



SURYA ROSHNI LIMITED

CIN -L31501HR1973PLC007543

2nd Floor, Padma Tower-1, Rajendra Place, New Delhi-110 008 (India)

Ph.: +91-11-25810093-96, 47108000 Fax : +91-11-25789560

E-mail : cs@surya.in Website : www.surya.co.in

SRL/se/yks/24-25/15

August 12, 2024

The Secretary
The Stock Exchange, Mumbai
MUMBAI - 400 001
Scrp Code: 500336

The Manager (Listing Department)
The National stock Exchange of India Ltd
Mumbai – 400 051
NSE Symbol: SURYAROSNI

Dear Madam, Sirs,

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

Pursuant to Regulation 34(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report ('BRSR') for Financial Year 2023-24. The BRSR forms part of the Company's 51st Annual Report for the Financial Year 2023-24.

The BRSR which form part of Annual Report is also available on the website of the Company at <https://surya.co.in>

This is for your information and records.

Thanking you,

Yours faithfully,
For Surya Roshni Limited

B. B. Singal
CFO & Company Secretary

Encl.: BRSR

SURYA

Business Responsibility & Sustainability Report

Financial Year 2023-24



SURYA ROSHNI LIMITED

Corporate Identity Number (CIN) - L31501HR1973PLC007543

Regd. Office: Prakash Nagar, Sankhol Bahadurgarh - 124507 (Haryana)

Phone: +91-1276-241540, Fax No. +91-1276-241886

Website: www.surya.co.in, E-mail: investorgrievances@sroshni.com

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

Sl.no	Required information	
1	Corporate Identity Number (CIN) of the listed entity	➤ L31501HR1973PLC007543
2	Name of the listed entity	➤ SURYA ROSHNI LIMITED
3	Year of incorporation	➤ 17 th October, 1973
4	Registered office address	➤ PRAKASH NAGAR, SANKHOL, BAHADURGARH - 124507 (HARYANA)
5	Corporate address	➤ PADMA TOWER - 1, 2 nd FLOOR, 5 RAJENDRA PLACE, NEW DELHI - 110 008
6	Email	➤ cs@surya.in
7	Telephone	➤ 011-47108000
8	Website	➤ www.surya.co.in
9	Financial year for which reporting is being done	➤ 2023-24
10	Name of the Stock Exchange(s) where shares are listed	➤ BSE Ltd. (BSE) and National Stock Exchange of India Limited (NSE)
11	Paid-up capital	➤ ₹ 54,40,89,740 (10,88,17,948 equity shares of ₹ 5/- each)
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	➤ Bharat Bhushan Singal (CFO & Company Secretary) Telephone: 47108000 (Extn. 610) and Email: cs@surya.in
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	➤ The disclosures under this report are made on a standalone basis
14	Name of the assurance provider	➤ No
15	Type of assurance obtained	➤ Not Applicable

II. Products/services

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

S. no	Description of main activity	Description of business activity	% of turnover of the entity
1.	Steel Pipes & Strips	1) Steel Pipes & Tubes 2) Cold Rolled (CR) Strips	80%
2.	Lighting & Fixtures Electrical Consumer Durables PVC Pipes	Lighting Products - Professional Luminaires and Consumer Luminaires Fans, Small Domestic Home Appliances and Water Heaters	20%

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

S. no	Product/service	NIC code	% of total turnover contributed
1.	Steel Pipes and Tubes	24106	72.85
2.	Cold Rolled Strips	24105	7.08
3.	Lighting Products	27400	20.07

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	6	1 corporate office in New Delhi and 28 branches across PAN India	35
International	Nil	Nil	Nil

19. Markets served by the entity:

a. Number of locations



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

15%



c. A brief on types of customers

The Company is the largest ERW GI Pipe manufacturer and the largest exporter of ERW Pipes in India, exporting to 50+ countries across globe, including USA, Australia, Canada, Mexico, the Middle East, Europe and Africa.


IV. Employees

20. Details as at the end of financial year:

a. Employees and workers (including differently abled):

Sl. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
 EMPLOYEES						
1	Permanent (D)	2,072	2,052	99.03	20	0.97
2	Other than permanent (E)	458	453	98.91	5	1.09
3	Total employees (D + E)	2,530	2,505	99.01	25	0.99
 WORKERS						
4	Permanent (F)	1,175	1,175	100.00	-	-
5	Other than permanent (G)	4,326	3,789	87.59	537	12.41
6	Total workers (F+G)	5,501	4,964	90.24	537	9.76

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



S. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)





DIFFERENTLY ABLED WORKERS

4	Permanent (F)	4	4	100	0	0.00
5	Other than permanent (G)	5	5	100	0	0.00
6	Total differently abled workers (F+G)	9	9	100	0	0.00

21. Participation/inclusion/representation of women:

	No. and percentage of females		
	Total (A)	No. (B)	% (B/A)
 Board of Directors	11	2	18.18%
 Key Management Personnel	2	0	0

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

	2023-24 (Turnover rate in current FY)			2022-23 (Turnover rate in previous FY)			2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
 Permanent employees	12.77	5.13	12.75	12.65	-	12.65	11.89	16.37	11.93
 Permanent workers	7.33	-	7.33	5.70	-	5.70	6.21	-	6.21

V. Holding, subsidiary and associate companies (including joint ventures)

23. (a) Name 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.	Surya Roshni LED Lighting Projects Limited	Subsidiary	100	No

VI. CSR details








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

(ii) Turnover - ₹ 78,08,51,90,379/-

(iii) Net worth - ₹ 19,99,85,85,376/-

VII. Transparency and disclosure compliances

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

Stakeholder group from whom complaint is received	Grievance redressal mechanism in place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	2023-24 (Current financial year)			2022-23 (Previous financial year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
 Communities	Yes	Nil	Nil	N.A.	Nil	Nil	N.A.
 Investors (other than shareholders)	Yes	Nil	Nil	N.A.	Nil	Nil	N.A.
 Shareholders	Yes	2	Nil	Resolved	2	Nil	Resolved
 Employees and workers	Yes	Nil	Nil	N.A.	Nil	Nil	N.A.
 Customers*	Yes	4,05,922	Nil	Resolved	3,40,801	Nil	Resolved
 Value chain partners	Yes	Nil	Nil	N.A.	Nil	Nil	N.A.
 Others-please specify	N.A.	None	None	N.A.	None	None	N.A.

* Number includes only grievances/escalation.



The Company is committed to encourage openness, promote transparency and reporting improvements without fear of rebuttal. The organisation is committed to creating a culture that encourages high standards of ethics and upholds decent and safe working conditions for the entire workforce. Grievance redress policy will be access on the website of the Company at the link: <https://surya.co.in/investor-relations/corporate-governance/#policies/>

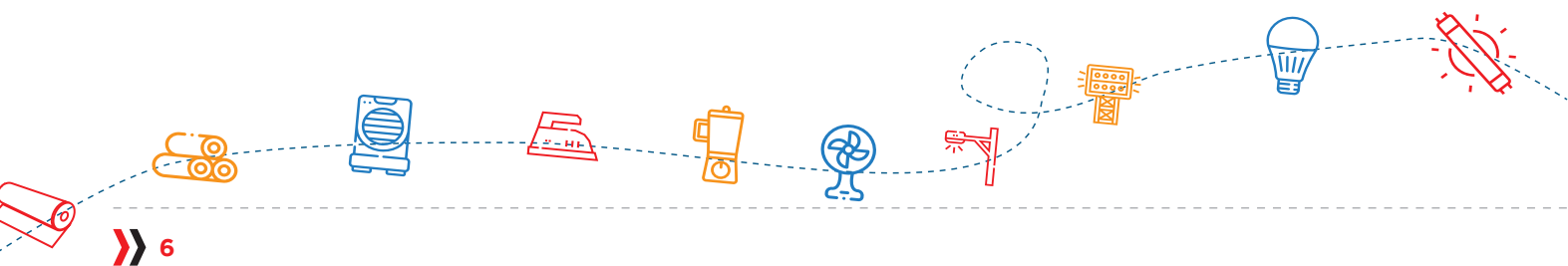
1. Communities, while interacting during the community engagement programmes, can report their grievances.
2. Investors and stakeholders can correspond with the Company by sending an Email to: investorgrievances@sroshni.com
3. Employees and workers can report any grievance by sending an Email to their respective unit HR Heads or to the HR Director at: ved@surya.in
4. Consumers can report grievances through the CRM system at <https://crm.surya.in> through the WhatsApp BOT (+91 9643300819), the Surya helpline number (1800 102 5657) or through a mobile Android application.
5. Value chain partners can reach us through our website: www.surya.co.in

Customer service and satisfaction are the focus areas of Surya Roshni, and we truly believe in providing the best service to our customers. We aim at minimising instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances. Surya Roshni has established a structured grievances redressal mechanism. We are committed to encouraging openness, promoting transparency and reporting improvements without fear of rebuttal. Surya Roshni follows 'Zero Tolerance' Policies w.r.t. non-compliance and is committed to creating a culture that encourages high standards of ethics and upholds decent and safe working conditions for workforce. The Company has a Vigil mechanism, whereby one is free to report complaints/violations of laws, rules, regulations, or unethical conduct, and actual or suspected fraud to the nodal officer. The Company will oversee the mechanism through the Audit Committee. Please refer point 5 of Corporate Governance Report as form part of this Annual Report for detailed information on grievance redressal.

26 Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format.



S. no	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	 Brand Reputation	 Risk	Given that Surya Roshni is a household name and provides products and services to millions of customers, any undesirable customer experience could result in the loss of customers or even reputational loss.	Listening to customers and driving continuous transformation to provide them with a frictionless experience is what Surya Roshni has always strived for. For a better customer experience, Surya Roshni has appropriately addressed their grievances. Customer experience is enhanced by offering products and services, which meet the needs of customers, as well as adopting to innovative technology solutions to provide a seamless and an on-the-go customer journey through its better services and innovative lighting products.	Negative Loss of reputation can result in loss of the customer, thereby adversely impacting the businesses of Surya Roshni.



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)
2.	 Business Ethics	 Risk	<ol style="list-style-type: none"> 1. Helps in risk management 2. Important in enhancing long-term value with stakeholders 3. Critical in the successful running of the Company 	<p>The Company is committed to adhering to the highest standards of ethical, moral and legal conduct for business operations. In order to maintain these standards, the Company has formalised the 'Code of Conduct' for Directors as well as all employees of the Company. This lays down the principles and standards that govern the actions of the employees in the course of the Company's business. It covers all dealings with vendors, customers and other business partners. Any actual or potential violation of the Code, however insignificant or perceived as such, would be a matter of serious concern for the Company. All such policies are communicated to employees on their joining. The Company conducts its relationships and dealings in business, and otherwise, under the Code of Conduct. It mainly focusses on five values i.e. Personal Leadership, Courage, People Development, Innovation and Execution Excellence. The Company has in place, different mechanisms for receiving and dealing with complaints from different stakeholders. The Company has established a vigil mechanism for employees, Directors and vendors to report concerns about unethical behavior and actual or suspected fraud or violation of the Company's Code of Conduct. The Whistle Blower Policy facilitates employees and vendors to report without fear, any wrongdoings or unethical or improper practice. There is a separate Stakeholders Relationship Committee for shareholder grievances. The Company has an exclusive Email id for redressal of investor grievances. Investors can Email at: investorgrievances@sroshni.com to lodge their complaints. The Company has an exclusive Email: consumercare@surya.in for consumer care. Consumers can lodge their complaints/ suggestions/feedback accordingly. In order to address workplace-related issues, the senior management team has periodic interactions, with employees at different locations. The Managing Director regularly receives feedback from employees across the country through specially instituted mechanisms.</p>	<p>Positive: Compliance with relevant regulatory requirements reflects the Company's commitment towards responsible business practices</p> <p>Negative: Non-compliance with regulatory requirements may affect the Company's image and impact its business continuity in the long term.</p>

S. no	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	 Energy Efficiency	 Risk and Opportunity	<p>Risk: Energy management has been identified as a key material issue under Climate change and environmental risk. Climate Change and Environmental risks are addressed to emphasise on the Company's climate consciousness and its contribution towards mitigation action plans against climate change</p> <p>Opportunity: Comprehensive resource management plans in alignment with the Company's environment conservation strategy will highlight the Company's commitment for improving environment preservation and its contribution towards climate change mitigation action plans.</p>	<p>The Company focusses on four major areas related to climate change i.e. energy conservation, water conservation, use of renewable energy and waste minimisation. The Company's Environment, Health and Safety (EHS) Policy covers all employees and stakeholders across all manufacturing units. In lighting manufacturing processes, high-energy consumption equipment had been replaced with cost-effective energy efficient equipment. The Company regularly monitors the operations and capacity optimisation of pumps, motors and cooling tower operations, to take corrective actions. The Company is contributing towards the global environment by complying with ISO Certification i.e., ISO 9001, ISO 14001 & OHSAS 18001 under the Integrated Management System, in each and every process of the Company. The Company regularly assesses various environmental risks associated with its activities and its probable impact. The purpose of this procedure is to establish and maintain procedures for identifying environmental/hazard aspects of activities. The manufacturing units have embraced initiatives on clean technology and energy efficiency. Innovative technologies have been implemented to reduce the impact on the environment. The Company has installed a solar panel at its manufacturing facilities at Bahadurgarh, and Malanpur Steel Plant and will be installing solar panels at all its other manufacturing units in times to come. In the longer term, the Company aims to reduce CO₂ emissions and generate energy at a lower cost at its factories in India. This is in-sync with the Company's approach towards building a sustainable ecosystem through efficient energy consumption and optimum utilisation of natural resources such as solar power and wind energy. Furthermore, this project will also enable significant operating cost-savings for the Company such as lower energy loss, reduced electricity bills and maintenance costs.</p>	<p>Positive: The Company's focus on strengthening climate and ESG specific initiatives bolsters long-term value creation and enables the Company to effectively respond to rising stakeholder demands</p> <p>Negative: Lack of robust initiatives and action plans to contribute to ESG awareness and climate change could adversely impact business operations and lead to workforce disruption.</p>

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)
4.	 Human Rights Practices	 Risk	<p>Risk: The absence of a comprehensive Human Rights governance structure from the aspects of parameters such as working conditions, child/forced labour, fair remuneration, gender diversity, prevention of sexual harassment, freedom of association, and collective bargaining will impact the Company's performance in the social domain from the perspective of the workforce as well as the community.</p>	<p>The Company respects the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and marginalised groups. All the practices and policies of the Company, including engagement with suppliers and contractors, among others, ensure that human rights are honoured and protected. To respect the human rights of our employees, including non-discrimination, prohibition of child and forced labour, freedom of association and the right to engage in collective bargaining. Surya Roshni strives to ensure that there is no discrimination or harassment due to gender, religion, ethnicity and disability. We continuously work towards building a conducive work environment wherein merit in qualification and performance becomes the sole criteria for selection and performance appraisal and the work environment is free from all forms of harassment - physical, verbal, psychological, sexual etc. Integrating a strong governance structure for Human Rights from the aspects of the Human Rights Policy, the Freedom of Association Policy and Due Diligence across the business operations extending to supply chain partners and vendors</p>	<p>Positive: Comprehensive alignment of Human Rights principles in accordance with the guiding principles of national and international Human Rights standards amplifies the Company's performance in the social aspect and reflects its commitment towards human rights integration within the Company's business model</p> <p>Negative: The absence of a Human Rights governance structure could result in employee dissatisfaction, impacting the workforce productivity that could impact the Company's long-term business growth plan. The lack of a strong redressal mechanism may result in non-compliance issues from a relevant regulatory perspective</p>

S. no	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5.	 Board Diversity and Independence	 Opportunity	Opportunity: The Company recognises and embraces the importance of a diverse Board in its success. We believe that a truly diverse Board will leverage differences in thought, perspective, knowledge, skill, industrial experience, age, ethnicity, and gender, which will help us to retain our competitive advantage.	<ol style="list-style-type: none"> 1. Ensure a transparent nomination process for directors with the diversity of thought, experience, knowledge, perspective, excellence in their performance; 2. The Board, as recommended by Nomination and Remuneration Committee, has adopted the Board Diversity Policy, which sets out the approach to diversity on the Board of Directors. 3. As an employer committed to diversity, Surya Roshni recognises that its success depends on creating a working environment which supports the diverse make-up of its employees with supporting policies and procedures to create a framework which promotes this policy 	Positive: Consistent efforts would have a positive impact due to improvement in productivity, etc.



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

The National Guidelines for Responsible Business Conduct (NGRBC) as bought out by Ministry of Corporate Affairs advocates nine principles referred as P1-P9 as given below:



Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1 a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the policies, if available	https://surya.co.in/investor-relations/corporate-governance/#policies/								
2 Whether the entity has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3 Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
4 Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 9001, ISO 14001 & OHSAS 18001, ISO 45001, AS1074 (AUSTRALIA), BIS 3589 : 2001, BIS 1239, BIS 1161, BIS 5504, BIS 4923, BIS 3601, BIS IS 4270 : 2001, EN 10219-1:2006, IS 4923, IS3183:2012, IS 4270:2001, API 5L, API 5CT, SLS/CE/UL								
5 Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company continues to give major emphasis on the conservation of energy and the measures taken during the previous years in the said regard were continued. Surya Roshni has identified material ESG issues, which will help the Company in setting targets and measures. Surya Roshni strives to become a sustainable organisation and is in the process of developing or setting targets for its business.								
6 Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Surya Roshni is committed to enhancing sustainability practices in a formal manner by adopting the guidelines defined under NGRBC and will work on measuring the performance once targets are set and defined.								

Governance, leadership and oversight

7 Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>It is with great pride that I present our Company's Business Responsibility and Sustainability Report (BRSR) for the year 2024. This report reflects our unwavering commitment to ethical business practices, environmental stewardship, and social responsibility. As a leading organisation in our industry, we recognise the profound impact our operations have on the environment and society. Our commitment to sustainability is not merely a strategic priority but a core value that shapes our corporate culture and decision-making processes. We are dedicated to driving positive change and fostering a sustainable future for all our stakeholders. Over the past year, we have made significant strides in reducing our environmental footprint. We have implemented advanced technologies and innovative processes to minimise our greenhouse gas emissions, reduce water consumption, and enhance waste management.</p> <p>Social responsibility remains at the heart of our operations. We are committed to upholding the highest standards of labour practices, promoting diversity and inclusion, and ensuring the well-being of our employees. Our community engagement programmes have positively impacted thousands of lives, and we continue to support various initiatives aimed at improving education, healthcare, and social welfare.</p> <p>Good governance is essential to our success. We maintain robust governance structures to ensure transparency, accountability, and ethical conduct throughout our organisation. Our Board of Directors and management team are dedicated to upholding these principles and continuously improving our governance practices.</p> <p>We understand that the journey towards sustainability is ongoing and requires collective effort. I extend my heartfelt gratitude to our employees, partners, and stakeholders for their unwavering support and collaboration. Together, we will continue to make a meaningful difference and build a sustainable future for generations to come.</p>								
--	---	--	--	--	--	--	--	--	--

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
----------------------	----	----	----	----	----	----	----	----	----

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

Mr. Kaustabh Narsinh Karmakar
Director - HR
Email: ved@surya.in
- 9** Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details.

Yes -The Risk Management Committee is, inter-alia, responsible for formulating the detailed risk management policy by identifying the internal and external risks faced by the Company, including financial, operational, sectoral, sustainability (particularly, ESG-related risks), information, cybersecurity risk, measures for risk mitigation, business continuity plan. The Committee regularly reviews the methodology, processes, and systems to monitor and evaluate risks associated with the business of the Company and proper implementation of the risk management policy. The Committee also regularly updates the Board of Directors about the nature and content of its discussions, recommendations, and actions to be taken.

10. Details of Review of NGRBCs by the Company:

Subject of review	Indicate whether review was undertaken by Director/Committee of the Board/any other committee									Frequency (Annually/Half yearly/quarterly/any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	As a practice, policies on the Business Responsibility of the Company are reviewed annually or on a need basis by the Committee of the Board. During this assessment, the efficacy of the policies is reviewed and necessary changes to policies & procedures are implemented									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Committee of the Board reviews compliance with the existing regulations as applicable and a Statutory Compliance Certificate on applicable laws.									On going basis – A Compliance Report from the plant/functional heads is placed before the Committee of the Board on a quarterly basis. In addition, tools are used to track and enforce 100% compliances.								

	P1	P2	P3	P4	P5	P6	P7	P8	P9
--	----	----	----	----	----	----	----	----	----

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

Yes, the policies are independently reviewed and assessed by the CareEdge Analytics and Advisory
- 12** If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated: **N.A.** (All Principles are covered by the Policies)




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 categorised 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.

Essential Indicators




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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
 Board of Directors	1	An induction/familiarisation session is arranged for every Independent Director, on his/her appointment to the Board of Directors. The induction session, among others, includes an overview of the Company, its vision and mission, the industry in which it operates, its business strategies, risk management, and the roles and responsibilities as a member of the Risk Management Committee and Board. On an ongoing basis, Surya Roshni's Board conducts meetings to provide updates regarding regulatory changes the Code of Conduct for the Prevention of Insider Trading, the Code of Conduct for Directors and Senior Management, Corporate Governance, Risk Management, IT & Cybersecurity, and changes in the regulatory environment as applicable during the meeting. Further, Independent Directors meet separately without the attendance of Non-Independent Directors, the Board as a whole, and the performance of the Chairman of the Board. During the year, a familiarization programme related to the Recent Amendments in the SEBI (LODR) Regulations was conducted for all the Directors to make them aware of the recent development/changes in the listing regulations.	100
 Key Managerial Personnel	1	Recent Amendments – SEBI (LODR) Regulations	100
 Employees Other than Board of Directors and KMPs	280	5S, Time Management, Electrical and Industrial Safety, On-the-Job Training, IMS, Firefighting, First Aid, Kaizen, Six Sigma QMS, ISO,API, ON JOB,Work Instrastion, SOP Safety Awareness at Workstation, Emergency Fire Training, Road Safety,Hazard, SAP, Discipline & Punctuality, Financial Awareness & Tax Saving, Higher Pesion, Human Rights, Material Management, First Aid, Use of PPEs, Housekeeping, Safety, General Awareness, ISO 9001: 2015 (QMS), Effective Communication, Human Rights, Yoga, Financial Wellness and Stress Management.	100

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
 Workers	73	5S, Time Management, Electrical and Industrial Safety, On-the-Job Training, IMS, Fire Fighting, First Aid, Kaizen, Six Sigma, QMS, ISO,API, ON JOB,Work Instrastion, SOP Safety Awareness at Workstation, Emergency Fire Training, Road Safety, Hazard, SAP, Discipline & Punctuality, Financial Awareness & Tax Saving, Higher Pesion, Human Rights, Material Management, First Aid, Use of PPEs, Housekeeping, Safety, General Awareness, ISO 9001: 2015 (QMS), Effective Communication, Human Rights, Yoga, Financial Wellness and Stress Management	100

2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity’s website):

Monetary

	NGRBC principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the case	Has an appeal been preferred? (Yes/No)
 Penalty/fine	Nil	Nil	Nil	Nil	No
 Settlement	Nil	Nil	Nil	Nil	No
 Compounding fee	Nil	Nil	Nil	Nil	No

Non-Monetary

	NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred? (Yes/No)
 Imprisonment	Nil	Nil	N.A.	No
 Punishment	Nil	Nil	N.A.	No

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

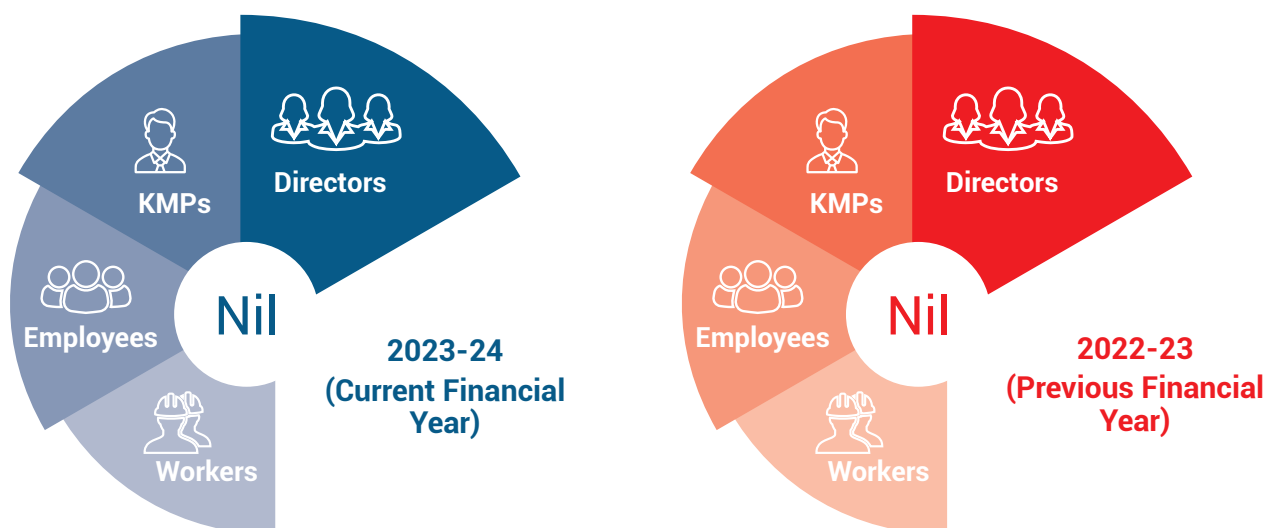
Case Details	Name of the regulatory/enforcement agencies/judicial institutions
Not Applicable	

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

Yes, the Company does not encourage associates or any connected stakeholders to engage in unethical means such as Bribery or kickbacks. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business relationships, wherever they cooperate, and in implementing and enforcing effective systems to counter bribery. Strong guidelines have been laid down to avoid malpractices and the consequences of such actions are also well-defined. Strong and stringent control measures are in place to stop such activities and associates are encouraged to bring to notice any such malpractice which might have been missed out. The Company's governance practices have been laid out on the foundation of honesty and integrity, conducting business in compliance with all regulatory and legal obligations. The principles of anti-corruption and bribery are captured in the policy of the Company: Anti Bribery Policy can be accessed at:

<https://surya.co.in/investor-relations/corporate-governance/#policies/>

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



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

	2023-24 (Current financial year)		2022-23 (Previous financial year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of conflict of interest of the KMPs	Nil	NA	Nil	NA

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

There were no cases of corruptions or conflicts of interest which required action by regulators/law enforcement agencies/ judicial institutions.

8.	2023-24 (Current financial year)	2022-23 (Previous financial year)
Number of days of accounts payable	22	24

9 Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers and related parties along-with loans and advances & investments, with related parties

Parameter	Metrics	2023-24 (Current financial year)	2022-23 (Previous financial year)
Concentration of purchases	a. Purchases from trading houses as % of total purchases	2.40	2.20
	b. Number of trading houses where purchases are made from	433	468
	c. Purchases from top 10 trading houses as % of total purchases from trading houses.	74.23	69.69
Concentration of sales	a. Sales to dealers/distributors as % of total sales	50.59	50.62
	b. Number of dealers/distributors to whom sales are made	5,321	3,369
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/ distributors	37.68	30.36
Share of RPTs in	a. Purchases (Purchases with related parties/total purchases)	-	-
	b. Sales (Sales to related parties/total sales)	0.14%	0.08%
	c. Loans & advances (Loans & advances given to related parties/total loans & advances)	-	-
	d. Investments (Investments in related parties/Total investments made)	-	-

Leadership Indicators

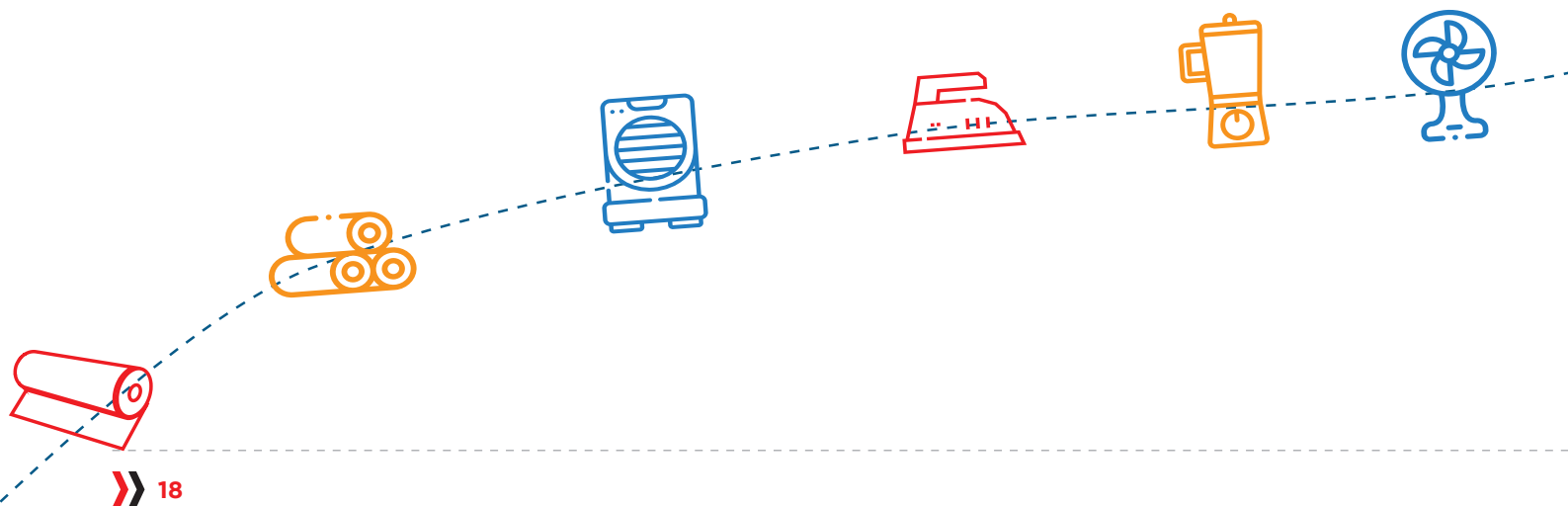
1 Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programmes held	Topics/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
One	P1 to P9	46% of the identified vendors

The Company has a long-lasting relationship with its suppliers/vendors. Awareness on sustainability is being created among vendors, while training and awareness on energy, health and safety is also being imparted to strategic vendors. For enhancing skills at the vendors' end, a focussed drive has been undertaken in the following areas and an organisational structure for the same has been put in place. The areas covered are vendor capability building, vendor evaluation standard, and supply risk mitigation and management.

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 established a vigil mechanism for employees, Directors and vendors for reporting concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct. The Whistle Blower Policy facilitates employees and vendors to report without fear, any wrongdoings or unethical or improper practice. Every Director of the Company discloses his/her concern or interest in the Company or companies or bodies corporate, firms, or other association of individuals and any change therein, annually or upon any change, which includes the shareholding. Further, a declaration is also taken annually from the Directors under the Code of Conduct confirming that they will always act in the interest of the Company and ensure that any other business or personal association, which they may have, does not involve any conflict of interest with the operations of the Company and the role therein. In the Meetings of the Board, the Directors abstain from participating in the items in which they are concerned or interested. To identify and track conflicts of interest involving the Directors/KMPs of the Company, the Corporate Secretarial team maintains a database of the Directors and the entities in which they are interested. This list is shared with the Finance Department for monitoring and tracking transaction(s) entered by the Company with such parties. Additionally, the Senior Management also affirms that they have not entered into any material, financial and commercial transactions, which may have a potential conflict with the interest of the Company at large.



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

Essential Indicators

- 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

	2023-24 (Current financial year)	2022-23 (Previous financial year)	Details of improvements in environmental and social impacts
R & D	46%	53%	The impact is in reduction of Hazardous gases on the environment through development of energy efficient Light Sources and Luminaires & its application including LED Lighting System carried out at Noida R&D centre.

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

Yes, the Company has formulated a Sustainable Supply Chain Management Policy that outlines the framework for reporting on environmental, social, and economic impacts. The Company checks the compliance and practices of its supply chain through supplier assessment and onsite audits. Our key focus is to assess on basis of ESG parameters and verify if the policies of the organisations, business continuity management systems practices, and strategies and initiatives to overcome sustainability risks are in place, Surya Roshni asks suppliers to adhere to the Supply Chain Code of Conduct through POs Also, we have incorporated terms and conditions in our Purchase Orders to purchase the raw material from the vendor having ISO 14001/ISO 18001 Certifications and legal consents under Environmental Protection Act.

- If yes, what percentage of inputs were sourced sustainably?

83%

- Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for

- Plastics (including packaging)

The Company has an established system for collecting back the plastic waste or multilayered packaging generated from its products as per the Extended Producer Responsibility (EPR) regulations. The recycling and disposal of the reclaimed plastics (including packaging) is carried out as per the Central Government rules and the provisions of the Plastic Waste Management Rules.

As an importer, we are registered on the CPCB Portal for EPR under the Plastic Waste Management Rules 2016. For the compliance of EPR, recycling our plastic packaging material which we received along with imported electronic components through registered recyclers.

As brand owners, we are registered on the CPCB Portal for EPR under the Plastic Waste Management Rules 2016. For the compliance of EPR, we recycle our post-consumer plastic packaging waste that we have placed in the market through registered recyclers.

(b) E-waste

As a manufacturer, we are given authorisation by the SPCB under E-Waste Management Rules 2022 for the recycling of our e-waste generated during the manufacturing of lamps in the recycling facility made at our site. As a Producer, we are registered on CPCB Portal for EPR under E-Waste Management Rules 2022. For compliance with EPR, recycling our EOL products which we have placed in the market through registered recyclers. A Pan India based agency authorised by the Pollution Control Board is selected for ensuring the safe disposal of e-waste with minimal environmental impact.

(c) Hazardous waste

The hazardous waste is sent for proper disposal at the Pollution Control Board's authorised facilities.

(d) Other waste.

Solid waste/sludge from water and waste treatment plants and process waste from the factories is disposed in a controlled manner as per the policy.

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.

Yes, EPR applies to the Company's business. Its waste collection plan is made in accordance with the EPR action plan filed with the CPCB. The use of plastic in the product is determined by the standards established by the Pollution Control Board. In addition, a procedure for the receipt and disposal of plastic is in place and complies with current statutory regulations. Also, EPR plans for e-waste and plastic waste are submitted to the Pollution Control Board.

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	No- The Company, being the largest exporter of ERW pipes and largest producer of ERW GI Pipes in India, manufactures ERW Steel Pipes (GI Black, Hollow section), API & Spiral Pipes, 3LPE Coated Pipes and CR Strips. It is also the Second Largest Manufacturing Lighting Company in India that manufactures world-class LED bulbs, LED Street Lights, LED Luminaire, Lighting products and provides fans and home appliances.	Boundary for which the Life Cycle Perspective/assessment was conducted
Name of Product/service		Whether conducted by independent external agency (Yes/No)
% of total turnover contributed		Results communicated in public domain (Yes/No) If yes, provide the web-link.

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.





The Product/services may have potential environmental concerns.

Name of Product/ service	Description of the risk/concern	Action taken
Packaging material	Plastic bags used in packaging were harmful to the environment.	The Company has mostly eliminated the use of plastic bags in its packaging. In places where it cannot be avoided, the thickness is changed to the allowable limit.
Lighting manufacturing	e-waste	The Company has started reusing the same packaging material, thereby reducing waste. The Company has started using ROHS-compliant raw materials. Also, recycling and safe disposal are being managed under the EPR plan.

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	
	2023-24 (Current financial year)	2022-23 (Previous financial year)
Plastic	8.69%	16.51%
Glass	0.49%	1.263%
Mercury	0.38%	0.055%
Phosphor Powder	0.47%	1.222%
Aluminium	0.55%	2.954%

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

	2023-24 Current financial year			2022-23 Previous financial year		
	Re-used	Recycled	Safely disposed	Re-used	Recycled	Safely disposed
 Plastics (including packaging)	696.06	NIL	229.71	40.89	Nil	44.638
 E-waste	NIL	1,157.03	3.10	NIL	22.757	NIL
 Hazardous waste	NIL	116.42	747.25	NIL	121.045	740.660
 Other waste	NIL	NIL	NIL	NIL	NIL	NIL

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 % of total products sold in respective category
<p>Damaged material is sent to the depots and is disposed of as-is through the contracting process. The quantum of such material is almost negligible.</p>	

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

Essential Indicators

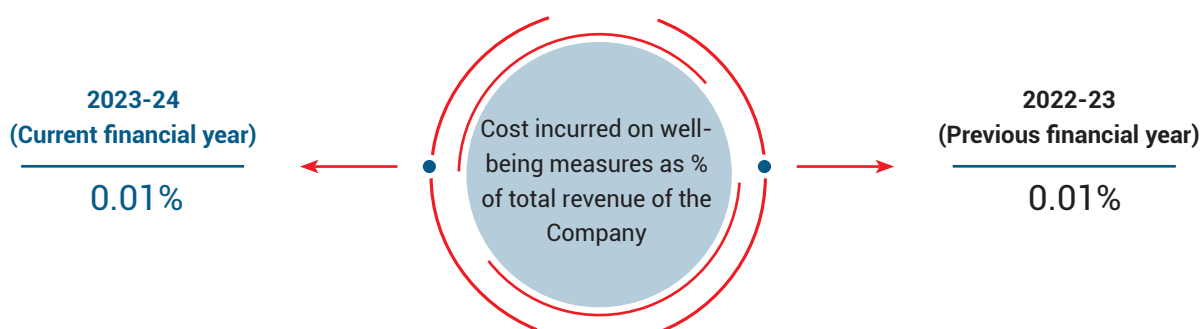
1. a. Details of measures for the well-being of employees:

% of employees covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	2,052	1,195	58.24	2,052	100.00	-	-	-	-	-	-
Female	20	17	85.00	20	100.00	1	5.00	-	-	-	-
Total	2,072	1,212	58.49	2,072	100.00	1	0.05	-	-	-	-
Other than permanent employees											
Male	453	-	-	-	-	-	-	-	-	-	-
Female	5	-	-	-	-	-	-	-	-	-	-
Total	458	-	-	-	-	-	-	-	-	-	-

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

% of workers covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	1,175	274	23.32	1,175	100.00	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	1,175	274	23.32	1,175	100.00	-	-	-	-	-	-
Other than permanent workers											
Male	3,789	1,860	49.09	3,789	100.00	-	-	-	-	-	-
Female	537	76	14.15	537	100.00	-	-	-	-	-	-
Total	4,326	1,936	44.75	4,326	100.00	-	-	-	-	-	-

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



2. Details of retirement benefits, for current FY and previous financial year.

Benefits	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	2.03	3.23	Yes	2.88	8.65	Yes
N.P.S.	3.64	-	Yes	1.51	-	Yes
Others-please specify	None	None	N.A.	None	None	N.A.

3. Accessibility of workplaces

Are the premises/offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes, as a principle, the Company, through its Equal Employment Opportunity policy, prohibits any kind of discrimination against any person with a disability in any matter related to employment as per the Rights of Persons with Disabilities Act, 2016, and Transgender persons (Protection of Rights) Act 2019. The corporate office and sites of Surya Roshni and its subsidiaries have ramps for easy movement of differently abled people and wheelchair-accessible restrooms are available.

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

Yes, Surya Roshni has adopted an Equal Employment Opportunity And Non-Discrimination Policy in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016, and provides a framework that is committed to the empowerment of persons with disabilities.

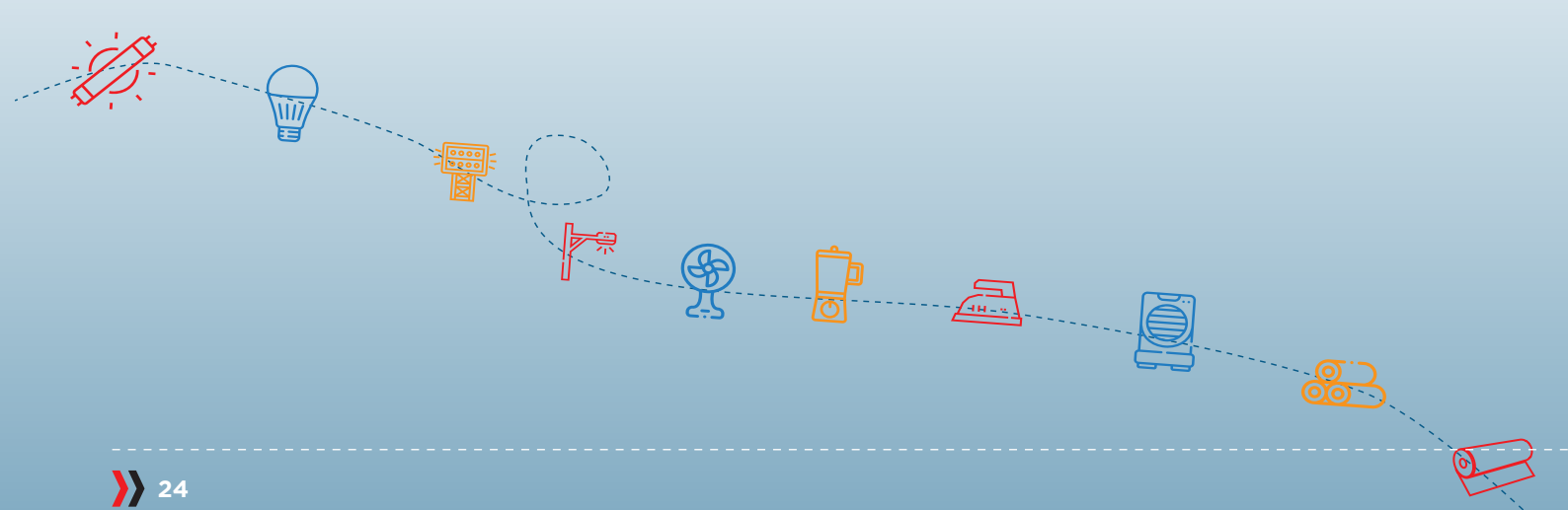
<https://surya.co.in/investor-relations/corporate-governance/#policies/>

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

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

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	<p>Yes. Surya Roshni strives to create a culture that is fair, open, & transparent and where employees and workers can openly present their views. Surya Roshni transparently communicates its policies and practices such as plans, compensation, performance metrics, performance pay grids and calculation, career enhancements, compliance, and other processes. Surya Roshni enables employees and workers to work without fear of prejudice, gender discrimination, and harassment. It has zero tolerance for any non-compliance with these principles. Surya Roshni has a Grievance Redressal Committee in which employees can raise issues by dropping letters or Emails. These serve as grievance mechanisms for its employees to report or raise their concerns confidentially, anonymously and without fear of any retaliation. The Whistle Blower Mechanism provides employees with a mechanism to report any concerns or grievances pertaining to any potential or actual violation of the Code of Conduct.</p>
Other than permanent workers	
Permanent employees	
Other than permanent employees	



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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees /workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)

Total permanent employees

Male	2,052	NIL	NIL	2,065	NIL	NIL
Female	20	NIL	NIL	19	NIL	NIL
Total	2,072	NIL	NIL	2,084	NIL	NIL

The Company does not have any employee associations. The Company, however, recognises the right to freedom of association through freedom of association policy and does not discourage collective bargaining.

Total permanent workers

Male	1,175	610	51.91	1,226	640	52.20
Female	-	-	-	-	-	-
Total	1,175	610	51.91	1,226	640	52.20

8. Details of training given to employees and workers:

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)

Employees

(Both permanent and other than permanent)

Male	2,505	906	36.17	920	36.73	2,495	819	32.83	763	30.58
Female	25	5	20.00	5	20.00	22	5	22.73	3	13.64
Total	2,530	911	36.01	925	36.56	2,517	824	32.74	766	30.43

Workers

Male	4,964	3,635	73.23	2,757	55.54	5,104	3,343	65.50	2,390	46.83
Female	537	481	89.57	537	100.00	455	455	100.00	455	100.00
Total	5,501	4,116	74.82	3,294	59.88	5,559	3,798	68.32	2,845	51.18

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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees*						
Male	2,505	1,873	74.77	2,495	1,883	75.47%
Female	25	20	80%	22	19	86.36%
Total	2,530	1,893	74.82	2,517	1,902	75.57%
Workers*						
Male	4,964	1,175	23.67	5,104	1,226	24.02%
Female	537	-	-	455	-	-
Total	5,501	1,175	21.36%	5,559	1,226	22.05%

*Includes permanent and other than permanent

10 Health and safety management system:

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

Yes, The health and safety of employees is extremely important to the Company and it is committed to building and maintaining a safe and healthy workplace. The Company's Environment, Health and Safety (EHS) Policy covers all employees and stakeholders across all manufacturing units. At a strategic level, the Company has embedded various Environment, Health & Safety (EHS) considerations in all aspects of its existing operations. All manufacturing locations are certified for IMS QMS 9001:2015 (Quality Management System), ISO 14001 (Environmental Management Systems) requirements and OHSAS 18001 (Occupational Health and Safety Management Systems) requirements. The Company has adhered to the applicable standards and limits for emissions and waste prescribed by the respective State Pollution Control Board (SPCB)/Central Pollution Control Board (CPCB).

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

Surya Roshni is committed to providing a safe and healthy workplace by minimising the risk of accidents, injury, and exposure to health risks and it complies with applicable laws and regulations with respect to safety at the workplace. Surya Roshni has taken an initiative to frame a comprehensive policy with respect to health and safety management systems such as plant safety audits, job safety analysis, work permit systems, workplace monitoring, noise monitoring, hygiene & sanitation, yearly safety audit, emergency exits, first aid boxes, etc.









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

Yes. Work-related hazards are being identified and addressed through a daily plant round and cross-functional behaviour safety observation rounds.

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

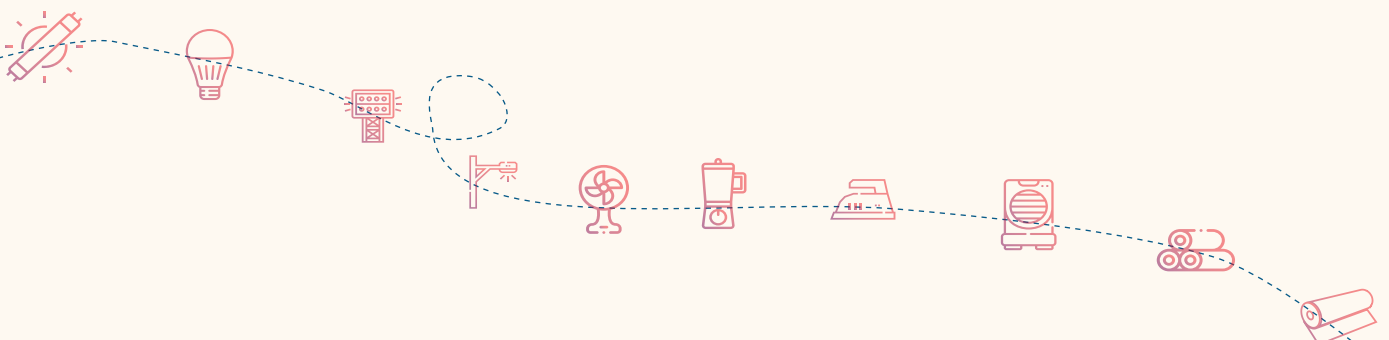
Yes, Surya Roshni has insured its employees under group-term insurance, health insurance and accidental insurance policies.

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

Safety Incident/Number	Category	2023-24 (Current financial year)	2022-23 (Previous financial year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	 Employees	Nil	Nil
	 Workers	Nil	Nil
Total recordable work-related injuries	 Employees	Nil	Nil
	 Workers	Nil	Nil
No. of fatalities	 Employees	Nil	Nil
	 Workers	1	1
High consequence work-related injury or ill-health (excluding fatalities)	 Employees	Nil	Nil
	 Workers	Nil	Nil

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

Please refer to Question No. 10 above.



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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working conditions	Nil	Nil	N.A.	Nil	Nil	N.A.
Health and safety	Nil	Nil	N.A.	Nil	Nil	N.A.

14. Assessments for the year:

**% of your plants and offices that were assessed
(by entity or statutory authorities or third parties)**



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.

1. We have Safety Command Centres established at each plant to track and raise awareness on safety culture.
2. Root Cause Analysis (RCA) are conducted for all the safety-related incidents and suitable corrective actions are taken. Safety Inspections and Safety Audits are also being done periodically. Corrective actions are being taken for all the observations given by the auditors (internal as well as external).
3. Rotational safety reviews are conducted by Site Heads and Plant Heads once a month. Key learning points shared by site implemented horizontally. In addition, PPE Matrix revised, and plant-wise PPE training modules has been deployed. A system of safety challans and surprise checks are used to strengthen the culture of safety.
4. The number of targeted safety placards and poster and signboards has been increased and placed at strategic locations to raise awareness as well as to reinforce that safety is everyone's responsibility.

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, Surya Roshni has a scheme in place to provide financial assistance to the legal dependents of the permanent employees in case of death while in service. In addition to this, employees are covered under the Group Personal Accident (GPA) Insurance.

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 monitors and tracks the compliance related to statutory dues by contractors supplying third party resources as a part of regular checks while processing the invoices. Periodic audits are also conducted to ensure compliance.

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 are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

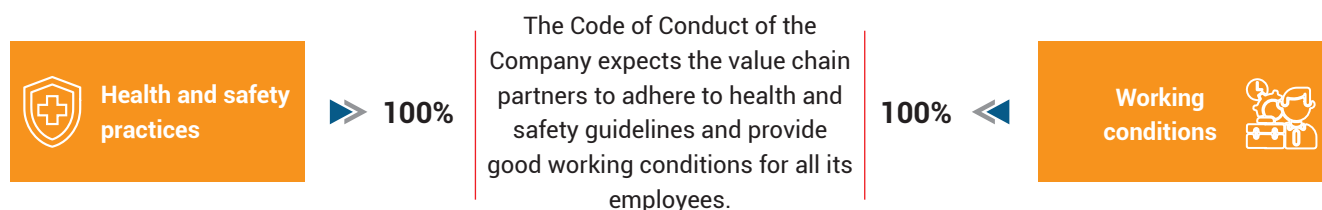
	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	2023-24 (Current financial year)	2022-23 (Previous financial year)	2023-24 (Current financial year)	2022-23 (Previous financial year)
 Employees	Nil	2	Nil	Nil
 Workers	Nil	1	Nil	Nil

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)

Yes, the Company provides skill training from time to time, which enables the employees to pursue employment post retirement or termination.

5 Details on assessment of value chain partners:

% of value chain partners (by value of business done with such partners) that were assessed



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.

The Company has adopted a structured approach towards adopting a proactive safety program and establishing a strong safety culture in the Company. Some of progressive actions are as follows: -

1. Management Safety Review Team constituted: Site Heads/Plant Heads/Factory Safety Officers/Factory HR Heads/Engineering team members. Guidance received from the Director on a regular basis.
2. Safety metrics finalised for review along with definition through Site Heads. 5 lagging indicators: Lost time incident, Reportable Accident, Lost Time Incident Rate, No Lost Time Injury and Fire Incident. 2 Leading indicators of Near Miss and Unsafe Acts and Unsafe Conditions.
3. PPE Matrix revised, and plant-wise PPE training modules prepared. Training programmes are on. Safety challans being introduced. Surprise checks being conducted by shop floor supervisors.
4. Approval matrix being changed following the change in the reporting of the safety function from the HR function to the Plant Heads.
5. Inter-plant safety assessment exercise by the Factory Safety Officers initiated.







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 key stakeholders identified include Customers, Employees, Business Partners (Suppliers and Vendors), Communities, Investors, Government Bodies, Industry Associations, and Non-Governmental Organisations (NGOs). Our approach towards responsible and sustainable business practices undergoes a systematic mapping through regular engagement with its internal and external stakeholders. This practice helps the Company prioritise key sustainability issues in terms of relevance to its business and stakeholders, including society and clients.

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 & marginalised group (Yes/No)	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
 Shareholders & Investors	No	Annual General Meeting, shareholder meets, email, Stock Exchange (SE) intimations, investor/analysts meet/conference calls, annual reports, quarterly results, media releases and the Company website	Annually/ Quarterly/ Ongoing	Share price appreciation, dividends, profitability and financial stability, climate change risks, cyber risks, growth prospects
 Employees	No	Senior leaders' communication/talk/forum, employee communication (CEO Online), goal setting and performance appraisal meetings/review, arbitration, wellness initiatives, engagement survey, email, intranet, websites, poster campaigns, circulars, a quarterly publication, and newsletters.	Ongoing	Operational efficiencies, improvement areas, long-term strategy plans, training and awareness, responsible marketing, brand communication, health, safety and engagement initiatives
 Customers	No	Website, complaints management, helpdesk, conferences, customer surveys, face-to-face meetings, Email, Customer feedbacks	Ongoing	Customers form a vital part of the Company's stakeholder engagement group to ensure quality services. The key areas of interest for customers are: New products, regulations.
 Suppliers/Value Chain Partners	No	Vendor meets, virtual modes such as Email, telephonically	Ongoing	Quality, timely delivery and payments, ESG consideration (sustainability, safety checks, compliances, ethical behaviour), ISO and OHSAS standards,
 Government	No	Advocacy meetings with local/state/national government and Advocacy meetings with local/state/national government & ministries, seminars, media releases, conferences, membership in local enterprise partnership and industry bodies industries, seminars, media releases, conferences, membership in local enterprise partnership and industry bodies and through email	Ongoing	Helps and guides in terms of connecting with Govt. Schemes in the same area for increased effectiveness, changes in regulatory frameworks, skill and capacity building, employment, environmental measures, policy advocacy, timely contribution to exchequer/local infrastructure, proactive engagement
 Communities	Yes	Multiple channels – physical, digital, and email	Need-based	Support socially high impact projects

Leadership Indicators

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.

The Company's response on Process: At Surya Roshni, the stakeholder engagement mechanism is a key driving force towards strengthening and diversifying the stakeholder relationship, which further facilitates the identification of key material issues impacting the Company's growth. The principles of governance, ethics, integrity and transparency form a solid foundation that guides the Company's progress. Stakeholder engagement led to the prioritization of material issues, mapping of the risks relevant to each material topic, and development of consequent risk mitigation strategies. The primary outcome of the stakeholder engagement exercise resulted in the identification and prioritization of material issues relevant to environmental, social, governance, and economic aspects. The identified material issues were presented to the highest governing member and the Board for their feedback and guidance on strategizing the sustainable growth model of the Company. As part of the Company's efforts to continually engage with internal and external stakeholder groups for the identification of key material issues impacting them, the stakeholder engagement exercise undergoes periodic review. The Company's Risk Management Committee is responsible for identifying risks that may impact company operations and developing policies and strategies to minimize and mitigate those risks as part of risk management effort.

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, Surya Roshni has always maintained a regular and proactive engagement with the Company's key stakeholders, allowing it to effectively work on its ESG strategies and be transparent about the outcomes. In response to current regulations and interactions with stakeholders, the Company performs periodic evaluations to update and reissue policies as needed.

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

There are no reportable concerns of vulnerable/marginalised groups. However, the Company undertakes various CSR activities in local areas that serve the vulnerable/marginalised stakeholder groups.



PRINCIPLE 5 : Businesses should respect and promote human rights

Essential Indicators

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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	2,072	593	28.62	2,084	609	29.22
Other than permanent	458	93	20.31	433	90	20.79
Total employees	2,530	686	27.11	2,517	699	27.77
Workers						
Permanent	1,175	447	38.04	1,226	455	37.11
Other than permanent	4,326	1,676	38.74	4,333	1,587	36.63
Total workers	5,501	2,123	38.59	5,559	2,042	36.73

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

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	2,072	0	0	2,072	100	2,084	0	0	2,084	100
Male	2,052	0	0	2,052	100	2,065	0	0	2,065	100
Female	20	0	0	20	100	19	0	0	19	100

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Other than permanent	458	0	0	458	100	433	0	0	433	100
Male	453	0	0	453	100	430	0	0	430	100
Female	5	0	0	5	100	3	0	0	3	100
Workers										
Permanent	1,175	0	0	1,175	100	1,226	0	0	1,226	100
Male	1,175	0	0	1,175	100	1,226	0	0	1,226	100
Female	0	0	0	0	0	0	0	0	0	0
Other than permanent	4,326	4,069	94.06	257	5.94	4,333	4,180	96.47	153	3.53
Male	3,789	3,535	93.30	254	6.70	3,878	3,725	96.05	153	3.95
Female	537	534	99.44	3	0.56	455	455	100.00	0	0

3. Details of remuneration/salary/wages, in the following format:

a. Median remuneration wages: (in Rupees)

Male			Female	
Number	Median remuneration/salary/wages of respective category		Number	Median remuneration/salary/wages of respective category
9	10,07,80,950	Board of Directors (BoD)*	2	-
2	1,00,35,839	Key Managerial Personnel	-	-
2046	6,14,304	Employees other than BoD and KMP	20	8,84,544
1175	4,10,508	Workers	-	-

* We have four Executive Directors who are paid remuneration and rest are Non-Executive Directors who only receive sitting fees.

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



4.

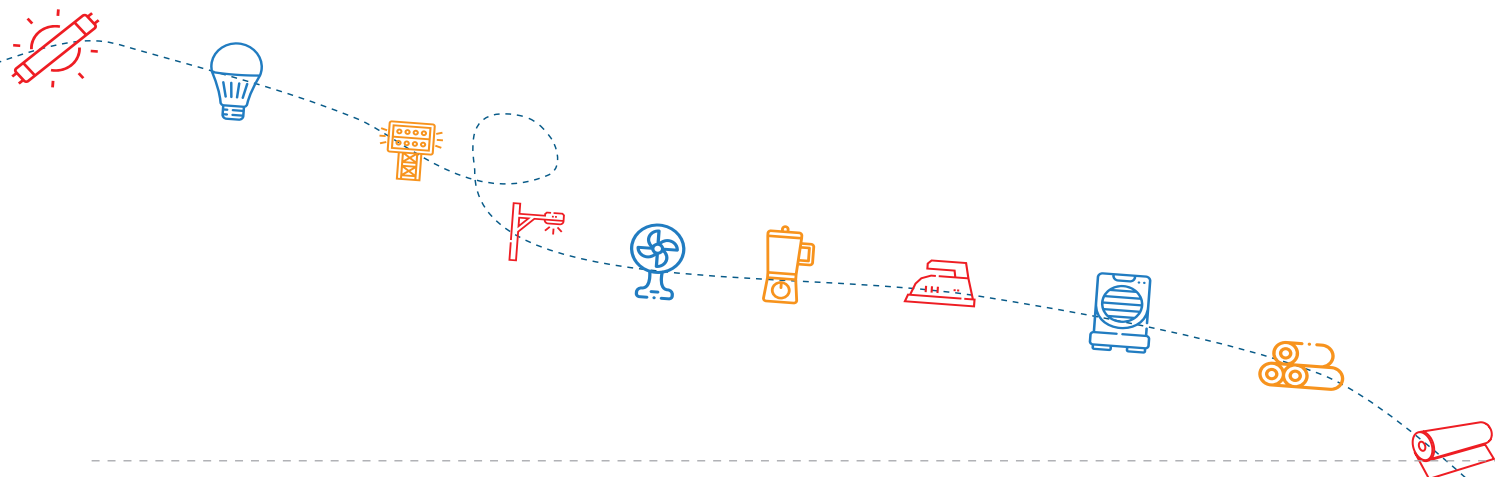
Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, the Company has formulated a Human Rights Policy and has a Grievance Redressal Committee where employees can address their complaints or grievances to the Human Resources department or to the Senior Management. There shall be no retaliation or reprisal taken against any employee or associate who raises concerns in accordance with the policy. The Committee is responsible for evaluating the reported issues and ensuring that they are addressed and rectified. In collaboration with the Senior Management, the Committee may also recommend a suitable resolution.







5.

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

The Company regards respect for human rights as one of its fundamental and core values and strives to support, protect and promote human rights to ensure that fair and ethical business and employment practices are followed. The Company is committed to maintaining a safe and harmonious business environment and workplace for everyone, irrespective of ethnicity, region, sexual orientation, race, caste, gender, religion, disability, work, designation, and other parameters. The Company believes that every workplace with the be free from violence, harassment, intimidation, and/or any other unsafe or disruptive conditions, either due to external or internal threats. Accordingly, the Company has aimed to provide reasonable safeguards for the benefit of employees at the workplace, while having due regard for their privacy and dignity. The Company also has zero tolerance towards and prohibits all forms of violence or physical, sexual, psychological, or verbal abuse. As a matter of policy, the Company does not hire any employee or engage with any agent or vendor against their free will.



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

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
 Sexual harassment	Nil	Nil	NA	Nil	Nil	NA
 Discrimination at workplace	Nil	Nil	NA	Nil	Nil	NA
 Child labour	Nil	Nil	NA	Nil	Nil	NA
 Forced labour/ Involuntary labour	Nil	Nil	NA	Nil	Nil	NA
 Wages	Nil	Nil	NA	Nil	Nil	NA
 Other human rights related Issues	Nil	Nil	NA	Nil	Nil	NA

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as 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

Surya Roshni believes in promoting employee well-being and providing a supportive environment to all employees and has guidelines on redressal mechanisms that are available internally for employees. For effective redressal of employee grievances, the Company has in place a Human Rights Policy, an employee manual, and the Whistle Blower Policy. The Company also has a Policy against Sexual Harassment at the workplace in adherence to the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. Surya Roshni, on a periodic basis, conducts training and sends reminders on the Prevention of Sexual Harassment (POSH).

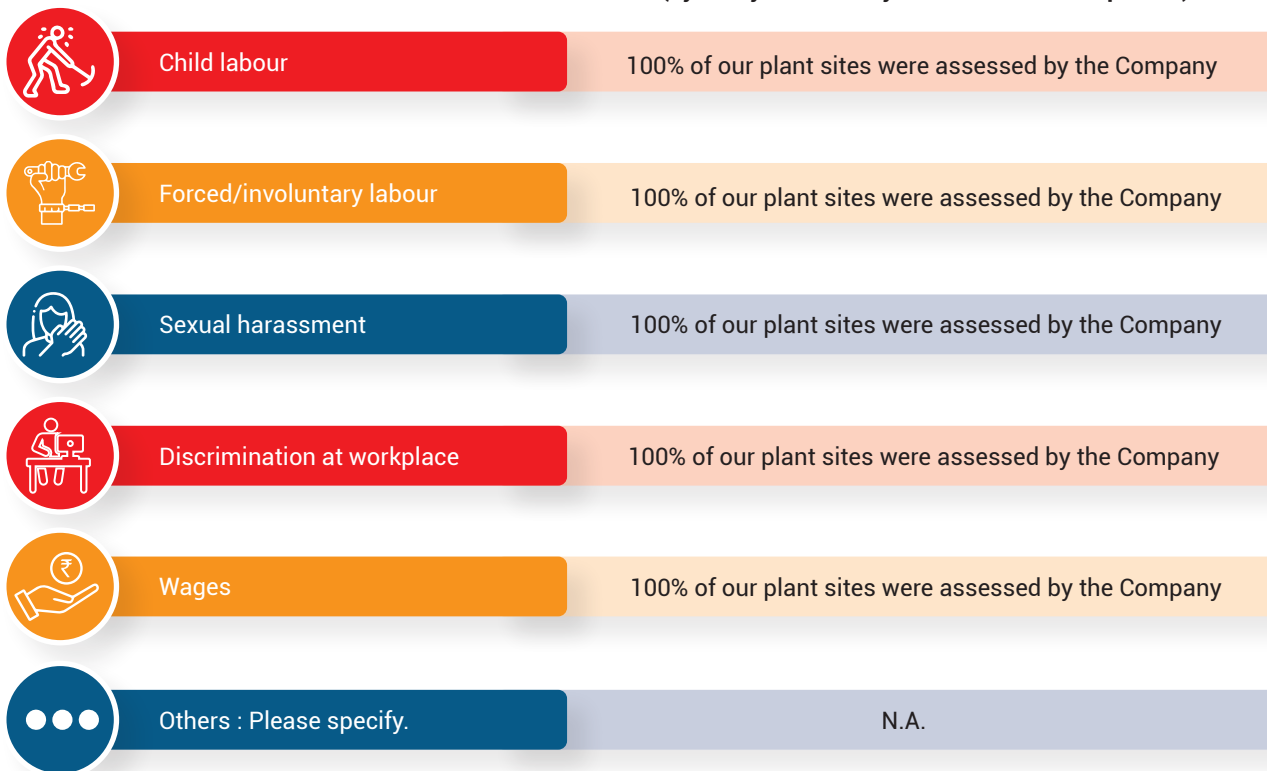
9

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

No, human rights requirements do not explicitly form a specific part of the business agreement & contracts. However, the Company has a zero tolerance policy for any human rights violations and adopts best practices while engaging with the employees and workers of the Company as well as external customers, suppliers and other value chain partners.

10 Assessments for the year:

% of your plants and offices that were assessed (by entity or statutory authorities or third parties)



11 Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 9 above.

No complaints related to child labour, forced labour, involuntary labour, or discriminatory employment were received during the reporting year, and none were pending at the end of the reporting year.

Leadership Indicators

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

The Company is of the belief that it has upheld the basic principles of human rights in all its dealings. The Company regularly sensitises its employees on the Code of Conduct through various training programmes as well.

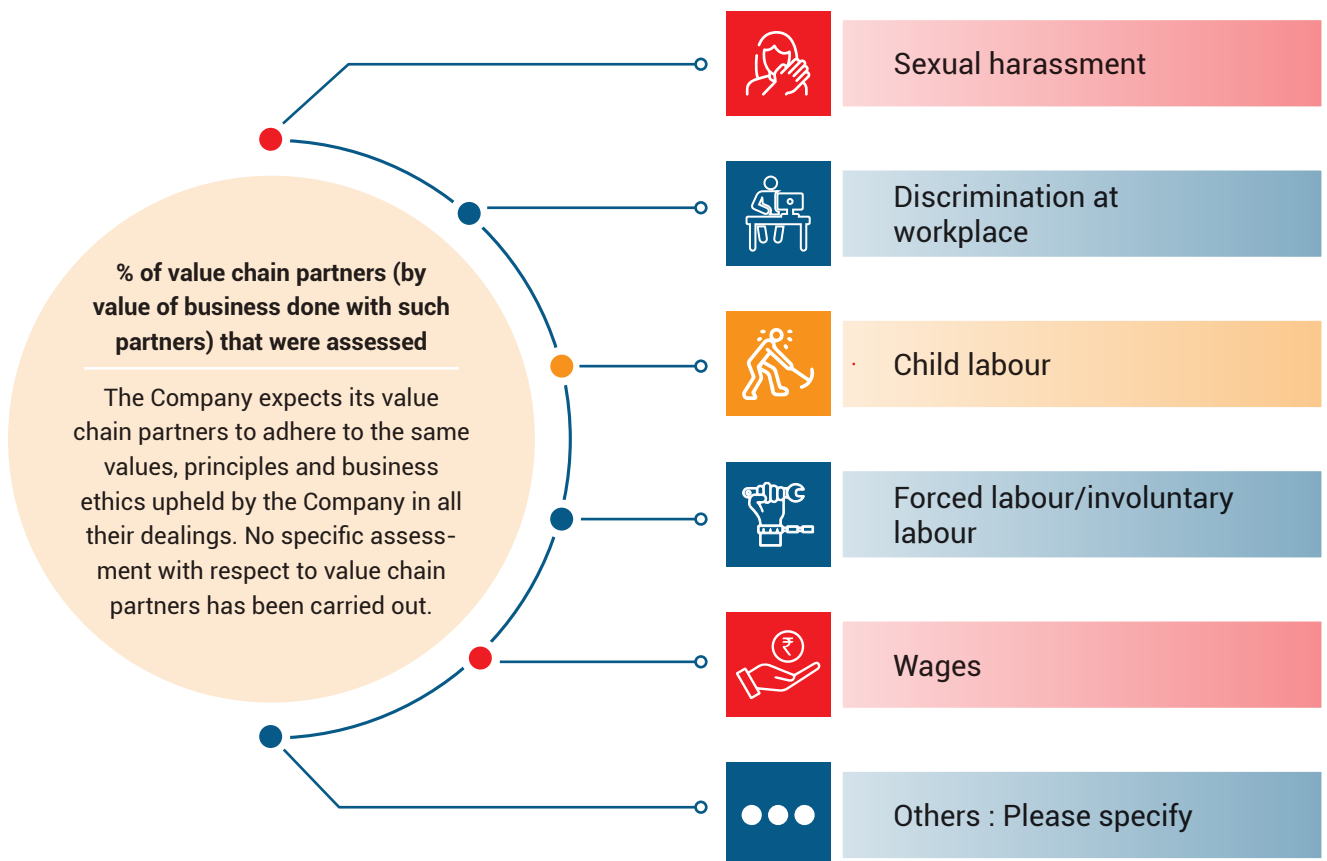
2 Details of the scope and coverage of any Human rights due-diligence conducted.

None

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?

Yes, Surya Roshni's offices have ramps for easy movement of differently abled visitors. Most of the offices are located in commercial premises which have elevators and infrastructure for differently able visitors. Wheelchair-accessible restrooms are available in offices of the Company.

4 Details on assessment of value chain partners:



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

No corrective action pertaining to Question 4 was necessitated by the Company during the year under review.

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	2023-24 (Current financial year)	2022-23 (Previous financial year)
From renewable sources		
Total electricity consumption (A)	74,289.328	54,178.088
Total fuel consumption (B)	Nil	Nil
Energy consumption through other sources (C)	Nil	Nil
Total energy consumed from renewable sources (A+B+C)	74,289.328	54,178.088
From non-renewable sources		
Total electricity consumption (D)	2,62,119.927	2,89,792.112
Total fuel consumption (E)	2,66,672.937	2,57,330.712
Energy consumption through other sources (F) (HSD)	0.566	733.711
Total energy consumed from non-renewable sources (D+E+F)	5,28,793.430	5,47,856.535
Total energy consumed (A+B+C+D+E+F)	6,03,082.758	6,02,034.623
Energy intensity per rupee of turnover (Total energy consumption/Revenue from Operations per ₹ crore)	77.234	75.292
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumption/Revenue from operations adjusted for PPP per ₹ crore)	77.234	75.292
Energy intensity in terms of physical output*	0.29	0.32
Energy intensity (optional) – the relevant metric may be selected by the entity	–	–

*Surya Roshni has multiple businesses, and physical output is reported in different units of measurement; thus, data for energy intensity in terms of physical output (tonnes of production) is reported only for Steel, which accounts for 80% of Surya Roshni's total energy consumption/water consumption/waste generated/emissions generation.

**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 independent assessment has been done

- 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.

This is not applicable to the Company as it does not fall under the PAT scheme of the Government of India.

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

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	NIL
(ii) Groundwater	86,455.24	92,764.400
(iii) Third party water (tanker) (KL)	3,81,105.00	3,25,157.000
(iv) Seawater/desalinated water	NIL	NIL
(v) Water from municipal corporation	NIL	NIL
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	4,67,560.240	4,17,921.400
Total volume of water consumption (in kilolitres)	4,67,560.240	4,17,921.400
Water intensity per rupee of turnover (Total Water consumption/ Revenue from operations per ₹ crore)	59.878	52.267
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/revenue from operations adjusted for PPP per ₹ crore)	59.878	52.267
Water intensity in terms of physical output*	0.33	0.29
Water intensity (optional)-the relevant metric may be selected by the entity	-	-

* Surya Roshni has multiple businesses, and physical output is reported in different units of measurement. Thus, data for energy intensity in terms of physical output (tonnes of production) is reported only for Steel, which accounts for 80% of the Company's total energy consumption/water consumption/waste generated/emissions generation.

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 independent assessment has been done

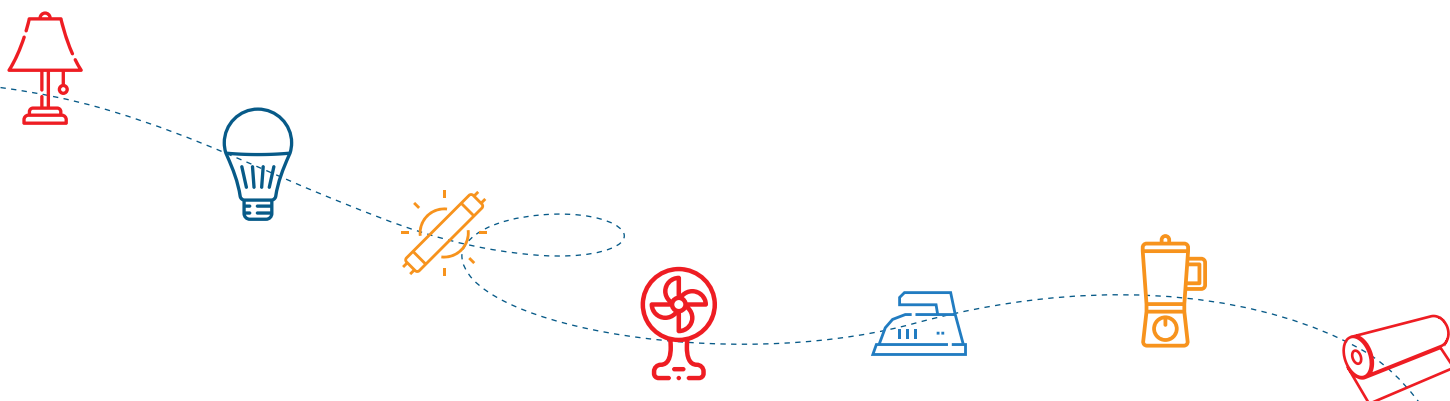
4 Provide the following details related to water discharged

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Water discharge by destination and level of treatment (in Kilolitres)		
(i) To Surface Water	N.A.	N.A.
- No treatment		
- With treatment – please specify level of treatment		
(ii) To Groundwater	N.A.	N.A.
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater	N.A.	N.A.
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties	N.A.	N.A.
- No treatment		
- With treatment – please specify level of treatment		
(v) Others - Treated Water in ETP/STP		
- No treatment		
- With treatment – please specify level of treatment	N.A.	N.A.
Total Water discharged (in kilolitres)	N.A.	N.A.

The Company has a Zero Liquid Discharge mechanism in place at all its manufacturing plants/facilities. It covers the end-to-end plant operations. Water from the STP is used for cooling tower/plants, gardening and glass plant processes like quencher etc. Water from the ETP/STP is reused in the production processes. Any solid waste generated is disposed off using approved third party agencies.

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 independent assessment has been done



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

Yes, the Company has a Zero Liquid Discharge mechanism in place at all its manufacturing plants/facilities. It covers the end-to-end plant operations. Water from the STP is used for cooling tower/plants, gardening and glass plant processes like quencher etc. Water from the ETP/STP is reused in the production processes. Any solid waste generated is disposed of using approved third-party agencies.

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

Parameter	Please specify unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
NOx	mg/m ³	340.178	778.110
SOx	mg/m ³	125.240	151.206
Particulate matter (PM) (PM 10 + 2.5)	mg/m ³	381.760	461.360
Persistent organic pollutants (POP)	mg/m ³	NIL	NIL
Volatile organic compounds (VOC)	mg/m ³	NIL	NIL
Hazardous air pollutants (HAP)	mg/m ³	NIL	NIL
Others – please specify	mg/m ³	NIL	NIL

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 independent assessment has been conducted.

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

Parameter	Unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	71,102.712	1,00,960.722
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	11,976.781	11,802.660
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (GHG emissions/Revenue from Operations per ₹ crore)		10.64	14.10
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 per ₹ crore)		10.64	14.10
Total Scope 1 and Scope 2 emission intensity in terms of physical output		0.00	0.00
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		Nil	Nil

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 independent assessment has been done

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

For reducing the Green House Gas emission, we have done following projects which were completed way back in 2006.

- We have switched over from fossil fuel as Furnace oil, HSD to Natural Gas in our Manufacturing Glass Shell, Aluminium Caps and Lamp Assembly operations.
- Installed Gas-Based Gen Sets for power backup.
- Replaced reciprocating type compressors with screw type compressors, which are more energy efficient.
- The save energy take several energy saving projects like VFD installation in blowers, replacement of flat belts in combustion blowers etc.

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

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total waste generated (in metric tonnes)		
Plastic waste (A)	1,133.090	591.050
E-waste(B)	1,163.291	30.230
Bio-medical waste (C)	0.020	0.009
Construction and demolition waste (D)	NIL	NIL
Battery waste (E)	14.976	0.635
Radioactive waste (F)	NIL	0.752
Other hazardous waste(G) ETP Sludge, Zinc Ash Zinc Dross, ETP Chemical Sludge , Spent Acid, Used Oil, Paint Process Residue, Discarded Barreal and Container	4,058.980	3,936.295
Other non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	-	142.130
Total (A+B + C + D + E + F + G + H)	6,370.357	4,701.101
Waste intensity per rupee of turnover (Total waste generated/revenue from operations per ₹ crore)	0.82	0.59
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/revenue from operations adjusted for PPP per ₹ crore)	0.82	0.59
Waste intensity in terms of physical output*	0.005	0.005
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-

* Surya Roshni Limited has multiple businesses, and physical output is reported in different units of measurement; thus, the data for energy intensity in terms of physical output (tonnes of production) is reported only for steel, which accounts for 80% of Surya Roshni's total energy consumption/water consumption/waste generated/emissions generation.

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
-----------	-------------------------------------	--------------------------------------

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

Category of waste	2023-24 (Current financial year)	2022-23 (Previous financial year)
(i) Recycled	130.452	121.234
(ii) Re-used	696.060	40.890
(iii) Other recovery operations	1,162.861	28.130
Total	1,989.373	190.254

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

Category of waste	2023-24 (Current financial year)	2022-23 (Previous financial year)
(i) Incineration	27.340	5.230
(ii) Landfilling	431.020	638.490
(iii) Other disposal operations	3,410.311	3,717.745
Total	3,868.671	4,361.465

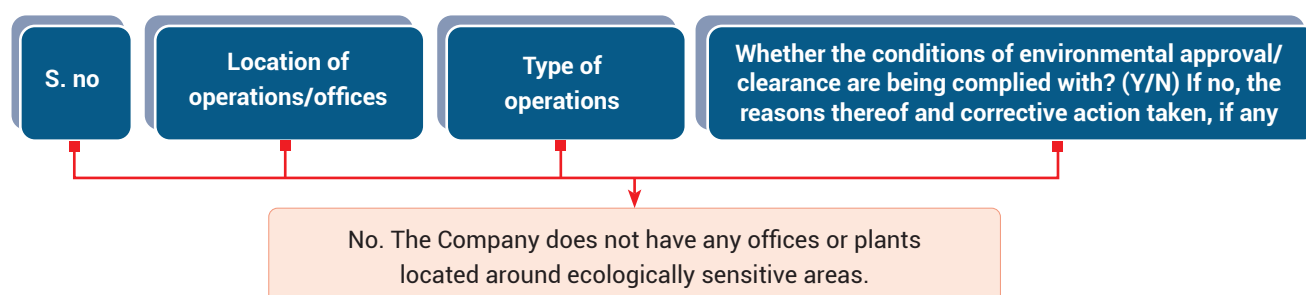
Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency

No independent assessment has been done

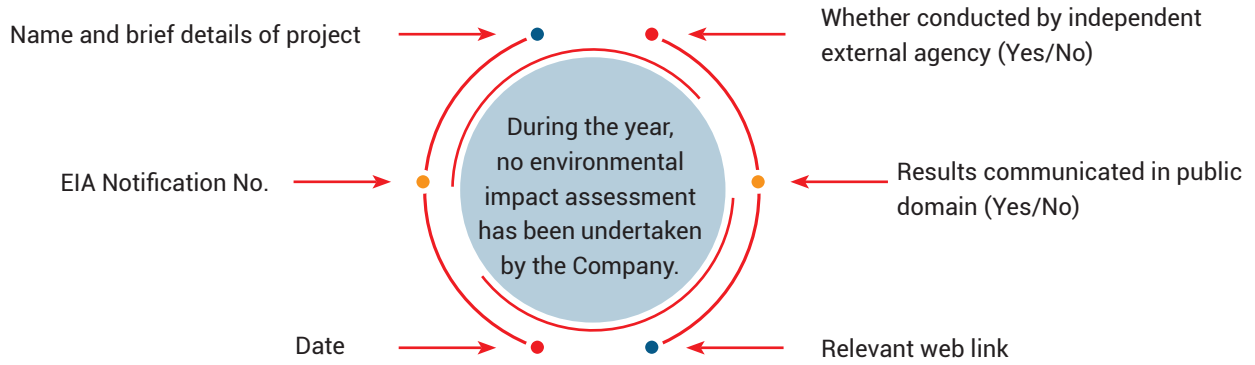
10 Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes

- Management practices adopted to the mercury containing waste lamp, we have installed a lamp recovery unit (Bulb Eater) at our site permitted by the State Pollution Control Board under E-Waste Management Rules, 2022
- Recover waste as Glass cullet, Phosphor powder, Aluminium Caps, and mercury. Glass cullet been recycled in our Glass Furnace for manufacturing of Glass shell of Lamps, Aluminium Caps been sold in by-back to our supplier of Aluminium strip, Phosphor powder been re-used after process in Lamp manufacturing and other use, Mercury recovered been re-distilled and reused in lamp-manufacturing.

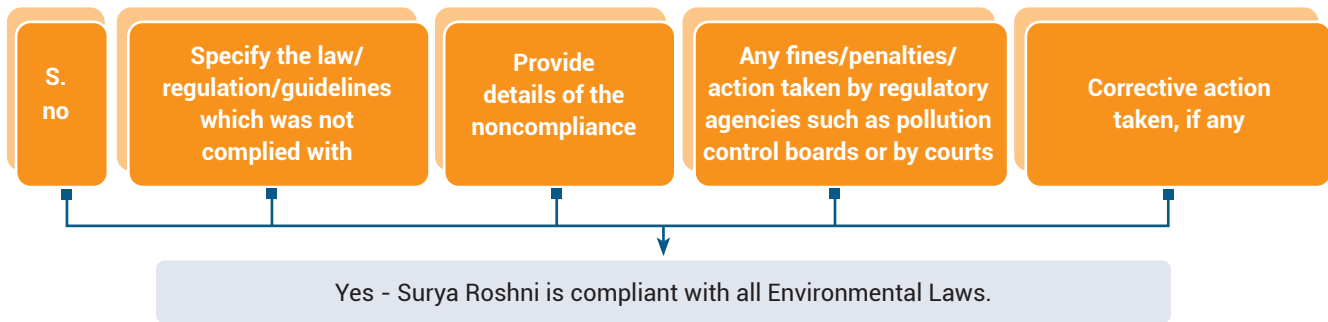
11 If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals/clearances are required, please specify details in the following format:



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



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



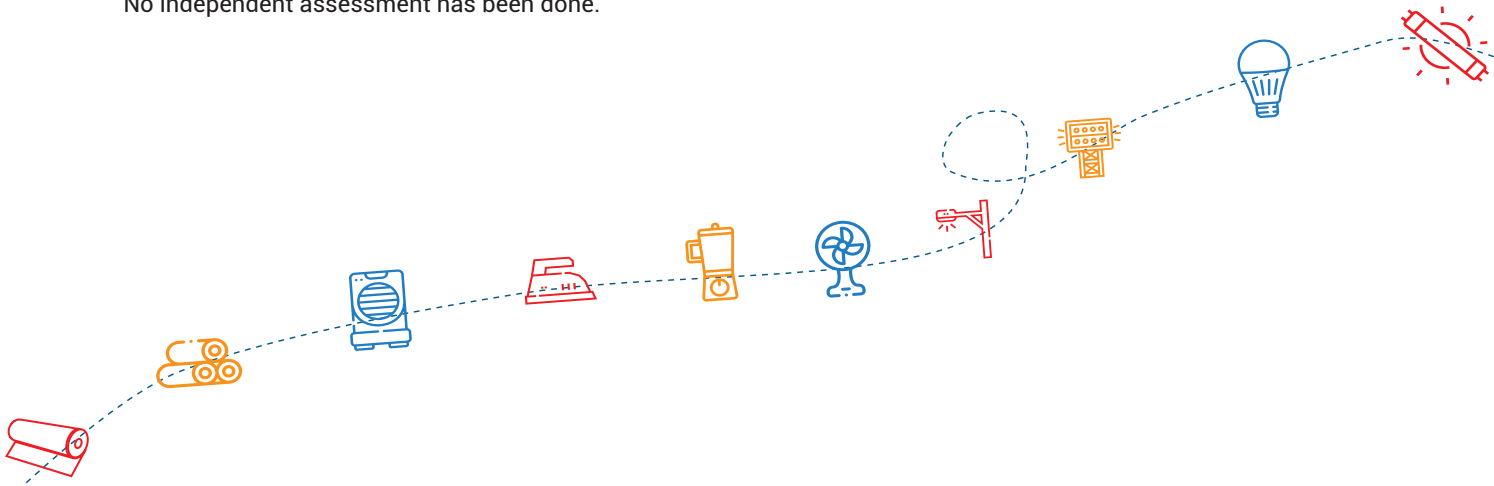
Leadership Indicators

1 Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

For each facility/plant located in areas of water stress, provide the information:
Surya Roshni doesn't have any plant in water-stressed areas.

**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 independent assessment has been done.



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

Parameter	Unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFC _s , PFC _s , SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	The Company is in the process of setting up a system for tracking Scope 3 emissions. The same can be published in the forthcoming years	
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 independent assessment has been done.

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

The Company regularly tests water and air quality in accordance with environmental rules and legislations.

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:

Sl. no.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
1	Saving consumption of fuel and energy in glass furnaces	Always use >50% cullet in Glass manufacturing	Helped to reduce CO ₂ emission
2	Replaced high-wattage light with LED	All HPMV lights of 250W were replaced with 45W LED light	Helped in reducing CO ₂ emission
3	Increase the open access to solar power	Agreement with another vendor and will draw 3 lakh units/month addition to an existing agreement	Save the fuel consumption in Power generation and hence reduce CO ₂ emission
4	Energy saving in Ribbon Annealing Conveyor	By changing the motor connection to star instead of Delta connection.	Initiative to save energy and reduce CO ₂ emission
5	Fluorescent lamps manufactured with Soda lime glass flare & Exhaust tubes in place of lead glass, several processes changed.	Dosing (mercury) heads were changed, pill dispensing unit was provided.	By doing this the use of Hazardous chemicals is reduced and shop floor people are safe and healthy.
6	Energy Saving on GLS (OSRAM) -2 nd	Installing shell cooling blower VFD to reduce energy consumption	Initiative to save energy and the environment
7	Save the environment by optimum use of packaging material	By using the packing material in return from the buyers and inhouse 3 to 4-cycle	By doing this, the use of fresh packaging reduced and reduction in packaging waste hence saving the environment

Sl. no.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
8	Process/product improvement for ROHS	<ol style="list-style-type: none"> 1. Elimination of lead-based solder 2. Elimination of lead glass 3. Reduction in mercury uses 	Helped to produce the green lamps and ROHS compliance
9	Producing LED bulbs and street lights	Installed assembly conveyors and machines	Helped to reduce significantly CO ₂ emission
10	Fluorescent lamp phosphor coating from butyl acetate-based to water-based	Tube drying system modified	By doing this the use of hazardous chemicals avoided
11	Fluorescent lamps & GLS manufacturing are done with Soda-lime Glass Flare & Exhaust tubes in place of Lead Glass, several processes are changed	<ol style="list-style-type: none"> 1. Flare cooling with high-pressure air increased 2. The annealing process is modified by increasing the length of the annealer 	Through this process, the use of hazardous chemicals is reduced and major lead consumption has been stopped. Also stopped importing hazardous lead glass scrap
12	Running Lamp recovery unit (Bulb Eater) for mercury lamp and recovering mercury for re-use	Installed Bulb Eater machine, in which we recover Glass Cullet, Phosphor Powder, Metal Cap, and Mercury separately	By doing this, the use of hazardous chemicals is reduced.
13	Utilization of waste heat of Gas based Gen Set for coating drying	Installed waste heat recovery unit, which uses the heat of a Gas Generator for heating the coil of the drying unit replacing thermic fluid	Initiative to save the environment and energy
14	Utilization of waste heat of Cap furnace for drying of pickled caps	Installed duct to divert the waste heat to the pickling process.	Gas consumption reduced
15	Changed conventional AC by inverter AC	Ductable conventional A.C. (8.5 TR) replaced by inverter ductable A.C. in New SMT area in PCB Plant.	Saved energy
16	Changed conventional AC by inverter AC	Installation of 2.0 TR split inverter A.C in place of old conventional split/window (2.0/1.5 TR) in various locations	Saved energy
17	Changed conventional pumps by energy efficient pumps	Energy efficient water pump (Make-Grundfos) installed for soft water supply for Lamp Plant (5.5 KW in place of 7.5 KW)	Saved energy
18	Energy saving	Optimization of cooling tower fan for Lamp Plant. (Existing fan of 5.5 KW replaced by 1.5 KW)	Saved energy
19	Energy saving	12 H.P. Water pump replaced by 5.0 H.P. for Batten Extrusion Plant Chiller with Modification in pipelines	Saved energy

Sl. no.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
20	Energy saving	Our old Existing chiller (Capacity-5TR).02 nos. utilized in place of 40 TR Chiller in the Batten Extrusion Plant in the winter season	Saved energy
21	Energy saving	Improving Power Factor of Induction Motors This project includes all induction motors in the plant with a rating of 7.5 hp and above, improving their power factor from 0.85 to 0.99 by installing power factor correction capacitors. Main Focus area Services, PCB, Filament and Batten Extrusion Plant	Saved energy
22	Energy saving	The surface temperature of the T5 Coating oven from 100-125°C to 70°C was reduced in order to improve energy efficiency and reduce operating costs	Saved energy & improve working environment temperature
23	Conducted water audit	Conducted water audit to identify the area for improvements	Saved water
24	EPR compliance	Registered under E-Waste EPR, Battery Waste EPR & Plastic waste EPR	Environmental Improvement

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

Yes, there are on-site emergency plan available in live with OHSAS guidelines. According to the plan, we do mock drills at regular intervals involving agencies such as Incident Controller, Site Controller, Fire fighters, District authorities as District Collector, Police, Fire brigade, Medical Officers etc. Responsibilities of agencies involved as Incident Controller, Site Controller, fire fighters, District authorities like the District Collector, Police, Fire brigade, Medical Officers etc.

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

There is no significant adverse impact to the environment. However, we comply with all applicable laws, rules and regulations in this regard.

We have also ISO certified company namely from QMS (ISO-9001:2015), EMS (ISO:14001:2015)

As per SEBI requirements: Every three years Energy Audit are being conducted and feasible suggestions are implemented.

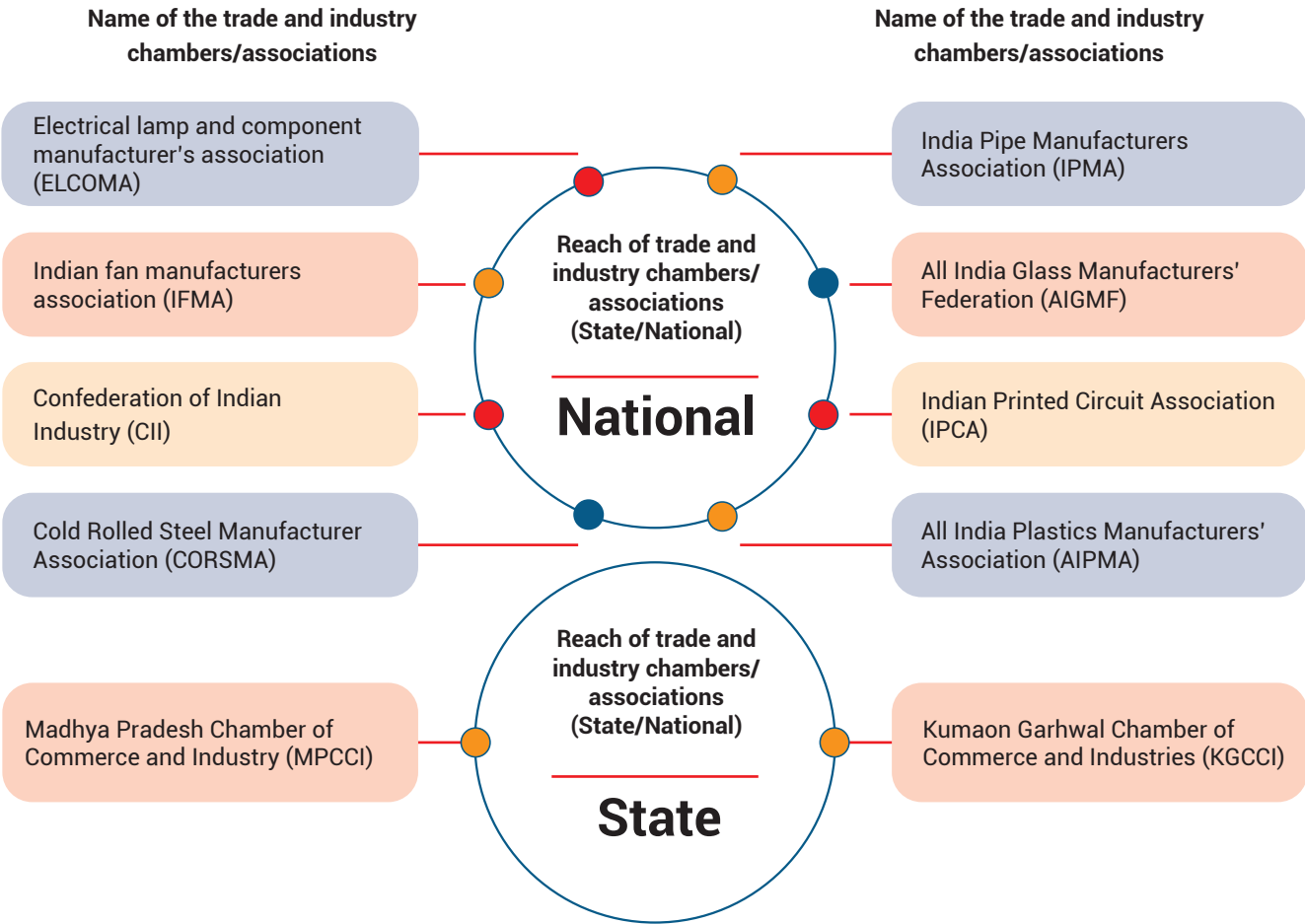
7 Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

47.17%

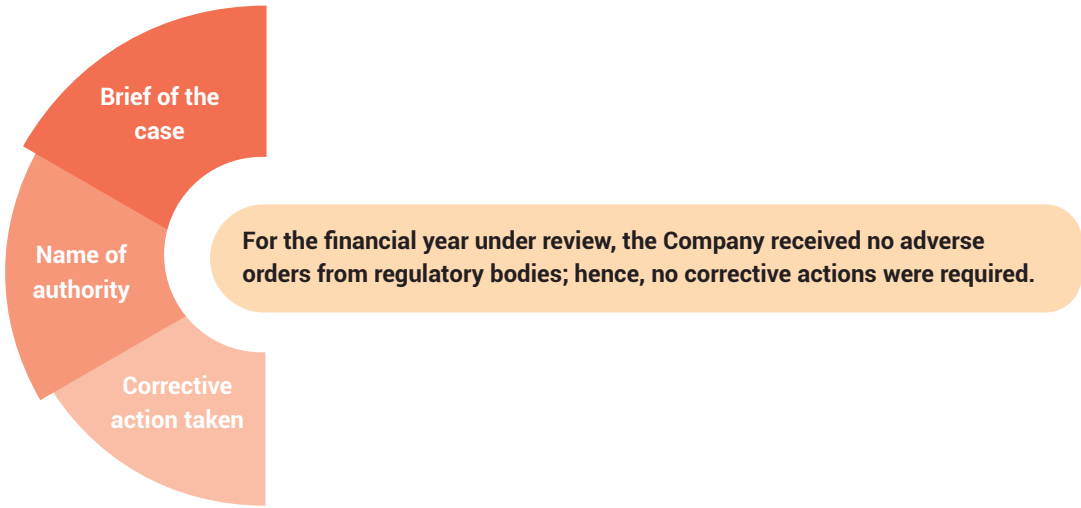
PRINCIPLE 7 : Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

1. a. **Number of affiliations with trade and industry chambers/associations. (As below)**
- 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.**



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



Leadership Indicators

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

The Company works with all stakeholders, relevant government & regulatory bodies and apex industry associations.

S. no	Public policy advocated	Methods 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.	The Company's public policy advocacy efforts are focussed on helping the steel and lighting industry improve its competitiveness. We, focus on increasing the demand and usage, sustainability environment and climate change. We also initiate efforts to decarbonise the industry in which we operate.	<ol style="list-style-type: none"> Engaging in discussions with the government and industry peers for laying down the framework for decarbonisation of the steel and lighting sector in India. Advocacy for adoption of best available technologies for improving energy & material efficiencies. 	No	Annually as a part of the business performance update to the Board	No



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
-----------------------------------	----------------------	----------------------	---	--	-------------------

Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, is not applicable as the average CSR obligation of the Company is less than ₹ 10 crore in the three immediately preceding financial years of the Company.

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

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 ₹)
--	-------	----------	---	--------------------------	---------------------------------------

Not Applicable

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

Surya Roshni's grievance redressal mechanisms are customised based on the specific requirements of each of its locations, so as to be more effective. The Company executes several community programmes to develop healthy relationships with the community. It regularly interacts with people and communities and tries to address their concerns. The Company ensures timely actions are taken to address the concerns raised by communities. Surya Roshni's CSR policy, framed as per the provisions of Section 135 and Schedule VII of the Act, describes and contains the Company's philosophy for delivering its responsibility as a corporate citizen and lays down the guidelines, process and mechanisms for undertaking socially beneficial programmes for welfare and sustainable development of the community at large.

The detailed policies of the Company is available on the website of the Company at the link: <https://surya.co.in/investor-relations/corporate-governance/#policies/>

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

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Directly sourced from MSMEs/small producers	7.50%	9.83%
The Company has a Pan India presence in strategic locations across the country in which we ensure to source as much input material as we can source locally wherever feasible. During 2023-24 and 2022-23, the Company procured sizeable material from local and small suppliers like general consumables and equipment spares etc.		
Directly from within India	94.83%	94.28%

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.

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Rural	31.74%	33.30%
Semi-urban	30.34%	28.26%
Urban	34.67%	35.29%
Metropolitan	3.25%	3.15%

For the purpose of categorization of people employed locations into Rural/semi-urban/urban/metropolitan the following mechanism has been adopted along with RBI Classification system:

- (a) Metropolitan cities considered namely – Delhi, Mumbai, Kolkata, Chennai, Bangalore, Pune, Hyderabad, Ahmedabad and Surat
- (b) All manufacturing locations (Plants) are mapped on the basis of their respective addresses.
- (c) All branch offices employees are mapped as at metropolitan location.

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	Not Applicable	Corrective action taken	Not Applicable
--	----------------	-------------------------	----------------

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

Sl.No	State	Aspirational District	Amount spent (In ₹)
1	Chhattisgarh	Rajnand Gaon, Korba	2,38,715
2	Jharkhand	Ranchi, Ramgarh	60,200
3	Madhya Pradesh	Vidisha	2,10,110
4	Uttarakhand	Udham Singh Nagar	8,09,401
5	Uttar Pradesh	Fatehpur	1,80,350

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

No, the Company does not have any preferential procurement policy focussing on suppliers from marginalised/vulnerable groups. The Company has a sustainable supply chain policy that provides competitiveness to all suppliers. However, Surya Roshni supports and motivates marginalised and vulnerable groups.

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

Not applicable.

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

NIL

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:

Intellectual Property based on traditional knowledge	Owned/acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
Not Applicable	Not Applicable	Not Applicable	Not Applicable

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	Not Applicable	Not Applicable

6 Details of beneficiaries of CSR Projects:



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

Essential Indicators

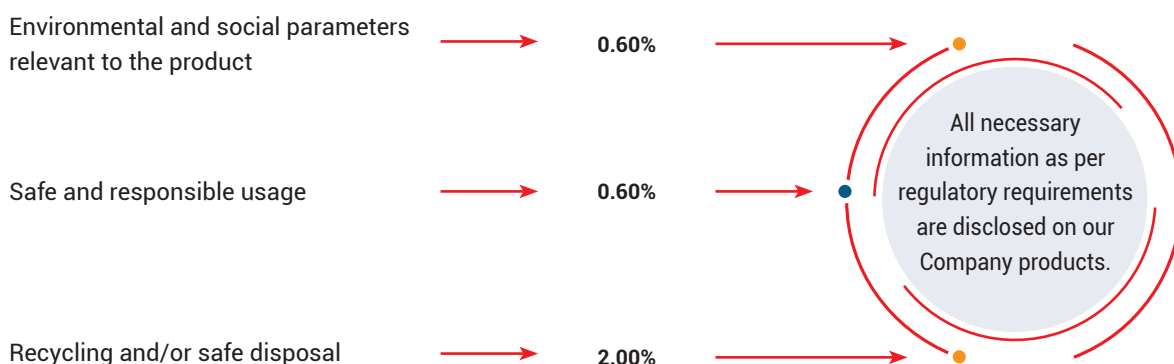
1 Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

A well-established system is in place for dealing with customer feedback and complaints. Customers are provided multiple options to connect with the Company through Email, telephone, website, social media, feedback forms etc. All complaints are appropriately addressed and all efforts are taken to resolve the same. The Company has a designated email id for customer complaints i.e. consumercare@surya.in.

Consumers can report grievances through the CRM system at <https://crm.surya.in> through the WhatsApp BOT (+91 9643300819) and Surya Roshni's helpline no number: 1800 102 5657 or through mobile Android application

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

As a percentage to total turnover



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

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	N.A.	Nil	Nil	N.A.
Advertising	Nil	Nil	N.A.	Nil	Nil	N.A.
Cyber-security	Nil	Nil	N.A.	Nil	Nil	N.A.
Delivery of products	Nil	Nil	N.A.	Nil	Nil	N.A.
Restrictive trade practices	Nil	Nil	N.A.	Nil	Nil	N.A.
Unfair trade practices	Nil	Nil	N.A.	Nil	Nil	N.A.
Other [products related]	4,05,922	Nil	Resolved	3,40,801	Nil	Resolved

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

	Number	Reasons for recall
Voluntary recalls	Nil	N.A.
Forced recalls	Nil	N.A.

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

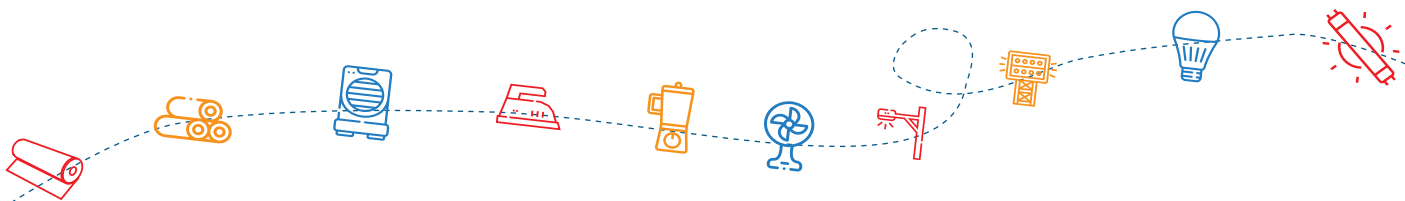
Yes, An Information and Security Policy has been implemented which provides support, and management direction, and documents how Information Security is managed throughout Care Ratings; it outlines the appropriate measures through which the Company will facilitate the secure and reliable flow of information, both within the Company and externally. The policy sets out the principles and an overarching framework for Information Security. It also details the supporting policies and guidelines, which will address the aspects of security. The web link to the policy is: <https://surya.co.in/investor-relations/corporate-governance/#policies/>

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.

During the Financial Year, there has been no issues to advertising, and the delivery of essential services; cybersecurity and data privacy of customers. No Penalties have been taken by the regulatory authorities on these matters.

7 Provide the following information relating to data breaches:

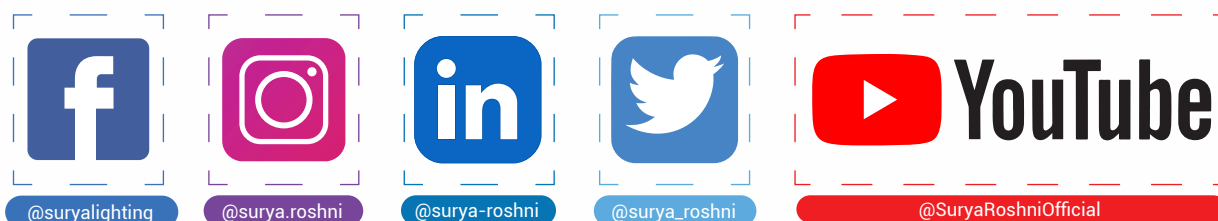
a. Number of instances of data breaches	Nil
b. Percentage of data breaches involving personally identifiable information of customers	Nil
c. Impact, if any, of the data breaches	None



Leadership Indicators

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

Information relating to all the products and services offered by the Company are available on the Company's website, <https://surya.co.in/> In addition, the Company actively uses various social media and digital platforms to disseminate information.



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

The Company provides service and installation manuals along with the product for safe installation and usage.

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

- During the year, there were no major disruptions of critical services of the Company. The Company has Business Continuity Plan in place to tackle and manage any disruption.
- Customers are intimated of any disruption through electronic communications or through the Company's website. The online portals also ensured that customers could continue to be served during the lockdowns.

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)

Yes, the Company adheres to all product labeling and product information requirements as per the local laws/statutory and relevant acts. Yes, we carry out consumer surveys to identify the needs of consumers and use this information for product development.

for and on behalf of
the Board of Directors

Place: New Delhi

Dated: 14th May, 2024

J P AGARWAL
CHAIRMAN

