



**KELLTON TECH SOLUTIONS LIMITED.**

To

The General Manager, Listing Department, Bombay Stock Exchange Limited, 1 <sup>st</sup> Floor, New Trading Wing, Rotunda Building, P.J. Towers, Dalal Street Fort, Mumbai-400001	The Manager, Listing Department, National Stock Exchange of India Ltd, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400051
<b>Scrip Code: 519602</b>	<b>Scrip Code: KELLTONTEC</b>

Dear Sir/Ma'am,

**SUBJECT: BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT OF THE COMPANY FOR THE FINANCIAL YEAR 2022-23**

Pursuant to the provisions of Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time), please find enclosed herewith the copy of the Business Responsibility & Sustainability Report for the Financial Year 2022-23.

Further, the aforesaid Report has also been uploaded on the website of the Company at [www.kellton.com](http://www.kellton.com)

Thanking You,  
Yours faithfully,  
For Kellton Tech Solutions Limited

**Rahul Jain**  
Digitally signed by Rahul Jain  
Date: 2023.09.08 18:33:37 +05'30'

**Rahul Jain**  
**Company Secretary and Compliance Officer**  
**Date: September 08, 2023**  
**Place: Hyderabad**



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

### **SECTION A: GENERAL INFORMATION ABOUT THE COMPANY**

#### **I. Details of the listed entity**

1	Corporate Identity Number (CIN) of the Company	L72200TG1993PLC016819
2	Name of the Company	Kellton Tech Solutions Limited
3	Year of Incorporation	1993
4	Registered address	Plot No 1367, Road No- 45, Jubilee Hills, Hyderabad – 500033, Telangana
5	Corporate Address	Plot No 1367, Road No- 45, Jubilee Hills, Hyderabad – 500033, Telangana
6	E-mail id	compliance@kelltontech.com
7	Telephone	040 4433 3000
8	Website	<a href="https://www.kelltontech.com/">https://www.kelltontech.com/</a>
9	Financial Year reported	01 April, 2022 to 31 March, 2023
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11	Paid Up Capital	Rs. 48,26,53,995
12	Name and contact details of the person who may be contacted in case of any queries on the BRSR report	Mr. Rahul Jain Mob: 8103808311 (Company Secretary and Compliance Officer) Email: compliance@kelltontech.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
14	Sector(s) that the Company is engaged in (industrial activity code-wise)	Information Technology and Computer Services activities
15	List three key products/services that the Company manufactures/provides (as in balance sheet)	<ul style="list-style-type: none"> <li>• Information Technology services and solutions</li> <li>• Platform IP</li> <li>• Technology Infrastructure and Services</li> </ul>
16	Total number of locations where business activity is undertaken by the Company – (a) Number of international locations- (b) Number of national locations: The Company is undertaking business activities across India and locations are given at page no .	USA (6 Locations), United Kingdom, Ireland, Poland, Singapore India (3 Locations),
17	Markets served by the Company – Local/ State/National/International	National and International



## II. Products/services

### 18. 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.	Information and Communication	Computer programming, Consultancy and related activities	100.00%

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

S no.	Product/Service	NIC Code	% of total Turnover
1.	Design and development services of software applications including customised and packaged software	99831413	100.00%

## III. Operations

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

Location	Number of Stores	Number of offices	Total
National	0	3	3
International	0	10	10

### 21. Markets served by the entity:

Locations	Number
National (No. of States)	28
International (No. of Countries)	22

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

51%

**c. A brief on types of customers:** Over the years, Kellton has grown into a full-service IT solutions provider with a global presence. Kellton has grown through a combination of organic growth and strategic acquisitions. We now have offices in the United States, Europe, and Asia, and it serves clients in a wide range of industries, including healthcare, finance, retail, and manufacturing.

We started out small, just like everyone else and have been led by our ambitious founders throughout this incredible journey. Our Clients includes Fintech, Banking, Financial Services & Insurance Non-Profit, Government & Education Manufacturing, Automotive & Chemicals Retail, E-Commerce & Distribution Travel, Logistics & Hospitality Oil, Gas & Mining Pharma, Healthcare & Life Sciences HiTech, SaaS, ISV & Communications Energy & Utilities



## IV. Employees

### 22. Details at the end of Financial Year

#### a. Employees and workers (including differently abled)

S. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	(B / A)	No. (C)	% (C / A)	No. (H)	% (H / A)
<b>EMPLOYEES</b>								
1	Permanent (D)	1144	908	79.37	236	20.63	0	0.00
2	Other than permanent (E)	61	50	81.97	11	18.03	0	0.00
3	<b>Total employees (D + E)</b>	<b>1205</b>	<b>958</b>	<b>79.50</b>	<b>247</b>	<b>20.50</b>	<b>0</b>	<b>0.00</b>
<b>WORKERS</b>								
4	Permanent (F)	0	0	0.00	0	0.00	0	0.00
5	Other than permanent (G)	0	0	0.00	0	0.00	0	0.00
6	<b>Total workers (F + G)</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>

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

S. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	(B / A)	No. (C)	% (C / A)	No. (H)	% (H / A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>								
1	Permanent (D)	1	1	100.00	0	0.00	0	0.00
2	Other than Permanent (E)	0	0	0.00	0	0.00	0	0.00
3	<b>Total employees (D + E)</b>	<b>1</b>	<b>1</b>	<b>100.00</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>
<b>DIFFERENTLY ABLED WORKERS</b>								
4	Permanent (F)	0	0	0.00	0	0.00	0	0.00
5	Other than Permanent (G)	0	0	0.00	0	0.00	0	0.00
6	<b>Total workers (F + G)</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>

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

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.50%
Key Management Personnel	3	0	0.00%



## 24. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2022-23				FY 2021-22				FY 2020-21			
	M	F	O	T	M	F	O	T	M	F	O	T
Permanent Employees	18.43%	15.27%	-	17.78%	17.94%	16.13%	-	17.49%	18.56%	19.34%	0	18.07%
Permanent Workers	0	0	0	0	0	0	0	0	0	0	0	0

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

### 25. Names of holding/ subsidiary/ associate companies/ joint ventures (as at March 31, 2023)

Sno.	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.	KELLTON DBYDX SOFTWARE Pvt Ltd	Subsidiary company	100.00%	No
2.	Kellton Tech Inc	Subsidiary company	100.00%	No
3.	Kellton Tech Solutions Inc	Subsidiary company	100.00%	No

## VI. CSR Details

### 26. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

(ii) Turnover (In Rs. Lakhs): 17085.4031

(iii) Net worth (in Rs. Lakhs): 15080.332,

### VII. Transparency and Disclosures Compliances

27. 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 provide link for grievance redress policy	FY2023			FY2022		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Re-marks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Re-marks



Communities	Yes <a href="https://www.kellton.com/legal-policies">https://www.kellton.com/legal-policies</a>	0	Nil	NA	0	0	NA
Investors (other than Shareholders)	Yes <a href="https://www.kellton.com/legal-policies">https://www.kellton.com/legal-policies</a>	0	Nil	NA	0	0	NA
Shareholders	Yes <a href="https://www.kellton.com/legal-policies">https://www.kellton.com/legal-policies</a>	2	Nil	complaints were regarding non receipt of dividend and same were resolved	5	0	complaints were regarding non receipt of dividend and same were resolved
Employees	Yes <a href="https://www.kellton.com/legal-policies">https://www.kellton.com/legal-policies</a>	0	0	NA	0	0	NA
Customer	Yes <a href="https://www.kellton.com/legal-policies">https://www.kellton.com/legal-policies</a>	0	0	NA	0	0	NA
Value Chain Partners	No	0	0	NA	0	0	NA

**28. Overview of the entity's material responsible business conduct issues**

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

SL No	Material Issue Identified Customer Satisfaction	Indicate whether Risk or Opportunity Risk and opportunity	Rationale for identifying risk or opportunity The identification of risks is important because if quality and timeliness are not maintained and customer-centric issues are not resolved, it will negatively impact customer satisfaction, which in turn will have a direct negative impact on the business  Rationale for identifying opportunity Identifying opportunities is crucial because when customers are satisfied with the services, it can result in repeat business, customer retention, and the expansion of the customer base. This highlights the significance of establishing strong customer relationships and consistently providing exceptional experiences that meet or surpass customer expectations.	In case of risk approach to adapt or mitigate  The company implemented has proactive measurement mechanisms, including the establishment of a customer feedback cell, to assess customer satisfaction levels and gather feedback from multiple angles. This includes evaluating customer satisfaction with ongoing work, tracking account growth, and assessing the effectiveness of the company's innovative and cost-effective solutions.	Financial  Positive: Risk mitigation approach Customer Satisfaction: The Company's profitability is greatly influenced by customer satisfaction and loyalty, which have a substantial positive impact. Enhancing customer satisfaction can also result in improved business prospects and foster growth opportunities.  Negative: The loss of trust in Company's ability to deliver the promised quality services can result in missed business opportunities. Additionally, any breach of privacy and data security can have severe consequences.
	Data Security	Risk	Data security is of utmost importance The Company has established in risk management strategy, given policies concerning the potential risks and negative information technology/ consequences associated with the cyber security risks that define loss, theft, or unauthorized access limits, mitigation strategies to sensitive data. These risks include and internal controls. financial losses, damage to reputation, legal liabilities, and loss of customer trust.	The Company has established policies concerning cyber security risks that define limits, mitigation strategies, and internal controls.  information technology	Negative Implications  The erosion of customer trust in ability to deliver, the promised quality services can result in missed business prospects and opportunities.

Talent retention and acquisition	Risk and opportunity	<p>Rationale for identifying risk</p> <ol style="list-style-type: none"> <li>High turnover rates: Losing skilled employees leads to increased recruitment and training expenses, reduced productivity, disruptions in team dynamics, and</li> <li>Skills gap: Difficulty in finding These include offering qualified professionals creates a competitive compensation skills gap that hinders achieving and benefits packages, business objectives and strategic goals.</li> <li>Competitive disadvantage: Inability a positive work culture. to retain or attract top talent puts the organisation at a competitive to monitor employee disadvantage, allowing competitors to gain an advantage</li> <li>Succession planning: Retaining or attracting top talent impacts succession planning by posing challenges in identifying and developing future leaders, affecting long-term organisational success.</li> </ol> <p>Rationale for identifying opportunity-</p> <ol style="list-style-type: none"> <li>Talented and motivated workforce crucial for organisational objectives and competitive edge</li> <li>Retaining and attracting top talent: <ul style="list-style-type: none"> <li>- Enhances productivity</li> <li>- Drives innovation</li> <li>- Increases customer satisfaction</li> </ul> </li> <li>Reduces costs related to turnover and recruitment</li> </ol>	<p>Risk mitigation approach:</p> <p>The risk mitigation strategy for this challenge entails the implementation of impactful talent management strategies.</p> <p>providing avenues professional growth and development, cultivating and utilizing data analytics engagement and satisfaction.</p>	<p>Positive:</p> <p>Retaining exceptional talent can effectively lower turnover costs and extend employee tenure, resulting in heightened efficiency and profitability.</p> <p>Acquiring and retaining top talent can also elevate productivity, as skilled and for engaged employees tend to demonstrate greater effectiveness in their roles. This, in turn, enhances the quality of customer service and contributes to higher levels of customer satisfaction, fostering increased loyalty and repeat business.</p> <p>Negative:</p> <p>Neglecting to address this risk results in adverse financial consequences, including elevated expenses related to recruiting, training, and onboarding new employees, diminished productivity, reduced morale among existing staff, and potential harm to the reputation as company's a desirable employer.</p>
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	Community Development	Opportunity	<p>Community development empowers individuals, fosters connections, and builds stronger communities. It promotes social cohesion, creates supportive environments, and enhances quality of life. Additionally, community development drives economic growth by supporting local businesses and creating jobs. It also addresses social issues, promotes social justice, and improves the well-being of marginalized communities through increased access to essential services. This helps the company to create a positive image which attracts more clients.</p>	-	<p>Positive: Supporting CSR activities creates a positive impact on the communities we engage with, addressing needs, promoting sustainability, and enhancing stakeholder relationships.</p>
Human rights and grievances	Risk and Opportunity		<p>Rationale for identifying as Risk: Neglecting human rights throughout functions and the value chain can cause reputational harm and erode trust from stakeholders, including the community, customers, investors, and shareholders. Rationale for identifying it as opportunity: Incorporating human rights into policies and processes fosters community connections, ethical practices, and elevated societal standards. This enhances branding, reputation, and attracts investor recognition for a high human rights quotient.</p>	<p>Risk Mitigation approach Raising awareness within the organisation and throughout the value chain about human rights requirements, along with focused training initiatives, helps mitigate risks. Establishing a well-defined policy and process for handling grievances and ensuring that relevant stakeholders are aware of this mechanism, builds trust by demonstrating that issues will be acknowledged and resolved.</p>	<p>Positive: Integrating a focus on human rights and a robust grievance handling mechanism into operational policies and procedures will attract investors, employees, and customers. This increased awareness and commitment contribute to business growth and a strong market share.  Negative: Ignoring human rights and grievances can lead to reputational damage, legal consequences, employee dissatisfaction and turnover, stakeholder disengagement, supply chain disruptions, and increased operational risks for Company.</p>



## 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.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and Management Processes</b>									
<b>1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>b. Has the policy been approved by the Board? (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>c. Web Link of the Policies, if available</b>	<a href="https://www.kellton.com/">https://www.kellton.com/</a>								
<b>2. Whether the entity has translated the policy into procedures. (Yes / No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>3. Do the enlisted policies extend to your value chain partners? (Yes/No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trust) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.</b>	None								
<b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any</b>	The Company is determined to follow the path envisioned under the 9 principles laid down in the National Voluntary Guidelines on Social, Environmental & Economic Responsibilities of Business issued by the Ministry of Corporate Affairs.								
<b>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b>	The Company shall continue to monitor its performance against the said principle(s) and take necessary action as and when the need arises.								
<b>Governance, leadership and oversight</b>									
<b>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):</b>									
<p>The purpose of our business is to dedicatedly serve to ensure stakeholder delight and influence the environment and society at large with our good work, as we abide by our values that form the cornerstone of our business strategies, decisions, and activities. We are committed to this roadmap as we seek to grow sustainably and deliver Information Technology services to frontier markers with excellence, again and again, with a lot more rigor and enthusiasm as the days pass.</p>									



<b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b>	Mr. Niranjan Chintam (DIN: 01658591), Chairman Telephone: +91 40 23555300 Email: compliance@kelltontech.com
<b>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.</b>	Yes, Committee consists of Managing Director as Chairman along with other functional heads.

10. Details of Review of NGRBCs by the Company:																		
Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	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	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Quarterly								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Di-rec-tor	Quarterly								
<b>11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, Name of the agency.</b>	P1	P2	P3	P4	P5	P6	P7	P8	P9	N	N	N	N	N	N	N	N	N

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

NA



## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

**Principle 1. Businesses should Conduct and Govern themselves with integrity and in a manner that is ethical, transparent and accountable.**

**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	% of persons in respective category covered by the awareness programmes
Board of Directors	1	Anti Bribery and Anti Corruption Policy	100%
Key Managerial Personnel	1	Anti Bribery and Anti Corruption Policy	100%
Employees other than BoD and KMPs	4	Anti Bribery and Anti Corruption Policy POSH Act Grievance Redressal Mechanism Importance of Stakeholders	100%
Workers	Not Applicable		

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



## A. Monetary

Particulars	NGRBC Principle	Name of the regulatory / Enforcement agencies/judicial institutions	Amount ( In Rs.)	Brief of the Case	Has an appeal been preferred ? (Yes/No)
Penalty/Fine	NA	NA	0	NA	NA
Settlement	NA	NA	0	NA	NA
Compounding Fee	NA	NA	0	NA	NA

## B. Non Monetary

Particulars	NGRBC Principle	Name of the regulatory / Enforcement agencies/judicial institutions	Amount ( In Rs.)	Brief of the Case	Has an appeal been preferred ? (Yes/No)
Imprisonment	NA	NA	0	NA	NA
Punishment	NA	NA	0	NA	NA

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision are 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, details in brief and if available, a web-link to the policy.

Yes, Company have an anti – corruption and anti-bribery policy, Company recognises and follows all applicable laws and regulations and respects lawful customs of the regions where we operate and transact. We are committed to acting and building relationships based on integrity and fairness in all our dealings. Hence, Kellton has adopted a “Zero Tolerance” approach to bribery and corruption. The policy is available on the website of the company at <https://www.kellton.com/legal-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:

	FY2023	FY2022
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0



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

	FY2023		FY2022	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

7. 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

## 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.

Category	FY2023	FY2022	Details of improvements in environmental and social impacts
R&D	0	0	-
Capex	0	0	-

## 2. Sustainable Sourcing

- a. Does the entity have procedures in place for sustainable sourcing? - No
- b. If yes, what percentage of inputs were sourced sustainably? - NA

## 3. Processes in place to reclaim products for reuse, recycle, and safe disposal of products at the end of life for

- a. Plastics (Including Packaging): NA
- b. E-Waste: NA
- c. Hazardous waste: NA
- d. other waste: NA



This metric is not relevant to our Company as our main business is related to Information Technology, and it does not involve the manufacturing of any product.

#### 4. Extended Producer Responsibility (EPR)

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, steps taken to address the same.

Not Applicable,

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

#### 1. Details of measures for the well-being of employees

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Num-ber (B)	% (B/A)	Num-ber (C)	% (C/A)	Num-ber (D)	% (D/A)	Num-ber (E)	% (E/A)	Num-ber (F)	% (F/A)
<b>Permanent Employees</b>											
Male	908	713	78.52	896	98.68	0	0.00	39	4.30	0	0.00
Female	236	182	77.12	232	98.31	7	3.00	0	0.00	0	0.00
Total	1144	895	78.23	1128	98.60	7	3.00	39	4.30	0	0.00
<b>Other than permanent employees</b>											
Male	50	0	0.0	0	0	0	0	0	0	0	0
Female	11	1	9.09	1	0	0	0	0	0	0	0
Total	61	1	1.64	1	0	0	0	0	0	0	0

#### 2. Details of measures for the well-being of Workers- NA

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Num-ber (B)	% (B/A)	Num-ber (C)	% (C/A)	Num-ber (D)	% (D/A)	Num-ber (E)	% (E/A)	Num-ber (F)	% (F/A)
<b>Permanent workers</b>											
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	908	0	0	0	0	0	0	0	0	0	0



Other than permanent employees											
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

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

Benefits	Number of employees covered as % of total employees	Number of Workers covered as % of total workers	Deducted and de-positd with the authority ( Y/N/N.A)	Number of employees covered as % of total employees	Number of Workers covered as % of total workers	Deducted and de-positd with the authority ( Y/N/N.A)
PF	95.10%	0	Yes	96.02%	0	Yes
Gratuity	100%	0	Yes	100%	0	Yes
ESI	0.00%	0	NA	0%	0	NA
Others – specify		-	-	-	-	-

### 4. 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, our offices are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016. We conduct sensitization and awareness programs for our managers and senior leaders to facilitate the inclusion of such employees within our organization and cater to their specific requirements, such as accessibility and accommodation

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

Yes, the policy is available on the website of the company at <https://www.kellton.com/legal-policies>

### 6. 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	39	100	0	0
Female	7	100	0	0
Total	46	100	0	0





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

	Yes/No (if yes then give details of the mechanism in brief) :
Permanent Workers	Yes, The Company has a Grievance Redressal policy, which address all kinds of issues an employee may face while at work. The grievance may include: <ul style="list-style-type: none"> <li>• Any kind of discrimination on account of disability, gender, race, sexual orientation, religion, marital status and social class</li> <li>• Violation of human rights</li> <li>• Bullying / workplace harassment</li> <li>• Denial of applicable benefits</li> <li>• Working conditions</li> </ul> No
Other than Permanent Workers	
Permanent Employees	
Other than permanent Employees	

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

Category	FY2023			FY2022		
	Total employees /workers in respective category (A)	Total employees/ workers in respective category, who are part of association (s) or Union (s) (B)	% (B/A)	Total employees /workers in respective category (C)	Total employees/ workers in respective category, who are part of association (s) or Union (s) (D)	%( D/C)
<b>Total Permanent Employees</b>						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
<b>Total Permanent Workers</b>						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0

**9. Details of Training imparted to the employees and workers**

Category	FY2023				FY2022			
	Total (A)				Total (D)			
		NO.(B)	% (B/A)	No. (C)		% (C/A)	No. (E)	% (E/D)



Employees										
Male	908	908	100.00	354	38.99	856	856	100	380	44.4
Female	236	236	100.00	97	41.10	246	246	100	110	44.7
Total	1144	1144	100.00	451	39.42	1102	1102	100	490	55.7
Workers										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

## 10. Details of performance and career development reviews of employees and workers:

Category	FY2023			FY2022		
	Total (A)	No.(B)	% (B/A)	Total (C)	No.(D)	% (D/C)
Employees						
Male	908	908	100	856	856	100
Female	236	236	100	246	246	100
Total	1144	1144	100	1102	1102	100
Workers						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0

## 11. 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, Company has implemented the Health and Safety Policy which covers all the employees of the Company.

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

Appropriate policies / guidelines have been formulated to address various types of hazards and related risk assessment & mitigation.

- All work-related hazards are identified basis the recommended guidelines.
- Their associated risk assessment procedures are part of the Safety manual.



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

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

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

Safety Incident / Number	Category	FY2023	FY2022
Lost Time Injury Frequency Rate (LTIFR) Per One million -person hours worked	Employees	0	0
	Workers	0	0
No of fatalities	Employees	0	0
	Workers	0	0
Total recordable work-related injuries	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

**13. Measures taken by the entity to ensure a safe and healthy work place.**

Employee well-being programs/initiatives are conducted for all the employees and during FY 2022-23 the following well-being initiatives were undertaken:

- Women safety programs
- Posh & gender sensitization meetings
- Road safety programs
- Women self-defense program
- Fire emergency training exit
- General health check up

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

	FY2023			FY2022		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working Conditions	5	0	NA	10	0	NA
Health & Safety	0	0	NA	0	0	NA

**15. Assessments for the year:**

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



**16. 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.**

The Company has implemented Hygiene Policy which ensures workplace cleanliness and basic amenities like availability of clean drinking water, proper sanitation facilities, etc.

The HR team conducts review on a quarterly basis to ensure all the points under the hygiene policy are taken care of.

Further, Training of all employees regarding protocol to be followed in case of any safety incident has been conducted.

**Principle 4. Businesses should respect the interests of and be responsive to all its stakeholders.**

**Essential Indicators:**

**1. Process for identification of key stakeholders**

Kellton has identified its key internal and external stakeholders through a deliberate and comprehensive process, involving both the board and management team. This process involved assessing various stakeholder groups and evaluating their potential impact on the company. The importance of each group was carefully considered through a series of deliberations, taking into account factors such as their influence and potential impact.

To ensure the long-term success of the company and build strong relationships with stakeholders, continuous engagement and monitoring is critical. By doing so, Kellton was able to better identify and meet the needs and expectations of its key stakeholders and adapt to changing circumstances. This approach helps Kellton to maintain a strong reputation and build trust with its stakeholders, while also positioning the company for long-term growth and success.

**2. Key stakeholder groups**

	<b>Whether identified as Vulnerable &amp; Marginalized Group (Yes/No)</b>	<b>Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other</b>	<b>Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)</b>	<b>Purpose and scope of engagement including key topics and concerns raised during such engagement</b>
Customers	No	<ul style="list-style-type: none"> <li>- satisfaction surveys</li> <li>- Marketing and advertising</li> <li>- Complaint handling and feedback</li> <li>- Electronic communication – social media, Calls</li> </ul>	It is a continuous process	Addressing requirements for products and grievances, if any



Suppliers/ CDMOs	No	<ul style="list-style-type: none"> <li>- Regular interaction through online and offline meetings, phone calls, e-mails</li> <li>- Conferences and workshops</li> <li>- In Person Meetings/ Visits.</li> </ul>	Daily	To share the specific requirements, Status update on product deliveries and other terms of trade.
Employees	No	<ul style="list-style-type: none"> <li>- Trainings and development programmes</li> <li>- Performance management system</li> <li>- Emails. Written communication</li> <li>- circulars and internal publications</li> <li>- Employee engagement initiatives</li> </ul>	Daily/ Weekly	For smooth functioning of business operations.
Investors	No	<ul style="list-style-type: none"> <li>No-Annual General meeting</li> <li>- Investor presentations and conference calls</li> <li>- Investor conferences and meets</li> <li>- Press releases, Quarterly Results and newsletters</li> </ul>	Quarterly/ Annually/ Need basis	To provide updates on company's operations and Financial Performance
Government/ Regulators	No	<ul style="list-style-type: none"> <li>- Meetings and formal dialogue</li> <li>- Filings with the regulators</li> </ul>	Others – Need basis	Business and Compliance related
Community	Yes	<ul style="list-style-type: none"> <li>-CSR partnerships - Contribution towards various causes</li> </ul>	Others – Need basis	CSR Initiatives of the Company



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

### Essential Indicators

#### 1. Training on human rights issues and policies

Category	FY2023			FY2022		
	Total (A)	Number of employees and workers covered (B)	% (B/A)	Total (C)	Number of employees and workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	1144	1144	100%	1102	1102	100%
Other than Permanent	61	61	100%	66	66	100%
Total Employees	1205	1205	100%	1168	1168	100%
<b>Workers</b>						
Permanent	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0
Total Workers	0	0	0	0	0	0

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

Category	FY2023					FY2022				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal Minimum Wage		More than minimum wage	
		No.(B)	%(B/A)	No.(C)	%(C/A)		No. (E)	%(E/D)	No.(F)	% F/D)
<b>Employees</b>										
Perma- nent										
Male	908	0	0	908	100	856	0	0	856	100%
Female	236	0	0	236	100	246	0	0	246	100%
<b>Other than Permanent</b>										
Male	50	0	0	50	0	23	0	0	23	100%
Female	11	0	0	11	0	42	0	0	42	100%



<b>Workers</b>										
Perma- nent										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
<b>Other than Perma- nent</b>	0									
		0	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0

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

	<b>Male</b>		<b>Female</b>	
	Number	Median remuneration/sal- ary/wages of respective category (Amt. in Rs. Lakhs)	Number	Median remuneration/sal- ary/wages of respective category (Amt. in Lakhs)
<b>Board of Direc- tors</b>	7	30	1	0.25
<b>Key Managerial Personal</b>	1	4.64	0	0
<b>Employees other than above</b>	908	10.21	236	7.47
<b>Workers</b>	0	0	0	0

\*Note: Remuneration includes sitting fee paid to directors.

4. Focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No) **Yes**

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

At Kellton, an effective grievance redressal procedure has been established to ensure that compliance guidelines and human rights concerns are upheld throughout the company. Additionally, we have a successful whistle blower procedure that enables our employees, including subsidiaries, to contact the Ombudsperson and make confidential disclosures regarding unethical behaviour and actual or suspected fraud. Also, there is an internal complaints committee, as mandated by law. There is a whistle blower hotline outside of Kellton that is anonymous, confidential, and accessible.



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

Category	FY2023			FY2022		
	Filed	Pending at the end of the year	Remarks	Filed	Pending at the end of the year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human right related issues	0	0	NA	0	0	NA

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

Yes, Company has mechanisms in place to prevent adverse consequences to the complainant in discrimination and harassment cases. The details of the complainant are kept confidential, and the authenticity of the complainant's report is investigated by the assigned committee. The details regarding the investigation are also limited to the internal resolution committee and kept confidential. The complainant is protected from any discrimination and harassment till the issue is resolved. This is done in order to safeguard the complainant's interest and confidence.

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

Yes, human rights requirements are part of our business and contracts. We expect of our vendors that they uphold and advocate the protection of the internationally recognized principles of human rights and that they refrain from engaging in violations of those principles.

## 9. Assessments of the year

Category	% of plants and offices that were assessed by the entity or by the statutory authorities or third parties
Child Labour	<b>100%</b>
Forced/Involuntary Labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	NA

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

Not Applicable





**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	FY23 (In Giga Joules)	FY22 (In Giga Joules)
Total electricity consumption (A)	4464.67	1263.62
Total fuel consumption (B)	Nil	Nil
Energy consumption through other sources (C)	Nil	Nil
Total energy consumption (A+B+C)	4464.67	1263.62
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.26	0.11
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

Any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.-No

**2. Doesites / 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	FY23	FY22
Water Withdrawal by Source ( In Kiloliters )		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	0	0
Total volume of water consumption (in kilolitres)	0	0
Water intensity per rupee of turnover (Water consumed / turnover)	0	0
Water intensity (optional) – the relevant metric may be selected by the entity	0	0

**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? If yes, provide details of its coverage and implementation.**

Zero Liquid Discharge is not applicable to the Company.

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



Parameter	Please specify unit	FY23	FY22
NOx		0	0
Sox		0	0
Particulate Mater		0	0
Persistent organic pollutants (POP)		0	0
Volatile organic compounds (VOC)		0	0
Hazardous air pollutants (HAP)		0	0
Others – please specify		0	0

The Company is not into manufacturing and therefore the possibility of releasing emissions into the atmosphere is negligible/not applicable.

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

## 6. Details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & their intensity

Parameter	Unit	FY23	FY22
Total Scope 1 emissions		0	0
(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) Metric tonnes of CO2 equivalent	Metric tonnes of CO2 equivalent	0	0
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	0	0
Total Scope 1 and Scope 2 emissions per rupee of turnover		0	0
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		0	0

**The Company is not into manufacturing and therefore the possibility of releasing greenhouse gas emissions into the atmosphere is negligible/not applicable.**

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: No**

## 7. Project related to reducing Green House Gas emission? If yes, details.

No, the Company does not have any project related to reducing greenhouse gas emissions.

## 8. Details of waste generated, re-cycled re-used and disposed off

Parameter	Unit	FY23
Plastic waste ( A)	Nil	0
E-waste ( B)	Nil	0



Bio-medical waste ( C)	Nil	0
Construction and demolition waste (D)	Nil	0
Battery waste (E)	Nil	0
Radioactive waste (F)	Nil	0
Other Hazardous waste (G)	Nil	0
Other Non-hazardous waste generated (H)		
(Break-up by composition i.e by materials relevant to the sector	Nil	0
<b>Total ( A+B+C+D+E+F+Gg+H)</b>	Nil	0
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
i.Re-cycled	Nil	0
ii.Re-used	Nil	0
iii.Other recovery operations	Nil	0
<b>Total</b>	Nil	0
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
<b>Category of Waste</b>		
i.Incineration	Nil	0
ii.Landfilling	Nil	0
iii.Other disposal operations	Nil	0
<b>Total</b>	Nil	0

The nature of business of the Company is International Wholesale Distribution where Company does not have any manufacturing facility or produce anything inhouse and hence, this clause is not applicable to us.

**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**

**9. Details of waste management practices, strategy adopted by the company to reduce usage of hazardous and toxic chemicals in our products and processes and the practices adopted to manage such wastes.**

As an International Wholesale Distribution Company, we do not manufacture any products and thus does not use any hazardous or toxic chemicals.

**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:**



Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
Not Applicable	Not Applicable	Not Applicable
Not Applicable	Not Applicable	Not Applicable

## 11. Details of environmental impact assessments (EIA) of projects undertaken by the entity based on applicable laws, in the current financial year:

During the reporting period, Company has not conducted any environment impact assessment. Company ensures compliance to local and national applicable laws wherever required.

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web Link
Not Applicable					

## 12. Compliance 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, Company ensures compliance to applicable laws.

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

SL No	Law / regulation / guidelines which was not complied with	Details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Not Applicable				

## 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: 2

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 -



SL No	Name of the trade industry chambers/associations	The reach of trade and industry chambers/associations ( State/National )
1	National Association of Software and Service Companies (NASSCOM)	National
2	TIE, the indus entrepreneurs	National

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

Name of authority	Brief of the case	Corrective actions taken
Nil		

**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 the project	SIA notification No.	Date of notification	Whether conducted by an Independent external agency ( Yes/No)	Results communicated in public domain ( Yes/ No) Not Applicable	Relevant weblink
Not Applicable					

**2. Information on project (s) for which ongoing rehabilitation and resettlement (R&R) is being undertaken by the entity**

SL No	Name of project for which R&R is ongoing	State	District	No. of project-affected families	% of PAFs covered by R&R	Amount paid to PAFs in FY23
Not Applicable						

**3. Mechanisms to receive and redress grievances of the community:**

We have a grievance redressal mechanism which covers all our stakeholders. Active engagement with the community and stakeholders requires an effective grievance redressal system that includes feedback loops and conflict resolution mechanisms. Stakeholders can share their feedback/ concern on [compliance@kelltontech.com](mailto:compliance@kelltontech.com)

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



Particulars	FY23	FY22
Directly sourced from MSMEs/small producers	0	0
Sourced directly from within the district and neighbouring districts	0	0

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

**Essential Indicators**

**1. Describe the mechanism in place to receive and respond to consumer complaints and feedback:**

Consumers can directly contact the Company through email or phone and further our representative visits all the clients regularly for their feedback and issues, if any. Further we have a dedicated microsite for customers to provide feedback and lodge complaints.

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

Particulars	As a % of total turnover
Environmental and social parameters relevant to the product	Not Applicable
Safe and responsible usage	
Recycling and/or safe disposal	

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

Particulars	FY2023		Remarks	FY2022		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data Privacy	0	0	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Other	0	0	NA	0	0	NA



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

<b>Particulars</b>	<b>Number</b>	<b>Reasons for recall</b>
Voluntary recalls	0	N.A
Forced recalls	0	N.A

#### **5. Details of instances of product recalls on account of safety issues:**

This metric is not relevant to Company as our main business is providing Information Technology services, and it does not involve the manufacturing of any product which would carry the information.

**6. Framework/ policy on cyber security and risks related to data privacy? (Yes/No)** If available, web-link of the policy.: Yes, the policy is available at <https://www.kellton.com/legal-policies>.

**7. 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.:**  
None