taking these corrective actions, Nava Limited demonstrates its commitment to continuously improving health and safety practices. These measures address specific areas of concern identified during assessments and contribute to fostering a safer and healthier work environment for all employees and contractors.</p>
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**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 for identifying key stakeholder groups of the entity	<p>Nava has developed a Stakeholder Engagement Framework for identification of Stakeholders. In line with this framework, the stakeholder identification process at the Company considers the following factors;</p> <ul style="list-style-type: none"> <li>• Dependency – groups or individuals who are directly or indirectly dependent on the organisation’s activities, products or services and associated performance, or on whom the organisation is dependent in order to operate.</li> <li>• Responsibility – groups or individuals to whom the organisation has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities.</li> <li>• Attention – groups or individuals who need immediate attention from the organisation about financial, wider economic, social or environmental issues.</li> <li>• Influence – groups or individuals who can have an impact on the organisations or a stakeholder’s strategic or operational decision-making.</li> </ul>
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**2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group:**

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees and Workers	No	<ul style="list-style-type: none"> <li>• Personalised learning and development programmes</li> <li>• Regular performance review and feedback</li> <li>• One-on-one engagement, townhall meetings</li> <li>• Programmes catered around overall wellbeing</li> <li>• Emails, Notice Board, Meetings</li> </ul>	Daily	<p>Purpose: To provide an open forum for employees to voice their concerns and improve company culture.</p> <p>Key topics: Employee concerns, communication, and feedback mechanisms.</p>
Customers	No	<ul style="list-style-type: none"> <li>• Partnering with them in their journey from products to services.</li> <li>• One-on-one interaction</li> <li>• Customer satisfaction survey</li> <li>• Customer service helpline</li> <li>• Email, Telephone and physical meetings, if required</li> </ul>	Fortnightly	<p>Purpose: Address customer queries, suggestions, complaints, and provide assurance.</p>
Suppliers	No	<ul style="list-style-type: none"> <li>• Emails</li> <li>• Supplier portals</li> <li>• Collaborative platforms</li> <li>• Supplier forums</li> <li>• Periodic face-to-face meetings</li> </ul>	As and when required	<p>Purpose: To gather feedback and input from suppliers regarding their experiences, challenges, and suggestions for improvement.</p>



Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	<ul style="list-style-type: none"> <li>• Annual General Meeting</li> <li>• Shareholder Meets</li> <li>• Email</li> <li>• Stock Exchange (SE) intimations</li> <li>• Investor/analysts meet/ conference calls, annual report</li> <li>• Quarterly results, media releases</li> <li>• Company/SE website</li> <li>• E-mail, Notice, Website, Investor Calls &amp; Newspaper advertisements</li> </ul>	Quarterly/ annually and whenever required	Evaluate financial performance and stability for potential growth.
Bankers	No	<ul style="list-style-type: none"> <li>• Periodical Meetings</li> <li>• Periodical Reports</li> <li>• Emails</li> </ul>	Requirement basis	Understand the banking compliance, maintaining rapport with our bankers, and banking/credit facilities
Government/ Regulatory Authorities	No	<ul style="list-style-type: none"> <li>• E-mails and letters</li> <li>• Conferences</li> <li>• Industry forums</li> <li>• Regulatory filings</li> <li>• Meetings with officials</li> <li>• Representations</li> </ul>	On periodical basis as provided under relevant legislations	In relation to Compliances with applicable laws, Industry concerns, changes in regulatory frameworks, skill and capacity building, employment:
Community	Yes	<ul style="list-style-type: none"> <li>• Collaboration with non-governmental organisations (NGOs)</li> <li>• Field visits</li> <li>• CSR and sustainability initiatives</li> <li>• Skill development</li> <li>• One-on-one interactions</li> </ul>	Periodically	Develop and implement sustainable CSR initiatives related to water and natural resource management, community development, education/skill development, and livelihood support.
Board of Directors	No	<ul style="list-style-type: none"> <li>• Board Meetings - Engage with Board members through regular board meetings, either in person or virtually, to discuss company performance, strategy, and challenges</li> <li>• Board Committees - Engage with Board committee members, such as Audit, CSR, and Risk Management committees, for more focused updates and discussions on specific areas of the company's operations</li> <li>• Board Reports - Provide regular reports to the Board on company performance and progress towards strategic goals</li> <li>• Informal Updates - Provide informal updates to Board members on an ongoing basis through channels such as emails, phone calls, or meetings outside of regular Board meetings.</li> </ul>	Quarterly and on any event/need basis	Purpose: To review the company's current business operations, planning and strategies, and identify opportunities for improvement.



Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Distributors	No	Emails, phone calls, distributor portals, and face-to-face meetings	Regular basis	Purpose: To evaluate the sales performance of distributors and discuss strategies to achieve sales targets.
Industry Associations and Trade Unions	No	<ul style="list-style-type: none"> <li>Meetings</li> <li>Letters</li> </ul>	As and when required	Purpose: To collaborate with industry associations and trade unions in advocating for favourable policies, regulations, and standards that benefit the industry as a whole.
Media	No	Emails	As and when required, quarterly	Purpose: To establish and maintain a positive relationship with the media to enhance the company's reputation and brand image.
Subsidiaries	No	<ul style="list-style-type: none"> <li>Email</li> <li>Phone</li> <li>Board representatives</li> </ul>	As and when required	To align the subsidiary company's goals and strategies with the overall objectives of Nava Limited.

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



**ESSENTIAL INDICATORS:**

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

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	508	508	100%	517	517	100%
Other than permanent	0	0	-	0	0	-
<b>Total Employees</b>	<b>508</b>	<b>508</b>	<b>100%</b>	<b>517</b>	<b>517</b>	<b>100%</b>
<b>Workers</b>						
Permanent	85	85	100%	89	89	100%
Other than permanent	1667	1667	100%	1722	1722	100%
<b>Total Workers</b>	<b>1752</b>	<b>1752</b>	<b>100%</b>	<b>1811</b>	<b>1811</b>	<b>100%</b>

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

Category	FY 2023-24 (Current Financial Year)					FY 2022-23 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	%(B/A)	No. (C)	%(C/A)		No. (E)	%(E/D)	No.(F)	%(F/D)
<b>Employees</b>										
Permanent										
Male	500	0	-	500	100%	510	0	-	510	100%
Female	8	0	-	8	100%	7	0	-	7	100%
Other than Permanent										
Male	0	-	-	-	-	-	-	-	-	-
Female	0	-	-	-	-	-	-	-	-	-
<b>Workers</b>										
Permanent										
Male	85	0	-	85	100%	89	0	-	89	100%
Female	0	-	-	-	-	-	-	-	-	-
Other than Permanent										
Male	1591	0	-	1591	100%	1612	0	-	1612	100%
Female	76	0	-	76	100%	110	0	-	110	100%

## 3. Details of remuneration/salary/wages

### a. Median remuneration / wages:

(in Rs.Lakhs)

Category	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)*	4	996.1	0	-
Key Managerial Personnel (KMP)	2	119.26	0	-
Employees other than BoD and KMP	500	7.98	8	12.61
Workers	85	3.34	0	-

\*The Board of Directors here comprises of Executive Directors only.

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

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Gross wages paid to females as % of total wages	2.5%	2.3%

**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)

Nava is deeply committed to upholding human rights standards and creating a respectful and inclusive work environment. To effectively manage and address any human rights concerns, the company has implemented the various measures.

- **Dedicated HR Teams:** Specialized Human Resources teams at each operating facility proactively identify and resolve human rights issues.
- **Audit Committee Oversight:** The Audit Committee is tasked with investigating and addressing human rights matters related to Nava’s business operations.
- **Commitment to Standards:** These measures underscore Nava’s dedication to fostering a culture of respect, equality, and inclusivity within its operations.

**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.

Nava is committed to upholding human rights and promoting an ethical, transparent, and accountable work environment. To achieve this, the company has implemented the following measures:

- **Code of Conduct and Standing Orders:** Nava’s Code of Conduct and Standing Orders provide clear guidance on human rights issues and promote harmony within the organization.
- **Whistle Blower and Protection Policy:** This policy encourages stakeholders to report Code of Conduct violations, offering incentives for reporting and ensuring prompt addressal of concerns by a designated team.
- **Direct Reporting to Audit Committee:** Employees can report human rights issues directly to the Chairman of the Audit Committee, providing a secure avenue for raising concerns.
- **Commitment to Ethical Standards:** These measures reflect Nava’s dedication to creating a culture of accountability, transparency, and adherence to the highest ethical standards, ensuring that human rights concerns are effectively addressed and resolved.

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

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment Discrimination at workplace Child Labour Forced Labour/ Involuntary Labour Wages Other human rights related issues	There were no complaints on the said parameters during the reporting period as well as the previous year.					

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

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

**8. Prevention of discrimination and harassment cases:**

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

The Whistle Blower & Protection Policy implemented by Nava includes a provision that emphasizes the confidentiality of complainants and protection against victimization.

- Confidentiality and Protection: Reports of wrongful conduct can be submitted confidentially or anonymously, with Nava ensuring strict confidentiality and conducting thorough investigations.
- Strict Enforcement: Nava enforces strict actions against breaches of confidentiality, fostering a secure environment for reporting wrongdoing.
- Encouraging Reporting: This approach encourages stakeholders to report misconduct without fear of retaliation.
- Promoting Accountability: By safeguarding confidentiality, Nava promotes accountability and transparency.
- Upholding Ethical Standards: The policy helps identify and address misconduct, promoting a work environment that upholds ethical standards and protects stakeholder rights.

**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, Nava's business agreements encompass critical aspects such as Health, Safety, and Environment (HSE), Ethics, and Human Rights. These agreements establish the standards and expectations that our suppliers, distributors, and other relevant parties must comply with. They serve as a framework to ensure that our partners align their operations with our values and principles.

By incorporating specific provisions related to HSE, Ethics, and Human Rights into our business agreements, we aim to create a shared commitment to responsible and sustainable practices throughout our supply chain.

**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 – please specify	100%
• Right to clean air and Water	
• Right to Privacy	
• Slavery	

\*Nava's plants hold ISO 45001:2018 certification for Occupational Health & Safety Management Systems.

**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.

During the self-assessment process and through diligent evaluation by customers, no significant risks or concerns were identified.

**PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT**



**ESSENTIAL INDICATORS:**

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>From renewable sources</b>		
Total electricity consumption (A)	95.65 GJ	74.78 GJ
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>95.65 GJ</b>	<b>74.78 GJ</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	24,65,716.15 GJ	36,74,260.21 GJ
Total fuel consumption (E)	1,84,29,225.11 GJ	2,12,25,669 GJ
Energy consumption through other sources (F)	482.4 GJ	2264 GJ
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>2,08,95,423.66 GJ</b>	<b>2,49,02,268 GJ</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>2,08,95,519.31 GJ</b>	<b>2,49,02,268 GJ</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumption / turnover in rupees)	0.0014	0.0015
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)*	0.000063	0.000070
<b>Energy intensity in terms of physical output</b>	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

\* The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2024 and 2023 by IMF for India which is 22.401 & 22.167 respectively.

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.**

Yes, Nava has been recognized as a designated consumer (DC) under the Performance, Achieve and Trade (PAT) Scheme implemented by the Government of India. Nava Limited's inclusion as a DC signifies its commitment to energy efficiency and sustainability.

Nava participated in two PAT cycles. In PAT Cycle-3, which concluded on March 31, 2020 the company has been awarded with 1160 No's of Energy Saving Certificates.

Currently, Nava is part of PAT Cycle-7, covering the period from 2022-23 to 2024-25. The target set for this cycle is to achieve a production of 1.8928 MTOE / MT of Ferro Alloy Production (FAP).

As of now, we have achieved 1.95 MTOE/MT of FAP up to the 2023-24 period. Relevant documents have been submitted to Bureau of Energy Efficiency (BEE) as on 19.06.2024. Our target for the year 2024-25 is to achieve 1.8928 MTOE/MT of FAP.

By actively participating in the PAT Scheme, Nava demonstrates its commitment to energy conservation and environmental stewardship. The company strives to continuously improve its energy efficiency practices and contribute to the national goals of sustainable development.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	35,65,151	31,96,846
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	35,65,151	31,96,846
<b>Total volume of water consumption (in kilolitres)</b>	35,65,151	31,96,846
<b>Water intensity per rupee of turnover</b>	0.00024	0.00019
(Total water consumption / Revenue from operations)		
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b>	0.0000108	0.00000100
(Total water consumption / Revenue from operations adjusted for PPP)		
<b>Water intensity in terms of physical output</b>	-	-
<b>Water intensity</b> (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.** Nava has conducted an assessment by an external agency. SN ENVIRO LABS & CONSULTANTS (National Accreditation Board for Testing and Calibration Laboratories (NABL) & National Accreditation Board for Education and Training (NABET) Accredited Agency) has monitored and assessed on water.

**4. Provide the following details related to water discharged : NOT APPLICABLE**

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (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	-	-
<b>Total water discharged (in kilolitres)</b>	-	-

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.** Nava has conducted an assessment by an external agency. SN ENVIRO LABS & CONSULTANTS (National Accreditation Board for Testing and Calibration Laboratories (NABL) & National Accreditation Board for Education and Training (NABET) Accredited Agency) has monitored and assessed on water.

**5. Mechanism for Zero Liquid Discharge:**

<p>Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.</p>	<p>Nava has successfully implemented a comprehensive zero liquid discharge program as part of its commitment to environmental sustainability. The program is designed to eliminate all liquid waste generated by our operations, ensuring responsible management of water resources.</p> <p>To achieve this goal, we have made significant investments in advanced treatment and discharge systems. These state-of-the-art systems enable us to effectively treat and reuse the different types of liquid waste generated during our production processes.</p> <p>For instance, the blowdown water from cooling towers, slag granulation water from the Ferro Alloy Plant, and plant washings are collected in specially lined storage ponds with a capacity of 15200 kilolitres per day (KLD).</p> <p>The collected wastewater is utilized within our plant premises for various purposes, such as water wetting on roads, dust suppression in yards, gardening, and slag granulation at the Ferro Alloy Plant.</p> <p>We have also implemented an online effluent monitoring system to continuously monitor the quality of wastewater.</p> <p>Furthermore, we have implemented robust wastewater treatment measures for domestic wastewater generated within the plant premises. Sewage treatment plants are in operation within the plant premises. These treatment systems effectively treat the domestic wastewater, and the treated water is reused for gardening and other industrial purposes.</p>
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**6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
NOx	mg/Nm3	1375.9	324.14
SOx	mg/Nm3	1950.85	446.15
Particulate matter (PM)	mg/Nm3	461.85	49.91
Persistent organic pollutants (POP)		-	-
Volatile organic compounds (VOC)		-	-
Hazardous air pollutants (HAP)		-	-
Others – please specify		-	-

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.** Nava has conducted an assessment by an external agency. SN ENVIRO LABS & CONSULTANTS (National Accreditation Board for Testing and Calibration Laboratories (NABL) & National Accreditation Board for Education and Training (NABET) Accredited Agency) has monitored and assessed on the Ambient Air Quality, Stack Emissions and Fugitive Emissions.

Nava Limited has Continuous Emission Monitoring Systems (CEMS) capable of measuring various air emission parameters. These integrated systems monitor flow rates, dust levels, and concentrations of key air pollutants like SO2, NO2, PM among others. They ensure compliance with regulatory requirements specific to each emission source

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

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	28,72,497.62	26,55,710.41
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	1,06,565	294.84
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO2 equivalent	0.00020	0.00016
(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)			

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)  (Total Scope 1 and Scope 2 emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO2 equivalent	0.0000090	0.0000074
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes of CO2 equivalent	-	-
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO2 equivalent	-	-

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.

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

Does the entity have any project related to reducing Green House Gas emission? If yes, then provide details.	Nava is actively planning and strategizing to initiate dedicated projects aimed at significantly reducing greenhouse gas (GHG) emissions in the years ahead.
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#### 9. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	NIL	16.92 MT
E-waste (B)	0.25 MT	0.0802 MT
Bio-medical waste (C)	0.033175 MT	0.03520 MT
Construction and demolition waste (D)	NIL	NIL
Battery waste (E)	3.16 MT	2.58 MT
Radioactive waste (F)	NIL	NIL
Other Hazardous waste. Please specify, if any. (G)	<ul style="list-style-type: none"> <li>• Fly Ash - 422176 MT</li> <li>• Slag - 22997 MT</li> <li>• Slag Granules - 103928.83 MT</li> <li>• Fly ash - 95706.240 MT</li> <li>• Bed ash - 43014.890 MT</li> <li>• Flue Gas Cleaning Residue - 8344.15 MT</li> </ul>	13.65 KL (Used Oil)  Ferro Alloy Production (FAP): <ul style="list-style-type: none"> <li>• Used Oil - 680 lit</li> <li>• Waste Containing Oil- 40kg</li> <li>• Flue Gas Cleaning Residue - 2064.64 MT</li> </ul> Power Production (PP): <ul style="list-style-type: none"> <li>• Used Oil - 3078 lit.</li> <li>• Waste Containing Oil - 240 Kg</li> </ul>
Other Non-Hazardous waste generated (H) Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	Ferro Alloy Production (FAP): <ul style="list-style-type: none"> <li>• Used Oil -525 liters</li> <li>• Waste Containing Oil - 25kg</li> <li>• Flue Gas Cleaning Residue - 741MT</li> </ul> Power Production (PP): <ul style="list-style-type: none"> <li>• Used Oil - 1840 liters</li> <li>• Waste Containing Oil- 85 Kg</li> <li>• Used / Waste Oil - 10.08 KL</li> </ul>	<ul style="list-style-type: none"> <li>• GCP Ash - 11161.50</li> <li>• Fly ash &amp; Bed ash - 3,20,744</li> <li>• Si-Mn Granules - 1,25,161.180</li> <li>• Fly Ash- 425342 MT</li> <li>• Slag - 48258 MT</li> </ul>
<b>Total (A + B + C + D + E + F + G + H)</b>	6,96,917.57	9,32,767.05



Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.000047	0.000058
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.0000021	0.0000026
Waste intensity in terms of physical output	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste

<b>(i) Recycled</b>	Flue Gas Cleaning Residue – 9,085.15	4,45,905.18
<b>(ii) Re-used</b>	NIL	11,161.50 • Hazardous Waste Used oil – 3,758 lit • Waste containing oil- 280 kg • Flue Gas cleaning residue- 2,065 MT
(iii) Other recovery operations	NIL	NA
Total	9,085.15	4,57,066.68

**For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)**

Category of waste

(i) Incineration	NIL	NIL
(ii) Landfilling	NIL	NIL
(iii) Other disposal operations	6,87,832.42	4,75,700.37
<ul style="list-style-type: none"> <li>Slag Granules , Fly ash &amp; Bed ash for Brick &amp; Cement Industries), Waste Oil are disposed to authorized approved TSPCB vendors for recycling purpose.</li> <li>Used / Waste Oil is disposed to authorised vendor approved by TSPCB for recycling at their plant.</li> <li>Used / Waste Batteries are disposed on buy back basis to the vendor</li> </ul>		
<b>Total</b>	<b>6,87,832.42</b>	<b>4,75,700.37</b>

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

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 strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

Nava has adopted the following waste management practices:

Solid Waste Management Practice:

- Slag (From Ferro Alloy Plant) and Fly ash (from Power Plant) are main solid wastes.
- After processing in Metal Recovery Plant, slag is completely reused in the form of chips for road making, civil construction and filling of low laying area. Granulated slag is used in fly ash bricks manufacturing instead of river sand.
- 100% utilization of fly ash has been achieved in different areas like fly ash bricks manufacturing, embankment/dyke raising, filling abandoned mine void & stone quarry.
- Free supply of fly ash to local fly ash bricks manufacturing unit.

Hazardous Waste Management Practice:

- Hazardous Waste like used oil, oil-soaked cotton waste & grease cotton waste, spent resins from DM Plant etc. are collected from different maintenance sites of the Plants & primarily stored in different Bins (On concrete floor of Hazardous Waste Storage Shed near General Store), which is disposed of to the Authorized Re-Cycler / Re-processor/ reused for preparation of mud gun mass.
- Hazardous Waste like flue gas clean residue is collected from Gas Cleaning Plant reused by blending with chrome ore in manufacturing of Ferro Chrome.
- Hazardous waste management practice is going on as per Hazardous Waste Management, Handling & Trans-boundary movement rules 2016.

Biomedical Waste Management Practice:

- Waste generated from first aid centre like cotton waste, needles, syringes, ample, bottles etc. are collected in different type of colour containers and after treatment they are disposed of according to laid down procedures.

E-Waste Management Practice:

- Implemented e-waste management in e-waste generating different departments like IT, C&I, Electrical etc. E-waste collection bins are kept in each of the above departments.
- E-waste is disposed through registered/Authorized recyclers.

Domestic Waste Management:

- Domestic Wastes generated from Guest House, Hostel, Canteen, Security Barrack & Colony etc are collected through mobile trolley. We have introduced different bins for collection of both bio- degradable and non-biodegradable on a mobile trolley.
- All colony residents have been trained to handle different types of waste as per our requirement. Automatic Mechanized Organic Waste Converter is installed to convert the food waste generated from colony, canteen, guest house etc to manure.

**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:**

S. No	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
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Nava does not have any operations/offices in/around ecologically sensitive areas.

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

Not applicable, Environmental impact assessment of projects were not required to be undertaken by Nava during the current financial year.

**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. Nava is compliant with the 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.

Nava have maintained active affiliations with a total of 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. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Federation of Telangana and Andhra Pradesh Chambers of Commerce and Industry	State
2.	The Confederation of Captive Power Plants of Odisha	State
3.	The Utkal Chamber of Commerce & Industry Limited, Bhubaneswar (Ferro alloys)	State
4.	Indian Ferro Alloys Producers Association (IFAPA)	National
5.	Engineering Export Promotion Council of India (EEPC India)	National

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

Name of authority	Brief of the case	Corrective action taken
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Nava has not engaged in any anti-competitive conduct.

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



**ESSENTIAL INDICATORS:**

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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This section is not applicable to Nava 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:**

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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This section is not applicable to Nava 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.

Nava has made a concerted effort to establish a comprehensive framework for addressing grievances and concerns raised by the community. At the operational level, a dedicated committee, comprising representatives from various departments, has been formed to oversee the reception, investigation, and resolution of written grievances. This committee is equipped to conduct thorough investigations into reported issues and take prompt and appropriate actions to address them effectively.

Furthermore, Nava places a strong emphasis on proactive engagement with the community. Regular meetings and discussions are held to actively involve community members in identifying and resolving any issues or complaints related to Nava's operations. By fostering a collaborative approach, Nava endeavours to address concerns in real-time and maintain an ongoing dialogue to ensure transparency and accountability.

It is noteworthy that Nava has not received any grievances specifically pertaining to its corporate social responsibility efforts. This reflects Nava's steadfast commitment to upholding exemplary standards and fulfilling its social responsibilities in a responsible and conscientious manner. By prioritizing ethical practices and community engagement, Nava strives to cultivate a positive and harmonious relationship with the communities it serves, thereby contributing to sustainable development and mutual prosperity.

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

Category	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	Nil	Nil
Directly from / within India	100%	100%

Nava does not procure any input material from Micro, Small and Medium Enterprises (MSMEs) or small producers, as the required input materials are natural minerals sourced exclusively from Public Sector Undertakings (PSUs) or large companies.

**7. 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 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Rural	80%	82%
Semi-urban	-	-
Urban	20%	18%
Metropolitan	-	-

\*Does not include contract workmen

**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.

Nava has implemented robust systems to efficiently handle consumer complaints and feedback. It's worth noting that Nava primarily deals in core products such as Ferro alloys and energy, which are not directly sold to end consumers. The energy produced is internally utilized for manufacturing Ferro alloys, essential raw materials for subsequent processing stages in the steel industry. Consequently, consumer complaints are relatively infrequent in this context.

Nevertheless, Nava places significant importance on maintaining exceptional product quality and ensuring customer satisfaction. In the rare event of a consumer issue, Nava has established effective channels for promptly receiving and addressing complaints. These mechanisms enable the company to swiftly respond to concerns and resolve potential issues to the best of its ability, demonstrating a strong commitment to customer-centric practices.

Although consumer complaints may be uncommon due to the nature of Nava's products and their intermediary usage, the company remains steadfast in upholding high standards, continuously enhancing its offerings, and addressing any consumer concerns that may arise within its operational scope.

**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*	48.71%
Safe and responsible usage*	48.71%
Recycling and/or safe disposal	Nil

\* This pertains exclusively to the production of Ferro Alloys (FAP).

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

Category	FY 2023-24 (Current Financial Year)	Remarks	FY 2022-23 (Previous Financial Year)	Remarks
	Received during the year	Pending resolution at end of year	Received during the year	Pending resolution at end of year
Data privacy Advertising Cyber-security Delivery of essential services Restrictive Trade Practices Unfair Trade Practices Other	No complaints were received on the mentioned parameters during the reporting year as well as the previous year.			

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

Particulars	Number	Reasons for recall
Voluntary recalls	Nil	None
Forced recalls	Nil	None

**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.

Nava places considerable emphasis on its cybersecurity policy as a vital measure for safeguarding its digital assets against cyber threats. This policy covers various aspects including information systems, networks, data security, roles and responsibilities, and incident response protocols.

All employees, contractors, and interns are required to adhere with this policy, which entails actions such as protecting confidential information, securing devices, practicing safe email habits, effectively managing passwords, ensuring secure data transmission, and promptly reporting any security breaches.

The IT Team is responsible for implementing security measures, providing training, and investigating breaches. Nava's cyber security policy is accessible on its portal at: <https://www.navalimited.com/investors/policies/brsr/>

**6. Corrective Actions:**

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 section is not applicable to Nava as there have been no reported incidents of such issues till date.

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

- a. Number of instances of data breaches - NIL
- b. Percentage of data breaches involving personally identifiable information of customers - NIL
- c. Impact, if any, of the data breaches - NA

