



**Unleash your potential**

Aptech Limited  
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**September 02, 2024**

<b>To,</b> <b>BSE Limited</b> 25 <sup>th</sup> Floor, P J Towers, Dalal Street, Mumbai - 400 001	<b>To,</b> <b>The National Stock Exchange of India Limited</b> Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex Bandra (E), Mumbai - 400 051
<b>Scrip Code: 532475</b> <b>Email: corp.comm@bseindia.com</b>	<b>Symbol: APTECHT</b> <b>Email: compliance@nse.co.in</b>

Dear Sir/Madam,

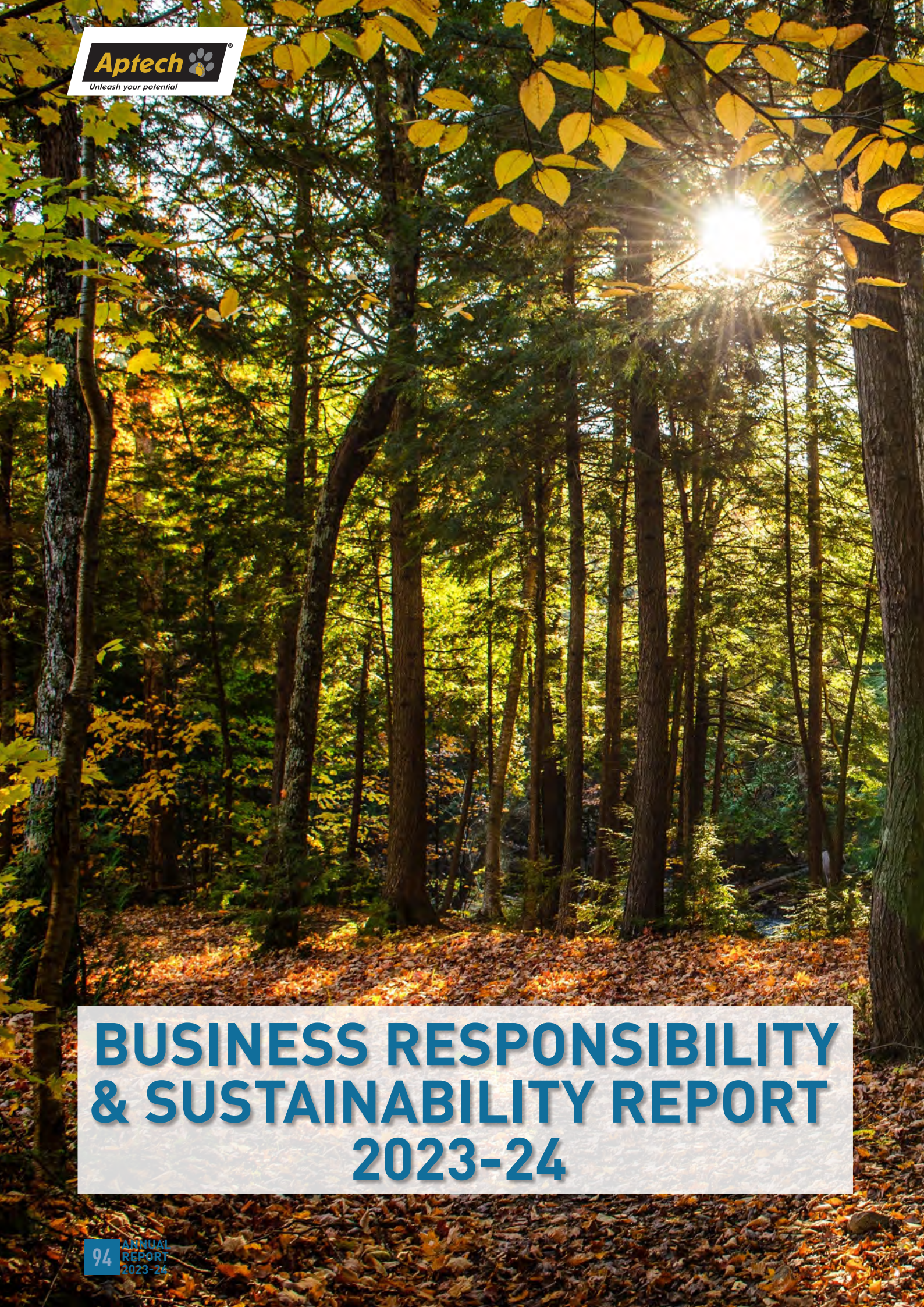
**Sub:** Submission of Business Responsibility and Sustainability Report for Financial Year 2023-24.

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Business Responsibility and Sustainability Report for the Financial Year 2023-24, which also forms part of the Annual Report of the Company for the Financial Year 2023-24.

Kindly take the same on record.

**For Aptech Limited**

**A K Biyani**  
**Company Secretary**  
**Membership No: F8378**  
**Encl.: as above**



# **BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT 2023-24**

## ROAD AHEAD

In recent times, a notable transformation has occurred within the corporate landscape, as more and more businesses are adopting the principles of environment, social, and governance (ESG) principles. ESG serves as a comprehensive framework that encourages Companies to assess their impact on the environment, nurture stakeholder relationships and uphold robust governance and ethical practices within their organizational framework. The heightened consciousness surrounding these aspects has propelled the company to start taking substantive measures in integrating ESG strategies.

Our commitment extends to cultivating inclusive and diversified work environments, ensuring equitable labour procedures, and fostering community engagement. There's also an enhanced emphasis on enhancing governance structures. This includes the implementation of transparent reporting mechanisms and accountability protocols. These progressive strides underline our dedication to embracing ESG principles.

These initiatives signify a broader realization within the Company that the prosperity of businesses is inherently intertwined with the well-being of the environment and society.

This holistic approach encompassing ESG considerations, reflects our dedication to creating a positive impact, not only for our business but also for the world at large.

# APTECH LIMITED - BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

- Corporate Identity Number (CIN) of the Listed Entity** - L72900MH2000PLC123841
- Name of the Listed Entity** - Aptech Limited
- Year of incorporation** - 2000
- Registered office address** - Aptech House, A 65, M.I.D.C Marol, Andheri (East) Mumbai MH 400093
- Corporate address** - Aptech House, A 65, M.I.D.C Marol, Andheri (East) Mumbai MH 400093
- E-mail** - cs@aptech.ac.in
- Telephone** - 022-68282300
- Website** - <https://www.aptech-worldwide.com/>
- Financial year for which reporting being done** - April 1, 2023 to March 31, 2024 (FY 2023-24)
- Name of the Stock Exchange(s) where shares are listed**

Name of the Exchange	Stock Code
Bombay Stock Exchange (BSE)	532475
National Stock Exchange (NSE)	APTECHT

- Paid-up Capital** - The paid-up equity share capital as on March 31, 2024, stood at ₹ 57,99,30,480 consisting of 5,79,93,048 equity shares of ₹ 10 each
- Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report** -  
Mr. A. K. Biyani  
Company Secretary cum Compliance Officer  
Tel no. 022-68282300  
Email - [cs@aptech.ac.in](mailto:cs@aptech.ac.in)
- Reporting boundary - Are the disclosures under this report made on a Standalone basis (i.e. only for the entity) or on a Consolidated basis (i.e. for the entity and all the entities which form a part of its Consolidated Financial Statements, taken together).** -  
The disclosures under this report are made on a Consolidated basis.
- Name of Assurance Provider - Not Applicable
- Type of Assurance obtained - Not Applicable

### II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Retail Domestic and International Training, Skilling and Education Business	Vocational skilling and non-formal academic curriculum based training programs. Under Individual Training, Aptech offers non-formal education, career and professional training through its multi brands - Arena Animation, Aptech Learning, Aptech Aviation Academy, MAAC, Aptech International Preschool, Lakme Academy Powered by Aptech and The Virtual Production Academy.	87%
2.	Institutional Training and Assessment Solutions (Enterprise Business Group - EBG)	Institutional Business Training, Assessment and recruitment solutions including infrastructure and software solutions for various Organizations / Institutions / Corporates.	13%

- 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.	Other Educational Service	85499	87
2.	Educational Support Services (Testing Evaluation Services)	85500	13

### 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	45	45
International	NA	2^	2

^The International offices of the Company are situated in Malaysia & Dubai.

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	PAN India
International (No. of Countries)	20+

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

The Company has 9% contribution from exports in total turnover.

c. A brief on types of customers

### IV. Employees

20. Details as at the end of Financial Year:

a. Employees and Workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	497	363	73.04	134	26.96
2.	Other than Permanent (E)	114	94	82.46	20	17.54
3.	Total employees (D + E)	611	457	74.80	154	25.20
WORKERS						
4.	Permanent (F)	Nil	Nil	Nil	Nil	Nil
5.	Other than Permanent (G)	Nil	Nil	Nil	Nil	Nil
6.	Total workers (F + G)	Nil	Nil	Nil	Nil	Nil

Note: Being a Technology Driven Skilling, Education and Training Company, we do not have workforce categorised as "Workers"; thus, no such disclosure applies to the entire Report.

b. Differently abled Employees and Workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	Nil	Nil	Nil	Nil	Nil
2.	Other than Permanent (E)	Nil	Nil	Nil	Nil	Nil
3.	Total differently abled employees (D + E)	Nil	Nil	Nil	Nil	Nil
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	Nil	Nil	Nil	Nil	Nil
5.	Other than permanent (G)	Nil	Nil	Nil	Nil	Nil
6.	Total differently abled workers (F + G)	Nil	Nil	Nil	Nil	Nil

21. Participation / Inclusion / Representation of women:

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	10	1	10
Key Management Personnel*	3	0	0

\*Key Managerial Personnel include Whole-time Director & Interim CEO, Chief Financial Officer and Company Secretary.

22. Turnover rate for Permanent Employees and Workers:

Particulars	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	25.76	22.50	24.86	20.65	31.72	23.70	19.79	35.60	23.80
Permanent Workers	NA	NA	NA	NA	NA	NA	NA	NA	NA

V. Holding, Subsidiary and Associate Companies (including Joint Ventures)

23. (a) Names of Holding / Subsidiary / Associate Companies / Joint Ventures:

S. No.	Name of the Holding / Subsidiary / Associate companies / Joint Ventures (A)	Indicate whether Holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Aptech Training Limited FZE Dubai	Subsidiary	100.00	All Subsidiaries / Associate Companies endeavor to participate in the Business Responsibility initiatives of the Company.
2.	MEL Training and Assessments Limited	Subsidiary	100.00	
3.	AGLSM SDN BHD, Malaysia	Subsidiary	100.00	
4.	Aptech Ventures Ltd, Mauritius	Subsidiary	100.00	
5.	Aptech Investment Enhancers Limited (Subsidiary of Aptech Ventures Limited)	Subsidiary	100.00	

VI. CSR Details

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

- a. Turnover (in ₹ Lakhs) – ₹ 43,680.55 Lakhs
- b. Networth (in ₹ Lakhs) – ₹ 25,998.35 Lakhs

## VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)		FY 2023-24			FY 2022-23		
	(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	No		Nil	Nil	NA	Nil	Nil	NA
Investors (other than Shareholders)	No		Nil	Nil	NA	Nil	Nil	NA
Shareholders	Yes, Redressal/ Complaints can be made to the Company [ by phone & email-cs@aptech.ac.in ], RTA [by phone & email-einward.ris@kfinitech.com]		22	1	Routine complaints	11	0	Routine complaints
Employees and Workers	Yes, Whistle Blower policy. Weblink- <a href="https://www.aptech-worldwide.com/downloads/code-of-conduct/WhistleBlowerPolicy.pdf">https://www.aptech-worldwide.com/downloads/code-of-conduct/WhistleBlowerPolicy.pdf</a>		Nil	Nil	NA	Nil	Nil	NA
Customers	Yes, Customer Care Mechanism <a href="mailto:customercare@aptech.ac.in">customercare@aptech.ac.in</a>		462	1	Routine complaints	134	2	Routine complaints
Value Chain Partners	Yes, Grievance Care Mechanism <a href="mailto:grievances@aptech.ac.in">grievances@aptech.ac.in</a>		Nil	Nil	NA	Nil	Nil	NA
Other (Please Specify)	Nil		Nil	Nil	NA	Nil	Nil	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.	Data Privacy and Cyber Security	Risk	The exposure / leakage of sensitive personal data information through cybersecurity breaches, digital malicious / hacking activities, Student negligence, dedicated cyber-attacks and such other fraudulent attempts through digital, social media, darknet and other newer technological/ Artificial Intelligence threats.	The Company has prioritized the implementation of the Information Security Management System within the Organization to strengthen the security posture. This will include a focus on Information Data and Privacy through a rigorous and well-evident structured policy and procedure.	Negative
2.	People's Risk	Risk	The inability to attract and retain quality people caused by factors such as inappropriate work culture, equality and ethics and inappropriate policy for women safety at workplace.	The Company has introduced a variety of training programs, encompassing both physical and virtual modules. These initiatives include opportunities for learning that are specifically designed to help retain employees within the Organization.	Negative
3.	Selling Practices & Services Delivery with Student complaints	Risk and Opportunity	Using false, unfair, misrepresentation and misleading selling practices and advertisements to bring prospective students may result in consumer complaints, goodwill depletion, significant fines and loss of public/ government credibility & reputational loss.	Enhanced disclosures, consumer grievance redressals, student resolutions, standard operating procedures for marketing/selling practices and seamless student deliverables keeping ethics, integrity and fairness in dealing with students and their interests are being ensured by the Company to mitigate this risk.	Negative and Positive
4.	Legal, Compliance and Regulatory Risks	Risk	The Company understands that Legal / Regulatory / Compliance obligations and representations, if not followed may result in business continuity risks. Lack of policies preventing fraud, unethical behaviour, integrity issues, corrupt practices, financial impropriety and other unfairness are some indicators of governance issues.	The Company has set stringent policies and procedures in place to protect itself from any legal / regulatory / compliance issues and ensuing fines / penalties. The company has proper compliance management systems and SOPs in place which is key to ensure all regulatory risks are mitigated in case any future risk arises.	Negative
5.	Ethical Governance and Transparency	Risk	Emerging requirements from investors, raters and regulators on ambitious ESG requirements and transparency thereof. The risk is reputational in case of instances of non-compliance with regulations or sectoral norms.	This risk is part of the formal ESG governance process that incorporates this risk as part of Aptech Risk Management systems and is integrated at the leadership / Senior Management level.	Negative
6.	Emerging Areas and Innovation	Opportunity	Our capability to create Courses / Content IP in new Emerging Areas and to bring continuous innovation, career driven pedagogy and cutting-edge skilling solutions enabled with technology keeping pace with rapidly changing industry requirements.		Positive



## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This Section is aimed at helping Businesses demonstrate the Structures, Policies and Processes put in place towards adopting the NGRBC Principles and Core Elements.

Principle	Particulars
P1	Businesses should conduct and govern themselves with integrity in a manner that is ethical, transparent and accountable.
P2	Businesses should provide goods and services in a manner that is sustainable and safe.
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
P4	Businesses should respect the interests of and be responsive towards all its stakeholders.
P5	Businesses should respect and promote human rights.
P6	Businesses should respect, protect and make efforts to restore the environment.
P7	Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
P8	Businesses should promote inclusive growth and equitable development.
P9	Businesses should engage with and provide value to their consumers in a responsible manner.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Policy and Management processes</b>									
1. a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	<p>P1 - FAMILIARISATION FOR INDEPENDENT DIRECTORS - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/Familiarisation-for-Independent-Directors.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/Familiarisation-for-Independent-Directors.pdf</a></p> <p>P1, P2 - RISK MANAGEMENT POLICY - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/RiskManagementPolicy.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/RiskManagementPolicy.pdf</a></p> <p>P3, P4 - DIVIDEND DISTRIBUTION POLICY - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/DIVIDENDDISTRIBUTIONPOLICY-APTECH.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/DIVIDENDDISTRIBUTIONPOLICY-APTECH.pdf</a></p> <p>P5 - PREVENTION OF SEXUAL HARASSMENT - <a href="https://www.aptech-worldwide.com/pages/investor-relations/investorrelations.aspx">https://www.aptech-worldwide.com/pages/investor-relations/investorrelations.aspx</a></p> <p>P6 - E-WASTE MANAGEMENT POLICY (Internal)</p> <p>P1 - DETERMINATION OF LEGITIMATE PURPOSE - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policyonlegitimatepurpose2.0.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policyonlegitimatepurpose2.0.pdf</a></p> <p>P1 - POLICY AND PROCEDURE OF INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/PolicyProcedure-LeakofUPSI.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/PolicyProcedure-LeakofUPSI.pdf</a></p> <p>P1 - POLICY ON BOARD DIVERSITY - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policy-on-Board-Diversity2.0.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policy-on-Board-Diversity2.0.pdf</a></p> <p>P1 - POLICY FOR ARCHIVING DISCLOSURES - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/ArchivalPolicy.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/ArchivalPolicy.pdf</a></p> <p>P9 - INVESTOR COMMUNICATION POLICY - <a href="https://www.aptech-worldwide.com/downloads/aptech-policy/aptech-investors-policy.pdf">https://www.aptech-worldwide.com/downloads/aptech-policy/aptech-investors-policy.pdf</a></p> <p>P1, P4, P7 - POLICY ON MATERIALITY OF RELATED PARTY TRANSACTIONS - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/AptechRPTPolicy2.0.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/AptechRPTPolicy2.0.pdf</a></p> <p>P1 - POLICY ON MATERIAL SUBSIDIARY - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policy-on-Material-Subsidiaries2.0.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policy-on-Material-Subsidiaries2.0.pdf</a></p> <p>P3, P8 - REMUNERATION POLICY - <a href="https://www.aptech-worldwide.com/downloads/aptech-policy/Remuneration-Policy.pdf">https://www.aptech-worldwide.com/downloads/aptech-policy/Remuneration-Policy.pdf</a></p> <p>P1, P4 - POLICY ON DETERMINATION OF MATERIALITY OF EVENTS - <a href="https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policy-on-determination-of-materiality-of-events2.0.pdf">https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policy-on-determination-of-materiality-of-events2.0.pdf</a></p>								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes								
3. Do the enlisted policies extend to your value chain partners? (Yes / No)	At present the Company does not involve value chain partners in its policies since they are separate entities working on a principal-to-principal basis.								
4. Name of the national and international codes / certifications / labels / standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<p>The Company has following certifications for its Institutional Business:</p> <ul style="list-style-type: none"> <li>• ISO 9001 – Standards for Quality Management System to improve customer satisfaction.</li> <li>• ISO 27001 – Standards for Information Management to avoid security breaches</li> <li>• CMMi – Standards for Risk Management and Risk Mitigation</li> <li>• ISO 20000 – Standards for Service Management to delivery better services</li> </ul>								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>In its ESG Journey, in alignment with Global targets, the Company looks forward to set short, medium and long term targets for sustainability KPIs mentioned below:</p> <ol style="list-style-type: none"> <li>1. Climate change mitigation</li> <li>2. Energy conservation</li> <li>3. Water management</li> <li>4. Waste management</li> <li>5. GHG reduction and</li> <li>6. Biodiversity protection</li> </ol>								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.									

#### Governance, leadership and oversight

7. Statement by director responsible for the Business Responsibility and Sustainability Report, highlighting ESG related challenges, targets and achievements.  The Company has been endorsing and practicing best practices towards conservation of environment, people care management and best governance practices with continued efforts over the years. We are fully committed to giving our stakeholders insights into our ESG Journey.									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Whole-time Director & Interim CEO								
9. Does the entity have a specified Committee of the Board / Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Board as a whole takes decisions on Sustainability related issues with the help of Policies and Procedures in place.								
10. Details of Review of NGRBCs by the Company:									

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Yes									Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	No major non-compliance of material nature has been reported. Operational issues are being addressed on an 'ongoing basis' as and when identified. Each functional head monitors and ensures Compliance applicable to their respective functions.									Periodically								

11. Has the entity carried out Independent Assessment / Evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	In addition to periodic internal evaluation at Board level, assurances and comfort is sought by the Company on its policies / procedures / codes through periodic audits by internal auditors and by external agencies / law firms on case-to-case basis.								
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12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes / No).	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes / No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes / No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

## 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.

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

#### Leadership Indicators

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

Segment	Total Number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	4	<ul style="list-style-type: none"> <li>Familiarization on the Company's Core Values, Code of Conduct, Roles and Responsibilities including the purpose and the business it operates in through familiarisation programmes.</li> <li>Key integrity matters that help to reflect and focus on key strategies.</li> <li>Sustainable initiatives of the Company, including regulatory and economic trends in the country.</li> </ul>	100
Key Managerial Personnel	4	<ul style="list-style-type: none"> <li>Sessions on SEBI (Prohibition of Insider Trading) Regulations, 2015</li> <li>Aptech Code of Conduct of the Company</li> </ul>	100
Employees other than BOD and KMPs	2	<ul style="list-style-type: none"> <li>Performance Management</li> </ul>	5%
Workers	Not Applicable		

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 Requirements) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory / enforcement agencies / judicial institutions	Amount (in INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	P1	BSE Limited National Stock Exchange of India Limited	11,800 each for both Exchanges	During the period under review, the Company experienced a delay in submitting the prior Board meeting intimation for the quarter ending June 30, 2023, as required by Regulation 29 of SEBI (LODR) Regulations, 2015.	Not Applicable
Settlement	Nil	NA	NA	NA	NA
Compounding Fees	Nil	NA	NA	NA	NA
Non-Monetary					
Imprisonment	NA				
Punishment	NA				

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

Case Details	Name of the Regulatory / Enforcement agencies / Judicial institutions
No	

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.

The Company recognizes the importance of fostering a culture of integrity and ethical conduct. As part of its ongoing commitment to responsible business practices, the Company has documented and implemented Anti-Bribery and Anti-Corruption policy available on Company's internal policy section.

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

Particulars	FY 2023-24	FY 2022-23
Directors	Nil	Nil
KMPs		
Employees		
Workers		

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

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	NA	NA	NA	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NA	NA	NA	NA

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions on cases of corruption and conflicts of interest:

Not Applicable

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

Particulars	FY 2023-24	FY 2022-23
Number of days of accounts payables	28 days	121 days

9. Openness of business:

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

Parameter	Metrics	FY 2023-24 (%)	FY 2022-23 (%)
Concentration of Purchases	a. Purchases from trading houses as % of total purchase.	Nil	Nil
	b. Number of trading houses where purchases are made from.	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses.	Nil	Nil
Concentration of Sales	a. Sales to dealers / distributors as % of total sales.	Nil	Nil
	b. Number of dealers / distributors to whom sales are made.	Nil	Nil
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors.	Nil	Nil
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases).	0.000127*	0.00141*
	b. Sales (Sales to related parties / Total Sales).	Nil	Nil
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances).	Nil	Nil
	d. Investments (Investments in related parties / Total Investments made)	Nil	Nil

\*Note – It is not in the nature of Purchases but Services availed from third party RPT (Airpay Payment Services Pvt. Ltd) reflected on Consolidated basis. For detailed RPT disclosure, please refer in the Financial Section of Annual Report.

**Leadership Indicators**


1. Awareness programs conducted for value chain partners on any of the Principles during the Financial Year:

Total number of awareness programs held	Topic / Principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programs
Given the nature of our business, the Company does not currently cover any value chain partners.		

2. Does the entity have processes in place to avoid / manage conflict of interests involving members of the Board? **(Yes/No)**  
If Yes, provide details of the same.

Yes, the Company has a Code of Conduct for the Board and Senior Management, which effectively addresses and manages conflicts of interest. This code sets clear guidelines for identifying and disclosing conflicts, ensuring decisions are made in the best interests of the Company. It promotes transparency, accountability and ethical decision-making fostering a culture of integrity at the highest levels of governance.

**SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 1**

	<p><b>SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS:</b></p> <p><b>Policies and SOPs:</b></p> <ul style="list-style-type: none"> <li>Aptech has various policies such as: <ul style="list-style-type: none"> <li>The Whistle Blower Policy,</li> <li>Code of Conduct,</li> <li>Prevention of Sexual Harassment Policy and</li> <li>Corporate Social Responsibility Policy,</li> <li>Dividend Distribution Policy</li> <li>Risk Management Policy.</li> </ul> </li> </ul>
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**PRINCIPLE 2 : Businesses should provide goods and services in a manner that is sustainable and safe**

**Leadership 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 the environmental and social impacts
R&D	Nil	Nil	Regular updation of its curriculum and content keeps the company's courses relevant and in line with the needs of the industry. This is the reason why industry prefers to hire the company's students. Hence, the amount spent by the company on content development has a direct impact on the social development through better employability and employment.
Capex	13.75%	17.74%	

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

The Company aims to enhance its sustainability efforts and contribute to environmentally and socially responsible sourcing practices based on following pillars.

Promote Environmental Sustainability: All suppliers to support a precautionary approach to environmental issues and undertake initiatives to promote better environmental responsibility.

Commitment to Human Rights, Labour and the Society: Suppliers to support, respect and protect human and labour rights and make sure their organisation/entity is not complicit in any kind of abuses and/or violations.

Ethical Integrity and Legality: Suppliers to demonstrate the highest standard of integrity, ethics and business conduct.

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

We do not have a policy of computing the value of inputs 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) (b) E-waste (c) Hazardous waste and (d) other waste.

Not applicable, as we are engaged in providing Training, Skilling, Education, Institutional Training, Assessment services and business solutions and we do not engage in manufacturing any products.

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.

Considering the nature of business, EPR is not applicable.

**Leadership Indicators**

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for Manufacturing Industry) or for its services (for Service Industry)? If yes, provide details in the following format?

NIC Code	Name of Product/ Service	% of total Turnover Contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/No). If yes, provide the web-link.
Not applicable. Since the Company is engaged in providing Training, Skilling, Education, Institutional Training, Assessment services and business solutions. We are dedicated to offering services that do not raise any social or environmental concerns. The Company maintains a focus on delivering solutions that align with responsible and sustainable practices, ensuring that its offerings have no adverse impacts on society or the environment. We strive to uphold high standards of ethical and responsible business conduct in all aspects of its operations.					

2. If there are any significant social or environmental concerns and / or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same:

Name of Product/ Service	Description of the risk/ concern	Action Taken
Considering the nature of business, LCA is not applicable.		

3. Percentage of recycled or reused input material to total material (by value) used in production (for Manufacturing Industry) or providing services (for Service Industry):

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Not Applicable, we are engaged in Training, Skilling, Education, Institutional Training, Assessment services and business solutions and do not manufacture any products.		



4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled and safely disposed, as per the following format:

	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	Considering the nature of business the same is not applicable.					
E-waste						
Hazardous Waste						
Other waste						

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category:

Indicate product category	Reclaimed products and their packaging materials (as percentage of products sold) for each product category.
Considering the nature of business the same is not applicable.	

## SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 2

	<p><b>SDG 12: RESPONSIBLE COSUMPTION AND PRODUCTION:</b></p> <ul style="list-style-type: none"> <li>For its B2B services of Assessment &amp; Testing, the Company offers solutions that help customers minimize environmentally intensive resource utilization, especially paper.</li> <li>The Company practices segregation of dry and wet waste as per the local municipal guidelines and works with vendors to responsibly dispose the e-waste</li> </ul>
	<p><b>SDG 13: CLIMATE ACTION:</b></p> <ul style="list-style-type: none"> <li>Company's charter provides how to responsibly dispose e-waste in accordance with the governmental policies.</li> <li>For its B2B services of Assessment &amp; Testing, the Company offers solutions that help customers minimize environmentally intensive resource utilization, especially paper.</li> <li>The Company practices segregation of dry and wet waste as per the local municipal guidelines and works with vendors to responsibly dispose the e-waste</li> <li>The course material for the training programs of the Company is not printed on paper but delivered digitally.</li> <li>It also experiments in some initiatives that promote awareness of environmental issues.</li> </ul>

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

**Essential Indicators**

1. a. Details of measures for the well-being of Employees:

% of Employees covered by											
Particular	Total (A)	Health Insurance		Accident Insurance		Maternity Insurance		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	363	363	100.00	363	100.00	Nil	Nil	363	100	363	100.00
Female	134	134	100.00	134	100.00	134	100	Nil	Nil	134	100.00
Total	497	497	100.00	497	100.00	134	100	363	100	497	100.00
Other than Permanent Employees											
Male	94	25	26.60	8	8.51	Nil	Nil	Nil	Nil	Nil	Nil
Female	20	0	0.00	0	0.00	Nil	Nil	Nil	Nil	Nil	Nil
Total	114	25	21.92	8	7.01	Nil	Nil	Nil	Nil	Nil	Nil

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

% of Employees covered by											
Particular	Total (A)	Health Insurance		Accident Insurance		Maternity Insurance		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	Not applicable										
Female											
Total											
Other than Permanent Employees											
Male	Not applicable										
Female											
Total											

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

Particulars	FY 2023-24	FY 2022-23
Cost incurred on well- being measures as a % of total revenue of the Company.	16.26%	14.35%

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

Benefits	FY 2023-24			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	NA	Yes	100.00	NA	Yes
Gratuity	100	NA	Yes	100.00	NA	Yes
ESI	0	NA	NA	100.00	NA	NA
Others – please specify	NA	NA	NA	NA	NA	NA

\*Considered Permanent Employees



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:

There are currently no disabled employees on the payroll, however the Company is dedicated to complying with the regulatory stipulations of the Disabilities Act, 2016. Acknowledging the significance of equal opportunities and inclusivity, the Company is prepared to provide active support to individuals with disabilities in alignment with compliance requirements.

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”

The Company recognizes the importance of equal opportunities for persons with disabilities and the entity is committed to creating an inclusive and accessible work environment. The Company has documented and implemented Equal opportunity policy available on Company’s internal policy section.

5. Return to work and Retention rates of Permanent Employees and Workers that took parental leave:

Gender	Permanent Employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100.00	100.00	Not applicable	
Female	100.00	100.00		
Total	100.00	100.00		

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

	Yes / No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Not applicable
Other than Permanent Workers	
Permanent Employees	Employees may register their concerns through the dedicated e-mail address being <a href="mailto:grievances@aptech.ac.in">grievances@aptech.ac.in</a> . The Company encourages its employees to register their concerns / grievances and ensures that there is no discrimination, retaliation or harassment of any kind against any employee who reports under the vigil mechanism or participates in the investigation.
Other than Permanent Employees	

7. Membership of Employees and Worker in Association(s) or Unions recognized 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	Nil			Nil		
Male						
Female						
Total Permanent Worker						
Male						
Female						

8. Details of training given to employees and workers:

	FY 2023-24					FY 2022-23				
	Total (A)	On Health and Safety measures		On Skill upgradation		Total (D)	On Health and Safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees*										
Male	363	144	39.67	200	55.10	369	68	18.43	11	2.98
Female	134	45	33.58	125	93.28	136	36	26.47	5	3.68
Total	497	189	38.03	325	65.39	505	104	20.59	16	3.17
Workers										
Male	Not Applicable									
Female										
Total										

\*Considered Permanent Employees

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	363	269	74.10	369	262	71.00
Female	134	106	79.10	136	95	69.85
Total	497	375	75.45	505	356	70.50
Workers						
Male	Not Applicable					
Female						
Total						

\*Considered Permanent Employees

10. Health and Safety Management System:

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

The Company is committed to safety management and prioritizes the well-being of its employees through comprehensive measures. On March 14, 2024, we conducted a fire drill training session to ensure our employees are well-prepared for fire emergencies. Our ongoing safety training programs cover a wide range of topics promoting a strong culture of safety and awareness among employees. We actively encourage employee participation and volunteering in safety meetings and regularly perform safety audits and inspections to maintain strict adherence to safety standards and regulations.

- 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 acknowledges the critical need to develop processes for identifying work-related hazards and assessing future risks. It is dedicated to implementing effective measures, including regular inspections, audits, risk assessments and incident reporting to maintain a safe work environment.

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

The Company prioritizes the safety and well-being of everyone involved in its operations. Although we do not have any workers in the Company, we uphold a strong system that promotes the reporting of any work-related concerns or risks.

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

Yes, the Company values employee well-being and has a comprehensive mediclaim policy and annual healthcare check-ups, ensuring access to quality medical coverage and promoting proactive health management.

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

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

The Company's operations does not involve any hazardous activity.

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

The Company prioritizes employee safety by implementing robust safety measures, including fire-fighting equipments, a reliable alarm system, 24-hour security, regular sanitization, regular health checkups and CCTV surveillance ensuring a secure working environment.

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	Nil	Nil	Nil	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil	Nil	Nil	Nil

14. Assessments for the year:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	While we haven't conducted any formal assessments, however, we have robust safety measures, including fire-fighting equipments, a reliable alarm system, 24-hour security, regular sanitization regular health checkups and CCTV surveillance.
Working Conditions	

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 assessment was carried out during the reporting period. However, several safety infrastructures such as emergency exits, signage and first aid kits have been appropriately placed and improved on periodic basis. Regular emergency response safety meetings are conducted to ensure employees are well-prepared for emergency situations. Emergency contact information is clearly displayed on the Notice Boards.

**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, the Company provides life insurance policies to protect its employees in the event of their death. The Company's dedication to its employees and their families is demonstrated through the offering of comprehensive life insurance coverage. In the unfortunate event of an employee's passing, the Company ensures that their family and beneficiaries receive crucial financial support and assistance.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners:

The Company ensures that statutory compliances are adhered by value chain partners. Proof of payment, deposit of statutory dues e.g., TDS payments is matched with Form 26AS, GST payment by the suppliers is matched through GST portal to ensure compliance, amongst other controls.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

Particulars	Total no. of affected employees/workers		No. of employees / workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
<b>Employees</b>	Nil, as no such instance was reported.			
<b>Workers</b>	Not applicable			

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? **(Yes/ No)**

No




5. Details on assessment of value chain partners:

Particular	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	We are committed to assessing our value chain partners on health and safety issues such as safe working conditions and sanitation.
Working Conditions	

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Not applicable, as no such assessment was conducted during the year.

### SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 3

	<p><b>SDG 9: INDUSTRY, INNOVATION AND INFRASTRUCTURE:</b></p> <ul style="list-style-type: none"> <li>Arena Animation inaugurated a new center in Nanded: Skilling youth for the growing AVGC.</li> </ul>
	<p><b>SDG 4: QUALITY EDUCATION:</b></p> <ul style="list-style-type: none"> <li>Providing computer, animation and related literacy to underprivileged children and youth, including high school and college drop-outs and the entire fee of the course is borne by the Company and its subsidiaries.</li> <li>The Company provides free-of-cost computer, animation and related training to underprivileged children and youth at its various centers.</li> <li>Aptech Aviation Academy formed a strategic alliance with GMR Aviation Academy to propel careers in airport management and customer service.</li> </ul>
	<p><b>SDG 5: GENDER EQUALITY:</b></p> <ul style="list-style-type: none"> <li>The Company has in place Prevention of Sexual Harassment Policy under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.</li> </ul>

### PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its Stakeholders

#### Essential Indicators

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

The first step in stakeholder’s management is understanding the different stakeholder categories as they pertain to workforce planning. There are several types of stakeholders who have interests in our business. Stakeholder identification helps in empowering people, creating sustainable change, building relationships and a better organization. We have always believed that its human capital is its biggest strength. We are fully aware that business growth is not sustainable without customers. The Company is privileged to have a strong relationship with the investors. Our suppliers / vendors/ contractors / partners have always made us deliver our promises promptly.

Our stakeholders include employees, customers, suppliers, vendors, investors and shareholders, business partners, government and regulators. We commit to engage openly and authentically with our stakeholders to enhance cooperation and mutual support for a sustainable relationship.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community, Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually / Half yearly / Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Website, E-mails, Intranet, Documents, Meetings, Trainings	Continuous	Proposing initiatives to enhance employee competency at work and promote work-life balance, including continuous learning, health and safety programs, diversity initiatives and additional benefits.
Shareholders / Investors	No	Press releases and press conferences, Stock Exchange updates, Email Advisories; SMS, E-Voting facilities; Physical / Digital Meetings; Investor Conferences; Analyst/ Institutional Investor Calls / Meets.	As and when required	Discuss Company's financial performance and strategic priorities. Pursuant to Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company's website contains a dedicated functional segment 'INVESTOR RELATIONS' where all the information meant for the Shareholders is available, including information on Directors, Financial Statements, Annual Reports, codes and policies, etc. Financial performance, Regulatory compliances and Corporate Governance.
Customers / Vendors	No	Direct communication	Regular and need-based	To be preferred vocational training, skilling and learning solutions provider to students / skill aspirants and make them highly employable and job-ready with industry relevant course curriculum.
Regulatory/ Government	No	Official communication channels, Regulatory audits/ inspections, Environmental compliance, Policy intervention, good governance, Statutory Corporate Filings	As per the Statutory Requirements	Report and comply on Legal and Regulatory Requirements.

#### Leadership Indicators

The consultation with the Board on key stakeholder concerns is largely mediated by different organizational functions which are responsible for the respective stakeholders. Periodic Board reviews are held at least once a quarter, during which the Board holds extensive discussions with the Managing Director / Whole-time Director / CEO and other senior leaders representing these functions.

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board:

We have identified our most material issues through a data-driven and consultative exercise. The material topics were shortlisted and prioritized based on their impact on our stakeholders and our business.



2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity:

Yes, Company's ESG strategy on material topics uses inputs gathered during stakeholder consultations. Material topics are shortlisted and prioritized based on their impact on our stakeholders and our business.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable / marginalized stakeholder groups:

All the CSR programs are primarily focused on vulnerable & marginalised sections of the society. A significant percentage of our beneficiaries are from economically backward sections of the society.

## SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 4

	<p><b>SDG 9: INDUSTRY, INNOVATION AND INFRASTRUCTURE:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 9 – that is mentioned above in Principle 3</li> </ul>
	<p><b>SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS:</b></p> <ul style="list-style-type: none"> <li>The Company always has the benefits of its stakeholders in mind. It has identified students, recruiters, business franchise partners (and suppliers), employees and shareholders as its key stakeholders and has been instrumental in transforming the lives of many students across the globe by putting them on an accelerated career growth path.</li> </ul> <p>Please refer to SDG 16 – that is mentioned above in Principle 1</p>

## PRINCIPLE 5: Businesses should respect and promote Human Rights

### Essential Indicators

1. Employees and Workers who have been provided training on human rights issues and policies) of the entity, in the following format:

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	497	497	100	505	505	100.00
Other than permanent	114	114	100	140	140	100.00
Total Employees	611	611	100	645	645	100.00
Workers						
Permanent	Not applicable, given the nature of the business, no workers are employed.					
Other than permanent						
Total Workers						

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	497	Nil	Nil	497	100	505	Nil	Nil	505	100
Male	363	Nil	Nil	363	100	369	Nil	Nil	369	100
Female	134	Nil	Nil	134	100	136	Nil	Nil	136	100
Other than Permanent	114	Nil	Nil	114	100	140	Nil	Nil	140	100
Male	94	Nil	Nil	94	100	117	Nil	Nil	117	100
Female	20	Nil	Nil	20	100	23	Nil	Nil	23	100
Workers										
Permanent	Not applicable					Not applicable				
Male										
Female										
Other than Permanent	Not applicable					Not applicable				
Male										
Female										

3. Details of remuneration / salary / wages, in the following format (Rupees in lakhs p.a.):

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)*	8	12.50	1	20.28
Key Managerial Personnel**	4***	174.76	0	0
Employees# other than BoD and KMP	360	7.58	134	7.42
Workers	NA	NA	NA	NA

#Considered permanent employees as on March 31, 2024.

#Median remuneration based on CTC of employees.

\* Board of Directors to not include Managing Director and Chief Executive Officer, Whole-time Director and Interim CEO.

\*\*Key Managerial Personnel include Managing Director and Chief Executive Officer, Whole-time Director and Interim CEO, Chief Financial Officer (CFO) and Company Secretary (CS).

\*\*\* Sad demise of Managing Director and Chief Executive Officer with effect from August 15, 2023.

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

Particulars	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages*	19.44%	19.69%

\*Considered permanent employees.

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, Mr. Shourya K. Chakravarty- Chief Human Resources Officer, takes care of human rights issues.

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

The Whistle-blower Policy and other reporting mechanisms have been implemented to empower our employees to voice their concerns and report any instances of malpractice, impropriety, abuse, deviant behaviour, or other such events. We recognize the importance of creating a safe and transparent work environment where every individual feels heard and protected. Our commitment to this policy ensures that employees can come forward without fear of retaliation, victimization, or any form of discrimination.

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 end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual harassment	Nil	Nil		Nil	Nil	
Discrimination at workplace						
Child Labour						
Forced Labour/ Involuntary Labour						
Wages						
Other Human Rights related issues						

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

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

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

We take pride in being a company that prioritizes the well-being and safety of our employees. Our comprehensive policy on the prevention of sexual harassment ensures a respectful and inclusive workplace for everyone. We handle every case of sexual harassment with utmost seriousness, committing to swift and thorough investigations, providing support to victims, and taking necessary actions to prevent recurrence. Our commitment to fostering a culture of respect and zero tolerance for harassment distinguishes us and contributes to the overall happiness and success of our employees.

9. Do human rights requirements form part of your business agreements and contracts?

While human rights requirements may not currently be incorporated in our agreements / contracts with our business partners since our business partners are separate entities working on a principal-to-principal basis. However, it is our endeavour to bring human rights posture / considerations in all our engagements.

10. Assessments for the year:

Particulars	% 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

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

NIL as during the reporting period no concerns were reported.

#### Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/ complaints:

NIL as during the reporting period no concerns were reported.

2. Details of the scope and coverage of any Human rights due-diligence conducted:

The Company embrace a zero-tolerance approach when it comes to issues pertaining to human rights. We are deeply committed to upholding the fundamental rights and dignity of every individual. Our unwavering dedication extends to complying with all government regulations and regulatory policies, as we believe in fostering an environment that promotes responsible and ethical practices.

3. Is the premise / office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

The entity's premises / office comply with the accessibility requirements outlined in the Rights of Persons with Disabilities Act ensuring equal access for differently-abled persons.

4. Details on assessment of value chain partners:


	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	We are committed to assessing our value chain partners on human rights issues such as child labour and sexual harassment. At present the Company does not involve value chain partners in its assessment since they are separate entities working on a principal-to-principal basis.
Discrimination at workplace	
Child Labour	
Forced Labour / Involuntary Labour	
Wages	
Others – Please Specify	

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

Not applicable, since no such assessment were conducted during the reporting period.



## SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 5

	<p><b>SDG 5: GENDER EQUALITY:</b></p> <ul style="list-style-type: none"> <li>The Company has in place Prevention of Sexual Harassment Policy under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.</li> </ul>
	<p><b>SDG 10: REDUCED INEQUALITIES:</b></p> <ul style="list-style-type: none"> <li>The Company has in place Prevention of Sexual Harassment Policy under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.</li> <li>Human rights are one of core principles at the Company. The Company's commitment to the protection and safeguarding of human rights is strong. It has implemented a Code of Conduct that all the employees, whether permanent or temporary, in addition to the vendor staff operating from its premises</li> </ul>
	<p><b>SDG 16: PEACE, JUSTICE AND STRONG INSTITUTION:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 16- that is mentioned above in Principle 1</li> </ul>

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

### Essential Indicators

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

Parameter	FY 2023-24 (In GJ)	FY 2022-23 (In GJ)
From renewable sources (in Giga Joules)		
Total electricity consumption (A)	0	0
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumption (A+B+C)	0	0
From Non-renewable sources		
Total electricity consumption (D)	2837.88	2168.779
Total fuel consumption (E)	64.694	51.0333
Energy consumption through other sources (F)	0	-
Total energy consumption (D+E+F)	2902.574	2219.812
Energy intensity per rupee of turnover <i>(Total energy consumption/ turnover in rupees)</i>	0.000000665	0.000000486
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total energy consumed / Revenue from operations adjusted for PPP)	0.0000149	0.0000108
Energy intensity in terms of physical output (GJ / Full time Employee)	5.748	4.466
Energy intensity <i>(optional)</i> – the relevant metric may be selected by the entity	Nil	Nil

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

**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, the evaluation is not being conducted by any external agency.

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. The Company is not identified as a Designated Consumer under the PAT Scheme.

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	3596.084	1680.46
(ii) Groundwater	280.00	47.00
(iii) Third party water	50.10	44.28
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	3926.184	1771.74
Total volume of water consumption (in kilolitres)	3926.184	1771.74
Water intensity per rupee of turnover (Water consumed / turnover)	0.000000899	0.000000388
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total water consumption / Revenue from operations adjusted for PPP)	0.0000201	0.00000859
Water intensity in terms of physical output (Kilolitres / Full time Employee)	7.775	3.565
Water intensity (optional) – the relevant metric may be selected by the entity	Nil	Nil

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

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, the evaluation is not being conducted by any external agency.

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 Surfacewater		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(ii) To Groundwater		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iii) To Seawater		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third-parties		
- No treatment	Nil	Nil
- With treatment – (Wastewater sent for municipal treatment)	1570.474	708.69
(v) Others		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
Total water discharged (in kilolitres)	1570.474	708.690

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, the evaluation is not being conducted by any external agency.

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

Given the nature of business the same is not applicable.

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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx			
Sox			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – please specify			

The Company being a training and education services and business solutions company does not have significant air emissions other than those arising from the operation of diesel generator sets during power outages. The operations of the Company have necessary consent under the Air (Prevention & Control of Pollution) Act, 1981 for operation of DG sets and ensures compliance.

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, the evaluation is not being conducted by any external agency.

7. Provide details of Greenhouse Gas Emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	18.16	16.99
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	0.47	0.308
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from Operations)	tCO <sub>2</sub> e	0.00000000427	0.00000000379
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)	tCO <sub>2</sub> e	0.0000000955	0.0000000839
Total Scope 1 and Scope 2 emission intensity in terms of physical output (tCO <sub>2</sub> e / Full time employee)	tCO <sub>2</sub> e	0.0369	0.0348
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		Nil	Nil

\*The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published by the IMF for India. For the years ended March 31, 2024 and March 31, 2023, it is 22.401 and 22.167, respectively.

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, the evaluation is not being conducted by any external agency.

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

The Company is committed to sustainability and actively exploring innovative solutions to reduce greenhouse gas emissions. While we currently don't have specific projects in place, we are dedicated to investing in research and development initiatives that align with our values. Through collaboration and transparency, we aim to make a positive impact and contribute to a greener future.

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)	0.0216	0.0154
E-waste (B)	0	0
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0.430	0.150
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please Specify, if any. (G)	0	0
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	15.756	6.389
Total (A+B + C + D + E + F + G +H)	16.208	6.554
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0000000371	0.0000000143
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total waste generated / Revenue from operations adjusted for PPP)	0.0000000831	0.0000000318
Waste intensity in terms of physical output (Metric tonnes / Full time employee)	0.0321	0.0132
Waste intensity <i>[optional]</i> – the relevant metric may be selected by the entity	Nil	Nil
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	Nil	Nil
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	Nil	Nil
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations – Municipal Corporation	16.208	6.554
Total	16.208	6.554

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

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, the evaluation is not being conducted by any external agency.

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.

Not applicable. As an education, training and tech-focused company, we recognize the importance of minimizing the usage of hazardous and toxic chemicals in our operations. Our strategy revolves around implementing stringent purchasing policies and collaborating with suppliers who prioritize environmental friendly alternatives. We actively seek out technologies and materials that are free from harmful substances, ensuring the safety of our employees, customers and the environment.

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? (Y/N)  If no, the reasons thereof and corrective action taken, if any.
	Nil, since none of the Company's entity is located in ecologically sensitive area.		

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
Nil. Currently, the Company has not undertaken any such assessment.					

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 and Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Serial Number	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 taken, if any action
Yes, the Company is compliant with all applicable environmental law / regulations / guidelines in India.				

### Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): **Not applicable**  
For each facility / plant located in areas of water stress, provide the following information:
- Name of the area : Not Applicable
  - Nature of operations : Training, Skilling, Education, Institutional Training, Assessment services and business solutions
  - Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)	Not Applicable, since the Company does not withdraw, consume, or discharge water in Central Ground Water Board (CGWB) notified areas of water stress.	
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed / turnover)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)	Not Applicable, since the company does not withdraw, consume, or discharge water in Central Ground Water Board (CGWB) notified areas of water stress.	
(i) Into Surface water		
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

Note: Indicate if any Independent Assessment / Evaluation / Assurance has been carried out by an external agency? (Y/N)  
If yes, name of the external agency.

No, the evaluation is not being conducted by any external agency.

2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent		Considering the level of quantification required for scope 3 calculation, currently the Company is not evaluating the emission and intensity.
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

Note: Indicate if any Independent Assessment / Evaluation / Assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No, the evaluation is not being conducted by any external agency.

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct and indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable, since none of the entity of the organisation is located in ecologically sensitive area.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Nil, since the reporting period no such initiative was undertaken.			

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

The Company has provisioned adequate disaster management and business continuity measures in order to deal with any unfortunate situations. The Company has tested and implemented work from home / anywhere policy dealing with unfortunate situations and have a robust disaster recovery system in place.




6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?

No significant adverse impact envisaged from the company's value chain.

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

Not Assessed, the Company is committed to initiate such assessments for environmental impacts in the forthcoming years.

## SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 6

	<p><b>SDG 12: RESPONSIBLE CONSUMPTION AND PRODUCTION:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 12- that is mentioned above in Principle 2</li> </ul>
	<p><b>SDG 13: CLIMATE ACTION:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 13- that is mentioned above in Principle 2</li> </ul>
	<p><b>SDG 15: LIFE ON LAND:</b></p> <ul style="list-style-type: none"> <li>The Company provides books in electronic format, reducing the Consumption of paper products.</li> </ul>

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

**Essential Indicators**

1. a) Number of affiliations with trade and industry chambers / associations.  
The Company has 7 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.

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Bombay Chamber of Commerce & Industry	State
2.	Confederation of Indian Industry (CII)	National
3.	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
4.	National Association of Software and Service Companies (NASSCOM)	National
5.	Beauty and Wellness Sector Skill Council (BWSSC)	National
6.	Media and Entertainment Skill Council (MESCC)	National

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



Name of authority	Brief of the case	Corrective active taken
Not applicable, since no adverse orders received from regulatory authorities.		

**Leadership Indicators**

1. Details of public policy positions advocated by the entity:

Sr. No	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, If available
1.	Not Applicable				

**SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 7**

	<p><b>SDG 10: REDUCED INEQUALITIES:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 10 – that is mentioned above in Principle 5.</li> </ul>
	<p><b>SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 16– that is mentioned above in Principle 1</li> </ul>

## PRINCIPLE 8 : Businesses should promote inclusive growth and equitable development

### Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the Current Financial Year.

Name and Brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web Link
No such projects were undertaken by the Company for which SIA was required as per applicable laws.					

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

S. No	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (in INR)
Not applicable, since no such projects were undertaken.						

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

The Company has accessible channels of communication such as dedicated email addresses or online platforms where community members can submit their grievances. The Company also has periodic employee connects through the employee experience team to check the pulse of the organization or to address grievances, if any.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	Given the nature of the business, this is not applicable.	
Sourced directly from within the district and neighbouring districts		

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

Location	FY 2023-24	FY 2022-23
Rural	0	0
Semi-urban	0	0
Urban	0	20
Metropolitan	100	80

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

### Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Not applicable, as the Company has not undertaken any projects of this nature.	

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

S. No	State	Aspirational District	Amount spent (In INR)
Nil, since none of the Company's CSR projects are undertaken in designated aspirational districts.			

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

Considering the type of industry, the organization currently do not purchase from suppliers comprising marginalized / vulnerable groups.

- (b) From which marginalized /vulnerable groups do you procure?

Not applicable, since the organization do not procure from marginalized/ vulnerable group.

- (c) What percentage of total procurement (by value) does it constitute

Not applicable, since the organization do not procure from marginalized/ vulnerable group.



4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the Current Financial Year), based on traditional knowledge:

S. No	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not Applicable, since no Intellectual Property was acquired by the entity.				




5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

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

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Azad Foundation	66	All the programs are primarily focused on vulnerable and marginalised sections of the society. A significant percentage of our beneficiaries are from economically backward sections of the society.
2	Ugam Education Foundation	4000+	
3	Childrens Movement for Civic Awareness (CMCA)	722	
4	Sri Krishna Sevadhama Trust, Udupi	50	
5	Workwith Dignity Foundation (WWD)	50	

#### SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 8

	<p><b>SDG 4: QUALITY EDUCATION</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 4 (Point 1, 2, 3 and 4) – that is mentioned above in Principle 3.</li> </ul>
	<p><b>SDG 9: INDUSTRY, INNOVATION AND INFRASTRUCTURE:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 9 – that is mentioned above in Principle 3</li> </ul>
	<p><b>SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 16– that is mentioned above in Principle 1</li> </ul>

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

##### Essential Indicators

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

The students have access to multiple channels to register their issues/ problems/ complaints regarding the course/ centre/ support services to the Company. These include a dedicated email address, online form and dedicated telephone number. The Company also responds to and resolves any complaints received on its social media pages. These complaints are handled based on a defined process flow and genuine complaints resolved to the satisfaction of the student.

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

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	Given the nature of the business, this is not applicable.
Safe and responsible usage	
Recycling and / or safe disposal	

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

Particulars	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the Year	Pending resolution at end of Year		Received during the Year	Pending resolution at end of Year	
Data Privacy	Nil			Nil		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other – Customer Complaints	462	1	Routine complaints	134	2	Routine complaints

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

	Number	Reasons for recall
Voluntary recalls	Given the nature of the business, this is not applicable.	
Forced recalls		

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

The company has prioritized the implementation of the Information Security Management System within the Organization to strengthen the security posture. This will include a focus on Information Data and Privacy through a rigorous and well-evident structured policy and procedure.

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.

The Company adheres to the applicable guidelines in the Code Book of The Advertising Standards Council of India (ASCI) in its marketing communication. The Company does not have any case filed against it regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last year and pending as of the end of the financial year. No complaints have been received related to cyber security or data privacy of customers.

7. Provide the following information relating to data breaches;

- Number of instances of data breaches : 1
- Percentage of data breaches involving personally identifiable information of customers: None
- Impact, if any of the data breaches: Impact of data breach could not be assessed however corrective incident management action was duly completed.

**Leadership Indicators**

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

BRAND	PLATFORM	LINK
ARENA ANIMATION	Website	<a href="https://www.arena-multimedia.com/in/en">https://www.arena-multimedia.com/in/en</a>
	Instagram	<a href="https://www.instagram.com/arenaanimation/">https://www.instagram.com/arenaanimation/</a>
	Facebook	<a href="https://www.facebook.com/arenaanimation">https://www.facebook.com/arenaanimation</a>
	LinkedIn	<a href="https://www.linkedin.com/school/arena-animation/">https://www.linkedin.com/school/arena-animation/</a>
	Twitter	<a href="https://twitter.com/Animation_Arena">https://twitter.com/Animation_Arena</a>
	YouTube	<a href="http://www.youtube.com/arenaanimation">http://www.youtube.com/arenaanimation</a>
MAAC	Website	<a href="https://www.maacindia.com/">https://www.maacindia.com/</a>
	Instagram	<a href="https://www.instagram.com/maacindiaofficial/">https://www.instagram.com/maacindiaofficial/</a>
	Facebook	<a href="https://www.facebook.com/maacindia/">https://www.facebook.com/maacindia/</a>
	LinkedIn	<a href="https://www.linkedin.com/school/595329/admin/">https://www.linkedin.com/school/595329/admin/</a>
	Twitter	<a href="https://twitter.com/MayaAcademyInd">https://twitter.com/MayaAcademyInd</a>
	YouTube	<a href="https://www.youtube.com/user/maacindia">https://www.youtube.com/user/maacindia</a>

BRAND	PLATFORM	LINK
LAKMÉ ACADEMY POWERED BY APTECH	Website	<a href="https://www.lakme-academy.com/">https://www.lakme-academy.com/</a>
	Instagram	<a href="https://www.instagram.com/lakmeacademy_aptech/">https://www.instagram.com/lakmeacademy_aptech/</a>
	Facebook	<a href="https://www.facebook.com/lakmeacademypoweredbyaptech/">https://www.facebook.com/lakmeacademypoweredbyaptech/</a>
	LinkedIn	<a href="https://www.linkedin.com/school/65074556/admin/">https://www.linkedin.com/school/65074556/admin/</a>
	Twitter	<a href="https://twitter.com/lakmeacademy/">https://twitter.com/lakmeacademy/</a>
	YouTube	<a href="https://www.youtube.com/channel/UCPXWTT2B2I8j4Y4PZ5JNXsQ">https://www.youtube.com/channel/UCPXWTT2B2I8j4Y4PZ5JNXsQ</a>
APTECH LEARNING	Website	<a href="https://www.aptechlearning.com/">https://www.aptechlearning.com/</a>
	Instagram	<a href="https://www.instagram.com/aptechlearning_official/">https://www.instagram.com/aptechlearning_official/</a>
	Facebook	<a href="https://www.facebook.com/AptechLearningOfficial">https://www.facebook.com/AptechLearningOfficial</a>
	LinkedIn	<a href="https://www.linkedin.com/school/aptech-learning/">https://www.linkedin.com/school/aptech-learning/</a>
	Twitter	<a href="https://twitter.com/Aptech_Learning">https://twitter.com/Aptech_Learning</a>
	YouTube	<a href="https://www.youtube.com/c/AptechLearning">https://www.youtube.com/c/AptechLearning</a>
APTECH AVIATION ACADEMY	Website	<a href="https://www.aptechaviationacademy.com/">https://www.aptechaviationacademy.com/</a>
	Instagram	<a href="https://www.instagram.com/aptech_aviation_official/">https://www.instagram.com/aptech_aviation_official/</a>
	Facebook	<a href="https://www.facebook.com/aptechaviationhospitality">https://www.facebook.com/aptechaviationhospitality</a>
	LinkedIn	<a href="https://www.linkedin.com/school/aptech-aviation-academy/">https://www.linkedin.com/school/aptech-aviation-academy/</a>
	Twitter	<a href="https://twitter.com/AptechAviation2">https://twitter.com/AptechAviation2</a>
	YouTube	<a href="https://www.youtube.com/user/aptechaviation">https://www.youtube.com/user/aptechaviation</a>
APTECH INTERNATIONAL PRESCHOOL	Website	<a href="https://www.aptechinternationalpreschool.com/">https://www.aptechinternationalpreschool.com/</a>
	Instagram	<a href="https://www.instagram.com/aptech_international_preschool/">https://www.instagram.com/aptech_international_preschool/</a>
	Facebook	<a href="https://www.facebook.com/aptechinternationalpreschool">https://www.facebook.com/aptechinternationalpreschool</a>
	LinkedIn	<a href="https://www.linkedin.com/school/aptech-international-preschool/">https://www.linkedin.com/school/aptech-international-preschool/</a>
	Twitter	<a href="https://twitter.com/AptechIntl">https://twitter.com/AptechIntl</a>
	YouTube	<a href="https://www.youtube.com/@AptechInternationalPreschool">https://www.youtube.com/@AptechInternationalPreschool</a>
APTECH CORPORATE	Website	<a href="https://www.aptech-worldwide.com/">https://www.aptech-worldwide.com/</a>
	Instagram	<a href="https://www.instagram.com/thehouseofaptech/">https://www.instagram.com/thehouseofaptech/</a>
	Facebook	<a href="https://www.facebook.com/Aptech">https://www.facebook.com/Aptech</a>
	LinkedIn	<a href="https://www.linkedin.com/company/aptech/">https://www.linkedin.com/company/aptech/</a>
	Twitter	<a href="https://twitter.com/aptechltd">https://twitter.com/aptechltd</a>
	YouTube	<a href="http://www.youtube.com/aptechltd">http://www.youtube.com/aptechltd</a>
THE VIRTUAL PRODUCTION ACADEMY BY APTECH	Website	<a href="https://thevirtualproductionacademy.com">https://thevirtualproductionacademy.com</a>
	Instagram	<a href="https://instagram.com/thevirtualproductionacademy?igshid=MzRlODBiNWFlZA==v">https://instagram.com/thevirtualproductionacademy?igshid=MzRlODBiNWFlZA==v</a>
	Facebook	<a href="https://www.facebook.com/thevirtualproductionacademy/">https://www.facebook.com/thevirtualproductionacademy/</a>
	Twitter	<a href="https://twitter.com/thetvpaofficial">https://twitter.com/thetvpaofficial</a>
	Youtube	<a href="https://www.youtube.com/channel/UCnp9RBM9Ao4-ItB8WBTvRw">https://www.youtube.com/channel/UCnp9RBM9Ao4-ItB8WBTvRw</a>
	LinkedIn	<a href="https://www.linkedin.com/company/97937773/admin/feed/posts/">https://www.linkedin.com/company/97937773/admin/feed/posts/</a>
	Pintrest	<a href="https://in.pinterest.com/thevirtualproductionacademy/">https://in.pinterest.com/thevirtualproductionacademy/</a>
	Threads	<a href="https://www.threads.net/@thevirtualproductionacademy">https://www.threads.net/@thevirtualproductionacademy</a>

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

The company is into the business of providing educational services. The welcome email to the students of its courses address the relevant aspects related to delivery of their course and usage of its online learning platform OnlineVarsity and online career platform Creosouls.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.



The Company has put in place systems to let customers know if there is a possibility of important services being disrupted or stopped however, we are upgrading the systems further. We believe in being open and honest with our customers, so we have mechanisms in place to communicate any risks or potential problems that may affect the services they rely on.

We use various methods such as email and messaging groups to provide timely updates about any risks or potential disruptions. Our aim is to keep customers well-informed so that they can make informed decisions and minimize any inconvenience.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/ Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Not applicable, since the Company is involved in providing services.

**SUSTAINABLE DEVELOPMENT GOALS (SDG) MAPPING: PRINCIPLE 9**

	<p><b>SDG 4: QUALITY EDUCATION:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 4- that is mentioned above in Principle 3</li> </ul>
	<p><b>SDG 12: RESPONSIBLE CONSUMPTION AND PRODUCTION:</b></p> <ul style="list-style-type: none"> <li>Please refer to SDG 12 – that is mentioned above in Principle 2</li> </ul>