



Vindhya Telelinks Limited

Regd. Office: Udyog Vihar, P.O. Chorhata,
Rewa - 486 006 (M.P.), India
Telephone No: (07662) 400400 * Fax No: (07662) 400591
Email: headoffice@vtlrewa.com; Website: www.vtlrewa.com
PAN NO.AAACV7757J * CIN: L31300MP1983PLC002134
GSTIN: 23AAACV7757J1Z00

VTL/CS/23-24/Reg-34(2)(f)

16 AUG 2023

BSE Ltd.
Corporate Relationship Department,
1st Floor, New Trading Ring,
Rotunda Building,
P.J. Towers, Dalal Street,
Fort,
MUMBAI-400 001

The Manager,
Listing Department,
The National Stock Exchange of India Ltd,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E),
MUMBAI-400 051

Company's Scrip Code: 517015

Company's Scrip Code: VINDHYATEL

Dear Sirs,

Sub: Business Responsibility and Sustainability Report for the financial year 2022-23 pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report ('BRSR') for the financial year 2022-23, which also forms part of the Annual Report of the Company for the financial year 2022-23.

This is for your information and records.

Thanking you,

Yours faithfully,
For Vindhya Telelinks Limited

(Dinesh Kapoor)
Company Secretary

Encl: As above



Works: i) Plot No.1, Udyog Vihar, P.O. Chorhata, Rewa-486006(M.P.)
ii) Plot No.1-C & 1-D, Udyog Vihar, P.O. Chorhata, Rewa-486006(M.P.)

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

[Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015]

This report has been prepared following the SEBI Guidelines for Business Responsibility and Sustainability Reporting (BRSR). Its primary objective is to demonstrate heightened transparency concerning the ways in which businesses generate value by actively contributing to a sustainable economy. The report underscores our unwavering commitment to creating long-term value for our stakeholders as we actively promote sustainable development.

SECTION A: GENERAL DISCLOSURES

I. DETAILS OF THE ENTITY

Sl. No.	Particulars	Response
1.	Corporate identity Number (CIN) of the Entity	L31300MP1983PLC002134
2.	Name of the Entity	Vindhya Telelinks Limited
3.	Year of incorporation	1983
4.	Registered office address	Udyog Vihar, P.O. Chorhata, Rewa- 486006 (M.P.), India
5.	Corporate address	Commercial Plaza, 2 nd Floor, Wing-B, Radisson Hotel, N.H-8, Mahipalpur, New Delhi – 110037, India
6.	E-mail	headoffice@vtlrewa.com
7.	Telephone	07662400400
8.	Website	www.vtlrewa.com
9.	Financial year for which reporting is being done	2022-23
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited (BSE) National Stock Exchange of India Limited (NSE)
11.	Paid-up Capital	₹ 118,508,630 (Divided into 11850863 equity shares of ₹ 10/- each).
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Shri Y.S. Lodha, Managing Director & CEO Phone: 011-45538800 e-mail: headoffice@vtlrewa.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).	The disclosures under this report are made on stand-alone basis, unless otherwise specified.

II. PRODUCTS/SERVICES

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Electrical equipment, General purpose and Special purpose Machinery & equipment, Transport equipment	21.71%
2.	Construction	Roads, Railways, Utility projects	78.29%

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

Sl. No.	Product/Service	NIC Code*	% of total Turnover contributed
1.	Manufacturing of Telecommunication Cables including Jelly Filled Copper Cables, Optical Fibre Cables, Solar PV Cables, Railway Signalling and Quad Cables, Power Cables and other telecom fibre accessories.	31300; 33201	21.71%
2.	Engineering, Procurement & Construction (EPC) business in the key infrastructure sectors viz. Telecom, Power, Water Supply & Irrigation, Gas Pipeline and System Integration.	45203; 45204	78.29%

* Alphabetic Index 5 digit as prescribed by The Ministry of Statistics and Programme Implementation (MOSPI) in terms of Guidance Note on BRSR Reporting issued by SEBI.

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	Cable Business - 1	Cable Business - 2	3
	EPC Business - 0	EPC Business - 8	8
International	Nil	Nil	Nil

17. Markets served by the entity:
(a) Number of locations

Locations	Number
National (No. of States)	The Cable Business Segment serves a total of 28 states and 3 Union territories within the country, while the EPC Business Segment at present operates in 19 states and 4 Union Territories across the nation. It demonstrate a strong presence in the national market, catering to a significant number of states and contributing to the entity's overall market reach domestically.
International (No. of Countries)	At the international level, the Cable Business Segment extends its services to 23 countries.

(b) Contribution of exports:

What is the contribution of exports as a percentage of the total turnover of the entity?	4.52%
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(c) Type of Customers

A brief on types of customers	<p>The Company operates in two Business Segments, namely Cable manufacturing and EPC (Engineering, Procurement, and Construction).</p> <p>Cable Manufacturing:</p> <p>Our Company is dedicated to supplying high-quality Telecom and Power Cables to various customers consisting of different Government Departments, including BSNL (Bharat Sanchar Nigam Limited) and APSFL (Andhra Pradesh State FiberNet Limited) and private sector telecom Companies such as Bharti Airtel, Reliance Jio etc., who rely on our cables for their communication infrastructure needs. We are proud to be a trusted supplier to these esteemed government organizations.</p> <p>In addition to government departments, we also cater to the requirements of the Railways. Our cables play a crucial role in ensuring efficient and reliable communication and power transmission within the vast railway network. By providing cables specifically designed for railway applications, we contribute to the smooth functioning of the transportation system.</p> <p>Telecom Operators form another significant customer segment for our Cable Business. We understand the importance of seamless connectivity in today's digital age, and we supply top-notch cables that enable telecom operators to deliver reliable voice and data services to their customers. Our cables undergo rigorous testing to meet the stringent standards set by the industry.</p> <p>Furthermore, we are actively involved in the renewable energy sector by supplying Solar DC Cables. These cables are essential components of solar power installations and enable the efficient transmission of direct current generated from solar panels. By serving the renewable energy industry, we contribute to the growth of sustainable and clean energy sources.</p>
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	<p>Engineering, Procurement, and Construction:</p> <p>EPC (Engineering, Procurement, and Construction) Business Segment boasts an impressive customer base encompassing various sectors.</p> <p>We are proud to be associated with the Central and State Government bodies, as our Company has successfully bid for and won several contract / tenders. The trust placed in us by government organizations highlights our ability to deliver on large-scale projects and meet stringent quality standards. Through our partnership with the government, we contribute to the development and modernization of public infrastructure in the country.</p> <p>Public Sector Undertakings also form an integral part of our customer base. These organizations, which play a vital role in various sectors such as telecom, water, irrigation, power, oil and gas, system integration etc. rely on our expertise for their engineering and construction needs. We collaborate closely with public sector undertakings to ensure the successful execution of their projects.</p> <p>Additionally, we serve Private Sector Corporates, catering to their diverse engineering and construction requirements. We offer customized solutions that meet the specific needs of private sector companies, enabling them to enhance their operational efficiency and achieve their project goals.</p> <p>Under the Company's IP-1 license for establishing a comprehensive optical fibre cable network, numerous telecom operators have been reliant on the network infrastructure developed by the Company. The network has been gradually expanded to encompass new geographical areas within India, thereby extending its coverage.</p> <p>We are committed to delivering exceptional products and services to our valued customers and establishing long-term partnerships based on trust and mutual success.</p>
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IV. EMPLOYEES
18. Details at the end of the year of financial year:
(a) Employees and workers (including differently abled):

Sl. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Employees						
1.	Permanent (D)	341	336	98.53%	5	1.47%
2.	Other than Permanent (E)	1456	1433	98.42%	23	1.58%
3.	Total employees (D + E)	1797	1769	98.44%	28	1.56%
Workers						
1.	Permanent (F)	104	104	100%	Nil	0%
2.	Other than Permanent (G)	147	147	100%	Nil	0%
3.	Total workers (F + G)	251	251	100%	Nil	0%

(b) Differently abled Employees and workers:

Sl. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently Abled Employees						
1.	Permanent (D)	1	1	100%	0	0%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total employees (D + E)	1	1	100%	0	0%
Differently Abled Workers						
1.	Permanent (F)	0	0	0%	0	0%
2.	Other than Permanent (G)	0	0	0%	0	0%
3.	Total workers (F + G)	0	0	0%	0	0%

19. Participation/Inclusion/Representation of women:

Category	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	10	2	20%
Key Management Personnel	3	0	0%

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	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	3.17%	Nil	3.17%	0.80%	Nil	0.80%	1.30%	Nil	1.30%
Permanent Workers	1.58%	Nil	1.58%	Nil	Nil	Nil	Nil	Nil	Nil

V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)
21. Names of holding / subsidiary / associate companies / joint ventures:

Sl. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	August Agents Limited	Subsidiary	100.00	No
2.	Insilco Agents Limited	Subsidiary	100.00	No
3.	Laneseda Agents Limited	Subsidiary	100.00	No
4.	Birla Visabeira Private Limited	Joint Venture	40.00	No
5.	Punjab Produce Holdings Limited	Associate	48.00	No
6.	Universal Cables Limited	Associate	23.85	No
7.	Birla Corporation Limited	Associate	8.29	No

VI. CORPORATE SOCIAL RESPONSIBILITY (CSR) DETAILS

Sl. No.	Requirement	Response
1.	Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
	Financial year 2021-22	
	Turnover (in ₹ Lakhs)	₹ 1,32,394.90
	Net worth (in ₹ Lakhs)	₹ 93,838.92
	Financial year 2022-23	
	Turnover (in ₹ Lakhs)	₹ 2,90,011.06
	Net worth (in ₹ Lakhs)	₹ 1,08,153.24

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 complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes*	0	0	-	0	0	-
Investors (including Shareholders)	Yes https://www.vtlrewa.com/investors-services.html	4	0	-	1	0	-
Employees and workers	Yes*	0	0	-	0	0	-
Customers	Yes*	0	0	-	0	0	-
Value Chain Partners	Yes*	0	0	-	0	0	-
Other (please specify)	-	-	-	-	-	-	-

* The Company has formulated a comprehensive Stakeholder Management Policy to establish a structured framework for addressing concerns and grievances raised by both internal and external stakeholders. This policy has been devised to proactively mitigate any potential social risks that could adversely affect the business operations.

In line with the policy, the Company places great emphasis on maintaining the highest level of confidentiality when managing grievances, thereby minimizing conflicts and nurturing robust stakeholder relationships. Stakeholders are strongly encouraged to utilize the dedicated redressal channel outlined in the policy, especially when alternative mechanisms are not accessible to them.

For further details, the Stakeholder Management Policy can be accessed via the following web link: <https://www.vtlrewa.com/pdf/Stakeholder-Management-Policy.pdf>.

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:

Sl. 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.	Footprint of operations	Risk & Opportunity	<p>RISK</p> <p>The Company's only limited activities pose risks to the local environment and surrounding communities, including biodiversity impacts, emissions into the air, water discharges, natural resource consumption, and waste generation. Managing and accessing these environmental risks are crucial to avoid potential legal and reputational issues.</p> <p>OPPORTUNITY</p> <p>There are opportunities for the Company to address these risks and enhance its reputation by implementing sustainable construction practices, conducting comprehensive environmental impact assessments, engaging stakeholders, and investing in innovation and research. By embracing these opportunities, the Company can minimize negative environmental impacts, comply with regulations, and position itself as a responsible and sustainable leader in the industry</p>	<p>The Company is actively mitigating the risk associated with footprints of operations by implementing robust environmental management systems, conducting regular assessments, and adopting sustainable practices. Through responsible resource consumption, waste reduction initiatives, and stakeholder engagement, the Company strives to minimize its environmental impact, protect local ecosystems, and ensure the well-being of surrounding communities.</p>	<p>NEGATIVE</p> <p>The financial implications of the identified risk include potential negative impacts such as increased costs for addressing environmental issues, potential fines or penalties for non-compliance with regulations, and potential legal expenses. These financial implications can lead to a decrease in profitability and cash flow if adequate measures are not taken to manage and mitigate environmental risks.</p> <p>POSITIVE</p> <p>Implementing sustainable construction practices and effectively managing environmental risks can enhance the Company's reputation and attractiveness to environmentally conscious clients and partners. This can lead to increased business opportunities, a competitive edge in obtaining new projects, and potentially higher project value. Additionally, proactive engagement with stakeholders and investment in research and innovation can drive efficiency, cost savings, and long-term financial sustainability.</p>
2.	Energy Management	Opportunity	<p>The identification of energy management as an opportunity for the Company stems from the potential benefits of enhancing overall energy efficiency, diversifying energy sources, and accessing alternative and renewable energy. By implementing energy-efficient technologies and systems, the Company can reduce costs, improve operational efficiency, and mitigate the risks associated with energy price fluctuations. Furthermore, the installation of a rooftop solar power plant demonstrates the Company's commitment to renewable energy, which not only reduces dependence on conventional sources but also aligns with sustainability goals. Embracing energy management as an opportunity can enhance competitiveness, contribute to a greener future, and strengthen the Company's environmental stewardship.</p>	-	<p>POSITIVE</p> <p>By enhancing overall energy efficiency, the Company can reduce energy consumption and associated costs, leading to potential cost savings and improved profitability. Diversifying energy sources and accessing alternative and renewable energy can also contribute to long-term financial sustainability by mitigating the risks of energy price fluctuations and reducing reliance on conventional energy sources. Additionally, investing in renewable energy initiatives, such as the rooftop solar power plant, may provide opportunities for incentives, subsidies, and long-term cost savings through reduced energy bills. Overall, effective energy management can positively impact the Company's financial performance and enhance its competitive position in the market.</p>

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Waste Management	Opportunity	<p>The Company has categorized waste management as an opportunity by implementing responsible waste management practices, such as minimizing waste generation and ensuring environmentally responsible disposal. Through meticulous waste segregation, reuse of materials within its operations, and responsible disposal through approved vendors, the Company aims to minimize its environmental footprint, conserve resources, and comply with regulatory requirements. This commitment to sustainable waste management not only reduces potential negative impacts but also presents opportunities for cost savings, resource efficiency, and enhanced environmental stewardship.</p>	-	<p>POSITIVE By minimizing waste generation and promoting resource efficiency, the Company can reduce waste disposal costs, optimize material usage, and potentially generate revenue through the sale of reusable materials. Furthermore, complying with regulatory requirements mitigates the risk of fines and legal liabilities, while demonstrating a commitment to sustainable practices can enhance the Company's reputation, attract environmentally conscious clients, and contribute to long-term financial sustainability.</p>
4.	Community Development	Risk & Opportunity	<p>The categorization of Community Development (Human Rights & Community Relations) as both a risk and an opportunity stem from the potential impacts of the Company's long-term construction activities on local communities. Risks include community dissatisfaction and potential legal issues arising from environmental and social impacts. On the other hand, the opportunity lies in engaging with stakeholders and prioritizing community interests to foster positive relationships, obtain a social license to operate, enhance the Company's reputation, and drive long-term business sustainability.</p>	<p>The Company is committed to mitigating the risk associated with Community Development by promoting community development, respecting human rights, and fostering strong community relations, the Company aims to build trust, enhance its social license to operate, and create shared value for both the Company and the communities it serves.</p>	<p>NEGATIVE Negative impacts such as community dissatisfaction, legal issues, and reputational damage can result in increased costs, potential litigation expenses, and a loss of business opportunities. Additionally, addressing environmental and social impacts may require additional investments in mitigation measures, potentially impacting profitability and cash flow in the short term.</p> <p>POSITIVE By prioritizing community engagement, respecting human rights, and obtaining a social license to operate, the Company can benefit from enhanced reputation and community support. This can lead to increased customer loyalty, attracting socially conscious investors, and opening doors to potential partnerships and business collaborations. The positive financial implications may include improved long-term profitability, access to new markets, and cost savings through streamlined operations and reduced conflicts with local communities.</p>

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5.	Workforce Health and Safety	Risk	<p>The categorization of Workforce Health and Safety as a risk is based on the high fatality and injury rates in the EPC industry compared to other sectors, as well as the increased vulnerability of temporary workers due to lack of training and experience. Failing to effectively manage these risks can result in human suffering, legal liabilities, and financial costs.</p>	<p>The Company prioritizes workforce health and safety by implementing comprehensive safety protocols, providing regular training programs, and fostering a strong safety culture. By conducting risk assessments, ensuring compliance with occupational health and safety regulations, and continuously monitoring and improving safety practices, the Company aims to protect the well-being of its employees. Through these efforts, the Company seeks to minimize accidents, injuries, and fatalities, creating a safe and healthy work environment while enhancing employee morale, productivity, and retention.</p>	<p>NEGATIVE</p> <p>Workplace accidents and injuries can result in increased costs, including medical expenses, compensation claims, potential legal liabilities, and regulatory fines. Additionally, such incidents can lead to project delays, increased insurance premiums, and reputational damage, impacting the Company's profitability and hindering its ability to secure future projects</p>
6.	Materials Sourcing	Opportunity	<p>The categorization of Materials Sourcing as an opportunity is based on the potential to reduce direct and indirect greenhouse gas emissions and integrate value chain partner considerations effectively into the Company's business strategy. By strategically selecting suppliers with lower carbon footprints, promoting sustainable practices, and incorporating responsible supply chain management, the Company can enhance its environmental reputation, attract environmentally conscious customers, and meet the growing demand for sustainable products and services. This opportunity aligns with environmental sustainability goals, enhances operational efficiency, and positively impacts the Company's long-term financial performance.</p>	-	<p>POSITIVE</p> <p>By strategically selecting suppliers with lower carbon footprints and incorporating sustainable practices, the Company can potentially reduce costs associated with energy consumption, waste management, and compliance with environmental regulations. Furthermore, meeting the growing demand for sustainable products and services can open new market opportunities, attract environmentally conscious customers, and strengthen the Company's competitive position. Additionally, a positive environmental reputation can enhance brand value and customer loyalty, leading to increased sales and long-term financial sustainability.</p>

Sl. 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)
7.	Systematic Risk Management	Risk	<p>The categorization of Systematic Risk Management as a risk is based on the need for the Company to successfully implement measures to address business continuity risks and enhance system resilience. Failure to effectively manage these risks can lead to operational disruptions, financial losses, and reputational damage. Although implementing such measures may incur upfront costs, the Company is likely to benefit from lower remediation expenses in the long term, as proactive risk management enhances operational efficiency, risk mitigation capabilities, and business continuity during high-impact disruptions.</p>	<p>The Company is dedicated to mitigating systematic risks by implementing robust risk management strategies and processes. Through proactive identification, assessment, and monitoring of potential risks, the Company aims to minimize the impact of high-impact disruptions on its operations. By establishing business continuity plans, implementing effective crisis management protocols, and fostering a culture of risk awareness and preparedness, the Company seeks to enhance its resilience and ensure the continuity of its operations. These systematic risk management efforts not only protect the Company's financial performance but also contribute to its long-term sustainability and ability to secure new projects with confidence.</p>	<p>NEGATIVE Failure to effectively address business continuity risks and enhance system resilience can result in significant financial losses due to operational disruptions, increased costs for remediation and recovery, and potential reputational damage. Additionally, the lack of preparedness for high-impact disruptions may lead to lost business opportunities, customer dissatisfaction, and potential legal liabilities, further impacting the Company's financial performance.</p>
8.	Product and Process Innovation	Opportunity	<p>The categorization of Product and Process Innovation as an opportunity is based on the potential to adopt sustainable construction methods that reduce the Company's environmental impact. By utilizing renewable and recyclable materials, minimizing embodied energy, reducing energy consumption, minimizing waste, and protecting natural habitats, the Company can enhance its environmental stewardship and reputation. Additionally, embracing innovative solutions and alternative strategies reflects a commitment to social and environmental responsibility, attracting conscious consumers, and gaining a competitive edge in the market. Overall, product and process innovation offer the Company a chance to align its operations with sustainability goals, drive positive change, and capitalize on the growing demand for sustainable practices.</p>	<p>-</p>	<p>POSITIVE Embracing product and process innovation in the adoption of sustainable construction methods can have positive financial implications for the Company. By using renewable and recyclable materials, reducing energy consumption, minimizing waste, and implementing innovative solutions, the Company can achieve cost savings through improved resource efficiency, reduced operational expenses, and decreased waste disposal costs. Moreover, the positive environmental reputation gained through these innovations can attract environmentally conscious customers, enhance brand value, and open new market opportunities, leading to increased sales, customer loyalty, and long-term financial sustainability.</p>

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9.	Business Integrity and Ethics	Risk	<p>The categorization of Business Integrity and Ethics as a risk is based on the Company's exposure to various risks related to bribery, corruption, and anti-competitive practices. Either in the Manufacturing operations or in the EPC, the Company is entangled into managing complexities arising out due to multiple local agents and subcontractors, the complications of project financing and project permitting, the magnitude of the contracts.</p>	<p>The Company places a strong emphasis on business integrity and ethics by adhering to high ethical standards and promoting a culture of honesty and transparency. By implementing robust governance structures, conducting regular ethics training, and enforcing strict compliance measures, the Company strives to prevent bribery, corruption, and anti-competitive practices. Through these efforts, the Company aims to safeguard its reputation, maintain the trust of stakeholders, and ensure long-term sustainability. By prioritizing business integrity and ethics, the Company not only mitigates legal and reputational risks but also fosters a positive working environment and fosters strong relationships with customers, suppliers, and partners.</p>	<p>NEGATIVE Instances of bribery, corruption, and anti-competitive practices can result in financial penalties, legal costs, and reputational damage. These negative outcomes can lead to loss of business opportunities, customer distrust, reduced market share, and potential legal liabilities, all of which can significantly impact the Company's financial performance and long-term sustainability.</p> <p>POSITIVE Effectively managing and prioritizing business integrity and ethics can have positive financial implications for the Company. By establishing an ethical culture, implementing robust governance structures, and maintaining strong internal controls, the Company can minimize the financial risks associated with unethical practices. This includes avoiding legal penalties, reputational damage, and loss of business opportunities. Moreover, a strong commitment to business integrity and ethics can enhance the Company's reputation, attract ethical business partners and investors, and foster customer loyalty, resulting in increased sales, market share, and long-term financial sustainability.</p>

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Sl. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1.	(a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(b) Has the policy been approved by the Board? (Yes/No)	Yes	No	No	Yes	No	No	Yes	Yes	No
	Particulars of the Policies	Anti-Corruption or Anti-Bribery Policy	Sourcing with Human Dignity Policy	Non-Discrimination, Diversity and Equal Opportunity Policy	Stakeholder Management Policy	Modern Slavery Policy, Human Dignity Policy	Sustainability Policy	Policy on Responsible Advocacy	Corporate Social Responsibility Policy	Information Security Management System Policy
	(c) Web Link of the Policies, if available	https://www.vtlrewa.com/pdf/Anti-Bribery-and-Anti-Corruption-Policy.pdf	https://www.vtlrewa.com/pdf/VTL-Sourcing-with-Human-Dignity.pdf	https://www.vtlrewa.com/pdf/Non-Discrimination-Diversity-and-Equal-Opportunity-Policy.pdf	https://www.vtlrewa.com/pdf/Stakeholder-Management-Policy.pdf	https://www.vtlrewa.com/pdf/VTL-Modern-Slavery-Policy.pdf https://www.vtlrewa.com/pdf/VTL-Human-Dignity-Policy.pdf	https://www.vtlrewa.com/pdf/VTL-sustainability-policy.pdf	https://www.vtlrewa.com/pdf/Policy-on-Responsible-Advocacy.pdf	https://www.vtlrewa.com/Policies/CSR.pdf	https://www.vtlrewa.com/ISMS-Policy.pdf
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Yes, the Company has translated the policy into procedures. These procedures outline the specific steps and actions required to implement the policies effectively. The Company ensures clarity and provides a practical framework for employees to follow. This translation promotes consistency and reduces ambiguity, ensuring that the policies are applied consistently throughout the organization.								

3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	<p>Yes, the policies of the Company extend to its value chain partners whenever appropriate and feasible. The Company understands the significance of aligning policies with its partners to ensure consistency and shared standards. The Company also considers entering into an 'Integrity Pact' with key Vendors/Partners as deemed necessary.</p> <p>By fostering collaboration and upholding common values, the Company promotes a responsible and harmonious business ecosystem for all stakeholders involved.</p>
4.	Name of the national and international codes/certifications/labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, TruStea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<p>The Company is having various management system certifications, BIS Licences and Other Product Certification.</p> <ul style="list-style-type: none"> ➤ Management Systems: <ol style="list-style-type: none"> 1. ISO 9001 : 2015 - Quality Management Systems 2. TL 9000 (R 6.3 / 5.7H) - Quality Management Systems for International Telecommunications Industry 3. ISO/TS 22163 : 2017 - Quality Management Systems for International Rail Industry 4. ISO 14001 : 2015 - Environment Management Systems 5. ISO 45001 : 2018 - Occupational Health and Safety Management Systems 6. ISO 27001 : 2013 - Information Security Management Systems 7. ISO 22301 : 2019 - Business Continuity Management Systems ➤ BIS Licences: <ol style="list-style-type: none"> 1. BIS License for LT Power and Control Cables as per IS 1554 (Pt-1) : 1988 2. BIS License for LT PVC Insulated Flexible Cables & Cords as per IS 694: 2010 3. BIS License for LT XLPE Insulated Power Cables per IS 7098 (Pt-1): 1988 4. BIS License for XLPE Insulated Power Cables for working voltages from 3.3 kV Up to and incl. 33 kV as per IS 7098 (Pt-2): 2011 ➤ Other Product Certifications: <ol style="list-style-type: none"> 1. Solar PV Cable (As per EN 50618:2014) (E-Beam Crosslinkable Cable) from TUV Rheinland 2. Electric cables for photovoltaic systems with a voltage rating of 1.5 kV DC (As per IEC 62930:2017) from TUV Rheinland
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>During the financial year 2022-23, the Company has set several goals to enhance its sustainability efforts and overall corporate social responsibility. These goals include:</p> <ol style="list-style-type: none"> 1. Establishing and maintaining systematic sustainability databases: The Company plans to develop comprehensive databases to effectively track and manage sustainability-related data. These databases will ensure smooth reporting in the future and enable the Company to measure its progress towards sustainability goals. 2. Reducing electricity consumption from the grid: The Company aims to reduce its reliance on grid electricity by a certain percentage. This reduction could be achieved through various means such as implementing energy-efficient technologies, optimizing energy usage, and exploring renewable energy sources. 3. Monitoring and evaluating E, S, & G parameters: The Company intends to actively monitor and evaluate the performance and risks associated with Environmental (E), Social (S), and Governance (G) parameters. This helps the Company identify areas for improvement and mitigate risks associated with sustainability issues. 4. Strengthening the training division and educating employees: The Company plans to enhance its training division to educate all employees and workers on issues related to Environmental, Social, and Governance (E,S&G) practices. By March, 2024, all employees will receive training on the actions and initiatives undertaken by the organization to address these issues effectively.

		<p>5. CO2 Emission Reduction in Construction Activities: To accomplish this goal, we are committed to adopting and deploying state-of-the-art technologies, practices, and processes that effectively mitigate the release of CO2 during our construction operations. Our focus is on utilizing the best available means to significantly reduce the environmental impact associated with our activities, thus contributing to the global efforts towards carbon footprint reduction and environmental sustainability. By prioritizing the reduction of CO2 emissions, we aim to demonstrate our dedication to responsible environmental stewardship in all aspects of our operations.</p> <p>6. Ensuring Full Compliance with Policies and Zero Tolerance for Bribery and Unethical Practices: The Company upholds the highest ethical standards, maintaining zero tolerance for bribery and unethical practices. We have implemented stringent policies, rigorous training, and regular monitoring to ensure compliance across all levels. Our commitment to integrity and fair practices fosters trust among stakeholders, as we strive to be an industry role model for ethical business conduct.</p> <p>These goals collectively reflect the Company’s commitment to sustainable practices, social responsibility, and the continuous improvement of its environmental, social, and governance performance.</p>
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met	<p>The Company has set specific commitments, goals and targets during the period 2022-23, hence the performance of the Company against the specific commitments, goals and targets along with reasons will be reported next year.</p>
Governance, leadership and oversight		
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements	<p><i>“As the Director responsible for business responsibility at VTL, I am honoured to provide an update on our Company’s progress in addressing key Environmental, Social, and Governance (ESG) challenges. Today, I am proud to share that our commitment to sustainability has led to significant advancements in our operations, positively impacting the environment, our stakeholders, and the communities we serve.</i></p> <p><i>Despite the ongoing challenges presented by the global pandemic, we have successfully achieved important milestones in various areas. Through our unwavering dedication to ESG principles, we have notably reduced our carbon footprint, ensuring a more sustainable future. Furthermore, we have actively engaged and invested in local communities through comprehensive Corporate Social Responsibility (CSR) framework that encompasses a range of focus areas viz. animal welfare, promoting healthcare, sanitation facilities, special education including employment enhancing vocational skills. By investing in these crucial areas, we actively contribute to the well-being of our planet and society.</i></p> <p><i>We firmly believe in the importance of continuous improvement, which is why we are setting new targets for the future. Our ultimate aspiration is to become a leading force in sustainability, not only within our industry but across all sectors. By exemplifying best practices in ESG, we aim to inspire positive change and be recognized as pioneers in creating a better world.</i></p> <p><i>Our Company has a comprehensive Corporate Social Responsibility (CSR) framework that encompasses a range of focus areas. These include animal welfare, promoting preventive healthcare and sanitation facilities, ensuring environmental sustainability, disaster management, and relief and rehabilitation activities. By investing in these crucial areas, we actively contribute to the well-being of our planet and society.</i></p> <p><i>To ensure the safety and well-being of our employees, we have implemented a robust system that covers all aspects of our operations. This system includes health and safety training, hazard identification, risk assessment, incident reporting, and ongoing monitoring and improvement. Our goal is to provide a secure and healthy work environment, in compliance with relevant regulations and standards, and empower our employees to report any potential risks or hazards.</i></p>

		<p>Moreover, we recognize the importance of stakeholder engagement and have developed a comprehensive framework to facilitate this process. This framework considers both the interests and influence of our stakeholders. By analysing factors such as dependency, responsibility, attention, and influence, we identify and engage with stakeholders in a manner that fosters meaningful dialogue and collaboration.</p> <p>Additionally, our commitment to good corporate governance practices is unwavering. We have assembled a team of exceptional Directors who serve on various committees, including CSR, Audit, Nomination and Remuneration Committee, Stakeholder's Relationship Committee, and Risk Management Committee. Their expertise and guidance ensure that our operations align with the highest standards of accountability, transparency, and ethical conduct.</p> <p>I am immensely proud of the progress we have made in our ESG endeavours. Our Company remains steadfast in its dedication to continuously improve our performance and set new benchmarks for the future. By prioritizing sustainability, engaging with stakeholders, and upholding good corporate governance practices, we strive to make a positive and lasting impact on our environment, society, and the lives of our employees."</p> <p>- Y.S. Lodha (Managing Director & CEO)</p>
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	The highest authority responsible for the implementation and oversight of the Business Responsibility policies has been given to Shri Y.S. Lodha (DIN: 00052861), the Managing Director and Chief Executive Officer of the Company. Further, he is accountable for implementing policies and making decisions on sustainability-related issues.
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.	

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	Yes, performance review was undertaken by Board of Directors.									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes, the Company comply with statutory requirements relevant to the principles with regard to Statutory requirements and review was undertaken by the Board of Directors.									Annually								

11. Independent assessment/ evaluation of the working of its policies by an external agency:

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.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	The Company has not undertaken any external assessment or evaluation of the effectiveness of its policies. However, an extensive internal management evaluation process is in place to thoroughly assess all policies. Subsequently, the Board of Directors approves these policies based on the outcomes of the evaluation.								

12. 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 (Yes/No)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	-	*	*	-	*	*	-	-	*

* These policies have been embedded into the systems and procedures followed by the Company for a considerable period of time. It is imperative to emphasize that strict adherence to these procedures is enforced to enhance operational efficiency and ensure the achievement of a sustainable business model.

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

The purpose of this section is to assist organizations in showcasing their proficiency in integrating principles and core elements into critical processes and decisions. The Company has duly provided all mandatory disclosures as per the BRSR framework. Efforts are underway to disclose leadership indicators for forthcoming fiscal years.

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	BRSR Awareness Program	80%
Key Managerial Personnel	1	BRSR Awareness Program	100%
Employees other than BOD and KMPs	<u>Cable Business:</u> 18	Awareness of ISO 45001, BCMS, ISMS, MSA. Training on Health & Wellbeing, Basic First Aid and Safety.	100%
	<u>EPC Business:</u> 4	i.Awareness of Integrated Management. requisite based on QMS (ISO 9001:2015), EMS (45001:2018) HSE (ISO 14001:2018)	50%
	52	ii.Training on Health & Wellbeing, Basic First Aid and Safety Prevention of Sexual Harassment, Code of Discipline, Social Security Training, On Job Training, IT Awareness training.	100%
Workers	<u>Cable Business:</u> 40	Awareness of ISO 45001, BCMS, ISMS, 5S. Training on Health & Wellbeing, Basic First Aid, Safety and On Job Training.	100%
	<u>EPC Business:</u> 10	Training on Health & Wellbeing, Basic First Aid and Safety, Prevention of Sexual Harassment, Code of Discipline, Social security, On Job Training	100%

The Company recognizes the importance of training for the development and growth of its employees, and for the success of the business. We believe that training is an investment that yields long-term benefits for both the individual and the organization.

In order to ensure the highest level of safety and quality in all our operations, the Company provides training programs for the Board of Directors, Key Management Personnel, Employees, and Workers. Our goal is to create a culture of continuous learning and improvement, where every individual is equipped with the knowledge and skills required to perform their job effectively and safely.

We understand that training is an ongoing process, and we are committed to providing our employees with the necessary support and resources to achieve their full potential. We believe that investing in our employees is key to our success, and we will continue to prioritize their growth and development.

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

MONETARY					
Particulars	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	Nil	NA	NA	NA	NA
Settlement	Nil	NA	NA	NA	NA
Compounding fee	Nil	NA	NA	NA	NA

NON-MONETARY					
Particulars	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment	Nil	NA	NA	NA	
Punishment	Nil	NA	NA	NA	

The Company takes immense pride in its unwavering commitment to upholding the highest standards of ethical and legal conduct across all its operations. Consequently, neither the Company nor its directors or key managerial personnel (KMPs) have incurred any fines, penalties, punishments, awards, compounding fees, or settlement amounts in any form of proceedings.

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
This particular section is not applicable to the Company	

4. Anti-corruption or Anti-bribery policy:

<p>Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.</p>	<p>Yes, the Company has developed a comprehensive Anti-Corruption or Anti-Bribery Policy, showcasing our unwavering dedication to maintaining the highest ethical standards throughout our business operations and fostering a climate of transparency and equitable business practices. This policy reflects our firm commitment to establishing and enforcing robust measures to detect, prevent, and combat corrupt activities, including bribery.</p> <p>For detailed information and access to the policy, kindly visit the following web link: https://www.vtlrewa.com/pdf/Anti-Bribery-and-Anti-Corruption-Policy.pdf.</p> <p>This policy serves as a guiding framework to ensure that all stakeholders, including employees, partners, and suppliers, are aware of our zero-tolerance approach towards corruption and bribery, and can actively contribute to the maintenance of a fair and ethical business environment.</p>
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5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

No disciplinary action has been taken by any law enforcement agency against any director, KMP, employees or workers of our Company for charges of bribery or corruption. Our Company maintains a zero-tolerance policy towards corruption and is dedicated to upholding the highest standards of ethical conduct and transparency in all business dealings.

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

	FY 2022-23 (Current Financial Year)		FY 2021-22 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	Nil	-

7. Corrective Actions:

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.	This particular section does not pertain to the Company, as it has not incurred any fines, penalties, or regulatory, law enforcement, or judicial actions with respect to instances involving corruption and conflicts of interest.
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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	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	-	-	NA
Capex	-	13.11%	Energy Conservation

2. Sustainable sourcing:

Does the entity have procedures in place for sustainable sourcing? (Yes/No)	<p>Cable Business:</p> <p>Yes, the Company has successfully incorporated a Supplier Framework with the explicit objective of fostering sustainable sourcing practices. This comprehensive framework encompasses the meticulous evaluation and selection of suppliers, primarily based on three fundamental criteria, namely:</p> <ul style="list-style-type: none"> • Quality: This criterion pertains to the meticulous assessment of the suppliers' products or services, encompassing factors such as performance, durability, reliability, and compliance with industry standards. By prioritizing quality, the Company aims to ensure that the sourced materials or services meet the highest standards and align with its own commitment to excellence. • Pricing: The Company diligently considers the financial aspect when assessing potential suppliers. This entails evaluating the overall cost-effectiveness and competitiveness of the proposed pricing structures. By meticulously scrutinizing pricing, the Company strives to strike a balance between obtaining optimal value for its investments while maintaining profitability and cost-efficiency. • Delivery: Timeliness and reliability of delivery are key factors in the selection process. The Company places great emphasis on suppliers' ability to deliver products or services within agreed-upon timeframes, maintaining consistency and minimizing disruptions to its own operations. By prioritizing efficient and reliable delivery, the Company seeks to uphold its commitment to meet customer demands and operational timelines.
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	<p>Further, suppliers are evaluated and ranked according to their performance in relation to the aforementioned parameters. Additionally, the Company has established Environmental Requirements for its suppliers, which are communicated to them.</p> <p>During the supplier registration process, the Company conducts an evaluation to assess their suitability. A Supplier Registration Questionnaire is sent to suppliers to gather information regarding Quality, Environment, Occupational Health & Safety, and compliance with Statutory & Regulatory Requirements.</p> <p>EPC Business:</p> <p>Within the framework of the EPC Business Segment, materials are procured using two distinct channels: direct sourcing and sourcing through contractors. Throughout the sourcing process, careful attention is given to the following factors:</p> <ul style="list-style-type: none"> • Standards & Specifications: The procurement process adheres to established benchmarks, such as BIS certifications, which serve as quality and compliance standards for the materials being sourced. • Contractor Selection: A comprehensive criterion is employed to select & empanel contractors. This criterion encompasses a range of parameters which includes evaluation of various techno-commercial as well as financial parameters enabling the ranking of contractors and facilitating informed decisions regarding sourcing preferences. • Ongoing Contractor Monitoring: Regular and periodic evaluations are conducted to monitor the performance of contractors on the basis of performance, quality consciousness, target achievement & other parameters. This monitoring process ensures that contractors consistently meet the required standards and maintain the expected level of quality and efficiency. <p>By incorporating these considerations into the sourcing procedures under the EPC Business Segment, the organization ensures that materials are procured in accordance with predefined standards and specifications while maintaining a robust system for contractor evaluation and monitoring.</p>
<p>If yes, what percentage of inputs were sourced sustainably?</p>	<p>100%</p>

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

<p>Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.</p>	<p>Cable Business:</p> <p>The Company ensures that the cables supplied to customers possess a minimum lifespan of 25-30 years. To ensure transparency and proper handling of end-of-life treatment, customers are provided with a comprehensive Material Safety Data Sheet (MSDS) that contains detailed information on the appropriate procedures for disposal or treatment.</p> <p>Given that the cables are predominantly utilized by industrial entities, the responsibility for the effective management of end-of-life treatment lies with the customers themselves. This entails adhering to the guidelines specified in the MSDS and complying with the relevant laws and regulations in force during that period.</p> <p>Regarding waste generated within the Company, stringent measures are implemented to ensure compliance with environmental laws and consent conditions. Specific waste categories are handled as follows:</p> <ul style="list-style-type: none"> • Plastic Waste: The Company responsibly sells plastic waste to authorized recyclers, thereby promoting sustainable waste management practices. • E-Waste: In line with regulatory requirements, the Company sells electronic waste exclusively to authorized recyclers, ensuring proper recycling and disposal. • Acid Batteries: The Company follows a buy-back policy with Original Equipment Manufacturers (OEMs) to ensure the safe and environmentally sound disposal of acid batteries. • Hazardous Waste: All hazardous waste generated is meticulously disposed of through authorized recyclers, adhering to strict guidelines and safety protocols. • Other Non-Hazardous Waste: The Company adopts a responsible approach by selling non-hazardous waste to trusted vendors who can appropriately handle and utilize the materials.
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	<p>EPC Business:</p> <p>Within the EPC Business Segment, two primary waste streams are generated: Construction & Demolition waste and Metallic Scrap waste. These waste materials are effectively managed through well-defined procedures. Construction & Demolition waste is reused wherever possible during ongoing operations, minimizing waste generation and promoting resource efficiency.</p> <p>Metallic Scrap waste, on the other hand, is sold exclusively to authorized vendors who possess the necessary expertise and infrastructure for proper recycling, disposal and utilization of these materials. By adopting such practices, the Company aims to reduce environmental impacts and contribute to sustainable waste management practices within the EPC Business Segment.</p>
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4. Extended Producer Responsibility (EPR) plan:

Whether Extended Producer Responsibility (EPR) is applicable to the entity’s activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.	Extended Producer Responsibility (EPR) is applicable and the Company has obtained EPR registration under Importer category.
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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	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	336	336	100%	336	100%	0	0%	0	0%	0	0%
Female	5	5	100%	5	100%	5	100%	0	0%	0	0%
Total	341	341	100%	341	100%	5	1%	0	0%	0	0%
Other than Permanent employees											
Male	1433	0	0%	1433	100%	0	0%	0	0%	0	0%
Female	23	0	0%	23	100%	23	100%	0	0%	0	0%
Total	1456	0	0%	1456	100%	23	2%	0	0%	0	0%

(B) Details of measures for the well-being of workers:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	104	104	100%	104	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	104	104	100%	104	100%	0	0%	0	0%	0	0%
Other than Permanent workers											
Male	147	147	100%	147	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	147	147	100%	147	100%	0	0%	0	0%	0	0%

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

Benefits	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	79%	NA	Yes	73%	NA	Yes
Others – Mediclaim	The Company has Workmen Compensation Policy in place of ESI for all the Workers					

3. Accessibility of workplaces:

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.	<p>Yes, the premises and offices of the Company are designed to be accessible to employees and workers with disabilities.</p> <p>Given that there is presently only one differently abled employee, meticulous attention has been given to providing suitable facilities both within the factory premises and in the Company's township where the employee resides. These accommodations are implemented to ensure that the employee can navigate and perform their duties comfortably and efficiently, in line with their unique requirements and abilities.</p>
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4. Equal Opportunity Policy:

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.	<p>Yes, the Company has adopted an Equal Opportunity Policy that ensures individuals of all age, religion, race, region, ethnicity, gender, ability, and sexual orientation work collectively in an environment that flourishes on originality.</p> <p>For more information regarding the Equal Opportunity Policy, please visit the following web link: https://www.vtlrewa.com/pdf/Non-Discrimination-Diversity-and-Equal-Opportunity-Policy.pdf.</p> <p>This policy document outlines the principles and guidelines that the Company upholds to promote equal opportunities and non-discrimination within the organization.</p>
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5. Return to work and Retention rates of permanent employees and workers that took parental leave:

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

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	<p>Certainly, the Company has established mechanisms to receive and address grievances in a formal and structured manner, ensuring that employees and workers have an avenue to voice their concerns. The following channels are available for the receipt of grievances:</p> <ul style="list-style-type: none"> • Suggestion Boxes: These designated boxes allow employees and workers to submit their grievances or suggestions anonymously, ensuring confidentiality and encouraging open communication. • Emails: The Company provides an official email address where employees and workers can send their grievances directly to the relevant department or designated personnel responsible for grievance handling. • Display Boards: Display boards are strategically placed within the premises, prominently featuring the mobile numbers of designated personnel who are responsible for addressing grievances. This ensures easy access and communication for employees and workers. • Site Safety Person's Interactions: The Site Safety Person actively engages in daily interactions with employees and workers, providing them with an opportunity to voice their concerns and grievances related to safety or any other relevant issues. • Head of HR Interactions: The Head of HR regularly interacts with employees and workers, creating an open and approachable environment where grievances can be discussed and resolved. <p>Once a grievance is received, the Company ensures a responsive approach to address the concern. Grievances are thoroughly examined, and necessary corrective actions are taken promptly. This includes conducting investigations, analysing the root causes, and implementing appropriate measures to resolve the issues raised. The Company is committed to fair and effective grievance resolution, ensuring that the concerns of employees and workers are acknowledged, heard, and appropriately addressed.</p>
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	341	156	45.7%	348	147	42.2%
Male	336	154	45.8%	341	144	42.2%
Female	5	2	40.0%	7	3	42.9%
Total Permanent Workers	104	104	100.0%	111	111	100.0%
Male	104	104	100.0%	111	111	100.0%
Female	0	0	0%	0	0	0%

The aforementioned details are exclusive to the cable business, as the employees and workers within the EPC business segment are not affiliated with any association or recognized union.

8. Details of training given to employees and workers:

Category	FY 2022-23 (Current Financial Year)					FY 2021-22 (Previous Financial Year)				
	Total (A)	On Health and safety		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	1769	1769	100%	1769	100%	1256	1244	99%	1244	99%
Female	28	28	100%	28	100%	22	22	100%	22	100%
Total	1797	1797	100%	1797	100%	1278	1266	99%	1266	99%
Workers										
Male	251	251	100%	231	92.03%	237	224	94.51%	217	91.56%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Total	251	251	100%	231	92.03%	237	224	94.51%	217	91.56%

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	1769	1725	97.51%	1256	1244	99.04%
Female	28	26	92.86%	22	20	90.91%
Total	1797	1751	97.44%	1278	1264	98.90%
Workers						
Male	251	231	92.03%	237	231	97.47%
Female	0	0	0.00%	0	0	0.00%
Total	251	231	92.03%	237	231	97.47%

10. Health and safety management system:

Sl. No.	Particulars	Response
(a)	Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?	Yes, the Company has implemented an occupational health and safety management system. The coverage of the system includes all aspects of the Company's operations, including employee and worker health and safety training, hazard identification and risk assessment, incident reporting and investigation, and ongoing monitoring and improvement. The system is designed to ensure a safe and healthy work environment for all employees and to comply with relevant health and safety regulations and standards.
(b)	What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?	The Company recognize that identifying work-related hazards and assessing risks is critical for ensuring the safety and well-being of our employees. To achieve this, we employ several processes and procedures, including the following: (a) Work safety analysis, standard operating procedure, and operational control plan are observed to monitor routine activities. (b) Non-routine activities are supervised using a seven-type work permit system, which covers various types of hazardous activities, including hot work operations, cold work activities, electrical installation and maintenance, working at heights, confined space entry, and heavy lifting operations.

Sl. No.	Particulars	Response
		<p>By following these processes and procedures, we strive to ensure the health and safety of our personnel, equipment, and materials involved in our operations.</p> <p>The Company is committed to minimizing the risks associated with non-routine activities, preventing accidents and injuries, and creating a safe and healthy work environment for all the employees and workers.</p>
(c)	Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)	<p>Yes, the Company has implemented robust mechanisms to enable workers to report work-related hazards and safeguard themselves from such risks. These mechanisms encompass well-defined reporting channels and procedures for employees to promptly communicate hazards, near-misses, and incidents. Moreover, the Company provides comprehensive training and resources to empower workers in identifying and reporting potential hazards effectively.</p> <p>Furthermore, the Company has implemented explicit policies and procedures to safeguard workers' rights to refuse unsafe work, without encountering any form of retaliation or reprisal. These measures are in place to uphold the principle of ensuring a secure and healthy work environment for all employees.</p>
(d)	Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)	<p>The Company offers its employees access to medical and healthcare services that are not directly related to occupational illnesses or injuries. These services may comprise health insurance coverage or the ability to obtain medical services through third-party providers.</p> <p>The primary objective of these services is to promote the general health and welfare of the employees, both on and off the job.</p>

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

Safety Incident/Number	Category	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	86.84	286.94
Total recordable work-related injuries	Employees	0	1
	Workers	25	12
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

12. Measures to ensure a safe and healthy workplace:

Describe the measures taken by the entity to ensure a safe and healthy work place.	<p>The Company has implemented robust operational controls to proactively identify and mitigate potential work-related hazards and associated risks. With the utmost commitment to ensuring a safe and healthy workplace, the following comprehensive measures have been adopted:</p> <ul style="list-style-type: none"> • Daily health and safety briefing exercises: Regular sessions are conducted to disseminate essential information and updates on health and safety practices to all employees. These briefings serve as a vital platform for promoting awareness and reinforcing the importance of maintaining a secure working environment. • On-the-job safety training through Site Safety Trainings: Employees undergo rigorous training sessions specifically tailored to their respective job roles and work environments. These trainings equip them with the necessary knowledge and skills to identify potential hazards, apply preventive measures, and respond effectively to emergencies. • Toolbox Trainings: Supplementing the on-the-job safety training, Toolbox Trainings further enhance employee awareness and proficiency in safety practices. These interactive sessions provide practical guidance on using tools, equipment, and machinery safely, thereby minimizing the risk of accidents and injuries.
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	<ul style="list-style-type: none"> • Display of proper safety instructions on board and signages: Visual aids, including prominently displayed safety instructions, signage, and posters, are strategically placed throughout the workplace. These visual cues serve as constant reminders of the importance of adhering to safety protocols and guidelines. • Feedback and suggestions: The Company regularly records feedback and suggestions from employees to continually improve working conditions. This feedback is analysed, and appropriate measures are taken to address any issues raised. • Engaging in reactive monitoring activities: The Company engages in reactive monitoring activities to identify potential hazards that may have been overlooked during routine inspections. This approach allows the Company to address potential hazards proactively, reducing the likelihood of accidents or injuries <p>The primary objective of these measures is to bolster the safety and well-being of all employees and diminish the likelihood of work-related accidents or illnesses.</p>
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13. Number of Complaints on the following made by employees and workers:

Particulars	FY (2022-23) Current Financial Year			FY (2021-22) Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	NA	Nil	Nil	NA
Health & Safety	Nil	Nil	NA	Nil	Nil	NA

The Company takes pride in maintaining a healthy and safe workplace, and is pleased to report that no complaints have been received from employees or workers concerning working conditions or health and safety. This underscores the Company's commitment to providing a positive work environment for all.

14. Assessments for the year:

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

15. Corrective Actions:

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.	<p>This specific section is deemed inapplicable as the assessments conducted on Health & Safety practices and working conditions did not reveal any notable risks or concerns.</p> <p>Through proactive measures and continuous improvement initiatives, the Company strives to maintain a safe working environment, adhering to industry best practices and relevant regulatory requirements. Our commitment to the health and safety of our workforce remains unwavering, and we will promptly address any emerging issues to further enhance our practices and working conditions.</p>
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PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

ESSENTIAL INDICATORS:
1. Identification of stakeholders group:

Describe the processes for identifying key stakeholder groups of the entity	<p>The Company has developed a stakeholder engagement framework to improve the process of identifying stakeholders. This framework is intended to increase the effectiveness of engagement with stakeholders, which is essential for maintaining the Company’s reputation, building trust, and creating value for all stakeholders.</p> <p>The stakeholder engagement framework consists of two dimensions, which are crucial in identifying stakeholders. The first dimension relates to the stakeholder’s interests, while the second dimension is concerned with the stakeholder’s level of influence. By considering both of these dimensions, the organization can identify stakeholders and determine the appropriate modes and levels of engagement required for each stakeholder group.</p> <p>In addition to these dimensions, the Company also takes into account several criteria when identifying stakeholder groups. These include:</p> <ol style="list-style-type: none"> The stakeholders’ level of dependency on the organization, The level of responsibility they have in relation to the organization, The amount of attention they receive from the organization, and Their level of influence over the organization. <p>By using this stakeholder engagement framework and considering these criteria, the Company can better identify the stakeholders who are most crucial to its success and develop engagement strategies that align with their needs and interests. This approach is critical for maintaining positive relationships with stakeholders and achieving the organization’s strategic objectives.</p>
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2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group:

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	<ul style="list-style-type: none"> Annual General Meeting, Shareholder meets, Email, Stock Exchange (SE) intimations, Annual report, quarterly results, media releases and Company’s website 	Quarterly, Half yearly and annually	Share price appreciation, dividends, profitability and financial stability, robust ESG practices, risks, growth prospects.
Employees & Workers	No	<ul style="list-style-type: none"> Emails Team Engagement Engagement through Training Programs Notice Board 	Periodically	Hearing of all employee concerns Conducting meetings People voice meeting Suggestion Schemes Conducting enquiries

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	<ul style="list-style-type: none"> • Emails • Regular Meets • Personal Visits / Interviews • Satisfaction Surveys 	Regular	Queries/suggestions/assurance/ complaints etc. Understating the customers' requirements
Suppliers	No	<ul style="list-style-type: none"> • Emails • Supplier Meetings 	Regular	Queries/suggestions/ assurance/ complaints etc. Raising our concerns with suppliers
Government and Regulators	No	<ul style="list-style-type: none"> • Reporting / Filings • Submissions/ Applications • Industry forum meets 	On periodical basis as provided under relevant legislations	In relation to Compliances with applicable laws, Industry concerns, changes in regulatory frameworks, skill and capacity building, employment.
Community	No	<ul style="list-style-type: none"> • Periodical Meets • Personal Visits 	Periodically	Under CSR projects covering Community development, livelihood support, disaster relief, Animal welfare, Sanitation etc
Board of Directors	No	<ul style="list-style-type: none"> • Emails • Regular meetings 	Quarterly and on any event/need basis	Company's business operations, planning, strategies etc.
Contractors	No	<ul style="list-style-type: none"> • Emails • Need based meetings • Periodical Reports 	Periodically	Contractual Agreements, Performance evaluation, Fair and timely payment, Quality and performance.
Industry & Trade Associations	No	<ul style="list-style-type: none"> • Emails • Regular meetings • Periodical Reports 	Periodically	Networking opportunities and industry specific updates
Trade Unions	No	<ul style="list-style-type: none"> • Emails • Need based meetings 	Requirement basis	Collective Bargaining, Worker welfare, Change in Employment practices, Labour relations
Subsidiaries	No	<ul style="list-style-type: none"> • Emails • Need based meetings • Periodical Reports 	Quarterly and need basis	Discussions on major Investment/ expansion plans', Sharing of performance Data, facilitate decision making on major topics.
Professional & Consultants	No	<ul style="list-style-type: none"> • Emails • Need based meetings • Periodical Reports 	Quarterly and need basis	Compliance to legal requirements, advice on business, legal, tax and environment etc. related issues.
Bankers	No	<ul style="list-style-type: none"> • Periodical Meetings • Periodical Reports • Emails 	Requirement basis	Understand the banking compliance Maintaining rapport with our bankers Banking/Credit facilities.
Waste Collection Agents	No	<ul style="list-style-type: none"> • Emails • Need based meetings 	Requirement basis	Compliance to legal requirements, to carry out sound management of the waste generated by the Company.

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 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	341	341	100%	348	348	100%
Other than permanent	1456	1456	100%	930	930	100%
Total Employees	1797	1797	100%	1278	1278	100%
Workers						
Permanent	104	104	100%	111	111	100%
Other than permanent	147	147	100%	126	126	100%
Total Workers	251	251	100%	237	237	100%

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

Category	FY 2022-23 (Current Financial Year)					FY 2021-22 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent	341	0	0%	341	100%	348	0	0%	348	100%
Male	336	0	0%	336	100%	341	0	0%	341	100%
Female	5	0	0%	5	100%	7	0	0%	7	100%
Other than Permanent	1456	0	0%	1456	100%	930	0	0%	930	100%
Male	1433	0	0%	1433	100%	915	0	0%	915	100%
Female	23	0	0%	23	100%	15	0	0%	15	100%
Workers										
Permanent	104	0	0%	104	100%	111	0	0%	111	100%
Male	104	0	0%	104	100%	111	0	0%	111	100%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Other than Permanent	147	0	0%	147	100%	126	2	2%	124	98%
Male	147	0	0%	147	100%	126	2	2%	124	98%
Female	0	0	0%	0	0%	0	0	0%	0	0%

The Company provides fair and competitive compensation to all employees and workers, as part of our responsibility and ethical practices. We believe that a fair wage is crucial for the well-being and dignity of our workforce, and we aim to pay above the minimum wage in all our operations. We acknowledge that offering fair compensation is not only the right thing to do but also critical to attracting and retaining a skilled and motivated workforce.

We regularly evaluate our compensation policies and practices to ensure that they align with our commitment to providing fair and competitive wages to all employees and workers. We are proud to have a valued and respected workforce, and we remain committed to upholding our promise of fair and equitable compensation.

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

Category	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BOD)	8	1112500	2	747500
Key Managerial Personnel (KMP)	3	7094178	0	0
Employees other than BOD and KMP	333	684804	5	587592
Workers	251	357045	0	0

4. Focal point for addressing human rights:

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)
<p>Yes, the Cable Business Segment of the Company has designated the Head of Human Resources as the focal point responsible for addressing any human rights impacts or issues that may arise as a result of the business's operations.</p> <p>Additionally, within the EPC Business Segment, the Project Monitoring Committee serves as the designated focal point for addressing human rights issues.</p>

5. Internal mechanisms in place to redress grievances related to human rights issues:

Describe the internal mechanisms in place to redress grievances related to human rights issues.
<p>The Company has implemented an internal grievance redressal mechanism that incorporates a well-defined Code of Discipline. Within this framework, individuals have the opportunity to lodge complaints directly with the Project Monitoring Committee or the Head of Human Resources, should any violations occur.</p> <p>Upon receiving a complaint, the designated focal point, in collaboration with the Human Resources department, initiates a thorough investigation into the matter. Prompt and appropriate remedial actions are then taken to address the situation effectively.</p> <p>Furthermore, the Company maintains open and transparent channels of communication with its stakeholders, including local communities, civil society organizations, and relevant government agencies. This proactive approach ensures that any grievances related to human rights are promptly and efficiently addressed, fostering a harmonious and responsible relationship with all stakeholders involved.</p>

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	NIL	NIL	None	NIL	NIL	None
Discrimination at workplace	NIL	NIL	None	NIL	NIL	None
Child Labour	NIL	NIL	None	NIL	NIL	None
Forced Labour/Involuntary Labour	NIL	NIL	None	NIL	NIL	None
Wages	NIL	NIL	None	NIL	NIL	None
Other human rights related issues	NIL	NIL	None	NIL	NIL	None

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

The Company is firmly committed to maintaining a workplace environment that is free from all forms of harassment, including sexual harassment. To ensure compliance with this commitment, the Company maintains a strict Code of Conduct for Sites and Project Operations, which requires the reporting of all harassment concerns and ensures prompt resolution of any complaints received.

Moreover, the Company has established internal committees across various locations to investigate allegations of sexual harassment and recommend appropriate action, as necessary. Additionally, regular awareness and training sessions are conducted to ensure that employees are fully aware of the nuances of sexual harassment and the relevant redressal mechanisms.

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

Yes, the Company diligently ensures the inclusion of specific human rights requirements within its business contracts. These requirements encompass the following:

1. Sellers, vendors, and suppliers are obligated to provide an Anti-Corruption Undertaking.
2. Suppliers are required to abstain from employing child labour in any of their manufacturing or general activities conducted within the factory premises.
3. Suppliers are expected to diligently comprehend and faithfully adhere to safety and environmental protocols.

In addition to the aforementioned clauses, other contextual and necessity-based requirements are also incorporated into the business contracts.

9. Assessments for the year:

Category	% 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 %

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

The Company's self-assessment and customer diligence did not reveal any noteworthy risks or concerns. The organization is committed to upholding human rights and has implemented a comprehensive framework to address significant risks and concerns associated with forced labour, child labour, sexual harassment, discrimination, and wages. This framework includes periodic evaluations to detect any potential violations and regular employee training to foster awareness and prevent such occurrences.

In the event of any violations being discovered, the Company takes swift and effective corrective action, which may involve suspending work, ending contracts, or pursuing legal action as appropriate. Furthermore, the Company continually assesses and improves its policies and procedures to ensure that human rights are upheld throughout all its operations.

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Year)
Total electricity consumption (A)	46310 GJ	28156 GJ
Total fuel consumption (B)	1838 GJ	298 GJ
Energy consumption through other sources (C)*	10387 GJ	10190 GJ
Total energy consumption (A+B+C)	58535 GJ	38644 GJ
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees)	7.7 GJ	7 GJ

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.

During the FY 2022-2023, The Company's total energy consumption saw an increase of 19891 GJ (51.5%) and an increase of 38% in total sales.

2. Designated Consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India:

This particular section is not applicable, as the Company has not been identified as designated consumer under Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

Parameter	FY 2022-2023	FY 2021-2022
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Groundwater	131192	137912
(iii) Third party water	Nil	Nil
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	131192	137912
Total volume of water consumption (in kilolitres)	131192	137912
Water intensity per rupee of turnover (Water consumed / turnover)	20.7 KL/Million Rs.	25.0 KL/Million Rs.
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. The Company has not conducted any independent assessment, evaluation or assurance by an external agency.

4. Mechanism for Zero Liquid Discharge:

Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.	<p>The Company has implemented a Zero Liquid Discharge (ZLD) system at its manufacturing plant located in Rewa, which has been operational since 1999. This mechanism ensures that no liquid waste is discharged from the facility.</p> <p>Water is primarily used for cooling purposes in the plant's operations and is circulated within a closed loop, without any release of industrial effluent into the environment.</p> <p>Additionally, the domestic wastewater generated within the facility is treated in a Sewage Treatment Plant (STP), and the resulting treated water is then employed for horticultural purposes within the Company premises. This ensures a sustainable and environmentally conscious approach to water management within the organization.</p>
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5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

The Company's cable business segment do not utilize any stacks that release air emissions.

Further, we would like to address an important matter regarding the emissions generated by our Engineering, Procurement, and Construction (EPC) business segment, during the reporting period, our EPC business faced significant challenges in measuring and documenting emissions due to the inherent complexities associated with its activities. Consequently, we regretfully acknowledge our inability to include any specific figures or data for this period within the report.

We are fully aware of the significance of environmental stewardship and the importance of transparent reporting. As such, we are actively taking steps to address this issue and enhance our emissions measurement system.

Currently, we are in the process of establishing a robust and reliable system that will enable us to accurately measure and document emissions for future financial years. We are committed to implementing comprehensive methodologies and leveraging advanced tools and technologies to ensure accurate reporting in the future.

Parameter	Please specify unit	FY 2022-2023	FY 2021-2022
NOx	-	Nil	Nil
SOx	-	Nil	Nil
Particulate matter (PM)	-	Nil	Nil
Persistent organic pollutants (POP)	-	Nil	Nil
Volatile organic compounds (VOC)	-	Nil	Nil
Hazardous air pollutants (HAP)	-	Nil	Nil
Others – please specify	-	Nil	Nil

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

The Company has not conducted any independent assessment, evaluation or assurance by an external agency. Nevertheless, the Company monitors ambient air quality on a quarterly basis through a National Accreditation Board for Testing and Calibration Laboratories (NABL) accredited agency.

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

Parameter	Unit	FY 2022-2023	FY 2021-2022
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	128	21
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	13387	9054
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO2 equivalent	1.77 MT/Million Rs	1.64 MT/Million Rs
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO2 equivalent	-	-

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.

The Company has not conducted any independent assessment, evaluation or assurance by an external agency. Nevertheless, the Company does perform quarterly monitoring of ambient air quality through an agency accredited by the National Accreditation Board for Testing and Calibration Laboratories (NABL).

7. Project related to reducing Green House Gas emission:

Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.	<p>The Company has implemented a rooftop solar power plant with a capacity of 2 MW, which has significantly aided in reducing its carbon footprint.</p> <p>Through the utilization of solar power, the Company has succeeded in curbing its CO2 emissions by 2406 MT in the fiscal year 2021-22 and by 2452 MT in the fiscal year 2022-23.</p>
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8. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2022-2023	FY 2021-2022
Total Waste generated (in metric tonnes)		
Plastic waste (A)	445 MT	310 MT
E-waste (B)	Nil	Nil
Bio-medical waste (C)	Nil	Nil
Construction and demolition waste (D)	Nil	Nil
Battery waste (E)	Nil	5.41 MT
Radioactive waste (F)	Nil	Nil
Other Hazardous waste. Please specify, if any. (G)	4.8 MT	4.91 MT
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	608 MT	615 MT
Total (A+ B + C + D + E + F + G + H)	1057.8 MT	935.32 MT
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
(i) Recycled	The plastic and other hazardous waste produced by the Company is vended to a registered recycler, while other non-hazardous waste is similarly sold for recycling, wherever feasible.	
(ii) Re-used		
(iii) Other recovery operations		
Total		
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste	The Company's waste management system encompasses appropriate waste disposal methods. Nonetheless, the Company is not executing any disposal methods as specified.	
(i) Incineration		
(ii) Landfilling		
(iii) Other disposal operations		
Total		

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.

The Company has not conducted any independent assessment, evaluation or assurance by an external agency.

9. Waste management practices adopted in the establishment:

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.	<p>The Company has implemented a suite of waste management practices to curtail waste generation and ensure that all waste is handled in an ecologically responsible manner.</p> <p>Cable Business: The storage, collection, and disposal of hazardous waste adheres to consent conditions. The hazardous waste generated is disposed of by vending it to Authorised Recyclers approved by the Central Pollution Control Board (CPCB). Similarly, solid waste is also disposed of in compliance with Consent Conditions.</p> <p>Although the manufacturing process of cables employs non-hazardous materials, certain waste material is categorized as hazardous due to the recycling process involved.</p> <p>EPC Business: This Business Segment places significant emphasis on the proper segregation of waste materials. Following meticulous sorting, two primary approaches are taken: firstly, where possible, segregated waste materials are reused internally to minimize waste production and encourage efficient resource usage.</p> <p>Secondly, any waste that cannot be reused in-house is vended to approved vendors who have the competence to responsibly handle and manage such materials. These practices exemplify the Company's commitment to sustainable waste management and play a part in reducing the environmental impact of our operations.</p>
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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:

Sl. No	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
The Company does not have any offices or operational sites in the vicinity of any ecologically sensitive area.			

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

The aforementioned section is not relevant to the Company. Nevertheless, the Company carries out an Aspect Impact Analysis of all its manufacturing processes as required by ISO 14001.

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

Yes, the Company is fully compliant with all the applicable environmental laws/regulations/guidelines in India including but not limited to Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules.

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) Affiliations with trade and industry chambers/ associations:

Number of affiliations with trade and industry chambers/ associations.
The Company is affiliated with five (5) trade and industry chambers/associations.

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

Sl. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Indian Electrical and Electronics Manufacturers Association (IEEMA)	National
2.	Engineering Export Promotion Council of India (EEPC)	National
3.	Telecom Equipment and Services Export Promotion Council (TEPC)	National
4.	Federation of Indian Export Organisations (FIEO)	National
5.	Bombay Chamber of Commerce & Industry (BCCI)	State

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

Name of authority	Brief of the case	Corrective action taken
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The Company has not engaged in any anti-competitive conduct.

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT



The Company places significant emphasis on its Social Policy, which encompasses a range of objectives including animal welfare, the establishment of environmentally sustainable social infrastructure, improved health facilities, the eradication of hunger, and the promotion of education pertaining to culture.

Furthermore, the Company actively engages in contributing to the social and economic advancement of the communities in which it operates. This commitment is reflected in the comprehensive Corporate Social Responsibility (CSR) policy, which encompasses the formulation, implementation, monitoring, evaluation, documentation, and reporting of CSR activities undertaken by the Company.

Through its social investments, the Company addresses various needs of the communities residing in the proximity of its facilities and plants. It achieves this by undertaking sustainable initiatives in critical areas such as health, education, animal welfare, infrastructure and community development, as well as responding to natural disasters and pandemics. By undertaking these initiatives, the Company strives to make a positive and lasting impact on the well-being and development of the local communities it serves.

ESSENTIAL INDICATORS:

- Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year:**

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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This section is not applicable to the Company as there were no projects that required SIA to be undertaken under Law.

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

Sl. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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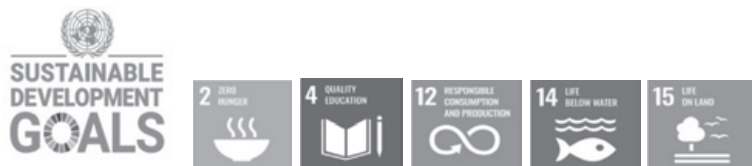
This section is not applicable to the Company as there were no projects that required Rehabilitation and Resettlement (R&R).

- Community redressal mechanism:**

Describe the mechanisms to receive and redress grievances of the community.
<p>The implementation of an effective Grievance Redressal Mechanism (GRM) is vital in fostering a strong bond with the community and acquiring the essential social license to carry out community-focused endeavours.</p> <p>To ensure that community members have a platform to voice their concerns, the Company has established a readily accessible and efficient grievance redressal mechanism. Within this framework, local employees regularly engage with the community, actively seeking out grievances and addressing them in a timely manner.</p> <p>Upon receiving feedback or complaints, the Company undertakes a comprehensive investigation of the matter at hand, leaving no stone unturned. This diligent process enables the Company to gather all relevant information and ascertain the appropriate actions required to rectify the situation. Swift corrective measures are then implemented to effectively resolve the grievances and maintain a harmonious relationship with the community.</p> <p>By upholding such a responsive and transparent approach, the Company endeavours to foster trust, open communication, and mutual respect with the community, thereby ensuring that their concerns are acknowledged and addressed in a satisfactory manner.</p>

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

Category	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	35.35%	33.12%
Sourced directly from within the district and neighbouring districts	47.53%	44.23%

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER


The Company places great importance on its commitment to responsibly engage with and provide value to its consumers, considering it a fundamental aspect of its business strategy. This approach not only builds trust and loyalty among customers but also contributes to a sustainable future for all stakeholders involved.

As a responsible entity, the Company acknowledges the significance of engaging with and offering value to its consumers in a responsible manner. It strives to ensure that its products and services not only meet the needs of customers but also minimize any potential adverse effects on society and the environment.

In pursuit of this objective, the Company actively seeks to understand the preferences and requirements of its customers. It maintains diverse channels of communication to interact with them, aiming to deliver the best possible experience. Moreover, the Company is committed to providing accurate and transparent information about its products and services. This includes comprehensive details about their safety, quality, and environmental impact.

By adopting this customer-centric approach, the Company aims to foster long-lasting relationships with its customers while upholding its commitment to social and environmental responsibility. Through these efforts, the Company strives to create a positive impact and contribute to a sustainable future for all stakeholders involved.

ESSENTIAL INDICATORS:
1. Consumer Complaints and feedback:

Describe the mechanisms in place to receive and respond to consumer complaints and feedback.
<p>The Company has implemented various channels through which customers can easily communicate their concerns and engage with the Company. To facilitate this, the contact information for all branches and marketing offices of the Company can be found on its website at https://www.vtlrewa.com/contact.html.</p> <p>In addition to these avenues, the Company has taken the initiative to assign a dedicated accounts manager to key customers. This personalized support ensures that the specific requirements, grievances, and expectations of these customers are effectively addressed.</p> <p>When a customer complaint is received, it is promptly conveyed to the sales department in Rewa. The details of the complaint are duly recorded in a customer complaint register, enabling a systematic approach to resolution. The Company takes immediate corrective and preventive actions to address the complaint and ensures that the customer is kept informed about the steps taken to resolve the issue.</p> <p>To gauge the satisfaction levels of its customers, the Company conducts an annual consumer satisfaction survey. This survey allows customers to provide feedback on their experiences, enabling the Company to identify areas for improvement and effectively address any issues raised by its customers.</p> <p>By establishing these comprehensive mechanisms, the Company strives to maintain open lines of communication with its customers, promptly address their concerns, and continuously enhance its services based on customer feedback.</p>

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

Category	As a percentage to total turnover
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	Not applicable

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

Category	FY 2022-23 (Current Financial Year)		Remarks	FY 2021-22 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data Privacy	During the financial years 2021-22 and 2022-23, the Company has not received any complaints within the specified categories.					
Advertising						
Cyber Security						
Delivery of essential Services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

Particulars	Number	Reasons for recall
Voluntary recalls	Nil	Nil
Forced recalls	Nil	Nil

5. Cyber security policy:

<p>Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.</p> <p>The Company has implemented a robust Information Security Management Policy that clearly outlines its dedication to upholding the confidentiality, integrity, and availability of information.</p> <p>Furthermore, the Company has attained ISO 27001 certification for its Information Security Management System, which serves as a testament to its unwavering commitment to maintaining the highest levels of information security. This certification underscores the Company's adherence to globally recognized standards in safeguarding sensitive information.</p> <p>For detailed information regarding the Information Security Management Policy, please refer to the Policy document, which can be accessed at the following weblink: https://www.vtlrewa.com/ISMS-Policy.pdf.</p> <p>This document provides comprehensive insights into the Company's practices and procedures for ensuring the security of information assets, reinforcing its commitment to protecting valuable information from unauthorized access, disclosure, alteration, or destruction.</p>
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6. Corrective Actions:

<p>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</p> <p>This particular section is not applicable.</p>
