

#### **Newgen Software Technologies Limited**

CIN: L72200DL 1992PLC049074, Registered Office: E-44/13, Okhla Phase II, New Delhi 110020, India Tel: +91 11 46533200, 26384060, 26384146 Fax:+91 11 26383963

**Date:** 27<sup>th</sup> June 2024

BSE Limited	National Stock Exchange of India Limited
Phiroze Jeejeebhoy Towers,	Exchange Plaza, Plot No. C/1, G Block,
Dalal Street,	Bandra- Kurla Complex
Mumbai – 400001	Bandra (E), Mumbai – 400051
Ref.: Newgen Software Technologies Limited	Ref.: Newgen Software Technologies Limited
(NEWGEN/INE619B01017)	(NEWGEN/INE619B01017)
Scrip Code – 540900	

#### Sub: Business Responsibility and Sustainability Report for the Financial Year 2023-24

Dear Sir/Ma'am,

Pursuant to Regulation 34 of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for Financial Year 2023-24, which forms part of the Integrated Annual Report FY 2023-24.

The BRSR is also available on the website of the Company at https://newgensoft.com.

You are requested to kindly take the same on record.

Thanking you,

For Newgen Software Technologies Limited

Aman Mourya Company Secretary

Encl.: a/a



### **Annexure 7**

# **Business Responsibility & Sustainability Reporting**

#### **SECTION A: GENERAL DISCLOSURES**

#### I. Details of the listed entity

Corporate Identity Number (CIN) of the Company:	L72200DL1992PLC049074
Name of the Company:	Newgen Software Technologies Limited
Year of Incorporation:	05-06-1992
Registered Office Address:	E-44/13 Okhla Phase II, New Delhi South Delhi DL
	110020
Corporate Address:	E-44/13 Okhla Phase II, New Delhi South Delhi DL
	110020
E-mail id:	cs.compliance@newgensoft.com
Telephone:	+91 11 46533200
Website:	https://newgensoft.com
Financial Year reported:	1 <sup>st</sup> April 2023 to 31 <sup>st</sup> March 2024
Name of the Stock Exchange(s) where shares are listed:	Bombay Stock Exchange (BSE)
	National Stock Exchange of India (NSE)
Paid-up Capital:	Rs. 14,029 lakhs
Name and contact detail (telephone, email address) of	Arun Kumar Gupta
the person who may be contacted in case of any queries	cs.compliance@newgensoft.com
on the BRSR report:	+91 11 46533200
Reporting boundary - Are the disclosures under this	Disclosures made in this report are on a standalone
report made on a standalone basis (i.e., only for the	basis and pertain only to Newgen Software
entity) or on a consolidated basis (i.e. for the entity and all	Technologies Limited
the entities which form a part of its consolidated financial	
statements, taken together).	
Name of assurance provider	Not applicable
Type of assurance obtained	Not applicable
	Name of the Company: Year of Incorporation: Registered Office Address:  Corporate Address:  E-mail id: Telephone: Website: Financial Year reported: Name of the Stock Exchange(s) where shares are listed:  Paid-up Capital: Name and contact detail (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report: 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). Name of assurance provider

#### II. Products/services

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

S.	Description of Main	Description of Business Activity	% of Turnover of
No.	Activity		the entity
1.	Software & IT services	Software application development Services and related activities	99%

#### 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.	Sale of Software/SaaS/ATS/AMC	9983	48%
2.	Sale of Services/ Others	9983	52%

#### **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	NA	17	20
International	NA	11	20

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

#### a. Number of locations

Locations	Number
National (No. of States)	28 States and 8 Union Territories
International (No. of Countries)	76

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

65%

#### c. A brief on types of customers:

Our customers are Business to Business Customers or Enterprise Customers in the Banking and Financial Services, Government, Shared Services, Healthcare, Insurance and other domains.

#### **IV.** Employees

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

#### a. Employees and workers\*\*\* (including differently abled):

S.	Darticulars	Total	Mal	е	Female		
No.		(A)	No. (B)	% (B / A)	No. (C)	% (C / A)	
		<b>EMPLOYEES</b>					
1.	Permanent* (D)	3890	2957	76.0%	933	24.0%	
2.	Other than Permanent** (E)	521	381	73.1%	140	26.9%	
3.	Total employees (D + E)	4411	3338	75.7%	1073	24.3%	

<sup>\*</sup>Permanent Employees include on-roll employees of Newgen including those who are on Probation.

#### b. Differently abled Employees and workers:

S.	Particulars	Total	Mal	e	Female				
No		(A)	No. (B)	% (B / A)	No. (C)	% (C / A)			
	DIFFERENTLY ABLED EMPLOYEES								
1.	Permanent (D)*	7	7	100%	0	0			
2.	Other than Permanent (E)	0	0	0	0	0			
3.	Total differently abled employees (D + E)	7	7	100%	0	0			

<sup>\*</sup>Diversity, Equity & Inclusion at workplace policy came into effect on 1 March 2023, and the Company started the process of collecting the Unique Disability ID of persons with disabilities thereafter. During the year, the Company had 29 differently abled employees as per the self-declaration in our internal survey, however only 7 of them have provided their Unique Disability ID

#### 21. Participation/Inclusion/Representation of women

	Total (A)	No. and Percentage of Females		
	(A)	No. (B)	% (B/A)	
Board of Directors	7	2	29%	
Key Management Personnel*	8	1	13%	

<sup>\*</sup> Key Managerial Personnel includes Managing Director and Whole Time Directors

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

	FY 2023-24		FY 2022-23			FY 2021-22			
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees*	16%	20%	17%	30%	30%	30%	48%	56%	50%

<sup>\*</sup>Turnover Rate computed as per the SEBI formula which is different from the industry practice and voluntary attrition calculations. Based on calculations as per industry practices, the Turnover rate is 10.4% for Males and 15.2% for Females for FY23-24, 22.4% for Males and 26.3% for Females for FY22-23, 41.6% for Males and 47.7% for Females for FY21-22

<sup>\*\*</sup>Other than Permanent Employees include Temporary, Casual, Contractual & named Third-Party Employees dedicatedly deployed at Newgen premises, Trainees.

<sup>\*\*\*</sup> All employees are categorized as Employees and none as 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 Business Responsibility initiatives of the listed entity? (Yes/No)
1	Newgen Software Inc. USA	WOS	100 %	Yes
2	Newgen Software Technologies Pte. Ltd.	WOS	100 %	Yes
3	Newgen Software Technologies Canada Ltd.	WOS	100 %	Yes
4	Newgen Software Technologies (UK) Limited	WOS	100 %	Yes
5	Newgen Software Technologies Pty Ltd.	WOS	100 %	Yes
6	Newgen Computers Technologies Limited.	WOS	100 %	Yes
7	Newgen Software Technologies LLC	WOS	100 %	Yes
8	Newgen Software Technologies Company Limited	WOS	100 %	Yes

WOS- Wholly owned Subsidiary

• During the year, Number Theory Software Technologies Limited, a wholly-owned subsidiary of the Company merged with the Company pursuant to the Order issued by Hon'ble National Company Law Tribunal (NCLT), New Delhi.

#### VI. CSR Details

- 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) Yes
  - (i) Turnover (in Rs.) 1,13,611.93 lakhs
  - (iii) Net worth (in Rs.) 1,14,757.71 lakhs

#### **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:

	Grievance Redressal		FY 2023-24			FY 2022-23	
Stakeholder group from whom complaint is received	Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	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	NA	NA	NA		NA	NA	
Investors (other than shareholders)	Yes https://newgensoft. com/company/investor- relations/	NA	NA		NA	NA	
Shareholders	Yes https://scores.sebi.gov.in/scores-home https://smartodr.in/login https://newgensoft. com/company/investor-relations/	10	0		16	0	_
Employees and workers	Yes https://investors. newgensoft.com/ wp-content/uploads/ investor/Whistle%20 Blower%20Policy.pdf	82	0		1	0	-

	Grievance Redressal		FY 2023-24			FY 2022-23	
Stakeholder group from whom complaint is received	Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	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
Customers	Yes, we have a mechanism in place to understand and resolve customer complaints	10	0		6	0	_
Value Chain Partners	NA	NA	NA		NA	NA	_
Other (please specify)	NA	NA	NA		NA	NA	_

#### 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.	GHG Emissions and Climate Change	Risk and Opportunity	Linked to Climate Change Risk Opportunity in engaging clients on climate	Undertake initiatives on energy efficiency, renewable energy	Increased operating costs in meeting the environmental standards/initiatives  Scope to capitalize on the opportunity through our solutions
			actions through our solutions		Solutions
2.	Diversity, Equity and Inclusion	Risk and opportunity	Linked to Human Capital risk	processes and governance structures to monitor	This could have a positive and negative impact on Productivity, innovation or retention of talent thus having employee cost implications
3.	Employee Engagement	Risk and opportunity	Linked to Human Capital risk	Increased initiatives for Employee	Impact on employer reputation, increased cost of talent, etc.
				engagement, retention and support. Focus on career and leadership development. Occupational health and safety measures	Scope to create and retain a talent pool and support in customer's digital journeys
4.	Data Privacy and Information Management	Risk and opportunity	Linked to Business and Continuity Risk/ Reputation Risk	Ensuring robust cybersecurity and data privacy frameworks and controls.	Increased operational cost for technological investments and hiring and training talent. Impact on reputation and business
				Continued investment in technology	Build a competitive edge through adoption of stringent data privacy standards
5.	Corporate Governance and Business Ethics	Risks and opportunity	Linked to Business and Continuity Risk/ Reputation Risk	Stipulated policies, processes and systems to ensure ethical conduct and strong governance.	Positive and negative legal and financial implications and reputational consequences impacting business



#### **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.

	Policy:								
	Pulley 6	and man	agemen <sup>•</sup>	t process	es				
<ul> <li>a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)</li> </ul>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	No*	No*	Yes	Yes	Yes	No	Yes	Yes
c. Web Link of the Policies, if available	#	#	#	#	#	#	#	#	#
Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes
Name of the national and	ISO 900	1:2015- C	Quality M	anageme	ent Syste	m			
international codes/certifications/	ISO 270	01:2013-	Informat	ion Secu	rity Mana	agement			
labels/ standards (e.g. Forest					-	-		ont	
Stewardship Council, Fairtrade,				-			IIVIIOIIIII	-III	
	SOC-1 Compliance- System and Organization Controls								
	SOC-2 Compliance- Service organization Control								
and mapped to each principle.	GDPR -	General I	Data Prot	ection R	egulatior	1			
	HIPAA-	The Heal	th Insura	nce Porta	ability and	d Accour	tability A	Act of 199	6
Specific commitments, goals				-		he goals	and targ	jets.	
Performance of the entity against	Not app	licable							
the specific commitments, goals									
for the business responsibility report, highlighting ESG	Please	eier to tri	e Criairri	ан з эре	echioru	ne same			
-									
	Δrun Kı	mar Gur	nta				-		
and oversight of the Business				oft com					
Responsibility policy (ies).				<u>DIL.COITI</u>					
Does the entity have a specified				hairman	and Mar	naging D	irector)		
Committee of the Board/ Director responsible for decision making on sustainability related issues?	res, ivir.	Diwakai	Nigarri (C	-Mailliai	i ariu Mai	naging D	irector)		
	No vour value chain partners? (Yes/No)  Name of the national and nternational codes/certifications/ abels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, SO, BIS) adopted by your entity and mapped to each principle.  Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  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)  Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).  Does the entity have a specified Committee of the Board/ Director responsible for decision making	No Name of the national and nternational codes/certifications/ abels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.  Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  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)  Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).  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Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues?	No Name of the national and international codes/certifications/abels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, SO, BIS) adopted by your entity and mapped to each principle.  Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  Covernance, leadership and overs please refer to the Chairman's Specificated challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)  Details of the highest authority responsible for implementation and oversight of the Business Responsibility have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues?	wour value chain partners? (Yes/No)  Name of the national and international codes/certifications/ abels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, SO, BIS) adopted by your entity and mapped to each principle.  Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  Statement by director responsible for the business responsibility report, highlighting ESC related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)  Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).  Does the entity have a specified committee of the Board/ Director responsible for decision making on sustainability related issues?	Iso 9001:2015- Quality Management System Iso 27001:2013- Information Security Management Iso 27011- Information Security Controls in Cloud e Iso 27018- Personal Data Security Controls Iso 27018- Personal Data Security Standard Internation Security Controls in Cloud e Iso 27018- Personal Data Security Standard Iso 27018- Personal Data Security Standard Internation Security Controls in Cloud e Iso 27018- Personal Data Security Standard Internation Security Controls in Cloud e Iso 27018- Personal Data Security Standard Internation Security Controls in Cloud e Iso 27018- Personal Data Security Controls Iso 27018- Personal Data Security Standard Internation Security Controls in Cloud e Iso 27018- Personal Data Security Controls in Cloud e Iso 27018- Personal Data Security Controls in Cloud e Iso 27018- Personal Data Security Controls Iso 27018- Personal Data Security Controls in Cloud e Iso 27018- Personal Data Security Controls Iso 27018- Personal Data Security Controls in Cloud e Iso 27018- Personal Data Security Controls Iso 270	Nonword value chain partners? (Yes/No)  Name of the national and nternational codes/certifications/ abels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) Standards (e.g. SA 8000, OHSAS, SO, BIS) adopted by your entity and mapped to each principle.  Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments (listed entity has lease the same are not met.  Covernance, leadership and oversight of the Business Responsibility policy (ies).  Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues?  ISO 9001:2013- Information Security Management (ISO 27017- Information Security Controls in Cloud environments (ISO 27018- Personal Data Security Controls (SOC-1 Compliance- System and Organization Controls (SOC-2 Compliance- Service organization Control GDPR - General Data Protection Regulation (HIPAA- The Health Insurance Portability and Accountability A PCI DSS- PCI Data Security Standard  The Company is working towards defining the goals and targets along-with reasons in case the same are not met.  Covernance, leadership and oversight  Please refer to the Chairman's Speech for the same  Covernance, leadership and oversight  Arun Kumar Gupta  Chief Financial Officer  cs.compliance@newgensoft.com  +9111 46533200  Yes, Mr. Diwakar Nigam (Chairman and Managing Director)	Name of the national and nternational codes/certifications/ abels/ standards (e.g. Forest stewardship Council, Falirtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, SO, BIS) adopted by your entity and mapped to each principle.  Specific commitments, goals and targets set by the entity with defined timelines, if any.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  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ISO 27017- Information Security Controls in Cloud environment ISO 27018- Personal Data Security Controls  SOC-1 Compliance- System and Organization Controls  SOC-2 Compliance- System and Organization Controls  SOC-2 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-2 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-2 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-2 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-1 Compliance- System and Organization Controls  SOC-2 Complianc

<sup>\*</sup>Approved by the Senior Management

<sup>#</sup>Weblink of the Policies:

### Principle 1: Ethics, Transparency and Accountability: Businesses should conduct and govern themselves with integrity in a manner that is Ethical, Transparent and Accountable.

- Anti-Bribery and Anti-corruption Policy\*
- Whistleblower Policy- https://investors.newgensoft.com/wp-content/uploads/investor/Whistle%20Blower%20Policy.pdf
- Code of Ethics and Business <u>Conduct-https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Code%20of%20Ethics%20&%20Business%20Conduct%20Ver%203.0.pdf</u>
- Disciplinary Action Policy\*

### Principle 2: Product Life Cycle Sustainability: Businesses should provide goods and services in a manner that is sustainable and safe:

- Information Security Policy\*
- Policy on Disposal and Reuse of Equipment\*
- Policy on Environment Sustainability\*
- Policy on Incident Reporting\*
- Supplier Code of Conduct\*
- Purchase Policy\*

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

• Code of Ethics and Business Conduct - <a href="https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Code%20of%20Ethics%20&%20Business%20Conduct%20Ver%203.0.pdf">https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Code%20of%20Ethics%20&%20Business%20Conduct%20Ver%203.0.pdf</a>

### Principle 4: Stakeholder Engagement: Businesses should respect the interests of and be responsive to all its stakeholders:

CSR Policy - https://investors.newgensoft.com/wp-content/uploads/2020/05/Policy-on-Corporate-Social-Responsibility.pdf

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

- Code of Ethics and Business Conduct <a href="https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/">https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/</a> Code%20of%20Ethics%20&%20Business%20Conduct%20Ver%203.0.pdf
- Supplier Code of Conduct\*
- Nomination and Remuneration Policy <a href="https://investors.newgensoft.com/wp-content/uploads/2021/06/doc00744720230509144545.pdf">https://investors.newgensoft.com/wp-content/uploads/2021/06/doc00744720230509144545.pdf</a>
- Prevention of Sexual Harassment of Women at workplace (POSH) <a href="https://investors.newgensoft.com/wp-content/uploads/2021/06/POSH-compressed.pdf">https://investors.newgensoft.com/wp-content/uploads/2021/06/POSH-compressed.pdf</a>
- Diversity Equity & Inclusion at Workplace Policy <a href="https://landing.newgensoft.com/hubfs/\_2020%20Website%20">https://landing.newgensoft.com/hubfs/\_2020%20Website%20</a> files/IR/Diversity%20Equity%20&%20Inclusion%20at%20Workplace%20Policy.pdf

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

- Policy on Environmental Sustainability\*
- Risk Management Policy <a href="https://investors.newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf">https://investors.newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf</a>
- Policy on Disposal and Reuse of Equipment\*

### Principle 7: Policy Advocacy: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent:

• Code of Ethics and Business Conduct - <a href="https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Code%20of%20Ethics%20&%20Business%20Conduct%20Ver%203.0.pdf">https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Code%20of%20Ethics%20&%20Business%20Conduct%20Ver%203.0.pdf</a>

#### Principle 8: Inclusive Growth: Businesses should promote inclusive growth and equitable development:

- CSR Policy https://investors.newgensoft.com/wp-content/uploads/2020/05/Policy-on-Corporate-Social-Responsibility.pdf
- Purchase Policy\*



### Principle 9: Customer/Consumer Value: Businesses should engage with and provide value to their consumers in a responsible manner:

- Policy on Disposal and Reuse of Equipment\*
- Policy on Incident Reporting\*
- Risk Management Policy <a href="https://investors.newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf">https://investors.newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf</a>

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

Subject for Review	Ur	Indicate whether Review was Undertaken by Director/ Committee of the Board/ Any other Committee							Frequency (Annually/ Half yearly/ Quarterly/ Any other- please specify)									
	ΡΊ	P2	Р3	P4	P5	Р6	P7	P8	P9	ΡΊ	P2	Р3	P4	P5	Р6	P7	P8	P
Performance against above policies and follow up action					Yes								A	nnua	lly			
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances					Yes								A	nnua	lly			
Has the Company	ca	rried		out	P1		P2	P3		P4	<b>P</b> !	5	P6		7	P8		P9

11. Has the Company carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

P1	P2	P3	P4	P5	P6	P7	P8	P9
No								

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	Р9
The Company does not consider the Principles									
material to its business									
The Company is not at a stage where it is in a									
position to formulate and implement the policies									
on specified principles	Not Applicable								
The Company does not have the financial or/human									
and technical resources available for the task									
It is planned to be done in the next financial year									
Any other reason									

<sup>\*</sup>The Policies are available on Newgen's Intranet Platform.

#### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.



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

#### ESSENTIAL INDICATORS

 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	%age of pe in respec Topics / principles covered under the training and its impact covered by awarene Program					
Board of Directors	1	Below training programs are regularly conducted for Board of Directors and Key Managerial Personnel:	100%				
Key Managerial Personnel	1	<ul> <li>Awareness sessions on Newgen's revised Code of Conduct</li> </ul>	100%				
		Familiarization program on various					
		Governance Topics like Anti bribery and corruption disclosures, stakeholders' engagements.					
		Social topics like welfare benefits, D&I initiatives, etc are also covered.					
Employees other than BoD and	352	Inductions programs are conducted for all new employees, which cover topics like:	96.8%				
KMPs		Newgen's Code of Conduct					
		<ul> <li>Policies like Anti-Bribery, Anti-corruption Policy, Conflict of Interest, Vigil Mechanism, Whistleblower Policy, D&amp;I Policy, Prevention of Sexual Harassment of Women at workplace (POSH) etc.</li> </ul>					
		All existing employees at Newgen are required to undergo refresher training on annual basis.					
		Additionally, Health and Safety trainings such as Fire Safety, Information Security etc. are periodically conducted at all our office locations.					

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 regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/fine					
Settlement	_	Not Ap	oplicable		
Compounding fees	_				
		Non-Monetary			
	NGRBC Principle	Name of regulatory/ enforcement agencies/ judicial institutions	Brief of th		s an appeal been eferred? (Yes/No)
Penalty/fine					
Settlement	_	Not Ap	oplicable		
Compounding fees	=				

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
Not applicable	

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

Yes, there is an Anti-Bribery & Anti-Corruption (ABAC) policy as well as Code of Conduct for preventing, detecting, and addressing bribery and corruption issues within the organization. Organisational processes have been designed and regularly reviewed to follow the policy.

Newgen adheres to the UN Global Compact's principles for prevention, deterrence and detection of fraud, bribery and other corrupt practices within the organisation. Our aim is to carry out all business activities with complete honesty, integrity, and the utmost ethical standards.

The policy applies to all individuals associated with Newgen worldwide, regardless of their level or grade, ensuring that our commitment to combatting bribery and corruption is upheld across the board.

The policy is available on Newgen's intranet platform

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	FY 2022-23
Directors		
KMPs	None	None
Employees	Note	None
Workers		

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

	FY 20	23-24	FY 20	22-23
	Number	Remarks	Number	Remarks
Number of complaints received in relation to	0	Not	0	Not
issues of Conflict of Interest of the Directors		applicable		Applicable
Number of complaints received in relation to	0	Not	0	Not
issues of Conflict of Interest of the KMPs		applicable		Applicable

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.

Not applicable

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

	FY 2023-24	FY 2023-24
Number of days of accounts payables*	21	26

• Excluding accrued expenses

#### 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	FY 2022- 23
Concentration	a. Purchases from trading houses as % of total purchases	N/A	N/A
of Purchases	b. Number of trading houses where purchases are made from	N/A	N/A
	c. Purchases from top 10 trading houses as % of total purchases	N/A	N/A
	from trading houses		
Concentration	a. Sales to dealers /distributors as % of total sales	N/A	N/A
of Sales	b. Number of dealers / distributors to whom sales are made	N/A	N/A
	c. Sales to top 10 dealers/ distributors as % of total sales to	N/A	N/A
	dealers / distributors		
Share of RPTs	a. Purchases (Purchases with related parties /Total Purchases)	20.7%	25.7%
in sales	b. Sales (Sales to related parties / Total Sales)	29.3%	30.5%
	c. Loans & advances (Loans & advances given to related parties /	-	-
	Total loans & advances)		
	d. Investments (Investments in related parties / Total Investments	7.3%	15.1%
	made)		

- Total investments include investment in treasury instruments
- All Related Party Transactions are with the wholly owned subsidiaries on arms-length basis in ordinary course of business.



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	Not measured	Not measured	Since our products and services are designed and developed with the purpose of digitizing business processes of our customers, we continue to invest in Development of enhanced solutions that could help reduce carbon footprint of our customers, however, we do not currently measure specific project based R&D investments.
Capex	Not measured	Not measured	Majority of our Capital Expenditure (Capex) in IT infrastructure is allocated towards upgrading our existing laptops, desktops and servers.
			This investment focuses on acquiring more energy-efficient and technologically advanced equipment, aligning with our commitment to sustainability and innovation. In addition, we are making specific investments in solar and other areas to become more sustainable, however, they are not captured separately

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

Yes. Newgen has Supplier Code of Conduct and Procurement policy which specifies procedures for sustainable sourcing.

The policy has clear guidelines about requirements of Human rights, Health & safety, Business Ethics and Environment policy from suppliers. Higher weightage is given to Suppliers with sustainability practices of



the suppliers during selection. Through our procurement policy and suppliers' code of conduct, we enforce adherence to the sustainability framework across our entire value chain.

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

As an IT company dealing predominantly with intangible inputs and products, we have integrated principles of sustainable sourcing into all our supply chains, where applicable.

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

Not applicable

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Not applicable



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:

Newgen remains committed to prioritizing the well-being of our employees. Newgen along with the voluntary employee committee (NEWS) supports and encourages employees through various programs/ interventions to maintain physical and mental/emotional wellness. Programs to ensure physical and mental wellness includes Regular Health Check-ups and Preventive Screenings, tie-ups with hospitals to benefit employees, Fitness Programs/ Sports activities and other awareness sessions and mindfulness and meditation programs from time to time. Additionally, comprehensive medical benefits are extended to all employees and their family. Furthermore, we have established partnerships with external childcare facilities across all office locations to support the needs of new parents.

					% of em	ployees co	vered by	,			
Category	Health Total insurance			Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
	(A)	Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
				Perr	nanent	employee	 S				
Male	2957	2957	100%	2957	100%			2957	100%	2957	100%
Female	933	933	100%	933	100%	933	100%	-		933	100%
Total	3890	3890	100%	3890	100%	933	100%	2957	100%	3890	100%

<sup>\*</sup>Coverage of category of employees in Health Insurance include Permanent, probation, casual, temporary employees for NSTL. Coverage of category of employees in Accident Insurance- Permanent, probation, casual, temporary employees for NSTL

Vendors and contractors are required to adhere to statutory compliances as per the State rules for other than permanent categories

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

Not applicable

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 well- being measures as a % of total revenue of the Company*	0.9%	Not Calculated

- Includes deemed cost of parental leaves, contribution to employee fund, day care cost, staff welfare and transport cost.
- 2. Details of retirement benefits, for Current FY and Previous Financial Year.

		FY 2023-24		FY 2022-23			
Benefits	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%	NA	Yes	100%	NA	Yes	
Gratuity	100%	NA	Yes	100%	NA	Yes	
ESI *	0.05%	NA	Yes	0.03%	NA	Yes	
Others - please specify	NA	NA	NA	NA	NA	NA	

<sup>\*</sup>Only 2 employees are eligible for ESIC benefits

#### 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, majority of our office premises have following provisions for differently abled employees and visitors:

- Ramps and handrails
- Accessible washrooms
- Wheelchair
- Designated accessible seats, parking etc.

Newgen is constantly evaluating the accessibility of offices and gathering feedback from employees to identify any gaps and address issues pointed out. Based on evaluation and feedback, we are continuously working towards improving infrastructure for eliminating barriers to ensure that they remain compliant with any changes to accessibility requirements either statutory or otherwise.

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

Yes, Newgen upholds a Diversity, Equity and Inclusion at workplace policy that is accessible to all our employees on the intranet. This policy ensures no discrimination based on disability, race, gender, age, religion, sexual orientation, or other beliefs.

We persist in our efforts to provide equal opportunities for individuals with disabilities across all employment facets, encompassing recruitment, training, promotions, and working conditions. The link to our Diversity Equity and Inclusion at Workplace policy is <a href="https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Diversity%20">https://landing.newgensoft.com/hubfs/\_2020%20Website%20files/IR/Diversity%20</a> Equity%20&%20Inclusion%20at%20Workplace%20Policy.pdf

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

Gender	Permanent emp	oloyees
Gender	Return to work rate	Retention rate
Male	100%	83%
Female	97%	71%
Total	99%	76%



#### 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. Newgen offers a single platform for reporting various concerns including
Other than Permanent Workers	matters relating to
Permanent Employees	Code of Ethics and Business Conduct
Other than Permanent Employees	Protected disclosures, insider trading, bribery and corruption
	Human rights, discrimination, harassment etc.
	This ensures that employees are able to raise their concerns and they are promptly and effectively addressed.
	For serious matters, a grievance redressal committee is convened within the company. This committee is composed of members from management, HR, Legal, or other pertinent departments, tailored to the specific nature of the grievance at hand.
	Additionally, Newgen has an Independent External Ombudsman under our Whistle-blower mechanism that ensures routing of all complaints to the relevant body for investigation and action. The designated Ombudsman administers the entire process – from recording, reviewing and investigating concerns raised and taking all necessary actions to get the issue resolved.

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

There are no Unions/Associations in Newgen that Employees are affiliated to.

		FY 2023-24		FY 2022-23				
Category	Total employees/ / workers in respective category (A)  No. of employees / workers in respective category, who are part of association(s) or Union (B)		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		Not Applicable		Not Applicable				
<b>Total Permanent</b>		пот Аррпсавте						
Workers								
- Male								
- Female								

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

#### a) Wellbeing and safety:

Employee Health, Wellbeing and Safety has always remained paramount at Newgen. For ensuring this, we regularly conduct following activities:

- Newgen along with the voluntary employee committee (NEWS) supports and encourages employees
  through various programs/ interventions to maintain physical and mental/ emotional wellness. Programs to
  ensure physical and mental wellness includes Regular Health Check-ups and Preventive Screenings, tie-ups
  with hospitals to benefit employees, Fitness Programs/ Sports activities and other awareness sessions and
  mindfulness and meditation programs from time to time.
- Regular fire safety sessions and fire safety training is conducted for or employees, to equip them with knowledge and skills necessary to respond effectively in case of an emergency. Clear evacuation routes and emergency exit signs are prominently displayed, and regular drills are also conducted to familiarize the employees with evacuation procedures.

#### b) Skill Upgradation Training:

We at Newgen take pride in the skills and knowledge of our employees which is always in line with the evolving technology for them to cater to the needs of our customers. Measures for constant Skill upgrade among employees include:

- Regular training sessions to update skills and knowledge.
- Providing access to online learning platforms and resources.
- Offering Certification programs to validate expertise.
- In-house Workshops: Conducting workshops to introduce new technologies and tools.
- Collaboration with Experts: Partnering with industry experts for insights and updates.
- Feedback Mechanism: Encouraging feedback to identify technological gaps and address them promptly.
- Tech Updates: Communicating updates and advancements in technology through internal channels.
- Hands-on Experience: Facilitating opportunities for hands-on experience with new technologies.
- Leadership, soft skills, quality trainings etc.

			Y 2023-24			FY 2022-23				
Category	Total	On Hea safety m		es Upgradation* Total		On Health and safety measures		On Skill upgradation		
	(A)	No.(B)	% (B/A)	No.(C)	% (C/A)	(D)	No.(E)	% (E/D)	No. (F)	% (F/D)
				En	nployees					
Male	3338	1475	33%	3125	94%	2835	2835	100%	2053	72.42%
Female	1073	14/5	55%	1014	95%	926	926	100%	656	70.84%
Total	4411	1475	33%	4139	94%	3761	3761	100%	2709	72.03%

• On Skill upgradation trainings, all trainings related to Newgen Products, Accelerator/domain, Quality Standards, Leadership Skills and other soft skills are included in FY'24. Employees who have undergone one or more trainings are included in the coverage

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

Catagony		FY 2023-24*		FY 2022-23*						
Category	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)				
	Employees									
Male	2957	2663	90.0%	2400	2048	85.3%				
Female	933	873	93.6%	790	714	90.4%				
Total	3890	3536	90.9%	3190	2762	86.6%				

<sup>\*</sup>Data is for Permanent employees only, based on assessments

#### 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 of such system?

Yes, we work diligently to maintain high standard of occupational health and safety across our offices. Some of the practices include:

- Fire and Safety Measures: Installation of apparatus and regular drills to ensure preparedness.
- Provision of Defibrillators: Equipping offices with defibrillators for emergency medical situations.
- Safe Transport Practices: Regular inspection of Company-Provided Transport Facilities for ensuring safe commutes for employees, with a special focus on the safety of female employees.
- Providing training and raising awareness among employees regarding occupational health and safety protocols.
- Adhering to relevant regulations and standards to ensure comprehensive safety measures.



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

In order to proactively address safety hazards, and ensure a secure work environment, the Company employs a comprehensive approach for Preventive Action and Emergency Management. We conduct regular safety inspections, assessments and identify potential risks. These inspections help in formulating and implementing effective standard operating procedures/ preventive measures to mitigate hazards and promote safety protocols across the organization.

At our office locations, we have provision and maintenance of fire detection, alarm, and suppression systems. We also conduct regular mock drills for fire evacuation as well as medical emergencies.

We periodically conduct checks and preventive maintenance of our electrical equipment and Fire detection, alarm and suppression system to prevent fire hazard.

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

Yes, Safety incident reporting and management processes have been designed and implemented to ensure that all work-related incidents are reported and closed after taking necessary corrective actions.

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

Yes, an Annual Health Check-up is provided for preventive healthcare of our employees. We also conduct awareness sessions on mental health and various lifestyle diseases for our employees.

#### 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	Employees	NIL	NIL
worked)			
Total recordable work-related injuries	Employees	NIL	NIL
No. of fatalities	Employees	NIL	NIL
High consequence work-related injury or ill-health (excluding fatalities)	Employees	NIL	NIL

<sup>\*</sup>Including in the contract workforce

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

#### For ensuring safe and healthy workplace, Newgen has taken measures such as:

- Installation and upkeep of fire detection, alarm, and suppression systems in office locations to ensure swift response in emergencies.
- Conducting routine mock drills for fire evacuation and medical emergencies to maintain preparedness and efficiency in response.
- Provision of safe transport practices for employees using Company provided transport.
- Programs to ensure physical and mental wellness includes Regular Health Check-ups and Preventive Screenings, tie-ups with hospitals to benefit employees, Fitness Programs/ Sports activities and other awareness sessions and mindfulness and meditation programs from time to time.

These measures collectively contribute to creating a secure and conducive workplace environment for our employees.

#### 13. 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	
Working Conditions Health & Safety	-	Nil			Nil		

#### 14. Assessments for the year:

	% of your plants and offices that were Assessed (by Company or Statutory Authorities or Third Parties)
Health and safety practices Working Conditions	We assess most of our offices internally on a regularly basis on Health and Safety practices and working conditions. Most of the Health and Safely and Working
	Conditions aspects are covered under ISO 27001 Certification as well.

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

No such incidents were reported during the year

#### LEADERSHIP INDICATORS

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Yes, Newgen has Group Term Insurance policy to support employees' families in the event of death of an employee.



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.

Newgen engages with a diverse range of stakeholders including customers, employees, investors/shareholders, vendors, government and statutory bodies, and the community at large as part of its business activities, CSR, ESG and other engagements. These stakeholders could be individuals, business entities, or other organizations that are touched by Company's business activities or its products/ platform or other activities like CSR undertaken by it as part of its operations. The Company engages with these stakeholders with an objective to understand their needs and requirements and their impact on the business, future outlook and risks in order to enhance the strategic and operational decisions.

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

Stakeholders Group	Whether identified as Vulnerable & Marginalised Group	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement Community Meetings, Notice Board, website, Others)	Frequency of engagement (Annually/ Half yearly/ quarterly/ others- please specify)	Purpose and scope of engagement including Key topics and concerns raised during such engagement
Customers	No	<ul> <li>Customer meetings/ visits/ reviews</li> <li>Industry Events</li> <li>Customer Satisfaction Surveys</li> <li>Customer Meets</li> <li>Brochures/ Case Studies/ Website/ Social media/ Mailers</li> </ul>	<ul> <li>Continuous:         Website/ Social         Media/ Meetings/         Mailers/ Industry         Events</li> <li>Annual: Customer         Satisfaction Surveys/         Customer Meet</li> </ul>	Updates on New products, Resolving Queries, Seeking Customer Feedback & Satisfaction
Employees	No	<ul> <li>NEWS Committee/ Events</li> <li>Townhall</li> <li>HR Surveys</li> <li>Mailers/ Internal Communications</li> <li>Intranet</li> </ul>	<ul> <li>Continuous: NEWS         Committee/ Events/         Mailers/ Internal         Communications/         Intranet</li> <li>Annual: Townhall/         HR Surveys</li> </ul>	Learning & Development, Employee recognition and Engagement activities, Employee performance review and career development, Employee Safety and Well Being



Stakeholders Group	Whether identified as Vulnerable & Marginalised Group	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement Community Meetings, Notice Board, website, Others)	Frequency of engagement (Annually/ Half yearly/ quarterly/ others- please specify)	Purpose and scope of engagement including Key topics and concerns raised during such engagement
Investors	No	<ul> <li>Quarterly Results/ Earnings Call</li> <li>Roadshows</li> <li>Annual General Meeting</li> <li>Financial Reports</li> <li>Press Releases and Presentations</li> <li>Mails</li> <li>Annual Report</li> </ul>	<ul> <li>Continuous: Website/ Social media/ Meetings</li> <li>Quarterly: Quarterly Results/ Earnings Call/ Roadshows/ Financial Reports/ Presentations</li> <li>Event basis: Press Releases</li> <li>Annual General Meeting, Annual Report</li> </ul>	Dividend Updates, Financial Performance, Resolving Queries etc.
Government and Regulatory Bodies	No	<ul> <li>Engagement in global forums</li> <li>Interacting with statutory/ regulatory bodies</li> </ul>	As and when required	Discussions with regards to various regulations and amendments, inspections, approvals.
Suppliers and Business Partners	No	Meetings/ Mails/ visits/ Events	As and when required	Resolving queries and operational challenges
Communities	No	<ul><li>School/Site visits</li><li>Press Releases</li><li>Social Media</li><li>Website</li></ul>	As and when required (continuous efforts)	Implementation of CSR projects.



#### **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:

		FY 2023-24				
Category	Total (A)	No. of employees / workers covered (B)  No. of employees / % (B / A)  Total		Total (C)	No. of employees / workers covered (D)	% (D / C)
		Emplo	yees			
Permanent	3890	3824	98.3%	3190	3011	94.4%
Other than permanent	521	502	96.4%	571	490	85.8%
Total Employees	4411	4326	98.1%	3761	3501	93.1%

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

	FY 2023-24				FY 2022-23							
Category	Total (A)	Mini	ual mum je to	Mini	than mum age	n Total Mi		Total Minimum		Minii	More than Minimum Wage	
		No.(B)	% (B/A)	No. (C)	%(C/A)		No.(E)	%(E/D)	No.(F)	% (F/D)		
			E	mployee	es							
Permanent												
Male	2957	-	-	2957	100%	2400	-	-	2400	100%		
Female	933	-	-	933	100%	790	-		790	100%		
Other Than Permanent	Other Than Permanent											
Male	313	-	-	313	100%	351	_	_	351	100%		
Female	134	-	-	134	100%	125	-	_	125	100%		

<sup>\*</sup> Excluding third party, contract, partner role and onsite employees

#### 3. Details of remuneration/salary/wages

#### 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)	5	87,92,332	2	1,28,37,426
Key Managerial Personnel*	7	3,14,70,964	1	1,79,82,520
Employees other than BoD and KMP	2952	9,50,053	933	8,97,084

• KMP includes Managing Director and Whole Time Directors

#### 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	20.66%	Not calculated

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

Yes

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

Yes, we have a mechanism available to receive and redress any grievances to maintain a work culture that is healthy, fair, and inclusive. This ensures that employees feel heard and valued, and their concerns are addressed promptly and effectively.

Newgen offers a single platform for reporting various concerns including matters relating to

- Code of Ethics and Business Conduct
- Protected disclosures, insider trading, bribery and corruption
- Human rights, discrimination, harassment etc.

This ensures that employees are able to raise their concerns and they are promptly and effectively addressed.

When needed, a committee is formed within the company to resolve the grievance. Committees established work in line with the company's policies on Code of Ethics and Business Conduct, POSH, Whistle-Blower, and Disciplinary Action Protocol (DAP).

#### 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	1	Nil		Nil	Nil	-
Discrimination at workplace	Nil	Nil		Nil	Nil	-
Child Labour	Nil	Nil		Nil	Nil	-
Forced Labour / Involuntary Labour	Nil	Nil		Nil	Nil	-
Wages	Nil	Nil		Nil	Nil	-
Other human Rights related issues	Nil	Nil		1	Nil	-



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

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	1	Nil
Complaints on POSH as a % of female employees / workers	0.09 %	Nil
Complaints on POSH upheld	1	Nil

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

- Our Diversity, Equity and Inclusion at workplace Policy ensures unbiased treatment at all stages of employment at all levels, regardless of disability, race, gender, age, religion, sexual orientation, or other beliefs. We conduct training and awareness sessions for employees to educate them about their rights and responsibilities.
- In the event of a complaint, we conduct confidential investigations, with members required to sign a Non-Disclosure Agreement to maintain confidentiality.
- Our company policies, including the Code of Ethics and Business Conduct, Prevention of Sexual Harassment
  of Women at Workplace (POSH), Whistle-Blower, and Disciplinary Action Protocol (DAP), outline detailed
  mechanisms for handling complaints. Our whistle-blower policy also clearly states that irrespective of the
  findings of the investigation, Complainant will be protected from any adverse actions from the Company.
- Additionally, we have an external Ombudsman for the Whistle-Blower Mechanism, ensuring impartiality and transparency in grievance resolution.

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

Yes, as per applicable Labour Laws

#### 10. Assessments for the year:

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

<sup>\*</sup> Internal Assessment

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

No concerns or risks were identified during these assessments.



BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT.

#### **ESSENTIAL INDICATORS**

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

Parameter (In GJ)	FY 2023-24	FY 2022-23
From renewable sources		
Total electricity consumption (A)	6.27	6.48*
Total fuel consumption (B)		
Energy consumption through other sources (C)		
Total energy consumed from renewable sources (A+B+C)	6.27	6.48
From non-renewable sources		
Total electricity consumption (D)	11,503.63	11000.74*
Total fuel consumption (E)	1368.33	501.35

Parameter (In GJ)	FY 2023-24	FY 2022-23
Energy consumption through other sources (F)		-
Total energy consumed from non- renewable sources (D+E+F)	12,871.96	11502.09
Total energy consumed (A+B+C+D+E+F)	12,878.22	11,508.57
Energy intensity per rupee of turnover	0.11 GJ/ Lakh	0.13 GJ/ Lakh
(Total energy consumed / Revenue from operations)	rupees	rupees
Energy intensity per rupee of turnover adjusted for Purchasing Power	2.54 GJ/ Lakh	2.87 GJ/ Lakh
Parity (PPP)*	Rupees	Rupees
(Total energy consumed / Revenue from operations adjusted for PPP)		
Energy intensity in terms of physical output (Per Employee)	2.92 GJ/	3.06 GJ/
	Employee	Employee

<sup>\*</sup> Total electricity consumption for last year modified based on updated information.

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.

Nc

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.

Not applicable

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	-	-
(iii) Third party water	39,236.65	36,028.94
(iv) Seawater / desalinated water	-	-
(v) Others	126.82	238.79
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	39,363.47	36,267.72
Total volume of water consumption (in kilolitres)	38,197.47	35202.72
Water intensity per rupee of turnover	0.34	0.40
(Total water consumption / Revenue from operations)	Kilolitre / Lakh	Kilolitre / Lakh
	rupees	rupees
Water intensity per rupee of turnover adjusted for Purchasing Power	7.53 KL/ Lakh	8.79 KL/ Lakh
Parity (PPP)*	Rupees	Rupees
(Total water consumption / Revenue from operations adjusted for PPP)		
Water intensity in terms of physical Output (Per Employee)	8.66 KL /	9.36 KL /
	Employee	Employee

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

\*For the purpose of PPP adjustment, conversion rate of INR 22.167/ USD (for 2023) and INR 22.401/ USD (for 2024) has been taken as per the latest information available on the Implied PPP Conversion Rate page of International Monetary Fund website.

4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatn	nent (in kilolitres)	
(i) To Surface water		
- No treatment	0	0
- With treatment - please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment - please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	NA	NA
- With treatment - please specify level of treatment	NA	NA

<sup>\*</sup>For the purpose of PPP adjustment, conversion rate of INR 22.167/ USD (for 2023) and INR 22.401/ USD (for 2024) has been taken as per the latest information available on the Implied PPP Conversion Rate page of International Monetary Fund website.



Parameter	FY 2023-24	FY 2022-23
(iv) Sent to third parties		
- No treatment	0	0
- With treatment - please specify level of Treatment	0	0
(v) Others		
- No treatment		
- With treatment - please specify level of Treatment	1166	1065
Total water discharged (in kiloliters)	1166	1065

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

Nο

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

Majority of our offices are located in multi-tenanted buildings, where the developer or building management is responsible for water treatment and discharge.

In our Chennai office, we have implemented a Zero Liquid Discharge mechanism to ensure responsible water management. We operate our own water treatment plant with a capacity of 12 KLD (Kilo Litres per Day) based on a Batch process Sewage Treatment Plant (STP). This innovative technology combines traditional anaerobic digestion with modern disinfection systems. The water, once free of bio pollutants, undergoes disinfection through Ozonation and filtration. Presently, the treated water is utilized for gardening and other cleaning purposes, contributing to our sustainability efforts.

#### 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	KG	140.43	108.09
Sox	KG	8.42	2.08
Particulate matter (PM)	KG	24.67	11.59
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others - (CO)	KG	58.49	63.4

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
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	466.06	290.53
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	2,642.64	2,490.45
Total Scope 1 and Scope 2 emission intensity per rupee of turnover	tCO2 e/lakh rupees	0.03	0.03
(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)			
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	tCo2e/Lakh Rupee adjusted for PPP	0.61 tCo2E / Lakh Rupee (adjusted for	Lakh Rupee (adjusted for
(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		PPP)	PPP)
Total Scope 1 and Scope 2 emission intensity in terms of physical output (Per Employee)	tCo2e/employee	0.70/ employee	0.74/ employee

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.

\*For the purpose of PPP adjustment, conversion rate of INR 22.167/ USD (for 2023) and INR 22.401/ USD (for 2024) has been taken as per the latest information available on the Implied PPP Conversion Rate page of International Monetary Fund website.

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

Yes, we have adopted number of measures to reduce our Green House Gas emissions:

#### **Energy Consumption Reduction Measures:**

- Majority of our offices have transitioned to LED lights. Motion sensor lights are being installed in common areas, meeting rooms and private offices.
- While a 19 KW-3 phase Rooftop solar power system is already functional at our Delhi Okhla Phase-II office with Net metering system, we are in the process of installation of additional inhouse solar power capacity at Noida and Chennai offices.
- We have also planned to install a Heat pump at our Noida office which will help us save significant amount of electricity during winter months.
- At our Okhla Phase-2 office, we have also converted our diesel based generator to a CNG based generator which will help reduce our carbon emissions
- At our new office space in Mumbai, we have designed it in such a manner that entire seating area gets natural sunlight thus eliminating the need for electrical lights during the day

These concerted efforts are towards our commitment to environmental sustainability and reducing our carbon footprint.

#### 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)	0.001	0.13
E-waste (B)	5.9	3.32
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	0.1	-
Battery waste (E)	6.01	4.04
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	-	-
Other Non-hazardous waste generated <b>(H).</b> 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)	12.02	7.49
Waste intensity per rupee of turnover	0.0001058 MT/	0.0000844 MT/
(Total waste generated / Revenue from operations)	Lakh Rupees	Lakh Rupees
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity	0.00237 MT/	0.00187 MT/
(PPP) (Total waste generated / Revenue from operations adjusted for PPP)	Lakh Rupees	Lakh Rupees
Waste intensity in terms of physical output (Per Employee)	0.003 MT/	0.002 MT/
	employee	employee
Waste intensity (optional) - the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recyc	ling, re-using or o	ther recovery
operations (in metric tonnes)		
Category of waste		
(i) Recycled	11.92*	6.91*
(ii) Re-used		0.58
(iii) Other recovery operations		_
Total	11.92	7.49
For each category of waste generated, total waste disposed by nature of dis	sposal method (ir	metric tonnes)
Category of waste		
(i) Incineration	NA	NA
(ii) Landfilling	NA	NA
(iii) Other disposal operations	NA	NA
Total	NA	NA



\*We sell our plastic waste and battery waste in a responsible manner to the authorized dealer for recycling.

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

\*For the purpose of PPP adjustment, conversion rate of INR 22.167/ USD (for 2023) and INR 22.401/ USD (for 2024) has been taken as per the latest information available on the Implied PPP Conversion Rate page of International Monetary Fund website.

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.

Being an IT company, our inputs, products and processes do not involve the usage of hazardous or toxic material or chemicals. Newgen has adopted Reduce-Reuse-Recycle philosophy to minimize its auxiliary waste. All waste, including Plastic Waste, Battery Waste, and E-waste, is responsibly disposed of through authorized dealers for recycling, following the guidelines set forth in the E-waste Management Rules, 2016.

Our waste management practices encompass:

- Following E-waste Management guidelines and disposing E-waste through authorised dealers
- Collecting and reusing rejected water from RO plants within our facilities for tasks such as mopping and cleaning.
- Introduced stationary made from recycled paper which can be recycled further
- Minimising the use of single use plastic especially plastic bottles in office premises. Encouraging employees to switch to reusable water bottles and also glass water bottles have been introduced for meeting rooms and visitors
- Reduction in food waste in cafeterias with the help of sustained campaign to sensitize employees
- Installation of Padcare machine at Mumbai office to recycle sanitary pads into sterlized paper and plastic
- Implementation of reusable cups and glasses for employees to use for tea and coffee consumption, reducing the need for disposable paper products and minimizing waste.

These waste management initiatives exemplify our commitment to environmental sustainability and responsible resource management.

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	Types of operations	Whether the conditions of environmental approval/clearance are being complied with?
			Not Applicable

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

Name and brief details of projects	EIA Notification No.	Date	Whether conducted by independent external agency	Results communicated in public domain	Relevant Web link
			Not Applicable		

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:

Newgen operates with the philosophy of transparency and compliance, we have teams responsible to ensure Compliance to all applicable laws and regulations.



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

#### **ESSENTIAL INDICATORS**

a. Number of affiliations with trade and industry chambers/ associations.

The company has affiliations with three 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.		Reach of trade and industry chambers/ associations (State/National)
1.	NASSCOM	National
2.	PHD Chamber of Commerce	National
3.	TiE Delhi-NCR	NCR Region

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

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



SHOULD PROMOTE INCLUSIVE GROWTH **EQUITABLE BUSINESSES AND DEVELOPMENT.** 

#### **ESSENTIAL INDICATORS**

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	
The company has not undertaken any SIAs in the surrent financial year						

The company has not undertaken any SIAs in the current financial year.

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)
Not Applicable						

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

Not Applicable

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

The company supports local and small suppliers (MSMEs) by procuring goods and services in proximity to its offices/ locations. First Preference is given to local vendors to the extent possible.

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	10.1%	10.4%
Sourced within India	99.1%	98.7%



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 location, as % of total wage cost

Location	FY 2023-24	FY 2022-23
Rural	-	
Semi-urban Semi-urban	-	Not Calculated
Urban	-	
Metropolitan	100%	

Newgen offices are located in metropolitan areas however we recruit people from all over India. Above numbers are for % of wages paid to new hires in 2023-24 as of total wage bill of new hires only.

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)



### 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.

We have structured approach and mechanism to track and respond to customer complaints and feedback. We conduct regular Business Reviews with our major clients to take their feedback and identify any opportunities for improvement. We also conduct customer satisfaction surveys.

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	
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	

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

	FY 202	23-24	Remarks	FY 2022-23		
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	-	Nil	Nil	-
Advertising	Nil	Nil	-	Nil	Nil	-
Cyber-security	3	Nil	-	Nil	Nil	
Delivery of essential services	NA	NA	-	NA	NA	-
Restrictive Trade Practices	NA	NA	-	NA	NA	-
Unfair Trade Practices	Nil	Nil	-	NA	NA	-
Other*	Nil	Nil	-	Nil*	Nil	-

<sup>\*</sup>Modified based on updated methodology

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

Newgen, being a software product and services company does not have any physical products thus product recall is not applicable. With the help of strong QC process involving rigorous testing, any software defect is rectified before release and deployment.

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

Yes, Newgen has a well-defined and documented Policy on Risk Management. Refer to the URL: <a href="https://investors.newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf">https://investors.newgensoft.com/wp-content/uploads/2021/06/Risk-Management-Policy.pdf</a>

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.

Newgen experienced a security incident related to ransomware in March 2024. Our Emergency response team got into action and worked diligently to contain the attack and mitigate any potential damage. None of our critical services or data were impacted. The Company engaged with global cyber security consulting firms, for comprehensive analysis, providing immediate recommendations and remediation steps. Accordingly, we took all the necessary measures to prevent damage to the IT systems of the Company and to safeguard the integrity and security of our systems. Basis the inputs provided by the consulting firms, the Company has set a roadmap to further investment in this area, to emerge stronger.

- 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