

ROLEX RINGS LIMITED

[CIN: L28910GJ2003PLC041991]

Regd. Office:-BEHIND GLOWTECH PRIVATE LIMITED, GONDAL ROAD, KOTHARIA, RAJKOT

Phone: (281)6699577/6699677

 $Email: compliance @rolexrings.com \ website. \ www.rolexrings.com$

Ref: RolexRings/Reg. 34/BRSR23-24/2

04th September, 2024

To,

Corporate Relationship Department,

BSE Limited,

Phiroze JeeJeebhoy Towers, Dalal Street,

Mumbai-400001

То

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G

Bandra Kurla Complex

Bandra (E), Mumbai - 400 051

Script Code: 543325

Script Symbol: ROLEXRINGS

Sub: Corrigendum to Business Responsibility & Sustainability Report for the Financial Year 2023-24:

Dear Sir,

In continuation to our letter vide Ref. No. RolexRings/Reg. 34/BRSR23-24/1 dated 13th August, 2024, whereby the company had submitted the Business Responsibility & Sustainability Report for the Financial Year 2023-24.

The members are requested to take note of the Corrigendum and the same to be read in conjunction with the BRSR 2023-24. The members are also requested to note that except for the changes enclosed herewith, all the other information as disclosed in BRSR Report remains unchanged.

We request you to take the above on record and treat the same as compliance under the applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015 and provisions of the Companies Act, 2013.

Thanking You,

Yours faithfully, For **Rolex Rings Limited**

(Hardik Dhimantbhai Gandhi) Company Secretary & Compliance Officer [Membership No. A39931]



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CORRIGENDUM TO THE BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT FOR THE FINANCIAL YEAR 2023-24

1) In BRSR Report in [Page No. 3], the table at Point No. 21 with regards to Turnover rate for permanent employees and workers needs to be now read as below:

| Turnover rate for permanent employees and workers | | | | | | | | | |
|---|-------------------------------|--------|--------|--------------------------------|--------|--------|---|--------|--------|
| | FY 2023-24 | | | FY 2022-23 | | | FY 2021-22 | | |
| Particular | (Turnover rate in current FY) | | | (Turnover rate in previous FY) | | | (Turnover rate in the year prior to the previous FY) | | |
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 17.24% | 0 | 17.24% | 17.98% | 0 | 17.98% | 7.92% | 0 | 7.92% |
| Permanent Workers | 42.07% | 0 | 42.07% | 34.34% | 0 | 34.34% | 35.85% | 0 | 35.85% |

- 2) In BRSR Report at [Page No. 4], the figures pertaining to CSR at point No. 23 shall now be read in conjuction with Millions instead of Rupees:
 - a. Turnover (In Mn.): 12,368.19 Mn.
 - b. Net worth (In Mn.): 8,981.84 Mn.

For Rolex Rings Limited

(Hardik Dhimantbhai Gandhi) Company Secretary & Compliance Officer [Membership No. A39931]

ANNEXURE II

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING FORMAT

(Business Responsibility and Sustainability Reporting (BRSR) is the practice of companies disclosing information about their environmental, social, and governance (ESG) performance. It goes beyond financial reporting to provide stakeholders with a comprehensive view of a company's non-financial impacts and contributions to sustainable development. BRSR covers topics such as environmental impact, social responsibility, and governance practices, aiming to promote transparency and accountability.)

SECTIONA: GENERAL DISCLOSURES

I. Details of the listed entity

| Sr. No. | Particulars | FY 2023-2024 |
|------------|--|---|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | L28910GJ2003PLC041991 |
| 2 | Name of the Listed Entity | Rolex Rings Limited |
| 3 | Year of incorporation | 13/02/2003 |
| 4 | Registered office address | B/h. Glowtech Steel Private Limited, Gondal Road, Kotharia-360004, Rajkot, Gujarat |
| 5 | Corporate address | Rolex Rings Limited, Nr. Kotharia Railway Crossing, Opp. Hotel Krishna Park, Gondal Road, Kotharia, Rajkot – 360004, GJ |
| 6 | E-mail | compliance@rolexrings.com |
| 7 | Telephone | 0281-6699677 |
| 8 | Website | www.rolexrings.com |
| 9 | Financial year for which reporting is being done | 01-04-2023 to 31-03-2024 |
| 10 | Name of the Stock Exchange(s) where shares are listed | BSE Limited and NSE Limited |
| 11 | Paid-up Capital | INR 27,23,33,120/- |
| 12 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | CS Hardik Gandhi Company Secretary & Compliance Officer Contact: +91 7405619137 |
| 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). | Standalone |
| 14 | Name of assurance provider | Not Applicable |
| 15 | Type of assurance obtained | Not Applicable |

II. Products/services

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

| Sr. No. | DescriptionofMainActivity | Description of Business Activity | % of Turnover of theentity |
|------------|---------------------------|----------------------------------|----------------------------|
| 1. | Bearings Rings | Bearing Rings | 60% |
| 2. | Automotive Components | Automotive components | 40% |

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

| Sr. No. | Product/Service | NIC Code | %of total Turnover Contributed |
|------------|-------------------------------------|----------|-----------------------------------|
| 1. | Manufacture of other articles n.e.c | 32909 | 100% |

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 | 3 | 1 | 4 |
| International | 0 | 0 | 0 |

19. Markets served by the entity:

a. Number of locations

| Locations | Number |
|----------------------------------|--------|
| National (No. of States) | 1 |
| International (No. of Countries) | 0 |

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

57%

c. A brief on types of customers

 $Our \ customers \ include \ Global \ Multinational \ companies, Tier \ I \ and \ Tier \ II \ component \ Manufacturer \ in \ Domestic \ and \ Overseas.$

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

| Sr. | Particulars | Total | Total M | | Fen | nale |
|-----|--------------------------|-------|---------|-----------|---------|-----------|
| No. | | (A) | No. (B) | % (B / A) | No. (C) | % (C / A) |
| EMP | LOYEES | | | | | |
| 1 | Permanent (D) | 85 | 85 | 100% | 0 | 0% |
| 2 | Other than Permanent (E) | 0 | 0 | 0% | 0 | 0% |
| 3 | Total employees (D + E) | 85 | 85 | 100% | 0 | 0% |
| WOR | KERS | | | | | |
| 4 | Permanent (F) | 1817 | 1817 | 100% | 0 | 0% |
| 5 | Other than Permanent (G) | 573 | 573 | 100% | 0 | 0% |
| 6 | Total workers (F + G) | 2390 | 2390 | 100% | 0 | 0% |

b. Differently abled Employees and workers:

| Sr. | Particulars | Total | Total Male | | Female | |
|-----------------------------|---|-------|------------|-----------|---------|-----------|
| No. | | (A) | No. (B) | % (B / A) | No. (C) | % (C / A) |
| DIFFERENTLY ABLED EMPLOYEES | | | | | | |
| 1 | Permanent (D) | 0 | 0 | 0% | 0 | 0% |
| 2 | Other than Permanent (E) | 0 | 0 | 0% | 0 | 0% |
| 3 | Total differently abled employees (D + E) | 0 | 0 | 0% | 0 | 0% |
| DIFF | ERENTLY ABLED WORKERS | | | | | |
| 4 | Permanent (F) | 16 | 16 | 100% | 0 | 0% |
| 5 | Other than Permanent (E) | 4 | 4 | 100% | 0 | 0% |
| 6 | Total differently abled workers (F + G) | 20 | 20 | 100% | 0 | 0% |

| Particular | Total | No. and percentage of Females | | |
|--------------------------|-------|-------------------------------|-----------|--|
| | (A) | No. (B) | % (B / A) | |
| Board of Directors | 6 | 1 | 16.67% | |
| Key Management Personnel | 2 | 0 | 0% | |

21. Turnover rate for permanent employees and workers

| Particular | FY 2023-24 | | | FY 2022-23 | | | FY 2021-22 | | |
|---------------------|------------|---------------|-----------|--------------------------------|--------|--------|--|--------|--------|
| | (Turnove | er rate in cu | rrent FY) | (Turnover rate in previous FY) | | | (Turnover rate in the year prior to the previous FY) | | |
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 17.24% | 0 | 17.24% | 17.98% | 0 | 17.98% | 7.92% | 0 | 7.92% |
| Permanent Workers | 42.07% | 0 | 42.07% | 34.34% | 0 | 34.34% | 35.85% | 0 | 35.85% |

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

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

Not Applicable

VI. CSR Details

23. (i) Whether CSR is applicable as per section 135 of Companies Act,2013: (Yes/No) Yes

a. Turnover (In Mn.)b. Net worth (In Mn.)12,368.19 Mn.8,981.84 Mn.

VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom complaint | Grievance Redressal | | FY 2023-24 | | FY 2022-23 | | | |
|--|------------------------|---|---|---------|---|---|---------|--|
| is received | Mechanism | Cur | rent Financial ` | /ear | Prev | vious Financial | Year | |
| | in Place (Yes/No)* | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | |
| Communities | Yes | 0 | 0 | - | 0 | 0 | - | |
| Investors (other than shareholders) | Yes | 0 | О | - | 0 | 0 | - | |
| Shareholders | Yes | 0 | 0 | - | 0 | 0 | - | |
| Employees and workers | Yes | 0 | 0 | - | 0 | 0 | - | |
| Customers | Yes | 0 | 0 | - | 0 | 0 | - | |
| Value Chain Partners | Yes | 0 | 0 | - | 0 | 0 | - | |

^{*} https://www.rolexrings.com/policies/

*Grievance Redressal Mechanism in Place (Yes/No)(If Yes, then provide web-link for grievance redress policy)

| Stakeholder group from whom complaint is received | Web Link for Grievance Policy |
|---|---|
| Communities | |
| Investors (other than shareholders) | |
| Shareholders | |
| Employees and workers | http://www.rolexrings.com/wp-content/uploads/2021/03/Vigil- Mechanism-Policy-Whistle-Blower-Policy.pdf |
| Customers | Meditalisin Folloy Willistic Blower Folloy.pur |
| Value Chain Partners | |
| Other (please specify) | |

25. 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

| Sr. 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. | Product Safety & Quality | 0 | Focusing on the quality and safety of products offers manufacturers a chance to tackle potential risks upfront. When companies make quality and safety their top priority, they set themselves apart from competitors and build a reputation for trustworthiness and customer happiness. This dedication to providing top-notch, safe products not only build customer loyalty but also boosts repeat business, leading to increased profits in the long run. | Not Applicable | Positive |
| 2. | Employee well-being and engagement | 0 | Employee engagement refers to the emotional bonds' individuals forge with an organization, shaping their commitment and sense of belonging. When employees are actively engaged, it typically leads to increased loyalty, reflecting positively on company policies and practices that promote employee satisfaction and retention. Conversely, a high turnover rate signals dissatisfaction among employees. | Not Applicable | Positive |
| 3. | Opportunities in Clean Tech | 0 | Clean technology offers a promising opportunity by incorporating various strategies to reduce or eliminate harmful environmental impacts, while also fostering economic and social progress. Its core aim is to reduce pollution and waste while improving productivity and efficiency. | Not Applicable | Positive |
| 4. | Community Relations | 0 | The industrial machinery and goods sector holds a significant position in the economy, providing employment and contributing to community development through taxes and capital generation. However, it faces important considerations regarding environmental policies, community health, and process safety. These factors have wide-ranging implications for regulations, operations, finances, and reputation within the industry. | Not Applicable | Positive |

| Sr. 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) |
|------------|--------------------------------------|--|--|--|--|
| | | | To navigate these challenges effectively, establishing strong relationships with communities becomes imperative. Such relationships can help mitigate potential operational disruptions, reduce regulatory risks, retain talented employees, minimize financial burdens associated with litigation from process safety incidents, and ensure a solid social license to operate. It's crucial to recognize that process safety incidents not only endanger community well-being but also entail regulatory penalties, legal actions, and significant mitigation costs. | | |
| 5. | Occupational Health and Safety | R | Production, maintenance, repair work, and other on-site tasks in industrial settings often demand a considerable amount of manual labor. This dependence on manual labor, however, comes with inherent risks. Workers' exposure to powered haulage and heavy machinery heightens the chances of accidents, falls, fatalities, and injuries. Temporary employees, in particular, may be at greater risk due to their limited training and work experience. Neglecting to safeguard workers' health and safety can lead to fines and penalties, while severe incidents can cause acute injuries and potential liabilities through legal or regulatory actions. Health and safety risks can also result in project delays and downtime, increasing project costs and reducing profitability.' | At Rolex Rings, we routinely carry out health and safety audits to detect any gaps in occupational health and safety hazards. These audits encompass the evaluation of safety protocols, the use of appropriate Personal Protective Equipment (PPE), and the identification of workplace hazards, all in line with industry and health and safety standards. We offer regular training and awareness programs on safe and healthy practices, particularly for the production floor. Additionally, we provide mechanisms for reporting and monitoring occupational health and safety hazards to mitigate risks effectively. | Negative |

| Sr. 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) |
|------------|------------------------------------|--|--|--|--|
| 6. | Material Sourcing efficiency | R | The industrial machinery and goods sector encounter inherent risks within their supply chains due to their dependence on essential materials used in their products. Many of these vital materials are obtained from deposits concentrated in a small number of countries, some of which may be vulnerable to geopolitical disruptions. Furthermore, the increasing global demand for these minerals across various industries can lead to price fluctuations and supply challenges, consequently shaping a competitive environment for companies in this sector. | Implement strategies and practices in place to improve procurement and sourcing of raw materials as it is critical for us uninterrupted production process. Foster positive relations with our vendors and suppliers to ensure long term sustainability in material sourcing. Further, adopt sustainable sourcing practices to procure sustainably sourced raw materials. Implement lean manufacturing practices to ensure a timely production process and reduce high and frequent dependency on suppliers. | Negative |
| 7. | Energy Management | R | The industrial machinery and goods sector frequently depends on substantial energy consumption to power various facilities and machinery, even those not directly engaged in manufacturing processes. Companies' decisions regarding the energy intensity of their operations and the energy sources they employ can fluctuate over time, impacting both operational efficiency and risk exposure. | Rolex Rings has a diversified mix of energy. This is achieved by investments made into renewable energy sources like windmill and solar installations. Conduct energy audits to identify high energy usage areas and find ways to implement energy efficient technologies or process to reduce overall energy consumption. Adopt energy management systems to improve energy efficiency process. | Negative |
| 8. | Corporate Governance | R | Businesses undergo assessment based on their performance in several critical governance domains, including ownership and control, board remuneration, accounting practices, business ethics, and tax transparency. This evaluation scrutinizes how a company's corporate governance and ethical practices affect its shareholders and other investors. | Rolex Rings Limited has efficient policies and practices in place to ensure effective corporate governance. We will continue to implement robust systems and practices to ensure ethical behavior, transparency, and accountability in corporate decision-making. Regular monitoring, independent audits, and board oversight is essential to our business to operate sustainably and help mitigate any risk. | Negative |

| Sr. 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) |
|------------|--|--|---|---|--|
| 9. | Labour Relations | R | Businesses with onsite workers must prioritize effective labor management techniques. Factors to evaluate include workforce size and intensity, operational locations, management-labor relationship quality, and company commitment to worker rights and involvement. Attrition of skilled workers is a substantial operational risk for businesses. | We implement tactics that promote strong labor relations, equal opportunity, worker benefits, and a safe and healthy workplace. We have processes in place to address employee issues. By creating a transparent mechanism and engaging with employees, we improve our labor relations. | Negative |
| 10. | Water consumption and waste water management | R | Companies that use an excessive amount of water in their production operations are vulnerable to water scarcity. This risk may lead to operational disruptions, rising water procurement prices, and higher capital expenditures. Manufacturing activities produce wastewater that requires treatment before discharge. Noncompliance with water quality rules can result in penalties and costly compliance actions. | Rolex Rings factories have a sewage treatment facility that treats industrial effluent before it is released into the environment. Additionally, we use water conservation measures to limit freshwater consumption. Monitor and report on water usage to find areas for improvement and adopt efficient water management practices. | Negative |
| 11. | GHG Emissions | R | Manufacturing of Industrial machinery and goods equipment involves the direct emission of greenhouse gases. Scope 1 emissions result from the burning of fossil fuels during the manufacture and cogeneration processes. Furthermore, manufacturing operations generate airemissions and harmful airpollutants. Those emissions offer potential operational concerns. This results in fines orexpenditures linked with regulation compliance. Management of prioritizing greenhouse gas emissions by Using energy efficiently, Alternative fuels or improving production processes can include unlock financial benefits such as enhanced operations, efficiency and decreased regulations present hazards. | We have implemented effective emission monitoring systems to track and identify any harmful or toxic pollutants emitted into the atmosphere. We conduct frequent GHG emissions audits to assess the effectiveness of existing emission management methods. As a responsible vehicle component maker, we have deployed solar rooftop, groundmount, and windmill energy capacity to offset emissions. We will continue to invest in GHG reduction initiatives and technology. | Negative |

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

| Sr. | No | Disclosure Questions | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | P8 | Р9 |
|--|--|--|-------|---|------------------|----------------------|-------------------|---------|----------|-----|-----|
| Polic | y an | d management processes | | | | | | | | | |
| 1. | а | Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No/NA) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| | b | Has the policy been approved by the Board? (Yes/No/NA) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| | c Web Link of the Policies, if available | | | | https:/ | //www.ro | olexring | s.com/p | olicies/ | _ | |
| 2 | | Whether the entity has translated the policy into procedures. (Yes / No/ NA) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 3 | | Do the enlisted policies extend to your value chain partners? (Yes/No/NA) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 4 | | Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | P3= I | SO 9001: ATF 1694 SO 4500 SO 14001 | 9:2016 1:2018 | | | | | | |
| Specific commitments, goals and targets set by the entity with defined timelines, if any. Rolex Rings Limited is dedicated to integrating sustainability heart of our operations. Currently, we are actively developing sustainability objectives that adhere to international sustainability and tackle key areas such as environmental stewardsh accountability, and economic durability. | | | | | | veloping onal sta | robust indards | | | | |
| 6 | | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | | | | | | | | | |
| Gove | 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)

Dear Stakeholder,

We, as an organization, recognize the relevance of Environmental, Social, and Governance principles in achieving a better future for the community. Our actions centre around incorporating such methods and reaching future environmental goals. We utilize environmentally friendly strategies such as using solar power and windmills for power generation and consumption. Furthermore, our commitment to society is being addressed through corporate social responsibility activities.

We have the power to develop a system that will help us achieve our goals, and we will continue to do so while aligning these goals with the long-term interests of our stakeholders.

As an organisation, we are committed to building on our achievements and making additional good contributions to the environment, society, and government in the coming years. We believe that implementing Environmental, Social, and Governance (ESG) practices into our operational framework will help to create a more sustainable future.

8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).

Mr. Manesh Madeka, Managing Director along with 2 whole time directors

| Sr. I | No | Disclosure Questions | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | P8 | P9 |
|-------|-------------------------------|--|--------------|----------|----------|----------|----------|---------|-----------|-----------|-----|
| 9 | | es the entity have a specified Committee of the Board/ Lues? (Yes / No/ NA). | Director res | sponsibl | e for de | cision m | naking c | n susta | inability | / related | Yes |
| | If Yes please provide details | | | | | | | | | | |
| | ESG | G Committee with Mr. Manesh Madeka as Chairman of th | e Commit | tee | | | | | | | |

10 Details of Review of NGRBCs by the Company

| | Subject for Review | Indicate whether review was undertak Director/Committee of the Board/Any other | | | | | | | | e |
|----|--|---|--|--|--|--|--|----|----|---|
| | | P1 P2 P3 P4 P5 P6 P7 F | | | | | | P8 | P9 | |
| a. | Performance against above policies and follow up action | n Director | | | | | | | | |
| b. | Description of other committee for performance against above policies and follow up action | t N.A. | | | | | | | | |
| C. | Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances | | | | | | | | | |
| d. | Description of other committee for compliance with statutory requirements of relevance to the principles and rectification | | | | | | | | | |

| | Subject for Review | Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee P1 P2 P3 P4 P5 P6 P7 P8 | | | | | | ee | | |
|----|--|---|--|--|--|--|--|----|--|--|
| | | | | | | | | P9 | | |
| a. | Performance against above policies and follow up action | Annually | | | | | | | | |
| b. | Description of other committee for performance against above policies and follow up action | N.A. | | | | | | | | |
| C. | Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances | J J | | | | | | | | |
| d. | Description of other committee for compliance with statutory requirements of relevance to the principles and rectification | | | | | | | | | |

| | | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | P8 | P9 |
|----|---|--------------------------------|---|-----|-----------|-----------|-----|-----|-----|-----|
| 11 | Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). | | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| | If yes, provide name of the agency. | ISO 900 IATF 169 ISO 450 | cy who c 01:2015; 949:2016 001:2018 001:2015 ord | S; | ed evalua | ation for | | | | |

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

| | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | Р8 | Р9 |
|---|----------------|----|----|----|----|----|----|----|----|
| 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) | Not Applicable | | | | | | | | |
| It is planned to be done in the next financial year (Yes/No) | | | | | | | | | |
| Any other reason (please specify) | | | | | | | | | |

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable. Accountable.

(This principle focuses on the importance of ethical conduct and transparency in business operations. Companies should follow ethical business practices and adhere to high standards of integrity. They should also be transparent about their activities, operations, and financial reporting, as well as be accountable for their actions)

Essential Indicators

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

| Segment | Segment Total number Topics/principles covered of training and training and its im awareness programmes held | | %age of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|---|--|
| Board of Directors | 4 | Treasury Management | 66.67% |
| Key Managerial Personnel | 4 | Cyber Security ESG Measures Increasing Operating efficiency | 100% |
| Employees other than BOD and KMPs | 7 | Lean Management Health and Safety Kaison Training 5s | 79.8% |
| Workers | 6 | Lean Management Health and Safety Kaison Training 5s | 62.8% |

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

| Monetary | | | | | | | | | | |
|-----------------|--------------------|---|---|----------------------|--|--|--|--|--|--|
| Particular | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Amount (In INR) (For Monetary Cases only) | Brief of the Case | Has an appeal been preferred? (Yes/No) | | | | | |
| Penalty/ Fine | - | - | - | - | - | | | | | |
| Settlement | - | - | - | _ | - | | | | | |
| Compounding fee | - | - | - | - | - | | | | | |

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

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

| Case Details | Name of the regulatory/ enforcement agencies/ judicial institutions |
|---------------------------------|---|
| Not Applicable. There were no i | nstances where action had to be taken. |

4. Does the entity have anti-corruption or anti-bribery policy? (Yes/ No)

Yes

If Yes, provide details in brief

At Rolex Rings Limited, we adhere to a strict principle of upholding integrity at all times. Our commitment extends to full compliance with local regulations and laws in every country where we conduct business, and we firmly reject any form of corruption. Our company's Code of Ethics enforces a zero-tolerance policy towards corruption and emphasizes the importance of adhering to both legal requirements and our own business principles.

If yes, provide a web link to the policy, if available -Web link anti-corruption or anti bribery policy is place

https://www.rolexrings.com/policies/

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

| Particular | FY 2023-24 | FY 2022-23 |
|------------|------------|------------|
| Directors | 0 | 0 |
| KMPs | 0 | 0 |
| Employees | 0 | 0 |
| Workers | 0 | 0 |

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

| Case Details | FY 20 | 23-24 | FY 2022-23 | | |
|--|--------|--------|------------|--------|--|
| | Number | Remark | Number | Remark | |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | 0 | NA | 0 | NA | |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | 0 | NA | 0 | NA | |

7. Provide detail principles 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 in the following format:

| Particular | FY 2023-24 | FY 2022-23 |
|-------------------------------------|------------|------------|
| Number of days of accounts payables | 43 days | 49 Days |

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 Parameter | Metrics | FY 2023-24 | FY 2022-23 | | |
|------------------------|--|------------|------------|--|--|
| Concentration of | . Purchases from trading houses as % of total purchases | 0 | 0 | | |
| Purchases | b. Number of trading houses where purchases are made from | | | | |
| | Purchases from top 10 trading houses as % of tot purchases from trading houses | al 0 | 0 | | |
| Concentration of Sales | . Sales to dealers / distributors as % of total sales | 0 | 0 | | |
| | o. Number of dealers / distributors to whom sales are made | 0 | 0 | | |
| | Sales to top 10 dealers / distributors as % of total sales dealers / distributors | 0 | 0 | | |
| Share of RPTs in | . Purchases (Purchases with related parties / Tot Purchases) | 0.19% | 0.17% | | |
| | o. Sales (Sales to related parties / Total Sales) | 0.08% | 0.08% | | |
| | Loans & advances (Loans & advances given to relate parties / Total loans & advances) | d 0 | 0 | | |
| | l. Investments | 0 | 0 | | |

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

(This principle highlights the importance of sustainable and safe production practices. Companies should strive to minimize the environmental impact of their activities and ensure that their products and services are safe for consumers and the environment.)

Essential Indicator

| Sr. No. | Particular | FY 2023-24 | FY 2022-23 | Details of improvements in environmental and social impacts |
|------------|------------|------------|------------|--|
| 1 | R&D | 0 | 0 | - |
| 2 | Capex | 45.28% | 33.63% | The Company had installed RoofTop Solar and Ground mounted solar panels in order to improve environmental impact |

| 2 | a. | Does the entity | have procedures i | n place fo | or sustainable sourcing? (| Yes/No |) No |
|---|----|-----------------|-------------------|------------|----------------------------|--------|------|
|---|----|-----------------|-------------------|------------|----------------------------|--------|------|

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

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) | 0 |
|-----|--------------------------------|---|
| (b) | E-waste | 0 |
| (c) | Hazardous waste | 0 |
| (d) | other waste | 0 |

b If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards?

Not Applicable

If not, provide steps taken to address the same

Not Applicable

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

(This principle emphasizes the importance of employee well-being. Companies should provide safe and healthy working conditions, fair wages, and opportunities for career development to all employees in their value chains, including suppliers, contractors, and temporary workers.)

Essential Indicators

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

| Category | % of employees covered by | | | | | | | | | | |
|-------------------------|------------------------------|--------------------|--------------|--------------------|--------------|--------------------|--------------|-------------------------|--------------|--------------------------|--------------|
| | Total Health ins (A) ance | | | | | Maternity benefits | | Paternity Ben- efits | | Day Care facil- ities | |
| | | Num- ber (B) | % (B / A) | Num- ber (C) | % (C / A) | Num- ber (D) | % (D / A) | Num- ber (E) | % (E / A) | Num- ber (F) | % (F / A) |
| Permanent employees | | | | | | | | | | | |
| Male | 85 | 85 | 100% | 85 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 85 | 85 | 100% | 85 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Other than permanent em | ployees | | | | | | | | | | |
| Male | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |

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

| Category | % of Workers covered by | | | | | | | | | | | |
|-------------------|-------------------------|--------------------|------------------|--------------------|-------------------------|--------------------|-----------------------|--------------------|-------------------------|--------------------|--------------------------|--|
| | | | Health insur- Ac | | Accident insur- ance | | Maternity benefits | | Paternity Ben- efits | | Day Care facil- ities | |
| | | Num- ber (B) | % (B / A) | Num- ber (C) | % (C / A) | Num- ber (D) | % (D / A) | Num- ber (E) | % (E / A) | Num- ber (F) | % (F / A) | |
| Permanent Workers | | | | | | | | | | | | |
| Male | 1817 | 1817 | 100 % | 1817 | 100% | 0 | 0% | 0 | 0% | 0 | 0% | |
| Female | 0 | 0 | 0 | 0 | 0 | 0 | 0% | 0 | 0% | 0 | 0% | |
| Total | 1817 | 1817 | 100% | 1817 | 100% | 0 | 0% | 0 | 0% | 0 | 0% | |

| Category | | % of Workers covered by | | | | | | | | | |
|-------------------------|--------------|-------------------------|--------------|--------------------|-------------------------|--------------------|--------------|-------------------------|--------------|--------------------------|--------------|
| | Total (A) | | | | Maternity P benefits | | | Paternity Ben- efits | | Day Care facil- ities | |
| | | Num- ber (B) | % (B / A) | Num- ber (C) | % (C / A) | Num- ber (D) | % (D / A) | Num- ber (E) | % (E / A) | Num- ber (F) | % (F / A) |
| Other than permanent Wo | rkers | | | | | | | | | | |
| Male | 573 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 573 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |

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

| | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Cost incurred on well-being measures as a % of total revenue of the company | 0.05% | 0.05% |

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

| Benefits | FY 2022-23 | | | | | |
|-------------------------|--|---|--|--|---|--|
| | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF | 100% | 100% | Υ | 100% | 100% | Υ |
| Gratuity | 100 % | 100 % | Υ | 100 % | 100 % | Υ |
| ESI | NA | NA | NA | NA | NA | NA |
| Others – please specify | | | | | | |
| EDLI Benefits | - | - | | 100% | 100% | NA |

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.

We prioritize employee happiness, workplace accessibility, and safety for all, including those with disabilities. We prioritize offering equitable opportunities for all employees and workers. We have practices in place to assist any individual with disabilities to carry out their employment without any

inconvenience. Individuals with disabilities can access and exit our premises without waiting in a queue, even at the Canteen.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016?

Yes

If so, provide a web-link to the policy. https://www.rolexrings.com/policies/

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

| Gender | Permanent | Employees | Permanent Workers | | |
|--------|---------------------|----------------|------------------------|----------------|--|
| | Return to work rate | Retention Rate | Return to work rate | Retention Rate | |
| Male | 0 | 0 | 0 | 0 | |
| Female | 0 | 0 | 0 | 0 | |
| Total | 0 | 0 | 0 | 0 | |

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

An employee or a worker can regress their grievances through the following mechanisms:

- a. Report directly to the concerned head of department
- b. Report to Human Resource Development
- c. Follow instructions as mentioned on the Open Door Policy
- d. Email and direct communication through mobile number provided
- e. Follow instructions as mentioned on the Whistle Blower Policy

| Category | Yes/No | If Yes, then give details of the mechanism in brief |
|--------------------------------|--------|--|
| Permanent Workers | Yes | https://www.rolexrings.com/policies/ |
| Other than Permanent Workers | Yes | https://www.rolexrings.com/policies/ |
| Permanent Employees | Yes | https://www.rolexrings.com/policies/ |
| Other than Permanent Employees | Yes | https://www.rolexrings.com/policies/ |

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

| Category | 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 | 85 | 0 | 0% | 90 | 0 | 0% | | |
| Female | 0 | 0 | 0% | 0 | 0 | 0% | | |
| Total Permanent Workers | | | | | | | | |
| Male | 1817 | 0 | 0% | 1701 | 0 | 0% | | |
| Female | 0 | 0 | 0% | 0 | 0 | 0% | | |

8. Details of training given to employees and workers:

| Category | FY 2023-24 | | | | | | FY 2022-23 | | | |
|-----------|------------|---------------|---------------------------------|---------------|-------------------------|------|---|-----------|-------------------------|--------------|
| | Total (A) | | On Health and afety Measures | | On Skill Upgradation | | Total (D) On Health and Safety Measures | | On Skill Upgradation | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | | Number (E) | % (E / D) | Number (F) | % (C / D) |
| Employees | | | | | | | | | | |
| Male | 85 | 68 | 80% | 57 | 67.05% | 90 | 90 | 100% | 90 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Total | 85 | 68 | 80% | 57 | 67.05% | 90 | 90 | 100% | 90 | 100% |
| Workers | | | | | | | | | | |
| Male | 1817 | 1399 | 77% | 1459 | 80.30% | 1701 | 1701 | 100% | 1701 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Total | 1817 | 1399 | 77% | 1459 | 80.30% | 1701 | 1701 | 100% | 1701 | 100% |

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 (D) | No. (E) | % (E / D) | |
| Employees | | | | | | | |
| Male | 85 | 85 | 100% | 90 | 90 | 100% | |
| Female | 0 | 0 | 0% | 0 | 0 | 0% | |
| Total | 85 | 85 | 100% | 90 | 90 | 100% | |
| Workers | | | | | | | |
| Male | 1817 | 1817 | 100% | 1701 | 1701 | 100% | |
| Female | 0 | 0 | 0% | 0 | 0 | 0% | |
| Total | 1817 | 1817 | 100% | 1701 | 1701 | 100% | |

10. Health and safety management system

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

Yes

If Yes, the Coverage such systems?

The company has a robust occupational health and safety management systems, and all the procedures are in place as per ISO 45001:2018. Additionally, the company is following the Rules and Regulations prescribed by the Government of the India to ensure health and safety. Regular monitoring of safety standards is done on shop floors.

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 company uses systematic processes to detect and assess work-related hazards and risks on a regular and irregular basis. This includes doing daily checks on safety criteria such as equipment functionality and environmental conditions to quickly identify and minimize any hazards. In addition, we ensure that Personal Protective Equipment (PPE) kits are available and used properly to reduce threats to worker safety. Hazard risks are assessed using detailed evaluations that consider the nature of the work, potential exposure, and applicable legislation. The entity is committed to meeting Occupational Health and Safety (OHS) system requirements,

and it keeps records of hazard identification, risk assessments, and control measures to demonstrate its commitment to safety and regulatory compliance.

 Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks? (Yes/No)

Yes

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

Yes

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

| Safety Incident/Number | Category* | FY 2023-24 | FY 2022-23 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours | Employees | 0 | 0 |
| worked) | Workers | 0 | 0 |
| Total recordable work-related injuries | Employees | 0 | 0 |
| | Workers | 14 | 11 |
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High-consequence work-related injury or ill health (excluding | Employees | 0 | 0 |
| fatalities) | Workers | 0 | 0 |

^{*}Including in the contract workforce

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

We comply to the Rules and Regulations of ISO 14001:2015 & ISO 45001:2018 Standards. Additionally, we regularly monitor site safety assessments on shop floor which includes daily checks on safety parameters like equipment functionality and environmental conditions, which can promptly identify and mitigate potential hazards.

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

| Particulars | 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 | 0 | 0 | - | 0 | 0 | - | |
| Health & Safety | 0 | 0 | - | 0 | 0 | - | |

14. Assessment for the year:

| Particulars | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Health and safety practices | 74% |
| Working Conditions | 74% |

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 major or critical incident had occurred during the year where corrective actions were taken.

We have a well-defined mechanism and framework as per safety standards and regularly monitor adherence to protocols and safety standards.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of

(A) Employees (Y/N) Yes
(B) Workers (Y/N) Yes

2. Details on assessment of value chain partners:

| Particulars | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------|---|
| Health and safety practices | 0% |
| Working Conditions | 75% |

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders.

(This principle highlights the importance of stakeholder engagement. Companies should consider the interests and perspectives of all stakeholders, including shareholders, employees, customers, suppliers, and the communities in which they operate. They should also be responsive to stakeholder concerns and feedback.)

Essential Indicators

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

The company has identified stakeholders who have a substantial impact on the organization's actions and outcomes. The organization values customer relationships for their impact on growth. Suppliers were also regarded as crucial.

Stakeholders play a crucial role in optimizing processes and delivering goods and services on schedule. The organization values its people as key stakeholders, prioritizing their well-being and participation. The group recognizes the importance of government support in driving sector growth and setting regulatory frameworks.

List of identified stakeholders for Rolex Rings Limited:

- 1. Employees
- 2. Shareholders & Lenders
- 3. Customers
- 4. Suppliers
- 5. Government and regulatory bodies

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

| Stakeholder Group | Whether | Channels of | Frequency of | Purpose and scope of engagement |
|-------------------------------------|--|---|---|---|
| | identified as Vulnerable & Marginalized Group | communication (Email, SMS, Newspaper, Pamphlets,Advertisement, Community Meetings, Notice Board, Website, Other- Please Specify) | engagement (Annually, Half-yearly, Quarterly, others- Please specify) | including key topics and concerns raised during such engagement |
| Employees | No | Other | On Regular Basis | Communicating with employees improves job productivity by encouraging open communication, addressing issues, and giving needed resources and assistance. This engagement involves implementing effective tactics, fostering cooperation, continuously analyzing and adjusting procedures to boost productivity and performance. |
| Shareholder, Lenders | No | Other | On Regular Basis | Engaging with people improves job productivity by encouraging open communication, addressing issues, and giving needed resources and assistance. This engagement involves implementing effective tactics, fostering cooperation, and continuously analyzing and adjusting procedures to boost productivity and performance. |
| Customers | No | Other | On Regular basis | Engaging with consumers helps assure quality satisfaction by knowing their wants, preferences, and feedback, and continuously developing products/services to meet or exceed expectations. This involvement involves developing strong customer relationships, providing outstanding experiences, and applying methods to improve customer happiness, loyalty, and retention. |
| Suppliers | No | Other | On Regular basis | Engaging with suppliers is intended to increase yield, source high-quality raw materials, and improve overall product quality. This involvement includes interacting closely, collaborate with suppliers to streamline production processes, improve material sourcing, and execute quality control measures to maintain consistency and superior product outcomes. |
| Government and Regulatory bodies | No | Other | On Regular basis | The objective of interacting with the government and regulatory bodies is to support better and seamless business opportunities by having transparent communication channels, addresses compliance requirements, and seeking favourable policies to promote business growth and inventiveness. |

PRINCIPLE 5 Businesses should respect and promote human rights.

(This principle focuses on the importance of human rights. Companies should respect and promote human rights, including the rights to freedom of expression, association, and privacy. They should also prevent and address human rights violations in their operations and value chains.)

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

| Benefits | | FY 2023-24 | | FY 2022-23 | | | |
|----------------------|-----------|--|-----------|------------|--|-----------|--|
| | Total (A) | No. of employees/ workers covered (B) | % (B / A) | Total (C) | No. of employees/ workers covered (D) | % (D / C) | |
| Employees | | | | | | | |
| Permanent | 85 | 54 | 63.53% | 90 | 57 | 63.33% | |
| Other than permanent | 0 | 0 | 0% | 0 | 0 | 0% | |
| Total Employees | 85 | 54 | 63.53% | 90 | 57 | 63.33% | |
| Workers | | | | | | | |
| Permanent | 1817 | 1817 | 100% | 1701 | 1448 | 85.12% | |
| Other than permanent | 573 | 573 | 100% | 704 | 0 | 0% | |
| Total Workers | 2390 | 2390 | 100% | 2405 | 1448 | 59.22% | |

2. Details of minimum wages paid to employees and workers

| Category | | | FY 2023-24 | 1 | | | | FY 2022-23 | 3 | |
|----------------------|------|------------|-------------------|------------|---------------------------|------|--------------------------|------------|---------------------------|----------|
| | | | ual to um Wage | | More than Minimum Wage | | 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 | | | | | | | | | | |
| Male | 85 | 0 | 0% | 85 | 100% | 90 | 0 | 0% | 90 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Total | 85 | 0 | 0% | 85 | 100% | 90 | 0 | 0% | 90 | 100% |
| Other than Permanent | | | | | | | | | | |
| Male | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Total | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Workers | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 1817 | 0 | 0% | 1817 | 100% | 1701 | 0 | 0% | 1701 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Total | 1817 | 0 | 0% | 1817 | 100% | 1701 | 0 | 0% | 1701 | 100% |

| Category | | ı | FY 2023-24 | 1 | | FY 2022-23 | | | | |
|----------------------|--------------|------------|------------|------------|---------------------------|------------|--------------------------|----------|---------------------------|----------|
| | Total (A) | | | | More than Iinimum Wage | | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B /A) | No. (C) | % (C /A) | | No. (E) | % (E /D) | No. (F) | % (F /D) |
| Other than Permanent | | | | | | | | | | |
| Male | 573 | 0 | 0% | 573 | 100% | 704 | 0 | 0% | 704 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Total | 573 | 0 | 0% | 573 | 100% | 704 | 0 | 0% | 704 | 100% |

3. Details of remuneration/salary/wages

a. Median remuneration / wages:

| Particular | Ma | ale | Female | | |
|----------------------------------|--------|---|--------|---|--|
| | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category | |
| Board of Directors (BoD) | 5 | 7500000 | 1 | 100000 | |
| Key Managerial Personnel | 2 | 620000 | 0 | 0 | |
| Employees other than BoD and KMP | 82 | 53083 | - | - | |
| Workers | 1759 | 17400 | - | - | |

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

| Particular | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Gross wages paid to females as % of total wages | 0 | 0 |

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business?

We don't have any issues till date with regards to Human Rights, however if any such issue comes the HR Head shall look into it along with Any Director of the company

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

Issue is put before HR Head and then it is taken before Board of Directors

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

| Particulars | FY 2023-24 | | | FY 2022-23 | | |
|-----------------------------|--------------------------|---------------------------------|---------|-------------|-------------|---|
| | Filed during the year | Pending resolution at the | Remarks | Filed durii | ng the year | Pending resolution at the end of year |
| Sexual Harassment | 0 | 0 | - | 0 | 0 | - |
| Discrimination at workplace | 0 | 0 | - | 0 | 0 | - |

| Particulars | | | FY 2022-23 | | | |
|-----------------------------------|--------------------------|---------------------------------|------------|-----------------------|---|---|
| | Filed during the year | Pending resolution at the | Remarks | Filed during the year | | Pending resolution at the end of year |
| Child Labour | 0 | 0 | - | 0 | 0 | - |
| Forced Labour/Involuntary Labour | 0 | 0 | - | 0 | 0 | - |
| Wages | 0 | 0 | - | 0 | 0 | - |
| Other human rights related issues | 0 | 0 | - | 0 | 0 | - |

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

| Particulars | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0 | 0 |
| Complaints on POSH as a % of female employees / workers | 0 | 0 |
| Complaints on POSH upheld | 0 | 0 |

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

We don't have any discrimation in our organisation with regards to caste or other matters

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

10. Assessments for the year:

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

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

No significant risks or concerns have raised during the assessments where corrective actions needed to be taken.

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

(This principle emphasizes the importance of environmental stewardship. Companies should minimize their impact on the environment, conserve natural resources, and promote environmental sustainability. They should also take steps to restore and rehabilitate degraded ecosystems.)

Essential Indicators

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

| Parameter Parameter | FY 2023-24 | FY 2022-23 | |
|--|--------------|--------------|--|
| From renewable sources | | | |
| Total electricity consumption (A) | 5178.53 GJ | - | |
| Total fuel consumption (B) | - | - | |
| Energy consumption through other sources (C.) | - | - | |
| Total energy consumed from renewable sources (A+B+C) | 5178.53 GJ | - | |
| From non-renewable sources | | | |
| Total electricity consumption (D) | 291366.42 GJ | 276050.06 GJ | |
| Total fuel consumption (E) | 28015.03 GJ | 54679.47 GJ | |
| Energy consumption through other sources (F) | - | - | |
| Total energy consumed from non-renewable sources (D+E+F) | 319381.45 GJ | 330729.53 GJ | |
| Total energy consumed (A+B+C+D+E+F) | 324559.98 GJ | 330729.53 GJ | |
| Energy intensity per rupee of turnover (In Millions) (Total energy consumed / Revenue from operations) | 26.24150987 | 27.58815242 | |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) | 530.6033 | 557.8324 | |
| Energy intensity in terms of physical output | 0.002878 | 0.00034 | |
| Energy intensity (optional) – the relevant metric may be selected by the entity | - | - | |
| Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? | No | | |
| If yes, name of the external agency. | NA | | |

 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? (Yes/No) No

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 | 0 | 0 |
| (ii) Groundwater | 37814.77 | 27410 |
| (iii) Third party water | 0 | 0 |
| (iv) Seawater / desalinated water | 0 | 0 |
| (v) Others (Recycled) | 16422 | 0 |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 54236.77 | 27410 |
| Total volume of water consumption (in kilolitres) | 54236.77 | 27410 |

| Parameter | FY 2023-24 | FY 2022-23 |
|---|-------------|-------------|
| Water intensity per rupee of turnover (in Millions) (Total water consumption / Revenue from operations) | 4.385182472 | 2.286434047 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) | 88.668 | 46.231 |
| Water intensity in terms of physical output | 0.00048 | 0.00028 |
| 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? (Yes/No) $_{\rm No}$

If yes, name of the external agency. NA

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 kilolitres) | | |
| (i) To Surface water | | |
| No treatment | - | - |
| With treatment - please specify level of treatment | - | - |
| (ii) To Groundwater | | |
| No treatment | - | - |
| With treatment – please specify level of treatment | - | - |
| (iii) To Seawater | | |
| No treatment | - | - |
| With treatment - please specify level of treatment | - | - |
| (iv) Sent to third-parties | | |
| No treatment | - | - |
| With treatment - please specify level of treatment | - | - |
| (v) Others | | |
| No treatment | - | - |
| With treatment - please specify level of treatment | - | - |
| Total water discharged (in kilolitres) | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) $_{\text{NO}}$

If yes, name of the external agency. NA

5. Has the entity implemented a mechanism for Zero Liquid Discharge?

Yes

If yes, provide details of its coverage and implementation.

Yes, Zero Liquid Discharge is implemented through the installation of Sewage Treatment Plants covering the industrial effluents and treatment of the same.

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 | PPMx | 22.7 | 11.28 |
| SOx | PPM | 30.5 | 20.76 |
| Particulate matter (PM) | mg/nm3 | 71.6 | 61.62 |
| 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) No

If yes, name of the external agency. NA

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 CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 4473.84 | 3027.22 |
| Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 57949.54 | 53426.90 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover (in Millions) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | - | 5.05 | 4.71 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | - | 102.05218 | 95.21962 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | - | 0.000553 | 0.000058 |
| 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. NA

8. Does the entity have any project related to reducing Green House Gas emission? (Yes/ No)
Yes

If Yes, then provide details.

The company is installed renewal energy projects such as:

- 1) Wind Mill Installed Capacity: 8.75 MW
- 2) Solar Rooftop installed capacity: 1.6 MW

- 3) Solar Ground mount installed capacity: 15.5 MW
- 4) Solar capacity to be installed in the Fiscal 2025: 9 MW

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) | - | - |
| Bio-medical waste (C) | - | - |
| Construction and demolition waste (D) | - | - |
| Battery waste (E) | - | - |
| Radioactive waste (F) | - | - |
| Other Hazardous waste. Please specify, if any. (G) | - | - |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) | | |
| Empty Barrels | 0.50 | 0.51 |
| Used Oil | 1.85 | 2.03 |
| Oil Sludge | 0.11 | 0.12 |
| Oil Cotton | 0.50 | 0.48 |
| Total (A+B + C + D + E + F + G + H) | 2.96 | 3.13 |
| Waste intensity per rupee of turnover(in Millions) (Total waste generated / Revenue from operations) | 0.00024 | 0.00026 |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)(in Lakh Rupees) | 0.00048 | 0.00052 |
| Waste intensity in terms of physical output | 0.0026 | 0.00032 |
| Waste intensity (optional) – the relevant metric may be selected by the entity | - | - |
| For each category of waste generated, total waste recovered through recycling, remetric tonnes) | using or other recovery | y operations (in |
| Category of waste | | |
| (i) Recycled | 0 | 0 |
| (ii) Re-used | 2.19 | 2.44 |
| (iii) Other recovery operations | 0 | 0 |
| Total | 2.19 | 2.44 |
| For each category of waste generated, total waste disposed by nature of disposal | method (in metric tonr | nes) |
| Category of waste | | |
| (i) Incineration | 0 | 0 |
| (ii) Landfilling | 0 | 0 |
| (iii) Other disposal operations | 3.34 | 0.69 |
| Total | 3.34 | 0.69 |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) NO

If yes, name of the external agency.

NA

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.

We have well-defined operational control procedures for trash management. Waste is categorized, handled, and stored in accordance with environmental and safety requirements, garbage is re-used in the manufacturing process based on its intended use, and we are in the process of partnering with an authorized third-party vendor to dispose of all sorts of garbage.

The company separates hazardous material and stores, handles, and disposes of it appropriately. Hazardous waste is either reused or stored in a Hazardous Storage Room. Empty barrels are reused for storage, while spent oil waste is used to lubricate plant and machinery.

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:

| Sr 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. | | | |
|-----------|--------------------------------|--------------------|---|---|--|--|--|
| NA | | | | | | | |

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 project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link | |
|---|----------------------------|------|---|--|----------------------|--|
| NII | | | | | | |

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N/NA). Yes

If not, provide details of all such non-compliances, in the following format:

| 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 |
|--|--|---|---------------------------------|
| | | NΔ | |

PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

(This principle highlights the importance of responsible advocacy. Companies should engage in policy advocacy in a responsible and transparent manner and avoid engaging in activities that could undermine the public interest or the democratic process.)

Essential Indicators

1. a. Number of affiliations with 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.

| Sr. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National/ International) |
|------------|---|---|
| 1. | CII | National |
| 2. | Association of Indian Forging Industries | National |
| 3. | ACMA | National |
| 4. | Rajkot Engineering Association | State |
| 5. | Rajkot Chamber of Commerce | State |
| 6. | Greater Rajkot Chamber of Commerce | State |

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

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

PRINCIPLES Businesses should promote inclusive growth and equitable development.

(This principle emphasizes the importance of promoting inclusive and equitable economic development. Companies should create economic opportunities for all, including disadvantaged and marginalized groups. They should also contribute to the development of local communities and support social and economic empowerment.)

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 |
|---|----------------------------|----------------------|---|--|-------------------|
| | | | | | |

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

| Sr. 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 | | | | | | | |

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

The Company has formulated a robust Vigil Mechanism Policy and the mechanisms are well explained in the said policy.

Any issue shall be first raised with HR Department Head. If the matter escalates, then it is further taken up to Director for redressal.

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

| Particular | FY 2023-24 | FY 2022-23 | |
|--|------------|------------|--|
| Directly sourced from MSMEs/ small producers | 2.60% | 2.56% | |
| Directly from within India | 89% | 86% | |

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

| Particular | FY 2023-24 | FY 2022-23 |
|--------------|------------|------------|
| Rural | 0% | 0% |
| Semi-urban | 0% | 0% |
| Urban | 0% | 0% |
| Metropolitan | 100% | 100% |

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

PRINCIPLE 9 Businesses should engage with and provide value to their consumers in a responsible manner.

(This principle highlights the importance of responsible consumer engagement. Companies should provide safe, high-quality products and services, and ensure that they are marketed and sold ethically and responsibly. They should also be transparent about their products and services, and provide consumers with the information they need to make informed choices.)

Essential Indicators

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

Continued customer connections have been our most important support for the Company's long-term success. Rolex Rings Limited prioritizes quality products and client satisfaction to maintain strong relationships. We consistently develop our goods by incorporating customer comments and concerns into our operations.

Customers can provide feedback and report their concerns by email to out QA staff.

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

| Particular | As a percentage to total turnover |
|---|-----------------------------------|
| Environmental and social parameters relevant to the product | 0% |
| Safe and responsible usage | 0% |
| Recycling and/or safe disposal | 0% |
| | |

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

| Particular | FY 20 | 23-24 | -24 Remark | | FY 2022-23 | |
|----------------|--------------------------------|---|------------|--------------------------------|---|---|
| | Received during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Data privacy | 0 | 0 | - | 0 | 0 | - |
| Advertising | 0 | 0 | - | 0 | 0 | - |
| Cyber-security | 0 | 0 | - | 0 | 0 | - |

| Particular | FY 20 | 2023-24 Remark | | FY 2022-23 | | Remark |
|--------------------------------|--------------------------------|---|---|--------------------------------|---|--------|
| | Received during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Delivery of essential services | 0 | 0 | - | 0 | 0 | - |
| Restrictive Trade Practices | 0 | 0 | - | 0 | 0 | - |
| Unfair Trade Practices | 0 | 0 | - | 0 | 0 | - |
| Other | 0 | 0 | - | 0 | 0 | - |

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

| Particular | Number | Reason for recall |
|-------------------|--------|-------------------|
| Voluntary recalls | 0 | NA |
| Forced recalls | 0 | NA |

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 http://www.rolexrings.com/wp-content/uploads/2023/06/Cyber-Security-and-Data-Privacy-Policy.pdf

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.

There were no cases relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty, where any corrective actions were needed to be taken.

- Provide the following information relating to data breaches
 - a. Number of instances of data breaches along-with impact

0

b. Percentage of data breaches involving personally identifiable information of customers

0%

c. Impact, if any, of the data breaches

Not Applicable