



Registered Office:
"Chaitanya",
No. 12, Khader Nawaz Khan Road,
Nungambakkam,
Chennai – 600006
PH: 044 28332115

Sundaram-Clayton Limited

29th June 2023

BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400 001.
Equity Scrip code: 520056
NCRPS Scrip code: 717505

National Stock Exchange of India Ltd.,
Exchange Plaza, 5th Floor,
Bandra-Kurla Complex,
Bandra (E), Mumbai 400 051.
Equity & NCRPS Scrip code: SUNCLAYLTD

Dear Sir/Madam,

Reg.: Business Responsibility and Sustainability Report

Please find enclosed the Business Responsibility and Sustainability Report of the Company for the Financial Year 2022-23.

The copy of the same is available on the website of the Company viz., www.sundaram-clayton.com.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully,
For Sundaram-Clayton Limited

R Raja Prakash
Company Secretary

Encl :a/a

Annexure - VI to Directors' Report to the shareholders

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT FOR FY 2022-23

SECTION A: GENERAL DISCLOSURES

I. DETAILS

1	Corporate Identity Number (CIN) of the Listed Entity	L35999TN1962PLC004792	
2	Name of the Listed Entity	Sundaram-Clayton Limited	
3	Year of incorporation	24-05-1962	
4.	Registered office address	"Chaitanya", No.12, Khader Nawaz Khan Road, Nungambakkam, Chennai - 600 006	
5.	Corporate address	"Chaitanya", No.12, Khader Nawaz Khan Road, Nungambakkam, Chennai - 600 006	
6.	E-mail	corpsec@sundaramclayton.com	
7.	Telephone	044-28332115	
8.	Website	www.sundaram-clayton.com	
9.	Date of start of Financial Year	Start Date	End Date
	Financial Year	01-04-2022	31-03-2023
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited, Mumbai and National Stock Exchange of India Limited, Mumbai	
11.	Paid-up Capital	₹ 2357,03,79,025	
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the Business Responsibility and Sustainability Report.		
	Name of Contact Person	R Raja Prakash	
	Contact Number of Contact Person	+91 44 2833 2115	
	Email of Contact Person	rrp@sundaramclayton.com	
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken, together).	Standalone basis	

II. PRODUCTS / SERVICES

14. Details of business activities

S. No.	Description of main activity	Description of business activity	% of turnover
1	Manufacturing	Metal and metal products	100

15. 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	Aluminium alloy cast articles including parts and components	24320	100%

Annexure - VI to Directors' Report to the shareholders - (continued)

III. OPERATIONS

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

Location	Number of plants	Number of offices	Total
National	4	2	6
International	1	1	2

17. Markets served by the entity:

a. Number of locations

Location	Number
National (No. of States)	8
International (No. of Countries)	10

b. What is the contribution of exports as a percentage of the total turnover of the entity? 46

c. A brief on types of customers

SCL manufactures cast, machined and sub-assembled aluminium die castings for heavy and medium commercial vehicles, passenger vehicles and two-wheelers. The customers for SCL's products are the automotive OEMs and Tier 1 manufacturers both within India and Globally. Since commencing operation in 1962, SCL has achieved many milestones and emerged as one of the preferred solution provider in machined and sub-assembled aluminium castings.

IV. EMPLOYEES

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No	Particulars	Total (A)	Male		Female		Others	
			No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
EMPLOYEES								
1.	Permanent (D)	555	517	93	38	7	-	-
2.	Other than Permanent (E)	6	5	83	1	17	-	-
3.	Total employees (D + E)	561	522	93	39	7	-	-
WORKERS								
4.	Permanent (F)	874	871	99	3	1	-	-
5.	Other than Permanent (G)	1847	1732	94	115	6	-	-
6.	Total workers (F + G)	2721	2603	96	118	4	-	-

Annexure - VI to Directors' Report to the shareholders - (continued)

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female		Others	
			No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
DIFFERENTLY ABLED EMPLOYEES								
1.	Permanent (D)	-	-	-	-	-	-	-
2.	Other than Permanent (E)	-	-	-	-	-	-	-
3.	Total differently abled employees (D + E)	-	-	-	-	-	-	-
DIFFERENTLY ABLED WORKERS								
4.	Permanent (F)	5	5	100	-	-	-	-
5.	Other than Permanent (G)	20	17	85	3	15	-	-
6.	Total differently abled workers (F + G)	25	22	88	3	12	-	-

19. Participation / Inclusion / Representation of women

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	2	22.22
Key Management Personnel	2	-	-

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

Category	FY 2022-23 (Turnover rate in current FY)				FY 2021-22 (Turnover rate in previous FY)				FY 2020-21 (Turnover rate in the year prior to the previous FY)			
	Male	Female	Others	Total	Male	Female	Others	Total	Male	Female	Others	Total
Permanent Employees	11.7	0.7	-	12.4	12	1	-	13	7.3	0.7	-	8
Permanent Workers	-	-	-	-	-	-	-	-	-	-	-	-

Annexure - VI to Directors' Report to the shareholders - (continued)

V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

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

S. No.	Name of the holding / subsidiary / associate companies/ joint ventures (A)	Indicate whether holding / Subsidiary / Associate / Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business entity Responsibility initiatives of the the listed entity? (Yes/No)
1	TVS Holdings Private Limited	Holding Company	64.72	No
2	TVS Motor Company Limited	Subsidiary	50.26	No
3	Sundaram-Clayton (USA) Limited, USA	Subsidiary	100	No
4	Sundaram Holding USA Inc, Delaware, USA	Subsidiary	100	No
5	Sundaram-Clayton GmbH, Germany	Subsidiary	100	No
6	Sundaram Auto Components Limited	Subsidiary	-	No
7	TVS Housing Limited	Subsidiary	-	No
8	TVS Motor Services Limited	Subsidiary	-	No
9	TVS Electric Mobility Limited	Subsidiary	-	No
10	TVS Credit Services Limited	Subsidiary	2.31	No
11	TVS Motor Company (Europe) B.V.	Subsidiary	-	No
12	TVS Motor (Singapore) Pte Limited	Subsidiary	-	No
13	PT TVS Motor Company Indonesia	Subsidiary	-	No
14	Harita ARC Private Limited	Subsidiary	-	No
15	TVS Housing Finance Private Limited	Subsidiary	-	No
16	Harita Two-Wheeler Mall Private Limited	Subsidiary	-	No
17	The Norton Motorcycle Co Limited, UK	Subsidiary	-	No
18	TVS Digital Pte Limited, Singapore	Subsidiary	-	No
19	The GO Corporation, Switzerland	Subsidiary	-	No
20	Swiss E-mobility Group (Holding) AG, Switzerland	Subsidiary	-	No
21	EBCO Limited, UK	Subsidiary	-	No

Sundaram-Clayton Limited

Annexure - VI to Directors' Report to the shareholders - (continued)

V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES) - (continued)

21. (a) Names of holding / subsidiary / associate companies / joint ventures - (continued)

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 entity Responsibility initiatives of the the listed entity? (Yes/No)
22	Celerity Motor GmbH, Germany	Subsidiary	-	No
23	EGO Movement, Stuttgart GmbH, Germany	Subsidiary	-	No
24	Swiss E-mobility Group (Schweiz), AG, Switzerland	Subsidiary	-	No
25	Colag E-mobility GmbH, Germany	Subsidiary	-	No
26	Alexand'RoEdouard'O Passion VéloSàrl, Switzerland	Subsidiary	-	No
27	Green Hills and Holding LLC, South Carolina, USA	Subsidiary	-	No
28	Components Equipment Leasing LLC, South Carolina, USA	Subsidiary	-	No
29	Sundaram-Clayton (USA) LLC, South Carolina, USA	Subsidiary	-	No
30	Premier Land Holding LLC, South Carolina, USA	Subsidiary	-	No
31	TVS Training and Services Limited	Associate	21.70	No
32	Sundram Non-Conventional Energy Systems Limited	Associate	23.53	No
33	Ultraviolette Automotive Private Limited	Associate	-	No
34	Emerald Haven Realty Limited	Associate	-	No
35	DriveX Mobility Private Limited	Associate	-	No
36	Tagbox Solutions Private Limited	Associate	-	No
37	Predictronics Corporation, USA	Associate	-	No
38	Tagbox Pte Limited, Singapore	Associate	-	No
39	Scienaptic Systems Inc., USA	Associate	-	No
40	Altizon Inc., USA	Associate	-	No

Sundaram-Clayton Limited

Annexure - VI to Directors' Report to the shareholders - (continued)

VI. CSR DETAILS

22. CSR Details

Whether CSR is applicable as per Section 135 of Companies Act, 2013	Yes
Turnover (₹ in Cr)	2073.96
Net worth (₹ in Cr)	697.28

VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

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

Stakeholder group from whom complaints is received	Grievance Redressal Mechanism in Place (Yes / No) if yes then provide web-link for grievance redress policy	FY 2022-23			FY 2021-22		
		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	-	-	-	-	-	-
Investors (other than shareholders)	Yes	-	-	-	-	-	-
Shareholders	Yes	1	-	-	1	-	-
Employees	Yes	-	-	-	-	-	-
Customers	Yes	85	-	-	47	-	-
Value Chain Partners (Dealers)	Yes	-	-	-	-	-	-
Value Chain Partners	Yes	-	-	-	-	-	-

The Company has established required framework for addressing specific grievances for all of its stakeholders. Code of Business Conduct and Ethics, Whistle Blower Mechanism provides sufficient guidance for reporting and resolving grievances. Web-link of such policies are available on the Company's website as provided in page no. 93 of this Annual Report.

Annexure - VI to Directors' Report to the shareholders - (continued)

24. 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.

Materiality analysis has been done to identify issues that concern our stakeholders and our business sustainability. Prioritization of materiality issues in the current context constructed from following sources-

- Issues based on sectoral guidelines.
- Issues flagged in peer reviews.
- Stakeholder engagement.
- Issues identified during discussions with the management and internal workshops.

Very important issues both for company & stakeholder are considered Material issues that have significant Business, Environmental & Social impact. Examples of identified material issues with approach for risk mitigation and financial implication is described below -

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	GHG Emission reduction	Risk & Opportunity	Risk 1. Failure to meet 1.5* aligned GHG reduction emission targets; 2. Reputational impacts and loss of trust from customers, investors and employees Opportunity Increase energy efficient projects, more renewable energy into the system	1. Climate strategy for operations and supply chain 2. Net zero commitment for operations and supply chain	Positive and Negative
2	Water Management	Risk	1. Poor water resource management will lead to depletion of water resources 2. Public backlash due to pollution of water bodies	1. Deploy a water conservation strategy and action plan for sites in water-stressed areas. 2. Site EHS assessment	Negative
3	Waste Management	Risk & Opportunity	Risk 1. Non-compliance leading to fines 2. Health impacts on personnel and local communities Opportunity 1. Increased recyclability leading to revenue creation 2. Enhancing circularity in value chain	1. Deploy a waste recycle framework. 2. Site EHS assessment	Positive & Negative
4	Cyber security	Risk	1. Risk of a malicious exploitation or intrusion into the infrastructures of SCL premises 2. Impacts on productivity, data privacy, operations 3. Financial cost and loss of confidence from stakeholders	1. Dedicated cyber security management with policies focusing on data privacy, Asset management, IT security and Business continuity 2. Employees trained on cyber security	Negative
5	CSR	Opportunity	1. Opportunity to give back to community 2. Upliftment of local community	CSR policy and framework	Positive

Annexure - VI to Directors' Report to the shareholders - (continued)

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

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

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	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
	Has the policy been approved by the Board?	Yes	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes
	Weblink of the Policies, if available	https://www.sundaram-clayton.com/Information.htm								
	Refer to the Whistle-blower Policy, Code of Business Conduct and Ethics which includes Anti-Bribery practices	Refer to the Code of Business Conduct and Ethics which includes Fair dealing with customers, suppliers, competitors, officers and employees.	-	Refer to the Policy on Prevention of Sexual Harassment	-	-	-	-	Refer to CSR Policy	-

Annexure - VI to Directors' Report to the shareholders - (continued)

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
2.	Whether the entity has translated the policy into procedures.	Yes	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Code of Conduct, Supplier Code of Conduct and Human Rights policy extend to our value chain partners								
4.	Name of the national and international codes / certifications / labels / standards	ISO 45001 ISO 14001								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Company is in the process of defining an overall ESG strategy with goals and targets on material issues.								
6.	Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met.	NA								
Governance, leadership and oversight										
7.	Statement by director responsible for the business value for money, environmentally friendly, lifetime responsibility report, highlighting ESG related challenges, targets and achievements	The Company is committed to being a profitable, socially responsible and a leading provider of sustainable light alloy solutions, globally. Towards this the Company is in the process of defining an overall ESG strategy and identifying the material issues with goals and targets. The Company proactively engages with stakeholders formally and informally to share information, discuss the Company's sustainability priorities, programs and performance, and determines opportunities to collaborate towards common goals. The Audit committee and Board oversees the implementation of various policies / codes as required under the legal framework in force from time to time. These are also reviewed at regular intervals by the board. The Board on a continuous basis reviews the business' alignment with the principles and core elements.								
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	At the highest level, the Board of Directors of your Company, led by the Chairman Emeritus and Managing Director, has the primary role to protect and assess the Business Responsibility (BR) performance of your Company.								
9.	Does the entity have a specified Committee of the Board / Director responsible for decision making on sustainability related issues?	Chairman, Chairman Emeritus & Managing Director, Managing Director and Director & Group Chief Financial Officer								
10.	Details of Review of NGRBCs by the Company: Performance against above policies and follow up action.	The policies of the Company are reviewed periodically / on a need basis by department heads / director / Board committees / Board members, wherever applicable. The Audit Committee and Board oversees the implementation of various policies - codes as required under the legal framework in force from time to time. These are also reviewed at regular intervals by the Board.								
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.	No. The policies of the Company are subject to audit by the internal auditors of the Company. The working of the policy is also ensured by the various department heads / director / Board committees / Board members, wherever applicable.								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles	-	-	-	-	-	-	-	-	-
The entity does not have the financial or / human and technical resources available for the task	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	P7 - The Company through the various industrial forums endeavours to promote growth and technological process, economic reforms, inclusive development policies and sustainable business principles. Therefore there is no need for such policy.								

Annexure - VI to Directors' Report to the shareholders - (continued)

SECTION C : PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1

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

ESSENTIAL INDICATORS

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

Segment	Total 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	All principles	100
Key Managerial Personnel (KMPs)	2	All principles	100
Employees other than BoD	from time to time	The employees / workers are imparted various trainings / awareness sessions such as induction / functional / behavioral training at the time of joining and leadership, policy, technical and unit specific compliance training during the course of employment.	100
Workers	from time to time		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 INR)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Penalty / Fine				
All	NA	Nil	NA	No
Settlement				
All	NA	Nil	NA	No
Compounding fee				
All	NA	Nil	NA	No

Annexure - VI to Directors' Report to the shareholders - (continued)

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

4. Does the entity have an anti-corruption or anti-bribery policy?

Yes. As part of Code of Conduct for all the employees, on discipline and misconduct, accepting bribe or illegal gratification, in any form, from anyone, in connection with the Company's business is considered as violation.

The Company has zero tolerance approach towards such violation, corruption and bribery. The Company has appropriate internal controls to ensure that the Company or its employees do not engage in unethical practices.

All employees are educated on the "Code of Conduct" with an objective to establish and specify standards of behaviour. Web-link of such policies covered under the Code of Conduct are available on the Company's website as provided in page no. 93 of this Annual Report.

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

Category	FY 2022-23	FY 2021-22
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

Particulars	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	Nil	Nil	Nil

Annexure - VI to Directors' Report to the shareholders - (continued)

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

Not Applicable

LEADERSHIP INDICATORS

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

During the year various training programs have been conducted for the supply chain partners. However, a framework to track such programs will be put in place going forward.

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

Yes, the Company has in place a 'Policy on Related Party Transactions', which are applicable to our Board members. Transactions with the Board members or any entity in which such Board members are concerned or interested are required to be approved by the Audit Committee and the Board of Directors. In such cases, the interested directors abstain themselves from the discussions at the meeting. The weblink of the policy is available elsewhere reported in the annual report.

PRINCIPLE 2

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

ESSENTIAL INDICATORS

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

Particulars	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impacts
R&D	15%	-	On Board diagnosis for BSVI compliance and EV products.
Capex	4%	-	

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

Yes

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

83% of input is sourced locally. Initiatives taken to ensure sustainable sourcing and encouraged suppliers to get certified under ISO 14001, OHSAS 18001 & IATF. Systems and process audits are conducted at supplier end periodically for better control through sourcing team.

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

- a. The Company does not have a process to collect, reuse, recycle and dispose the aluminium castings after supply to customers. However, this process is being done by various OEMs and third parties to recover and reuse aluminium.
- b. The material processed by the company, i.e., aluminium based alloys is 100% recyclable. Presently rejected aluminium castings (8% of production) are re-melted inside the factory. The aluminium swarf is remelted and reused for production. Sand used for making cores is recycled.

Annexure - VI to Directors' Report to the shareholders - (continued)

c. Hazardous waste materials generated by the company during aluminium castings production are given to authorized vendors either for disposal or recycling.

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

No

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?

No

The Company does not do any assessment of its products from life cycle perspective. However, this process is being done by various OEMs and third parties to recover and reuse aluminium. The material process by the Company, i.e., aluminium based alloys is 100% recyclable.

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.

Not applicable

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total material	
	FY 2022-23	FY 2021-22
Aluminium	100%	100%
Sand core	90%	90%

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

Particulars	FY 2022-23			FY 2021-22		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Material received in bins.	-

The Company works continuously with its vendors and customers to use returnable packaging modes (plastic bins and trolleys) to reduce usage of non-recyclable packaging wherever possible.

Annexure - VI to Directors' Report to the shareholders - (continued)

PRINCIPLE 3

BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

ESSENTIAL INDICATORS

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

Category	Total (A)	% of employees covered by									
		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	517	517	100	517	100	-	-	517	100	517	100
Female	38	38	100	38	100	38	100	-	-	38	100
Total	555	555	100	555	100	38	100	517	100	555	100
Other than Permanent employees											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

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

Category	Total (A)	% of workers covered by									
		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	871	871	100	871	100	-	-	871	100	871	100
Female	3	3	100	3	100	3	100	-	-	3	100
Total	874	874	100	874	100	3	100	871	100	874	100
Other than Permanent workers											
Male	1732	1732	100	1732	100	-	-	1732	100	1732	100
Female	115	115	100	115	100	115	100	-	-	115	100
Total	1847	1847	100	1847	100	115	100	1732	100	1847	100

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

Benefits	FY 2022-23			FY 2021-22		
	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	100	100	Yes	100	100	Yes
Others - please specify	-	-	-	-	-	-

Annexure - VI to Directors' Report to the shareholders - (continued)

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?

Yes, to identified areas. Steps are being taken to improve on the same.

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 (Fair and Ethical practices policy).

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100	100	100	100
Female	100	100	100	100
Total	100	100	100	100

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.

Category	Yes/No (If Yes, then give details of the mechanism in brief)	Remark
Permanent Workers	Yes	The Company POSH Committee, members are from diverged group Whistle-blower, CoC (Code of Conduct) for all categories of permanent employees and workers are available. Dedicated channels for raising such grievances have been put in place and communicated to all the concerned stakeholders.
Other than Permanent Workers	Yes	
Permanent Employees	Yes	
Other than Permanent Employees	Yes	

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

100% of permanent employees working in workers grade are members of internal Employees Union that is affiliated to INTUC

Category	FY 2022-23			FY 2021-22		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees						
- Male	-	-	-	-	-	-
- Female	-	-	-	-	-	-
- Others	-	-	-	-	-	-
Total Permanent Workers	874	874	100	-	-	-
- Male	871	871	100	-	-	-
- Female	3	3	100	-	-	-
- Others	-	-	-	-	-	-

Annexure - VI to Directors' Report to the shareholders - (continued)

8. Details of training given to employees and workers:

Category	Total (A)	FY 2022-23				FY 2021-22				
		On Health and safety measures		On Skill upgradation		Total D	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
EMPLOYEES										
Male	515	369	72	363	70	435	261	60	218	50
Female	38	28	74	-	-	23	12	52	-	-
Others	-	-	-	-	-	-	-	-	-	-
Total	553	397	72	363	66	458	273	60	218	48
WORKERS										
Male	775	775	100	439	57	1958	1958	100	944	48
Female	33	33	100	12	36	-	-	-	-	-
Others	-	-	-	-	-	-	-	-	-	-
Total	808	808	100	451	56	1958	1958	100	944	48

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
EMPLOYEES						
Male	515	433	84	508	435	86
Female	38	21	55	36	23	64
Others	-	-	-	-	-	-
Total	553	454	82	544	458	84
WORKERS						
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-
Others	-	-	-	-	-	-
Total	-	-	-	-	-	-

10. Health and safety management system:

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

Yes. Covering Chennai and Hosur locations

If yes, the coverage such system?

Scope : Manufacture of Aluminium Gravity die casting and pressure die casting components and machined components

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

Hazard Identification and Risk Assessment (HIRA), Safety Audit by EHS professionals, Safety Interaction by line management, Safety inspection by Government authorities, External Auditors, ISO 45001 (Occupational Health & Safety Management system)

Annexure - VI to Directors' Report to the shareholders - (continued)

HIRA is a process of defining and describing hazards by characterising their probability, frequency, and severity and evaluating adverse consequences, including potential losses and injuries. A risk assessment that provides the factual basis for activities is included in the corporate safety strategy to reduce losses from identified hazards at workplace. While carrying out Hazard Assessment, all the activities including routine and non-routine in each section are selected, Hazard Assessment conducted to identify the significant risks. For all the significant risks, control measures are defined to mitigate the risks. The HIRA process is a dynamic document which is reviewed every year or if there is change in process, layout, materials etc. of there is an accident or incident in that particular activity.

Periodic medical check-ups are done in-house with specific tests identified as per risk assessment of employees working in different departments having exposure to different occupational health hazards. Health assessment on return-to-work is done prior to rejoining. Medical fitness certificate is verified and validated and maintained as record.

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 identified through reporting mechanisms viz., Unsafe Condition Reporting, Near Miss Reporting, Reports from Safety committee meeting, Total Employee Involvement (TEI) - Suggestions and TEI - QCC.

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

Yes, the Company has tied-up with nearby multispecialty hospitals for non-occupational health services to all our employees.

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

Safety Incident / Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	-	-
	Workers	0.9	1
Total recordable work-related injuries	Employees	-	-
	Workers	5	7
No. of fatalities	Employees	-	-
	Workers	-	-
High consequence work-related injury or ill-health (excluding fatalities)	Employees	-	-
	Workers	-	-

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

The Company engages employees to improve safety and health such as safety audits through internal and external experts, safety training for its employees on topics like Four Stage Safety Clearance, 100% Induction Training, Contractor Safety Management System, Plant Safety Rating System, Work Permit System, Visual Control System Related to Safety, Work Environment Monitoring, Internal & External Safety Audits, Fire Extinguishers, Fire Hydrants and Automatic suppression systems.

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

Particulars	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	-	Nil	Nil	-
Health & Safety	Nil	Nil	-	Nil	Nil	-

The observations/ suggestions made by safety committee members and Union committee members during monthly safety committee meeting & monthly union meeting respectively are addressed appropriately.

Annexure - VI to Directors' Report to the shareholders - (continued)

14. Assessments for the year:

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

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

Planning to engage with Dupont for implementation of safety systems for cultural transformation.

LEADERSHIP INDICATORS

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

a. Employees (Y/N)

Yes, Employee death benefit scheme, group personal accident coverage and all other benefits in line with Statutory benefits provided for employee benefit.

b. Workers (Y/N).

Yes, Family Relief Fund is extended to the family members of the deceased employees by making contribution from all permanent employees and matching contribution by the Company.

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 has adequate mechanisms and monitors ensures that any statutory dues have the deducted and deposited by the value chain partners, in accordance applicable regulations and reviewed as per regular audit processes. The Company also collects necessary certificates and proofs from its contractors with respect to payment of statutory dues like PF, ESIC, etc. relating to contractual employees and workers.

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:

Particulars	Total no. of affected employees / workers		No. of employees / workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
Employees	-	-	-	-
Workers	-	-	-	-

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

No

5. Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	5
Working Conditions	5

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.

There were no significant risks/concerns arising from the assessments of health and safety practices and working conditions of value chain partners.

Annexure - VI to Directors' Report to the shareholders - (continued)

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 Company continuously expands its proactive engagement with all the stakeholder groups. The Company prioritises engagement as an integral part of partnership building and aims to institutionalize a structured approach through a formal process in the future.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Pamphlets, Meetings, Notice Board, Website), Other	Frequency of engagement (Annually / Half yearly / Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	E-mail, Website, Meetings	Monthly / Daily / Weekly / Quarterly / Half yearly / Annually	Through frequent Customer interaction, Customer satisfaction surveys. Key Concerns include Product / Service quality, Timely Delivery, Fair Pricing
Employees	No	Notice Board, Email,	Monthly / Daily / Weekly / Quarterly / Half yearly / Annually	Performance appraisal, employee engagement survey, grievance handling process, training workshops. Key Concerns: Career planning, communication on employee related policies.
Policy Makers	No	Email, Meetings.	As & when required	Policy advocacy participation, industry associations. Key Concerns: No specific concerns.
Supplier	No	Email, Meetings	As and when required	Supplier meets/supplier visits/supplier survey. Key Concerns: Supply chain communication on long range plan/ financial transactions/ rejections update/ scheduling, fluctuating order volumes, early involvement from suppliers to meet new product development targets, performance, rewards
Regulatory body	No	Email, Meetings	As and when required	Submission of reports, inspection visits, need-based meetings on directives. Key Concerns: Regulatory compliance and transparency in disclosure.
Shareholders/ Investors	No	Email, Website, Meetings	Quarterly / Half yearly / Annually	Investor forums, corporate communication, annual general meetings, annual reports. Key Concerns: Company strategy and performance, future plans, returns to shareholders.
Trade union	No	Meetings	Monthly / Quarterly / As and when required	Key concerns : Occupational health and safety concerns, other benefits.
Local community	No	Community Meetings	As and when required	Panchayat board meeting. Key concerns: Welfare related requests.

Annexure - VI to Directors' Report to the shareholders - (continued)

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.**

Respective business / functional heads engage with the stakeholders on various ESG topics and the relevant feedback from such consultation is provided to the Board, wherever applicable.

- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No).**

Yes

Employees & Workers: Based on demand & towards facilitating Health & wellness, special camps were conducted tying up with local hospitals for booster dose vaccination on COVID 19 prevention.

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

Towards enhancing engagement of Persons with Disability (PwD) and based on requests from Service providers / NGOs, job fairs and recruitment camps were conducted, and employment provided.

PRINCIPLE 5

BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

ESSENTIAL INDICATORS

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (B)	% (D / C)
EMPLOYEES						
Permanent	555	555	100	-	-	-
Other than permanent	6	6	100	-	-	-
Total Employees	561	561	100	-	-	-
WORKERS						
Permanent	874	874	100	-	-	-
Other than permanent	1847	1847	100	-	-	-
Total Workers	2721	2721	100	-	-	-

- Annual coverage of training through an e-module is mandatory for all employees.
- Certified for SA8000 and awareness is extended to all employees & Workers which covers elements on Human Rights. Orientation capsule covers Human Rights Elements for other than permanent employees.
- All existing employees have been imparted training on company's policies on human rights issues. All new joinees are taken through these policies as part of induction program. The Company is in the process of developing self learning e-modules to ensure tracking going forward.

Annexure - VI to Directors' Report to the shareholders - (continued)

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

Category	Total (A)	FY 2022-23				Total D	FY 2021-22			
		Equal to Minimum Wage		More than Minimum Wage			Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
EMPLOYEES										
Permanent	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Others	-	-	-	-	-	-	-	-	-	-
Other than permanent	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Others	-	-	-	-	-	-	-	-	-	-

Category	Total (A)	FY 2022-23				Total D	FY 2021-22			
		Equal to Minimum Wage		More than Minimum Wage			Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
WORKERS										
Permanent	874	-	-	874	100	980	-	-	980	100
Male	871	-	-	871	100	977	-	-	977	100
Female	3	-	-	3	100	3	-	-	3	100
Other than permanent	1732	-	-	1732	100	1702	-	-	1702	100
Male	1732	-	-	1732	100	1702	-	-	1702	100
Female	-	-	-	-	-	-	-	-	-	-

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

Particulars	Male		Female	
	Number	Median remuneration/ salary / wages of respective category (₹ in Cr)	Number	Median remuneration / salary / wages of respective category (₹ in Cr)
Board of Directors (BoD)	7	0.07	2	4.91
Key Managerial Personnel	2	3.26	-	-
Employees other than Bod and KMP	595	0.08	48	0.05
Workers - Permanent	830	0.06	-	-

Annexure - VI to Directors' Report to the shareholders - (continued)

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)

Heads of IR and HR are the persons responsible for addressing any human rights impacts or issues for the employees in the business. For POSH complaints there is an internal committee comprising of senior team across locations which addresses any issues raised.

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

Employees can reach out to Head HR / Head IR with reference to grievances related to human rights issues. An e-mail ID is made available for this purpose. There is also an automated voice recording facility to register any specific grievances. Confidentiality of the complaint raising such issues is assured.

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

Particulars	FY 2022-23			FY 2021-22		
	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	-	-	-	-	-	-
Discrimination at workplace	-	-	-	-	-	-
Child Labour	-	-	-	-	-	-
Forced Labour / Involuntary Labour	-	-	-	-	-	-
Wages	-	-	-	-	-	-
Other human rights related issues	-	-	-	-	-	-

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

Company assures confidentiality and protection to the complainant in furtherance, any attempts to intimidate the complainant would be treated as a violation of code of conduct. The following steps are followed:

- All complaints are handled in time bound manner.
- At the request of the aggrieved employee, steps are taken to settle the matter through mutual agreement, before initiating enquiry, provided that no monetary settlement shall be made as a basis of conciliation.
- If a settlement is arrived through conciliation, the committee shall prepare a written settlement with its recommendations duly signed by both parties and witnessed by the committee and provide the same to Management.
- The committee shall provide Unclassified / Restricted / Protected / Confidential copies of the settlement to the aggrieved employee and the respondent, and no enquiry shall be conducted further.

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

Yes. Business agreements and contracts contain a standard provision of compliance with all the applicable laws, conventions, and policies etc., which encompasses the human rights requirements.

9. Assessments for the year:

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

Annexure - VI to Directors' Report to the shareholders - (continued)

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

- Infrastructure development for Person with Disability.

LEADERSHIP INDICATORS

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

The Company has introduced flexible working hours for the welfare of the employees. The Company has also introduced an independent helpline for employees to call anonymously and register their grievance.

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

Nil

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 . All production facilities are accessible

4. Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	5
Forced / involuntary labour	5
Sexual harassment	5
Discrimination at workplace	5
Wages	5
Others - please specify	-

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

There were no significant risks / concerns arising from the above said assessments.

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	Unit	FY 2022-23	FY 2021-22
Total electricity consumption (A)	Kilo Joules	319.2	299.9
Total fuel consumption (B)	Kilo Joules	27.5	22.8
Energy consumption through other sources (C)	Kilo Joules	-	-
Total energy consumption (A+B+C)	Kilo Joules	346.7	322.7
Energy intensity per rupee of turnover (Total energy consumption / turnover in rupees)	Joules / Rupee	167117	18511
Energy intensity (optional) - the relevant metric may be selected by the entity	Kilo Joules	-	-

UOM for Total electricity & fuel consumption is in Kilo Joules.

UOM for Energy intensity per rupee of turnover is in Joules / Rupee.

Annexure - VI to Directors' Report to the shareholders - (continued)

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

No

- 2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N)**

No

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

Parameter	Unit	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)			
(i) Surface water	Kilolitres	-	-
(ii) Groundwater	Kilolitres	1,11,864	1,43,518
(iii) Third party water	Kilolitres	1,32,300	97,075
(iv) Seawater / desalinated water	Kilolitres	-	-
(v) Others	Kilolitres	2,98,234	2,86,783
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	Kilolitres	5,42,398	5,27,376
Total volume of water consumption (in kilolitres)	Kilolitres	5,42,398	5,27,376
Water intensity per rupee of turnover (Water consumed / turnover)	Litres / Rupee	0.026153	0.030252
Water intensity (optional) - the relevant metric may be selected by the entity	Kilolitres	-	-

- Wastewater from industrial process is treated, recycled and used in industrial applications.
- Direct rainwater harvesting is also adopted.

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

No

- 4. Has the entity implemented a mechanism for Zero Liquid Discharge?**

Yes

If yes, provide details of its coverage and implementation.

All the Four plants of the Company have implement Zero Liquid Discharge System.

- 5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

Parameter	Unit	FY 2022-23	FY 2021-22
NOx	Micrograms / M3	20.2	20.8
SOx	Micrograms / M3	21.8	22.4
Particulate matter (PM)	Micrograms / M3	69.0	72.0
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	ppm	BDL (DL:01)	BDL (DL:01)
Hazardous air pollutants (HAP)	-	-	-
Others - please specify	Micrograms / M3	0.67	0.69

Note: Indicate if any independent assessment / evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

Annexure - VI to Directors' Report to the shareholders - (continued)

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

Parameter	Unit	FY 2022-23	FY 2021-22
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	19,516	19,685
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	61,150	61,371
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent	80,666	81,056
Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity	-	-	-

Note: Indicate if any independent assessment / evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

7. Does the entity have any project related to reducing Green House Gas emission?

Yes

If Yes, then provide details.

1) Increase in share of renewable energy. e.g., Augmentation of solar energy & procurement of green power through Indian Energy Exchange. 2) Waste Heat Recovery from Regenerative Thermal Oxidizer (RTO) and Air Compressors. 3) Implementation of energy efficient projects e.g. conversion of induction motor based blowers to DC blowers.

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Waste generated (in metric tonnes)			
Plastic waste (A)	metric tonnes	66.36	60.70
E-waste (B)	metric tonnes	5.28	5.05
Bio-medical waste (C)	metric tonnes	0.90	1.00
Construction and demolition waste (D)	metric tonnes	452.43	372.06
Battery waste (E)	metric tonnes	1.06	0.98
Radioactive waste (F)	metric tonnes	-	-
Other Hazardous waste. Please specify, if any. (G)	metric tonnes	268.74	274.03
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	metric tonnes	12,140.98	11,695.60
Total (A+B + C + D + E + F + G + H)	metric tonnes	12,940.14	12,409.52
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)			
Category of waste			
(i) Recycled	metric tonnes	6,576.64	7,411.98
(ii) Re-used	metric tonnes	-	-
(iii) Other recovery operations	metric tonnes	-	-
Total	metric tonnes	6,576.64	7,411.98
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)			
Category of waste			
(i) Incineration	metric tonnes	-	-
(ii) Land filling	metric tonnes	-	-
((iii) Other disposal operations	metric tonnes	6,363.50	4,997.54
Total	metric tonnes	6,363.50	4,997.54

Other disposal operations - Waste is co-processed and co-incinerated in cement industry.

Annexure - VI to Directors' Report to the shareholders - (continued)

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

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

The Company restricts the use of "hazardous chemicals" in the parts of our products/processes. Company has an internal standard which controls the usage of hazardous substances considering various national and international laws on hazardous substance. Aluminium swarf are melted and converted into aluminium alloys. All other categories of waste are disposed through authorized agencies.

- 10. 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:**

Not applicable

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

Necessity for environment impact assessment did not arise during reporting period.

- 12. 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).**

Yes

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

LEADERSHIP INDICATORS

- 1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:**

Parameter	Unit	FY 2022-23	FY 2021-22
From renewable sources			
Total electricity consumption (A)	Kilo Joules	51.98	54.90
Total fuel consumption (B)	Kilo Joules	-	-
Energy consumption through other sources (C)	Kilo Joules	-	-
Total energy consumed from renewable sources (A+B+C)	Kilo Joules	51.98	54.90
From non-renewable sources			
Total electricity consumption (D)	Kilo Joules	319.20	299.90
Total fuel consumption (E)	Kilo Joules	27.48	22.82
Energy consumption through other sources (F)	Kilo Joules	-	-
Total energy consumed from non-renewable sources (D+E+F)	Kilo Joules	346.68	322.71

UOM for energy consumption is in Kilo Joules.

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

No

Annexure - VI to Directors' Report to the shareholders - (continued)

2. Provide the following details related to water discharged:

Parameter	Unit	FY 2022-23	FY 2021-22
Water discharge by destination and level of treatment (in kilolitres)			
(i) To Surface water	kilolitres	-	-
- No treatment	kilolitres	-	-
- With treatment - please specify level of treatment	kilolitres	-	-
(ii) To Groundwater	kilolitres	-	-
- No treatment	kilolitres	-	-
- With treatment - please specify level of treatment	kilolitres	-	-
(iii) To Seawater	kilolitres	-	-
- No treatment	kilolitres	-	-
- With treatment - please specify level of treatment	kilolitres	-	-
(iv) Sent to third-parties	kilolitres	-	-
- No treatment	kilolitres	-	-
- With treatment - please specify level of treatment	kilolitres	-	-
(v) Others	kilolitres	-	-
- No treatment	kilolitres	-	-
- With treatment - please specify level of treatment	kilolitres	88520	87525
Total water discharged (in kilolitres)	kilolitres	88520	87525

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

3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): Not Applicable as Our plants do not come under water stress area

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) -

No

If yes, name of the external agency.

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ ,	Metric tonnes of CO ₂ equivalent	-	-
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent	-	-
Total Scope 3 emission intensity (optional) - the relevant metric may be selected by the entity	Metric tonnes of CO ₂ equivalent	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)

No

If yes, name of the external agency.

Scope 3 inventorization considering upstream and downstream process is taken as one of the major projects for FY 2023-24.

5. With respect to the ecologically sensitive areas reported at Question 10 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.

Not applicable

Annexure - VI to Directors' Report to the shareholders - (continued)

6. 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:

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative 2022-23	Corrective action taken, if any FY 2021-22
1	Direct harvesting of rainwater	Rainwater is collected and used for industrial application.	Saving of ground water / fresh water from third party	-
2	Water conservation	Specific projects undertaken to reduce use of process water in production	Saving of ground water / fresh water from third party	-
3	Energy saving	Specific projects undertaken to reduce the consumption of energy in the premises across plants	Reduction in energy consumed	-

7. Does the entity have a business continuity and disaster management plan?

Yes

Give details in 100 words/ web link.

The Company has in place a business continuity and disaster management plan which is periodically reviewed and updated based on new risks identified. These risks apart from covering the regular business risks also address risk due to pandemic and cyber security and response to ensure business continuity. The risks identified are also presented to the Management and the Risk Assessment Committee of the Company every year.

8. 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.

The Company has started to conduct environment audit among the value chain. The Company has started insisting all its value chains to obtain ISO 14001 standards.

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

5%.

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.

Annexure - VI to Directors' Report to the shareholders - (continued)

b. List the top 10 trade and industry chambers / associations (determined based on the total members of such body) the entity is a member of / affiliated to.

S. No.	Name of the trade and industry chambers / associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industries (CII)	State & National
2	Automotive Component Manufacturers Association (ACMA)	State & National
3	FICCI	National
4	Indo German Chamber of Commerce	State, National & International
5	Employers Federation of India (EFI)	National
6.	Employers Federation of South India (EFSI)	State
7.	Madras Chamber of Commerce and Industry (MCCI)	State

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

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

LEADERSHIP INDICATORS

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information is available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly / Quarterly / Others - please specify)	Web Link, if available
Nil					

Annexure - VI to Directors' Report to the shareholders - (continued)

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 TVS SST's Initiatives in Polur, West Arani and Javadhu Hills block of Tiruvannamalai district of Tamil Nadu.	-	-	Institute of Rural Management, Anand (IRMA)	Yes	-
Impact assessment of partially desilted minor irrigation tanks in Tiruvannamalai, Tirunelveli and Krishnagiri districts	-	-	Centre for Water Resources, Anna University, Chennai	Yes	-

Independent Impact studies were carried out with Institute of Rural Management, Anand and Centre for Water Resources, Anna University, Chennai.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format: - Not Applicable

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

CSR team members lives in villages where welfare activities are carried out, to understand the needs and receive feedback then and there.

Continuous interaction with community to understand the benefit and utility of various programmes implemented through SHG meetings, and meeting with various community-based organizations.

Feedback from government officials at panchayat, block and district level on the effectiveness on implementation of the government welfare schemes and programmes at grass root level villages.

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

Particulars	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers	-	-
Sourced directly from within the district and neighbouring districts	-	-

Annexure - VI to Directors' Report to the shareholders - (continued)

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):

The impact assessment reports by Institute of Rural Management, Anand (IRMA) and Centre for Water resources, Anna University highlighted the positive impact on the social and economic condition in the project villages.

The impact assessment report by IRMA recommended that the program should focus on building the capacity of individuals in the community to become micro-entrepreneurs. This can be done through providing training on different aspects of business management and entrepreneurship, as well as providing institutional support such as access to credit and market linkages.

Based on the feedback, a platform for all rural SHG products and online e-commerce to support market linkages has been created to promote entrepreneurship among the women.

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

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

Yes

(b) From which marginalized /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: Nil

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.: Nil

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Holistic rural development in tribal habitations of Tamil Nadu, Karnataka, and Maharashtra.	90,000	100%
2	Renovation of anganwadis, schools, hostel, health centers, veterinary centers and other rural community infrastructure	25,000	85%
3	Medical consultations, simple diagnostics, and medicines free of cost at medical centres & Conducting general health camps, dental camps and eye camps in schools.	2,00,000	80%
4	Desilting of water storage bodies and channels	4,500	70%
5	Livelihood projects for women in Self-Help Groups	20,000	80%
6	Providing a platform for sales of women self-help group products	900	75%
7	Improving learning outcomes of children in primary and middle schools	5,000	95%
8	Improving life-skills among children	600	90%

Annexure - VI to Directors' Report to the shareholders - (continued)

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.

Customer complaints are recorded by the organization as and when they occur. These are communicated to identified employees and corrective and preventive actions are implemented and communicated back to customers. The complaints and the corrective and preventive actions are reviewed internally by the senior management of the Company. Routine feedback about the performance of the Company is also sought through periodic interactions while visiting the customers as well as when customers visit the Company.

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

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	100
Safe and responsible usage	-
Recycling and/or safe disposal	-

Environmental and social parameters

The Company produces parts to the prints and specifications provided by the customers. The Company displays product information as required by the customers. This is approved by them during the development process.

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

Particulars	FY 2022-23 (Current Financial Year)			FY 2021-22 (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		Nil	Nil	
Advertising	Nil	Nil		Nil	Nil	
Cyber-security	Nil	Nil		Nil	Nil	
Delivery of essential services	Nil	Nil		Nil	Nil	
Restrictive Trade Practices	Nil	Nil		Nil	Nil	
Unfair Trade Practices	Nil	Nil		Nil	Nil	
Other	Nil	Nil		Nil	Nil	

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

Particulars	Number	Reasons for recall
Voluntary recalls	Nil	Not applicable
Forced recalls	Nil	Not applicable

Annexure - VI to Directors' Report to the shareholders - (continued)

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No)

Yes

If available, provide a web-link of the policy.

The Company has framework and policy in place to address cyber security risks as well as data privacy.

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.

Not applicable

LEADERSHIP INDICATORS

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

Official Website, social media, and labels

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

Not applicable.

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

Risks - business and operational are identified and appropriate counter measures deployed. These are reviewed by the management and Board periodically. As appropriate, the risk of disruption / discontinuation of services are also communicated to customers as well as external agencies

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not applicable)

The Company displays product information as required by the customers. This is approved by them during the development process.

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

5. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along-with impact

Nil

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

Nil.

For and on behalf of the Board of Directors

Chennai
5th May 2023

R GOPALAN
Chairman
DIN: 01624555