

Action Construction Equipment Limited

Corporate & Registered Office

Dudhola Link Road, Dudhola, Distt. Palwal-121102, Haryana, India



Date: August 03, 2024

To,

The Manager Listing
BSE Limited
5th Floor, P.J. Towers,
Dalal Street,
Mumbai-400001

Scrip Code: 532762

The Manager Listing
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (E),
Mumbai-400051

CM Quote: ACE

Subject: Business Responsibility and Sustainability Report for FY 2023-24

Dear Sir/Madam,

Pursuant to Regulation 34 (2) (f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Company Business Responsibility and Sustainability Report (BRSR) for Financial Year 2023-24, which also forms part of the Annual Report of the Company for Financial Year 2023-24, submitted to the Exchanges vide our intimation dated August 03, 2024.

This is for your information and records please.

Yours faithfully

For Action Construction Equipment Limited

Anil Kumar
Company Secretary
M.No. ACS:37791

Encl: As Above



Corporate Office: Phone: +91-1275-280111 (50 Lines), Fax: +91-1275-280133, E-mail: works2@ace-cranes.com

Mktg. H.Q.: 4th Floor, Pinnacle, Surajkund, Faridabad, NCR-121009, Phone: +91-129-4550000 (100 Lines), Fax: +91-129-4550022, Email: marketing@ace-cranes.com **Customer Care No.:** 1800 1800 004 (Toll Free), **CIN:** L74899HR1995PLC053860, **Website:** www.ace-cranes.com

Annexure-IX of Board's Report
BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT
Pursuant to the provision of Regulation 34(2) (f) of
SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

SECTION A : GENERAL DISCLOSURES :

I. Details of the listed entity :

S. No.	Particulars	Details
1.	Corporate Identity Number (CIN) of the Company	L74899HR1995PLC053860
2.	Name of the Company	Action Construction Equipment Limited (ACE)
3.	Year of incorporation	1995
4.	Registered office address	Dudhola Link Road, Dudhola, Palwal, Haryana – 121102
5.	Corporate address	Dudhola Link Road, Dudhola, Palwal, Haryana – 121102
6.	E-mail	cs@ace-cranes.com
7.	Telephone	01275-280111, 01275-280103
8.	Website	www.ace-cranes.com
9.	Financial year for which reporting is being done	2023-24
10.	Name of the Stock Exchange(s) where shares are listed	<ul style="list-style-type: none"> • National Stock Exchange of India Limited • BSE Limited
11.	Paid-up Capital	₹ 23,81,66,392
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. Rajan Luthra Chief Financial Officer Tel. No. : 01275-280172 E-mail : cs@ace-cranes.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 disclosure under this report covers the standalone operations of Action Construction Equipment Limited, in India, unless otherwise stated.
14.	Name of Assurance Provider	Not applicable for the reporting period as per SEBI Circular No. SEBI/ HO/CFD/CFD-SEC-2/P/CIR/2023/122 dt. July 12, 2023.
15.	Type of Assurance Provider	Not applicable for the reporting period as per SEBI Circular No. SEBI/ HO/CFD/CFD-SEC-2/P/CIR/2023/122 dt. July 12, 2023

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	Manufacturing and/or sale of cranes, material handling, construction equipment and agri equipment.	100

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

S. No.	Products/Services	NIC Code	% to total Turnover contributed
1.	Cranes	291-Manufacture of general purpose machinery	72.28
2.	Construction Equipment	291-Manufacture of general purpose machinery	13.26
3.	Material Handling	291-Manufacture of general purpose machinery	6.31
4.	Agri Equipment	292-Manufacture of special purpose machinery	8.14
Total			100.00

III. Operations :

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

Location	Number of plants	Number of offices	Total
National	8	13	21
International	-	-	-

19. Markets served by the entity:

A. Number of locations

Locations	Number
National (No. of States)	National: Across India, 28 states and 8 union territories
International (No. of Countries)	More than 37 Countries

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

5.47%

C. A brief on types of customers

Action Construction Equipment Limited is India's leading material handling and construction equipment manufacturing Company offering cutting-edge technology products with a majority market share in Mobile Cranes and Tower Cranes segment. In addition to Mobile Cranes, with a strong history of innovation, the Company's impressive portfolio includes Mobile/Fixed Tower Cranes, Crawler Cranes, Truck Mounted Cranes, Lorry Loaders, Backhoe Loaders/Loaders, Vibratory Rollers, Forklifts, Tractors & Harvesters and other Construction Equipment. ACE has a consolidated presence in all major Infrastructure, Construction, Heavy Engineering and Industrial Projects across the country. ACE has helped accelerate India's socio-economic growth through its presence across high-growth sectors, ACE is committed to contributing towards India's growth story and bringing in quality change in the lives of people.

Through our product portfolio, we serve a wide variety of customers. Our wide range of customers includes Construction and Industrial Companies, Government Agencies, Mining Companies, Rental Companies, and Individuals. Our products play a crucial role in various daily operations at Infra project sites, mining and production of metals, cement, coal industry, power sector, defence & the allied industries. The company has one of the widest Sales and Service network, with over 100+ locations supported by 13 regional offices in India and also exports to over 37 countries across Middle East, Africa, Asia and Latin America.

IV. Employees

20. Detail as at the end of financial year

A. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Employees						
1.	Permanent (D)	1387	1367	98.56%	20	1.44%
2.	Other than permanent (E)	-	-	-	-	-
3.	Total employees (D + E)	1387	1367	98.56%	20	1.44%
Workers						
4.	Permanent (F)	-	-	-	-	-
5.	Other than Permanent (G)	3618	3615	99.92%	3	0.08%
6.	Total Workers (F + G)	3618	3615	99.92%	3	0.08%

B. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently Abled Employees						
1.	Permanent (D)	1	1	100%	-	-
2.	Other than permanent (E)	-	-	-	-	-
3.	Total differently abled employees (D + E)	1	1	100%	-	-
Differently Abled Workers						
4.	Permanent (F)	-	-	-	-	-
5.	Other than Permanent (G)	-	-	-	-	-
6.	Total differently abled workers (F + G)	-	-	-	-	-

21. Participation/Inclusion/Representation of women :

Particulars	Total (A)	No. and Percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	3	37.5%
Key Management Personnel (Other than Board Member)	2	-	-

22. Turnover rate for permanent employees and workers (disclose trends for the past 3 years) :

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	30.96%	0.07%	31.03%	29.36%	0.17%	29.53%	23.57%	0.26%	23.83%
Permanent Workers	-	-	-	-	-	-	-	-	-

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

23. (a) Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate Companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Crane Kraft India Private Limited	Wholly Owned Subsidiary	100.00	No
2.	SC Forma, SA Romania (Under Liquidation)	Subsidiary	89.52	No
3.	Namo Metals	Partnership firm	90.00	No

VI. CSR Details :

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013 : Yes

(ii) Turnover : ₹ 29,11,53,88,913

(iii) Net worth : ₹ 12,19,79,52,867

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			FY 2022-23		
		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 ¹	Yes	-	-	-	-	-	-
Investors (other than shareholders) ²	Yes	-	-	-	-	-	-
Shareholders ²	Yes	10	NIL	-	5	NIL	-
Employees and workers ³	Yes	15	NIL	-	12	NIL	-
*Customers ⁴	Yes	37	12	-	20	8	-
Value Chain Partners	Yes	-	-	-	-	-	-
Other (please specify)	Yes	-	-	-	-	-	-

*Customers complaints includes only legal notices and consumers cases filed with Hon'ble courts.

The Company is committed to encourage openness, promote transparency and reporting improvements without fear of rebuttal. The organisation is committed to creating a culture that encourages high standards of ethics and upholds decent and safe working conditions for the entire workforces. Weblink : <https://www.ace-cranes.com/home/investor-policies-and-programme-codes>.

¹Communities while interacting during the community engagement programmes can report their grievances.

²Investors and stakeholders can correspond with the Company by sending an e-mail to cs@ace-cranes.com and to RTA at admin@skylinerta.com

³Employees and workers can report any grievance by sending an e-mail to auditcommittee.wb@ace-cranes.com.

⁴Consumers can report grievances through toll-free number 1800-1800-004 and can send e-mail at helpdesk@ace-cranes.com.

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.	Brand	R	Brand disruption due to negative feedback on social media, sub-standard service quality & prevalence of counterfeit product.	Implemented system of social listening & sentiments analysis to handle feedback; PAN India network of authorized service centers to address customer complaints.	Negative
2.	Supply	R	Disruption in production due to dependency on single source, volatile commodity cost.	Strong management team continues to work towards sustainable low cost of production, operational excellence and securing key raw material linkage. Continuous focus on cost optimisation projects to bring down fixed costs and optimise variable costs. Development of alternate suppliers and enhanced focus on localisation.	Negative
3.	IT Security & Data Protection	R	Cyber threats, Data breach, use of Company information.	We have IT center and Enterprise Resource Planning (ERP)—integrating all business divisions, Data Loss Prevention strategy implemented across all IT assets. Adoption of strong IT security measures. Implementation of policies and procedures to ensure integrity of cyber security interventions.	Negative
4.	Product - Right Product Quality	R	Products in compliance with regulatory requirements, meet highest quality parameters, environmentally sustainable and features innovative designs.	Redesigning and transitioning all models through process optimization into energy efficient models and Collecting consumer feedback & insights to build strategic focus on smart technology products.	Negative
5.	New Technologies	O	Consumers looking for smart, easy-to-use, energy efficient, technologically advanced products.	The ACE brand has long been associated with well-engineered products and smart solutions by prioritising deep understanding of consumer needs; R&D center helps enhance our capabilities in enhancing world class innovation and optimize product efficiencies.	Positive

6.	Value, Ethics and Compliance	R	ACE recognises that value ethics compliance are essential for its reputation and trust in the market and society. ACE faces the risk of legal or regulatory violations or ethical breaches that could harm its image and performance.	To mitigate this risk, ACE has established a Code of Conduct that outlines the values and principles that guide its actions and decisions. ACE also has various policies and procedures that ensure compliance with all applicable laws and regulations in the countries where it operates. ACE also conducts regular trainings, audits, reviews, and assessments to monitor and ensure compliance and ethical conduct across the organisation. ACE also has a whistle blower mechanism that allows anyone to report any suspected or actual violations or breaches without fear of retaliation.	Positive
7.	Community Engagement & Local Employment	O	ACE sees community engagement & local employment as an opportunity to support the social development of the communities where it operates and to strengthen its social license to operate. ACE engages with the local communities through various initiatives that focus on health care and skill development. ACE also creates employment opportunities for the local people and supports local suppliers and vendors.		Positive
8.	Employment	O	ACE sees employment as an opportunity to attract, retain, and develop a skilled and diverse workforce that is essential for its success and sustainability. ACE also respects the human rights and labour rights of its employees and ensures a safe, healthy, and inclusive work environment for them.		Positive

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.	PRINCIPLE DESCRIPTION
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
P2	Businesses should provide goods and services in a manner that is sustainable and safe.
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains.

P4	Businesses should respect the interests of and be responsive to all its stakeholders.
P5	Businesses should respect and promote human rights.
P6	Businesses should respect and make efforts to protect and restore the environment.
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
P8	Businesses should promote inclusive growth and equitable development.
P9	Businesses should engage with and provide value to their consumers in a responsible manner.

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)	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 Policies of the Company are placed on the Company's website and the same can be accessed through the weblink: https://www.ace-cranes.com/home/investor-policies-and-programme-codes .								
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	To emphasise on the values of transparency and ethical behaviour, empowerment and accountability. The Company has formalised the 'Code of Conduct' for the Directors and employees of the Company. The Code lays down principles and standards that govern the actions of the employees during conduct of the Company's business. It covers all dealings with vendors, consumers, and other business partners.								
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.	ISO 9001 : 2015, ISO 14001 : 2015, ISO 4500 : 2018 & 5S workplace organising management system.								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Please refer to the Chairman's Message, Management Discussion and Analysis Report ("MDA") and in the Annual Report for our management approach and commitments.								
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Please refer to the Chairman's Message, Management Discussion and Analysis Report ("MDA") and in the Annual Report for our management approach and commitments.								
Governance, leadership and oversight										

7.	Statement by director responsible for the business responsibility report highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure).	ACE integrates environmental, social and governance (ESG) principles into its business strategy which is central to improving the quality of life of the communities it serves. As sustainable management is a crucial component of the Company's strategy across its entire value chain, it is constantly making adequate efforts to protect the environment. Throughout the course of the year, the Company remained committed to making its business operations more eco-friendly. Please refer to the Chairman's Message, MDA Report for our management approach and commitments.																		
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Sorab Agarwal Whole Time Director DIN: 00057666																		
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the Directors and senior management periodically monitor the business responsibility performance of the Company. The Board of directors reviews the business responsibility performance on an annual basis. The CSR Committee reviews the social performance and the Risk Management Committee assess and review the identified risks from time to time.																		
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.	The Directors and Senior Management of the Company periodically or on need basis review the Business Responsibility Policies and guide on further actions, if required for modifications/ improvement in the policies.																		
	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances.	The Company is in compliance with statutory requirements of relevance to the principles.																		
11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	<table border="1"> <tr> <td>P 1</td><td>P 2</td><td>P 3</td><td>P 4</td><td>P 5</td><td>P 6</td><td>P 7</td><td>P 8</td><td>P 9</td> </tr> <tr> <td colspan="9">No, however all policies and processes are subject to Internal reviews done for the Company from time to time.</td> </tr> </table>	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	No, however all policies and processes are subject to Internal reviews done for the Company from time to time.								
P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9												
No, however all policies and processes are subject to Internal reviews done for the Company from time to time.																				

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-

The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	-	-	-	-	-	-	-	-	-

SECTION C : PRINCIPLE WISE PERFORMANCE DISCLOSURE :

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

Essential Indicators:

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

Segment	Total 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 & Key Managerial Personnel	4	<ul style="list-style-type: none"> Overall industry in which the Company operates, Company's operations and Strategy and Annual Budget of the Company Internal Financial Control Systems CSR strategy framework Supply Chain of the Company Environment, Health and Safety Risk Management Corporate governance practices Cyber security awareness Other regulatory updates 	100%
Employees other than BoD and KMPs	12	<ul style="list-style-type: none"> Training on Measurement System Analysis & Calibration Training on Mahindra Engine Diagnosis Fabrication Excellence Level-I 5'S Training (Plant Wise) Welding Best Practices Communication Effectiveness Adhesive Technology Training Torque Master Training AI Global Summit 7-QC Tools & 8D Awareness Integration of Generative AI Tools Tractor Products Training 	37.71%
Workers	10	<ul style="list-style-type: none"> Do's & Don'ts for all product segments Work Instructions Trainings 5's Training (Plant Wise) 	15.15%

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

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

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

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

4. Does the entity have an anti-corruption or anti bribery policy ? if yes provide details in brief and if available, provide a web-link to the policy.

Yes, the anti-corruption and anti-bribery policies are included in the Company's Code of Conduct Policy ("COC"). All new hires are required to undergo training on the COC. The Company believes in maintaining high ethical and legal standards. It is committed to imbuing the appropriate regulatory framework to govern its business performance. The link to access policy is <https://www.ace-crane.com/home/investor-policies-and-programme-codes>.

5. Numbers 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	FY 2022-23
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

	FY 2023-24		FY 2022-23	
	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. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

NIL

8. Number of days of accounts payables (Accounts payable *365) / Cost of goods/services procured) in the following format.

	FY 2023-24	FY 2022-23
Number of days of accounts payable	91	92

9. Open-ness of Business

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	FY 2022-23
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) Sales to dealers / distributors as a % of total sales	39%	35%
	(b) Number of dealers / distributors to whom sales are made	457	528
	(c) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	49%	52%
Share of RPTs in	(a) Purchases (Purchases with related parties / Total Purchases)	0.02	0.00
	(b) Sales (Sales to related parties / Total Sales)	1.60	1.61
	(c) Loans & Advances (Loans & Advances given to related parties / Total loans & Advances)	0.00	0.00
	(d) Investments (Investments in related parties / Total Investment made)	1.55	2.62

*Company's vendors of material goods and services are not trading houses, and it is important to note that there is no specific guidance on trading houses in the SEBI BRSR guidelines.

PRINCIPLE 2 : BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE:

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D	5%	3.75%	Developments of Electric CEV-5 Cranes and Engines
Capex	-	-	-

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No), b. If yes, what percentage of inputs were sourced sustainably?

No

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

Waste management in a safe and responsible manner is a crucial priority for our businesses.

Plastics : All plastic waste generated in the plant premises is disposed off through an authorized recycler/third parties approved by the Central Pollution Control Board or the State Pollution Control Board.

E-waste: E-waste is not material to ACE. All the E-waste is disposed through authorised third parties.

Hazardous waste: We have partnered with Government approved vendors and Haryana State Pollution Control Board (HSPCB) vendors, to recycle/dispose our waste oil and other types of Hazardous wastes.

Other waste : All the other Non-hazardous waste generated is sent to the recycler/third parties.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).

If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

No

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)
Permanent Employees											
Male	1367	944	69.06%	1367	100%	-	-	-	-	-	-
Female	20	8	40%	20	100%	-	-	-	-	-	-
Total	1387	952	68.64%	1387	100%	-	-	-	-	-	-
Other than Permanent Employees											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

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

Category	% of Workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number	%(B/A)	Number	%(C/A)	Number	%(D/A)	Number	%(E/A)	Number	%(F/A)
Permanent											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

Other than Permanent											
Male	3615	-	-	3615	100%	-	-	-	-	-	-
Female	3	-	-	3	100%	-	-	-	-	-	-
Total	3618	-	-	3618	100%	-	-	-	-	-	-

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

	FY. 2023-24	FY. 2022-23
Cost incurred on the well-being measures as a % of total revenue of the company	0.02%	0.03%

2. Details of retirement benefits.

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as % of total employees	No. of workers covered as a % of total workers	Deducted and eposited 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%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	Eligibility as per ESIC Act.			Eligibility as per ESIC Act.		
Others						

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.

Yes, Our premises are fully accessible to individuals with disabilities in accordance with the Rights of Persons with Disabilities Act, 2016. We offer comprehensive assistance to ensure that all visitors, employees, and workers are accommodated with ease.

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

The Company is committed to ensuring that existing employees, job applicants and workers are treated fairly in an environment free from discrimination based on race, gender, religion or beliefs, disability, age, sexual orientation, gender identity, gender expression, and so on. The Company promotes equal treatment and opportunities for all employees. The employee code of conduct specifically prohibits discrimination in all its manifestations.

The link to the policy is <https://www.ace-cranes.com/home/investor-policies-and-programme-codes>.

We strive to create a workplace that values diversity and inclusion for all employees.

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

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

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
Other than Permanent Workers	Yes
Permanent Employees	Yes
Other than Permanent Employees	Yes

ACE have whistle blower Policy which is accessible to internal stakeholders and is available on Company's website and In case of any unethical matter, all employees are encouraged to report the concern to their supervisor or reporting manager. For organisational issues, performance and appraisal related concerns or if the complaint is against the Supervisor or Reporting Manager, they are directed towards Human Resource Manager. The whistle blower policy which can be accessed via link: <https://www.ace-cranes.com/home/investor-policies-and-programme-codes>.

All complaints are reviewed periodically, and investigation is carried out followed by strict disciplinary action against person.

In case of contractor workers, contractor takes care of the grievances if any raised by the employee/worker.

7. Membership of employees and worker in association(s) or unions recognised by the listed entity: NIL

Benefits	FY 2023-24			FY 2022-23		
	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	-	-	-	-	-	-
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-
Total Permanent Workers	-	-	-	-	-	-
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23				
	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)
Employees										
Male	1367	-	-	523	38.26	1193	-	-	290	24.31

Female	20	-	-	-	-	16	-	-	-	-
Total	1387	-	-	523	37.71	1209	-	-	290	23.99
Workers										
Male	3615	-	-	548	15.16	2803	-	-	472	16.83
Female	03	-	-	-	-	02	-	-	-	-
Total	3618	-	-	548	15.15	2805	-	-	472	16.83

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1367	1367	100%	1193	1193	100%
Female	20	20	100%	16	16	100%
Total	1387	1387	100%	1209	1209	100%
Workers						
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-
Total	-	-	-	-	-	-

Note : All workers are other than permanent (contractual) . Performance and career development reviews of workers are done by the contractor(s).

10. Health and safety management system:

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

Yes, the Company acknowledges the fact that the identification of work-related hazards is crucial for ensuring the safety of its people. Each plant implements aspect Impact and identifying hazards, assessing risks and defining controls, to ensure that EHS operations are conducted with care. Every manufacturing location has an occupational health and safety management system.

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

The risk assessment process is elaborated with departmental and individual roles and responsibilities, monitoring control measures, competency training and awareness of individuals associated with such activities, all in support of our goal of preventing incidents, injuries, occupational disease, emergency control and prevention, and business continuity. For all activities, whether routine or irregular (permit and project activities), the Company has undertaken its own self-assessments in areas such as electrical safety, fire safety, machine safety, and so on.

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

Yes, the Company urges its employees to record near-miss situations discovered during various operations, which are then classified, and an action plan is developed and implemented to prevent a recurrence. Each manufacturing facility has a specific protocol in place for reporting work-related hazards, injuries, hazardous conditions, and unsafe activities.

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

Yes, all employees are covered under health insurance and ESI scheme.

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

Safety Incident/Number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	-	-
	Workers	-	-
Total recordable work-related injuries	Employees	5	6
	Workers	-	-
No. of fatalities	Employees	-	-
	Workers	-	-
High consequence work-related injury or ill-health (excluding fatalities)	Employees	-	-
	Workers	-	-

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

- ACE manufacturing plants holds Certificates in ISO 14001:2015, ISO 45001:2018, ISO 9001:2015 & 5S workplace organising management system.
- We conduct regular risk assessments to identify potential hazards in the workplace.
- We ensure that each employee has access to and is trained to use appropriate PPE such as gloves, helmets, shoes to protect against specific hazards.
- In terms of equipment, inherently safe machinery is a priority, with the goal of zero level-1 incidents. Process guidelines are followed to ensure safety and compliance.
- Employee motivation is fostered through various activities and celebrations, such as National Safety Week and Environment Week.
- Organization-wide training, awareness programs, and motivational activities are conducted to promote safe behavior and engagement among employees.
- A Reward/Recognition & Consequence Management system has been implemented to address work behaviors and situations, ensuring accountability and reinforcing safety practices.
- Management monitors performance in safety, environment, and compliance on a periodical basis, with a well-defined structure in place for accountability on a regular basis.
- Our adherence to local, state, and national regulations, including ISO standards, guides our comprehensive safety policies and procedures. Regular training sessions on health and safety protocols, first aid, fire drills, and machinery handling are provided to ensure our workforce is well-informed.
- Regular risk assessments are conducted to identify potential hazards, and appropriate PPE is provided to all employees.
- Safety is a top priority at every manufacturing plant, with separate safety committees ensuring the participation of both workers and management. Training and development opportunities are regularly offered to employees, focusing on safety, environment, and compliance.

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

Category	FY 2023-24			FY 2022-23		
	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	4	NIL	-	3	NIL	-
Health & Safety	3	NIL	-	2	NIL	-

14. Assessments for the year:

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

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

Safety at the workplace is of utmost priority at ACE. We have system in place w.r.t. safety inspections, operation control, monitoring, audit and assessments and others. Gaps, learnings, improvements are implemented across the Company to avoid repeated incidents. The corrective actions are driven by site leadership of location.

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

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

The process for identifying key stakeholders is on the basis of the material influence they have on the Company or on how they are materially influenced by the Company's corporate decisions and the consequences of those decisions. We also use various tools and frameworks to identify and prioritize our key stakeholders and their material issues and concerns. We use the feedback and inputs from our stakeholder engagement to improve our decision-making process and our business practices and performance.

The Company makes continual efforts to understand their requirements, expectations and interests to create value for the business.

The Company's stakeholder engagement strategy is focused on two-way communication to receive varying perspectives and apply them to the business.

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
Local Community	No	<ul style="list-style-type: none"> CSR initiatives Volunteering 	Regular/event based	CSR initiatives, Relationship Development and creation of job opportunities etc.
Suppliers	No	<ul style="list-style-type: none"> One to-one meetings Regular operational reviews 	Regular	The Company collaborates with the suppliers to maintain seamless business operations by ensuring effective and efficient procurement practices.
Employees	No	<ul style="list-style-type: none"> Meetings Employee engagement activities Team building, workshops, capability building and training Performance management system Rewards and recognitions 	Regular	Employees are the most important assets of the Company and are essential to its long-term success. They are critical to increasing the Company's competitiveness and confirming its market leadership.

Government and regulatory authorities	No	<ul style="list-style-type: none"> Email website Annual Reports/ Compliance Filings Advertisement 	Regular	Regulatory & Legal Requirements, Technology & Innovation
Consumers	No	Customer engagement surveys	Regular	Consumers' purchasing habits have an influence on the Company, so it is critical to have continual contact with them to understand their needs and desires.
Investors/ Shareholders	No	<ul style="list-style-type: none"> Annual general meeting Financial result declarations Media releases Investor calls and meets 	Regular/event based	Investors are critical to the Company's success and growth. They help the Company by strengthening its financial resilience.

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			FY 2022-23		
	Total (A)	No. of Employees / workers covered (B)	% (B / A)	Total (A)	No. of Employees / workers covered (B)	% (B / A)
Employees						
Permanent	1387	1387	100%	1209	1209	100%
Other than Permanent	-	-	-	-	-	-
Total Employees	1387	1387	100%	1209	1209	100%
Workers						
Permanent	-	-	-	-	-	-
Other than Permanent	3618	3618	100%	2803	2803	100%
Total Workers	3618	3618	100%	2803	2803	100%

*Human Rights is part of ACE COC, so every employee is covered.

The Company operates in an open, fair and transparent manner and is dedicated to upholding the highest ethical standards and practices. To expose unethical conduct and encourage professionalism and ethical behaviour among its staff, the whistle-blower and code of conduct policies are in place.

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

Category	FY 2023-24				FY 2022-23					
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	% (B / A)	No. (C)	% (C / A)		No.(E)	% (E / D)	No. (F)	% (F / D)

Employees										
Permanent	1387	-	-	1387	100%	1209	-	-	1209	100%
Male	1367	-	-	1367	100%	1193	-	-	1193	100%
Female	20	-	-	20	100%	16	-	-	16	100%
Other than Permanent	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Other than Permanent	3618	310	8.57%	3308	91.43%	2805	280	9.98%	2525	90.02%
Male	3615	310	8.58%	3305	91.42%	2803	280	9.99%	2523	90.01%
Female	03	-	-	03	100%	02	-	-	02	100%

3. Details of remuneration/salary/wages, in the following format (₹in lakhs).

A. Median Remuneration Wages.

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)-Executive	2	301.62	2	174.49
Board of Directors (BoD)-Non Executive	3	2.45	1	2.45
Key Managerial Personnel (Other than Board members)	2	34.42	0	-
Employees other than BoD and KMP	1367	5.30	20	4.70
Workers*	3615	-	3	-

*All workers are other than permanent (Contractual). Remuneration/Wages/Salary of workers are paid by contractor(s).

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	0.93%	1.02%

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

Human rights is a sensitive topic, and the Company has zero tolerance for human rights violations. The Company is aware of how severe violations of human rights are. Human rights is one of the Company's key focus areas. Any human rights violation, wherever reported, shall be investigated by the Management following the code of conduct policy of the Company. To maintain a safe and productive workplace, the Company has adopted a POSH policy and a whistle-blower policy. To familiarise the employees with POSH and whistle-blower policies as well as the implications of human rights issues, the Company also offers training on these topics.

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

The Company is committed to supporting internationally accepted human rights principles and standards. It has also established procedures and processes to ensure that no human rights violations occur throughout the Company's operations. The Company's POSH and whistle-blower policies aid employees in reporting complaints. All grievances are addressed as and when received by the respective manufacturing unit heads, project managers, and business unit heads in coordination with HR. All the grievances received are duly investigated, and appropriate actions are taken to resolve the issue or complaint. Whenever required, disciplinary actions are initiated as deemed fit, and assistance from regulatory authorities is sought.

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

	FY 2023-24			FY 2022-23		
	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	NIL	NIL	NIL	NIL	NIL	NIL
Discrimination at workplace	NIL	NIL	NIL	NIL	NIL	NIL
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL
Forced Labour/Involuntary Labour	NIL	NIL	NIL	NIL	NIL	NIL
Wages	NIL	NIL	NIL	NIL	NIL	NIL
Other human rights related issues	NIL	NIL	NIL	NIL	NIL	NIL

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

	FY 2023-24	FY 2022-23
Total Compliants reportd under Sexual Harrasment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	NIL	NIL
Complaints on POSH as a % of female employees/workers	NIL	NIL
Complaints on POSH upheld	NIL	NIL

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

ACE is committed to providing equal opportunities to all individuals and is intolerant towards discrimination and / or harassment based on race, sex, nationality, ethnicity, origin, religion, age, disability, sexual orientation, gender identification and expression (including transgender identity), political opinion, medical condition, language as protected by applicable laws.

The Company's whistle-blower policy has clearly laid down the guidelines to prevent retaliation against a complainant. A complainant has the right to complete anonymity unless required by law enforcement agencies. The organisation prohibits retaliation against a complainant, such as threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages.

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

No. However, the Company strongly believes that compliance with human rights should be form part of every organisation's ethics & policies. Regular engagement activities are organised with suppliers and vendors for discussion on compliance with human right issue.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	0%, ACE periodically monitors compliances of all the relevant laws and policies pertaining to mentioned issues.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

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

NIL

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	FY 2022-23
From Renewable sources		
Total electricity consumption (A)	8.53	5.97
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	8.53	5.97
From non-renewable sources		
Total electricity consumption (D)	26.34	20.82
Total fuel consumption (E)	2.57	2.45
Energy consumption through other sources (F)	-	-
Total energy consumed from non renewable sources (D+E+F)	28.91	23.27
Total energy consumed (A+B+C+D+E+F)	37.44	29.24
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)*	0.01x10 ⁻⁷	0.01x10 ⁻⁷
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / revenue from operations adjusted for PPP)*	-	-
Energy Intensity in terms of physical Output*	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

*Negligible-As production processes of the Company does not require much power.

Note : All figures are in Tera Joules.

Note : Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

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

No, as we do not fall under DC category.

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

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	26749	16495
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	26749	16495
Total volume of water consumption (in kilolitres)	26749	16495
Water intensity per rupee of turnover (Total Water consumption/Revenue from operations)	-	-
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	-	-
Water intensity in terms of physical output		
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

4. Provide the following details related to water discharged.

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(i) To Ground water	-	-
- No treatment	-	-
- With treatment- please specify level of treatment	-	-
(ii) To Seawater	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(iii) Sent to third parties	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(iv) Others	16500	10061
- No treatment	-	-
- With treatment - please specify level of treatment	16500	10061
Total water discharged (in kilometers)	16500	10061

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

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

At present, the Company does not have a zero-liquid discharge mechanism. However, all its facilities use 100% of the treated water

within the premises for horticulture, toilet use and landscaping purposes. Effluent treatment plant for trade effluent treatment and use of treated water for cooling tower make up and floor washing.

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	FY 2022-23
NOx	-	-	-
SOx	-	-	-
Particulate matter (PM)	-	-	-
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

Note : Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	-	-
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	-	-
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	-	-	-
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operation adjusted for PPP)	-	-	-
Total Scope 1 and Scope 2 emissions in terms of physical output	-	-	-
Total scope 1 and scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

Note : Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

8. Does the entity have any project related to reducing Green House Gas emission? if Yes, the provide details.

At its plants, the Company is using natural gas to reduce the GHG emissions and Contributing to sustainable development goals and government's agenda of adopting clean and green energy, the Company at present has solar power generation capacity of 2478.9 KWP.

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

Parameter	FY 2023-24	FY 2022-23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	-	-
E-waste (B)	0.540	0.483

Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	0.483	0.382
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G) (Paint Sludge, Phosphate Sludge and waste oil)	111.690	81.925
Other Non-hazardous waste generated (H) Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	-	-
Total (A+B + C + D + E + F + G+ H)	112.713	82.790
Parameter	FY 2023-24	FY 2022-23
Water intensity per rupee of turnover (Total waste generated / revenue from operations)	-	-
Waster intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / revenue from operations adjusted for PPP)	-	-
Waste intensity in terms of physical output	-	-
Waste 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		
(i) Recycled	-	-
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	-	-
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	112.713	82.790
Total	112.713	82.790

Note : Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

10. Briefly describe the waste management practices adopted in your establishments. describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

The Company makes consistent efforts to track and regulate the use of hazardous substances and considers it essential to manage its resources responsibly since it benefits the environment.

The Company's operational units are responsible for ensuring that all hazardous materials are delivered to a State Pollution Control Board-approved authorised disposal operator/vendors/third parties or other Government approved vendors. Moreover, the waste generated within the plant gets segregated at the source through colour-coded waste collection bins, awareness on waste management, disposal according to the law of the land, etc.

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 :

No.

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.
-	-	-	-
-	-	-	-

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

No data recorded

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain Yes / No)	Relevant Web link
-	-	-	-	-	-
-	-	-	-	-	-

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

Yes, the ACE is compliant with the applicable environment laws/guidelines.

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

PRINCIPLE 7 : BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT :

Essential Indicators

1. A. Number of affiliations with trade and industry chambers/ associations.

Number of affiliations with trade and industry chambers/ associations : 8

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 (State/National)
1.	ICEMA - Indian Construction Equipment Manufacturers Association	National
2.	TMA - Tractors & Manufacturer Association	National
3.	CII - Confederation of Indian Industry	National
4.	FIA - Faridabad Industry Association	State
5.	Crane Owners Association of India	National
6.	Aerial Platform Association of India	National
7.	Palwal Industry Association	State
8.	The Automotive Research Association of India	National

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

For the Financial Year under review, the Company received no adverse orders from regulatory bodies; hence, no corrective actions were required.

Name of authority	Brief of the case	Corrective action taken
-	-	-
-	-	-

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.

NIL

Name and brief details of project	SIA Notification No	Date of Notification	Whether conducted by independent external agency (Yes /No)	Results communicated in public Domain (Yes / No)	Relevant Web link
-	-	-	-	-	-
-	-	-	-	-	-

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

NIL

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)
-	-	-	-	-	-	-
-	-	-	-	-	-	-

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

The Company executes several community programmes to develop healthy relationships with the community. It regularly interacts with people and communities and tries to address their concerns. The Company ensures timely actions are taken to address the concerns raised by communities.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	34.99%	43.07%
Directly from within India	88.91%	87.58%

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

Location	FY 2023-24	FY 2022-23
Rural	-	-
Semi-Urban	-	-
Urban	-	-
Metropolitan	-	-

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

Essential Indicators

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

To ensure customer grievances get addressed in time and with quality, our team follows a time bound standard operating procedure of grievance redressal. Once a customer registers a grievance, it is logged in our system. We analyse the issue and provide Corrective actions and ensure proper resolution. We take measures to make sure that customers don't face the same issues in the future. A toll-free number and E-mail Id is provided on the website.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	Data not recorded

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

	FY 2023-24		Remarks	FY 2022-22		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	NIL	NIL	NIL	NIL	NIL	NIL
Advertising	NIL	NIL	NIL	NIL	NIL	NIL
Cyber-security	NIL	NIL	NIL	NIL	NIL	NIL
Delivery of essential services	NIL	NIL	NIL	NIL	NIL	NIL
Restrictive Trade Practices	NIL	NIL	NIL	NIL	NIL	NIL
Unfair Trade Practices	NIL	NIL	NIL	NIL	NIL	NIL
Other	NIL	NIL	NIL	NIL	NIL	NIL

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

	Number	Reasons for recall
Voluntary recalls	NIL	NIL
Forced recalls	NIL	NIL

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/no) if available, provide a Weblink of the policy.

The Company has a privacy policy in place that offers various security strategies to ensure the data security of users and devices. The policy is present on the Company's website and can be accessed using this link: <https://www.ace-cranes.com/home/investor-policies-and-programme-codes>.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

ACE consider data privacy, a critical aspect to ensure customer information safety. Our Policy on "Risk Management" clearly outlines our approach to maintaining data privacy.

7. Provide the following information relating to data breaches:

- A. Number of instances of data breaches involving personally identifiable information of customers: **Nil**
- B. Percentage of data breaches involving personally identifiable information of customers: **Nil**
- C. Impact, if any, of the data breaches: **NA**