

July 14, 2023

To,
National Stock Exchange of India Limited

Exchange Plaza, Plot No. C/1, G Block, Bandra - Kurla Complex, Bandra (East), Mumbai - 400 051. To,
BSE Limited
Corporate Relations Department,
1st Floor, New Trading Ring,
P. J. Towers, Dalal Street,

Mumbai - 400 001.

Sub.: <u>Business Responsibility and Sustainability Report ("BRSR") for the Financial Year 2022-23.</u>

Ref: Scrip Code - 501150 and NSE Scrip Code: - CENTRUM

Madam/Dear Sir,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015, please find enclosed the Business Responsibility and Sustainability Report ("BRSR") for the Financial Year 2022-23 which forms an integral part of the Annual Report for the Financial Year 2022-23.

The BRSR is also available on the website of the Company at www.centrum.co.in

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For Centrum Capital Limited

Parthasarathy Iyengar Company Secretary Membership No. A21472

**Enclosed: As above** 

Annexure C

# **Business Responsibility and Sustainability Report**

#### **SECTION A: GENERAL DISCLOSURES**

| I. | Details of the listed entity   | Remarks   |
|----|--|---|
| 1  | Corporate Identity Number (CIN) of the Listed Entity   | L65990MH1977PLC019986   |
| 2  | Name of the Listed Entity  | CENTRUM CAPITAL LIMITED   |
| 3  | Year of incorporation  | 1977  |
| 4  | Registered office address  | Level -9, Centrum House, C.S.T. Road, Vidyanagari<br>Marg, Kalina, Santacruz (E), Mumbai - 400098 |
| 5  | Corporate address  | Level -9, Centrum House, C.S.T. Road, Vidyanagari<br>Marg, Kalina, Santacruz (E), Mumbai - 400098 |
| 6  | E-mail   | secretarial@centrum.co.in   |
| 7  | Telephone  | 022 4215 9000   |
| 8  | Website  | www.centrum.co.in   |
| 9  | Financial year for which reporting is being done   | 2022-23   |
| 10 | Name of the Stock Exchange(s) where shares are listed  | National Stock Exchange of India Limited,<br>BSE Limited  |
| 11 | Paid-up Capital  | ₹ 41,60,32,740  |
| 12 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the Business Responsibility and Sustainability Report (BRSR) report                                 | Mr. Jaspal Singh Bindra<br>022 4215 9000<br>cs@centrum.co.in                                      |
| 13 | Reporting boundary - Are the disclosures under this report made<br>on a standalone basis (i.e. only for the entity) or on a consolidated<br>basis (i.e. for the entity and all the entities which form a part of its | Standalone basis  |

#### II. Products/Services

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

consolidated financial statements, taken together).

| Sr.<br>No. | Description of Main Activity Description of Rusiness Activity |  | % of Turnover of the entity |
|------------|---|--|-----------------------------|
| 1          | Financial and Insurance Services                              | Financial Advisory, Brokerage and Consultancy Services | 80.69                       |
| 2          | Financial and Insurance Services                              | Other Financial Activities                             | 19.31                       |

# C+NTRUM

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

| Sr.<br>No. | Product/Service   | NIC Code | % of total Turnover contributed |
|------------|---|----------|---------------------------------|
| 1          | Activities auxiliary to financial service activities n.e.c. | 66190    | 100                             |

#### 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      | -                | 3                 | 3     |
| International | -                | -                 | -     |

- 17 Markets served by the entity
- a. Number of locations

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 3      |
| International (No. of Countries) | -      |

- b. What is the contribution of exports as a percentage of the total turnover of the entity?
  - 1.17%
- c. A brief on types of customers

The Company is engaged in providing fee based financial services to its clients comprising bluechip corporates, state and centre level undertakings (PSU), banks and financial institutions. It is also associated with fund raising exercises through placement of debt.

#### **IV. Employees**

- 18 Details as at the end of Financial Year:
- a. Employees and workers (including differently abled):

| Sr. | – ———————————————————————————————————— | Total (A) | M              | ale       | Female  |           |  |
|-----|--|-----------|----------------|-----------|---------|-----------|--|
| No. | Particulars                            | Total (A) | No. (B)        | % (B / A) | No. (C) | % (C / A) |  |
|     |  | E         | MPLOYEES       |           |         |           |  |
| 1   | Permanent (D)                          | 43        | 30             | 70%       | 13      | 30%       |  |
| 2   | Other than Permanent (E)               | -         | -              | -         | -       | -         |  |
| 3   | Total employees (D + E)                | 43        | 30             | 70%       | 13      | 30%       |  |
|     |  | 1         | <b>NORKERS</b> |           |         |           |  |
| 4   | Permanent (F)                          | -         | -              | -         | -       | -         |  |
| 5   | Other than Permanent (G)               | -         | -              | -         | -       | -         |  |
| 6   | Total workers (F + G)                  | -         | -              | -         | -       | -         |  |

### b. Differently abled Employees and workers

| Sr. | Particulars                               | Total (A)  | M             | ale       | Female  |           |  |
|-----|---|------------|---------------|-----------|---------|-----------|--|
| No. |   | Total (A)  | No. (B)       | % (B / A) | No. (C) | % (C / A) |  |
|     |   | DIFFERENTL | Y ABLED EMPLO | OYEES     |         |           |  |
| 1   | Permanent (D)                             | -          | -             | -         | -       | -         |  |
| 2   | Other than Permanent (E)                  | -          | -             | -         | -       | -         |  |
| 3   | Total differently abled employees (D + E) | -          | -             | -         | -       | -         |  |
|     |   | DIFFERENT  | LY ABLED WOR  | KERS      |         |           |  |
| 4   | Permanent (F)                             | -          | -             | -         | -       | -         |  |
| 5   | Other than Permanent (G)                  | -          | -             | -         | -       | -         |  |
| 6   | Total differently abled workers (F + G)   | -          | -             | -         | -       | -         |  |

### 19 Participation/Inclusion/Representation of women

|                          | Total (A) | No. and percentage of Females |           |  |
|--------------------------|-----------|-------------------------------|-----------|--|
|                          | 10tal (A) | No. (B)                       | % (B / A) |  |
| Board of Directors       | 13        | 2                             | 15.38     |  |
| Key Management Personnel | 3         | -                             | -         |  |

Note: Key Managerial Personnel are Executive Chairman, Chief Financial Officer and Company Secretary of the Company

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

| Particulars       | FY 2023 |        | Total  | FY 2022 |        | Total  | FY 2021 |        | Total  |
|-------------------|---------|--------|--------|---------|--------|--------|---------|--------|--------|
|                   | Male    | Female |        | Male    | Female | IOLAI  | Male    | Female | Total  |
| Permanent         | 12.20%  | 2.40%  | 14.60% | 31.70%  | 31.20% | 62.90% | 24.90%  | 9.00%  | 33.90% |
| Employees         |         |        |        |         |        |        |         |        |        |
| Permanent Workers |         |        |        |         | NA     |        |         |        |        |

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

21 Names of holding / subsidiary / associate companies / joint ventures

| Sr.<br>No. | Name of the holding / subsidiary / associate companies / joint ventures | Indicate whether<br>holding/ Subsidiary/<br>Associate/ Joint<br>Venture | % of shares<br>held by<br>listed entity | Does the entity indicated<br>at column A, participate<br>in the Business<br>Responsibility initiatives<br>of the listed entity?<br>(Yes/No) |
|------------|---|---|---|---|
| 1          | Centrum Retail Services Limited   | Subsidiary  | 100.00                                  | No  |
| 2          | Centrum Financial Services Limited                                      | Subsidiary  | 100.00                                  | No  |
| 3          | Centrum Broking Limited   | Subsidiary  | 100.00                                  | No  |
| 4          | Centrum Wealth Limited  | Subsidiary  | 68.28                                   | No  |
| 5          | Centrum Capital Advisors Limited  | Subsidiary  | 100.00                                  | No  |
| 6          | Centrum Housing Finance Limited   | Subsidiary  | 56.39                                   | No  |
| 7          | Centrum Insurance Brokers Limited                                       | Subsidiary  | 100.00                                  | No  |
| 8          | Centrum Investment Advisors Limited                                     | Subsidiary  | 100.00                                  | No  |
| 9          | Centrum Capital International Limited                                   | Subsidiary  | 100.00                                  | No  |
| 10         | CCIL Investment Management Limited                                      | Subsidiary  | 100.00                                  | No  |

| Sr.<br>No. | Name of the holding / subsidiary / associate companies / joint ventures | Indicate whether<br>holding/ Subsidiary/<br>Associate/ Joint<br>Venture | % of shares<br>held by<br>listed entity | Does the entity indicated<br>at column A, participate<br>in the Business<br>Responsibility initiatives<br>of the listed entity?<br>(Yes/No) |
|------------|---|---|---|---|
| 11         | Centrum Microcredit Limited   | Subsidiary  | 100.00                                  | No  |
| 12         | Modulus Alternatives Investment<br>Managers Limited                     | Subsidiary  | 100.00                                  | No  |
| 13         | Centrum International Services Pte Limited                              | Subsidiary  | 100.00                                  | No  |
| 14         | Ignis Capital Advisors Limited  | Subsidiary  | 100.00                                  | No  |
| 15         | Unity Small Finance Bank Limited  | Subsidiary  | 51.00                                   | No  |
| 16         | Acorn Fund Consultants Private Limited                                  | Associate   | 49.00                                   | No  |

### VI. CSR Details

| 22 (i) | Whether CSR is applicable as per section 135 of Companies Act, 2013 (Yes/No): | No                |
|--------|---|-------------------|
| (ii)   | Turnover  | ₹2,590.39 lakhs   |
| (iii)  | Net worth   | ₹ 44,109.97 lakhs |

### 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:

|   | Grievance   |  | FY 2023   |   |  | FY 2022   |         |
|---|---|--|---|---|--|---|---------|
| Stakeholder<br>group from<br>whom<br>complaint is<br>received | Redressal<br>Mechanism in<br>Place (Yes/No) (If<br>Yes, then provide<br>web-link for<br>grievance redress<br>policy)    | Number of<br>complaints<br>filed<br>during the<br>year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks   | Number of<br>complaints<br>filed<br>during the<br>year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks |
| Communities   | -   | -  | -   | -   | -  | -   | -       |
| Investors<br>(other than<br>shareholders)                     | Yes, Debenture Holders can register their complaints/ grievances by writing an email to the Company ID cs@centrum.co.in | -  | -   | -   | -  | -   | -       |
| Shareholders  | Yes, Shareholders can register their complaints/ grievances by writing an email to the Company ID cs@centrum.co.in      | 2  | -   | Complaints were suitably resolved in a timely manner. | -  | -   | -       |

|   | Grievance  |  | FY 2023   |         |  | FY 2022   |         |
|---|--|--|---|---------|--|---|---------|
| Stakeholder<br>group from<br>whom<br>complaint is<br>received | Redressal<br>Mechanism in<br>Place (Yes/No) (If<br>Yes, then provide<br>web-link for<br>grievance redress<br>policy)   | Number of<br>complaints<br>filed<br>during the<br>year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks | Number of<br>complaints<br>filed<br>during the<br>year | Number of<br>complaints<br>pending<br>resolution<br>at close of<br>the year | Remarks |
| Employees<br>and Workers                                      | Yes, Employees can raise their grievances through email to Group Head - Human Resource. The Company has an Vigil Mechanism in place and employees can report as per the Whistle Blower Policy of the Company. Whistle Blower Policy is published on the website and intranet of the Company. | -  |   | -       |  | -   |         |
| Customers   | Yes, Customers can raise their grievances by   | -  | -   | -       | -  | -   | -       |

### 24 Overview of the entity's material responsible business conduct issues

writing an email to the Company ID igmbd@centrum. co.in or cs@ centrum.co.in

Value Chain Partners

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

| Sr.<br>No. | Material<br>issue<br>identified | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the risk / opportunity   | In case of risk,<br>approach<br>to adapt or<br>mitigate   | Financial implications of<br>the risk or opportunity<br>(Indicate positive or<br>negative implications) |  |
|------------|---------------------------------|---|--|---|---|--|
| 1          | Human<br>Capital                | Opportunity<br>and Risk                             | Opportunity: Given the nature of the business of the Company, it requires human capital with high skills and talent to keep up | The demand<br>for skilled<br>human capital<br>is high and | Positive: Retention of key employees drives improvement in customer acquisition and retention.          |  |

| Sr.<br>No. | Material<br>issue<br>identified    | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the risk / opportunity   | In case of risk,<br>approach<br>to adapt or<br>mitigate   | Financial implications of<br>the risk or opportunity<br>(Indicate positive or<br>negative implications)  |
|------------|------------------------------------|---|--|---|--|
|            |                                    |   | with the dynamically changing regulatory environment and guide clients, customers and stakeholders efficiently.  Risk: There is intense competition for experienced senior management and other qualified personnel, particularly office managers & executives. If we cannot hire additional or retain existing management personnel and employees, our ability to expand our business will be impaired and our revenue could be adversely affected. Failure to train and motivate our employees properly may result in an increase in employee attrition rates, require additional hiring, divert management resources, adversely affect our origination and collection rates, increase our exposure to highrisk credit and impose significant costs on us. | consequently, the Company has invested in the learning and development of the employees and outperformed competitors not only with respect to remuneration and employment benefits but also mental and physical well-being.                                   | Negative: High attrition possibilities leads to increase in employee benefit expenses and creates legacy issues.   |
| 2          | Technology<br>and Data<br>Security | Opportunity<br>and Risk                             | Opportunity: Technology has allowed the Company to provide its services remotely and serve our clients in a robust and efficient manner. Technology serves as a catalyst for innovation, driving economic growth and creating new opportunities for businesses. It enables the development of new products, services, and business models, leading to increased productivity and competitiveness.  Risk: Computer break-ins, power and communication disruptions could affect the security of information stored in and transmitted through our computer systems and network infrastructure.   | We seek to protect our computer systems and network infrastructure from physical break-ins as well as fraud and system failures. We employ security systems, including firewalls and password encryption, designed to minimize the risk of security breaches. | Positive: Having a robust IT infrastructure offers improved efficiency, enhanced communication and collaboration, scalability, data management and security, business continuity, cost savings in the long run, and a competitive advantage.  Negative: A significant failure of security measures or operational procedures could have a limited effect on our business as the Company doesn't deal with customer data. Although we take adequate measures to safeguard against system-related and other frauds, there can be no assurance that it would be able to prevent frauds. |

| Sr.<br>No. | Material<br>issue<br>identified   | Indicate<br>whether risk<br>or opportunity<br>(R/O) | Rationale for identifying the risk / opportunity  | In case of risk,<br>approach<br>to adapt or<br>mitigate | Financial implications of<br>the risk or opportunity<br>(Indicate positive or<br>negative implications)   |
|------------|-----------------------------------|---|---|---|---|
| 3          | Investments<br>in<br>Subsidiaries | Opportunity   | The Company is the holding company having significant investments across multiple subsidiaries with diversified fee based businesses, a growing lending platform and a Small Finance Bank. The Banking, Financial Services and Insurance (BFSI) sector is expected to grow significantly in the coming years, with government initiatives such as Digital India, the Unified Payments Interface (UPI), globalisation and a push towards a cashless economy acting as driving factors. |   | The digital lending market is expected to be a major growth driver, with a projected book size of USD 515 billion by 2030. The adoption of digital payment modes and mobile apps in rural areas is creating opportunities for digital banking and new business avenues. The simplification of banking procedures through digitisation is further increasing the reach of the banking sector.  With the growth of India's high-net-worth and ultra high-net-worth population, the potential for the growth of the wealth management industry continues to be higher than ever. |

#### **SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

National Voluntary Guidelines (NVGs) on social, environmental and economic responsibilities of business prescribed by the Ministry of Corporate Affairs advocates the nine principles as detailed below:

- PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
- PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe
- PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains
- PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders
- PRINCIPLE 5: Businesses should respect and promote human rights
- PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment
- PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- PRINCIPLE 8: Businesses should promote inclusive growth and equitable development
- PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

# C₹NTRUM

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the National Guidelines on Responsible Business Conduct (NGRBC) Principles and Core Elements

| Sr.  | Disclosure Questions  |                                     |  |                                 |  |                              |                                 |                                 |   |                                 |
|------|---|-------------------------------------|--|---------------------------------|--|------------------------------|---------------------------------|---------------------------------|---|---------------------------------|
| No.  | Policy and management processes   | P 1                                 | P 2  | P 3                             | P 4  | P 5                          | P 6                             | P 7                             | P 8   | P 9                             |
| 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                             | No                              | Yes   | Yes                             |
|      | b. Has the policy been approved by the Board? (Yes/No)  | Yes                                 | Yes  | Yes                             | Yes  | Yes                          | Yes                             | No                              | Yes   | Yes                             |
|      | c. Web Link of the Policies, if available   | the wo                              | ebsite <u>y</u>                            | www.ce                          | ntrum.c                                      | <u>:o.in</u> . 9             | Some o                          | f the p                         | essed to<br>oolicies<br>other i                         | of the                          |
| 2    | Whether the entity has translated the policy into procedures. (Yes / No)  | Yes                                 | Yes  | Yes                             | Yes  | Yes                          | Yes                             | No                              | Yes   | Yes                             |
| 3    | Do the enlisted policies extend to your value chain partners? (Yes/No)  | Yes                                 | Yes  | Yes                             | Yes  | Yes                          | Yes                             | No                              | Yes   | Yes                             |
| 4    | Name of the national and international codes/<br>certifications/labels/ standards (e.g. Forest<br>Stewardship Council, Fairtrade, Rainforest<br>Alliance, Trustee) standards (e.g. SA 8000,<br>OHSAS, ISO, BIS) adopted by your entity and<br>mapped to each principle. | -                                   | -  | -                               | -  | -                            | -                               | -                               | -   | -                               |
| 5    | Specific commitments, goals and targets set by the entity with defined timelines, if any.   | proces<br>param<br>survey<br>consur | s for al<br>eters li<br>s, cons<br>mption, | l policie<br>ke shar<br>umptior | s. We he | ave pro<br>r comp<br>sources | cedures<br>laints, e<br>like wa | s in pla<br>employe<br>ater, pa | or eva<br>ce to tra<br>ee satis<br>per, ele<br>nts with | ack key<br>faction<br>ectricity |
| 6    | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  |                                     |  | y tracks<br>developi            |  |                              | •                               |                                 | nd recor  | d it for                        |
| Gove | ernance, leadership and oversight   |                                     |  |                                 |  |                              |                                 |                                 |   |                                 |
| 7    | Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)  | Discus                              | sion an                                    | d Analys                        | sis.   |                              |                                 |                                 | e Manag   | gement                          |
| 8    | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).  | Mr. Jas                             | spal Sing                                  | gh Bindr                        | a - Exed                                     | cutive C                     | hairmar                         | 1                               |   |                                 |
| 9    | Does the entity have a specified Committee of<br>the Board/ Director responsible for decision<br>making on sustainability related issues? (Yes /<br>No). If yes, provide details.   | for Su                              | ıstainab                                   | ility rel                       | ated a                                       | ctivities                    | Comm                            | nunity/                         | an is ir<br>social<br>Compa                             | related                         |

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### 10 Details of Review of NGRBCs by the Company:

| Subject for Review  |             | dert  | aker          | by I | Direc | tor / | iew v<br>Con | nmit | ttee                       |        |       |       |      |       |     |       |       |       |
|---|-------------|---|---------------|------|-------|-------|--------------|------|----------------------------|--------|-------|-------|------|-------|-----|-------|-------|-------|
|   | P1          | P2  | Р3            | P4   | Р5    | P6    | P7           | P8   | P8 P9 P1 P2 P3 P4 P5 P6 P7 |        |       |       |      | P7    | P8  | P9    |       |       |
| Performance against above policies and follow up action   | Con<br>requ | Policies wherever stated have been approved by Board / Committees of Board of the Company. Polices are reviewed at periodic intervals in all aspects including statutory equirements depending on the frequency stated in respective policies or on need pasis whichever is earlier and necessary updates are made to the policies. |               |      |       |       |              |      |                            |        |       |       |      |       |     |       |       |       |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any noncompliances |             |   | pany<br>princ |      |       | essar | y pro        | oced | ures                       | in pla | ace t | o ens | sure | the c | omp | lianc | e wit | h all |

| 11 | Has the entity carried out independent   | P1     | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|----|--|--------|----|----|----|----|----|----|----|----|
|    | assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency. | No, ho |    | •  |    |    |    | -  |    |    |

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

| Questions  | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7           | P 8 | P 9 |
|--|-----|-----|-----|-----|-----|-----|---------------|-----|-----|
| The entity does not consider the Principles material to its business (Yes/No)  | -   | -   | -   | -   | -   | -   |               | -   | -   |
| 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 | -   | -   | -   | -   | -   | -   | Refer<br>note | -   | -   |
| and technical resources available for the task (Yes/No)  | -   | -   | -   | -   | -   | -   | 1             | -   | -   |
| It is planned to be done in the next financial year (Yes/No)   | -   | -   | -   | -   | -   | -   |               | -   | -   |
| Any other reason (please specify)  | -   | -   | -   | -   | -   | -   |               | -   | -   |

Note 1: While there is no specific Policy outlined for this principle, the Company's published Code of Conduct and Business Ethics governs all employees, officers and Directors and requires them to act in accordance with high professional and ethical standards. The Company, through trade bodies and associations, puts forth a number of suggestions.



#### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE - 1

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

#### **Essential Indicators**

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

| Segment                           | Total number of training and awareness programmes held | Topics / principles<br>covered under the<br>training and its impact | % age of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|---|---|
| Board of Directors                |  | Refer Note 1  |   |
| Key Managerial Personnel          |  | Refer Note 2  |   |
| Employees other than BOD and KMPs |  | Refer Note 2  |   |
| Workers                           | The Company does not                                   | have any workers as provi   | ded in the guidance note on   |
|                                   |  | BRSR, issued by SEBI  |   |

#### Note 1

The Company provides various updates to the members of the Board and Committee during the course of Board/ Committee Meeting and Offline Sessions on matters pertaining to updates on the business, risk management framework, fraud prevention, cyber security, key compliance, risk and audit observations, impact arising out of the issues along with management action plans. The Board was also apprised on the latest development in laws including changes in the laws pertaining to Insider Trading, Related Party Transactions, Taxation, etc. Considering all of the above, approximately 3 hours would have been spent by each Board Member during the financial year on various familiarisation programmes during Board/Committee meetings and offline sessions.

#### Note 2

The Company has a Code of Conduct which defines the professional and ethical standards that employees, KMPs and Directors need to adhere to in compliance with all applicable statutory laws, regulations and internal policies. The Code is published on the Company's website/Intranet. Employees including KMPs are required to annually confirm that they have read and understood the Code. All new employees are also required to confirm that they have read and understood the Code at the time of their induction. In addition, the Company has instituted several policies to ensure adherence to existing statutory laws and regulations such as The Whistle Blower policy, The Prevention of Sexual Harassment (POSH) at the Workplace policy, etc.

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  |            |                      |  |
|-----------------|--------------------|---|------------|----------------------|--|
|                 | NGRBC<br>Principle | Name of the regulatory/<br>enforcement agencies/<br>judicial institutions | Amount (₹) | Brief of the<br>Case | Has an appeal<br>been preferred?<br>(Yes/No) |
| Penalty/ Fine   |                    |   |            |                      |  |
| Settlement      |                    |   | Nil        |                      |  |
| Compounding fee |                    |   |            |                      |  |

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

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

| Case Details | Name of the regulatory/ enforcement agencies/ judicial institutions |
|--------------|---|
|              | NA  |

- 4 Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy Yes <a href="https://www.centrum.co.in">www.centrum.co.in</a>
- Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

| Particulars | FY 2023 | FY 2022 |  |  |  |
|-------------|---------|---------|--|--|--|
| Directors   |         |         |  |  |  |
| KMPs        | N       | :1      |  |  |  |
| Employees   | Nil     |         |  |  |  |
| Workers     |         |         |  |  |  |

6 Details of complaints with regard to conflict of interest

| Particulars  | FY 20  | 23      | FY 2022 |         |  |
|--|--------|---------|---------|---------|--|
| Particulars  | Number | Remarks | Number  | Remarks |  |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | -      | NA      | -       | NA      |  |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | -      | NA      | -       | NA      |  |

7 Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest: Not Applicable

#### **Leadership Indicators**

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

Yes. The Company annually obtains declaration from the directors affirming compliance with the Code of Conduct for the Board of Directors and Senior Management Personnel of the Company. The Company also conducts regular internal checks to ensure the same.

### 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

|       | FY 2023 | FY 2022 | Details of improvements in environmental and social impacts |
|-------|---------|---------|---|
| R&D   | -       | -       | NA  |
| Capex | -       | -       | NA  |

- 2 a. Does the entity have procedures in place for sustainable sourcing? (Yes/No) No.
  - b. If yes, what percentage of inputs were sourced sustainably?The consumption of resources is limited to running of operations and sourcing of inputs is not material.
- 3 Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.
  - Not applicable. The Company is engaged in Financial services industry. The Company doesn't supply any products and hence this is not applicable.
- 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
  No.

#### **PRINCIPLE - 3**

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

#### **Essential Indicators**

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

|          |           |                  |              | % of em            | ployees      | covered by            | y            |                    |              |                         |               |
|----------|-----------|------------------|--------------|--------------------|--------------|-----------------------|--------------|--------------------|--------------|-------------------------|---------------|
| Category | Total (A) | Health insurance |              | Accident insurance |              | Maternity<br>benefits |              | Paternity Benefits |              | Day Care<br>facilities* |               |
|          | Total (A) | Number<br>(B)    | %<br>(B / A) | Number<br>(C)      | %<br>(C / A) | Number<br>(D)         | %<br>(D / A) | Number<br>(E)      | %<br>(E / A) | Number<br>(F)           | %<br>(F / A)  |
|          |           |                  |              |                    | <del></del>  | nployees              |              |                    |              |                         | <del>``</del> |
| Male     | 30        | 30               | 100%         | -                  | -            | -                     | -            | 30                 | 100%         | -                       | -             |
| Female   | 13        | 13               | 100%         | -                  | -            | 13                    | 100%         | -                  | -            | -                       | -             |
| Total    | 43        | 43               | 100%         | -                  | -            | 13#                   | 100%         | 30#                | 100%         | -                       | -             |
|          | _         |                  | C            | ther than          | Perman       | ent emplo             | yees         |                    |              |                         |               |
| Male     |           |                  |              |                    |              |                       |              |                    |              |                         |               |
| Female   |           |                  |              |                    |              | NA                    |              |                    |              |                         |               |
| Total    |           |                  |              |                    |              |                       |              |                    |              |                         |               |

<sup>\*</sup>To enable women employees to stay invested in their careers, the Company offers supportive policies that cater to their needs at various life stages. Some of these policies include maternity leave including sabbatical, adoption leave of 84 days and medical leave in case of miscarriage / medical termination of pregnancy, any illness arising out of pregnancy and trust based sick leave and paternity leave.

<sup>\*</sup>The Company extends Maternity Benefit and Paternity Benefit to all female and male employees respectively.

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

|          |       |                     |              | % (                   | of worke     | rs covered            | by           |                       |              |                        |              |
|----------|-------|---------------------|--------------|-----------------------|--------------|-----------------------|--------------|-----------------------|--------------|------------------------|--------------|
| Category | Total | Health<br>insurance |              | Accident<br>insurance |              | Maternity<br>benefits |              | Paternity<br>Benefits |              | Day Care<br>facilities |              |
|          | (A)   | Number<br>(B)       | %<br>(B / A) | Number<br>(C)         | %<br>(C / A) | Number<br>(D)         | %<br>(D / A) | Number<br>(E)         | %<br>(E / A) | Number<br>(F)          | %<br>(F / A) |
|          |       |                     |              |                       | Permane      | nt workers            |              |                       |              |                        |              |
| Male     |       |                     |              |                       |              |                       |              |                       |              |                        |              |
| Female   |       |                     |              |                       |              | NA                    |              |                       |              |                        |              |
| Total    |       |                     |              |                       |              |                       |              |                       |              |                        |              |
|          |       |                     |              | Other                 | than Per     | manent wo             | orkers       |                       |              |                        |              |
| Male     |       |                     |              |                       |              |                       |              |                       |              |                        |              |
| Female   |       |                     |              |                       |              | NA                    |              |                       |              |                        |              |
| Total    |       |                     |              |                       |              |                       |              |                       |              |                        |              |

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI

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

|                         |  | FY 2023  |  |  | FY 2022  |  |
|-------------------------|--|--|--|--|--|--|
| Benefits                | No. of<br>employees<br>covered as a<br>% of total<br>employees | No. of<br>workers<br>covered as<br>a % of total<br>workers | Deducted and<br>deposited<br>with the<br>authority<br>(Y/N/N.A.) | No. of<br>employees<br>covered as<br>a % of total<br>employees | No. of<br>workers<br>covered as a<br>% of total<br>workers | Deducted and<br>deposited<br>with the<br>authority<br>(Y/N/N.A.) |
| PF                      | 98%  | NA   | Yes  | 97%  | NA   | Yes  |
| Gratuity                | 100%   | NA   | Yes  | 100%   | NA   | Yes  |
| ESI                     | 0%   | NA   | Yes  | 0%   | NA   | Yes  |
| Others – please specify | 0  | NA   | NA   | 0  | NA   | NA   |

#### 3 Accessibility of workplaces

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

Yes, our offices are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

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

Yes, Equal Opportunity Policy of the Company is available at <a href="https://centrum.co.in/sites/default/files/Policies/Equal%20Opportunity%20Policy.pdf">https://centrum.co.in/sites/default/files/Policies/Equal%20Opportunity%20Policy.pdf</a>

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

| Gender | Permanent              | employees  | Permanent workers           |                       |  |  |  |
|--------|------------------------|--|-----------------------------|-----------------------|--|--|--|
| Gender | Return to work rate    | Return to work rate Retention rate Return to work rate |                             |                       |  |  |  |
| Male   | Not Applicable, as non | e of the employees a                                   | availed Maternity or Paterr | nity Leave during the |  |  |  |
| Female |                        | year un  | der review.                 |                       |  |  |  |
| Total  |                        |  |                             |                       |  |  |  |

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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            | The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI  |
| Other than Permanent Workers | NA   |
| Permanent Employees          | Yes, The Company has a culture where employees can freely raise and discuss issues concerning themselves to Group Head - Human Resource.   |
|                              | The Company has formulated a Policy on Prevention of Sexual Harassment at Workplace for prevention, prohibition and redressal of sexual harassment at workplace. The Policy can be viewed at <a href="https://centrum.co.in/sites/default/files/Policies/Policy%20for%20Prevention%20Prohibition%20and%20Redressal%20of%20Sexual%20Harassment%20at%20the%20workplace_0.pdf">https://centrum.co.in/sites/default/files/Policies/Policy%20for%20Prevention%20Prohibition%20and%20Redressal%20of%20Sexual%20Harassment%20at%20the%20workplace_0.pdf</a> . Further the Company has set-up an Internal Complaints Committee to redress any such complaints received.  |
|                              | The Company has a Whistle Blower Policy to report genuine concerns or grievances and to provide adequate safeguards against victimization of persons who may use the mechanism. The Whistle Blower Policy encourages the employees and other parties to report unethical behaviours, malpractices, wrongful conduct, fraud, violation of the Company's policies & values, violation of law by any employee of the Company without any fear of retaliation. The mechanism provides for adequate safeguards against victimization of employees to avail of the mechanism and also provides for direct access to the Chairperson of the Audit Committee in exceptional cases. The policy can be viewed at <a href="https://centrum.co.in/sites/default/files/Policies/Whistle%20Blower%20Policy_1.pdf">https://centrum.co.in/sites/default/files/Policies/Whistle%20Blower%20Policy_1.pdf</a> |
| Other than Permanent         | NA   |
| Employees                    |  |

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

|          |                        | FY 2023  |  |   | FY 2022  |              |
|----------|------------------------|----------|--|---|--|--------------|
| Category | respective<br>category |          | No. of employees / workers in respective category, % who are (B / A) part of association(s) or Union (B) |   | No. of employees / workers in respective category, who are part of association(s) or Union (D) | %<br>(D / C) |
|          |                        | Permanen | t Employees  |   |  |              |
| - Male   |                        |          |  |   |  |              |
| - Female |                        |          | -  |   |  |              |
| Total    |                        |          |  |   |  |              |
|          |                        | Permane  | nt Workers   |   |  |              |
| - Male   |                        |          |  |   |  |              |
| - Female |                        |          | N  | A |  |              |
| Total    |                        |          |  |   |  |              |

8 Details of training given to employees and workers

| -        |  |         | FY 2023   |                      | FY 2022   |    |                      |                      |         |           |  |
|----------|--|---------|-----------|----------------------|-----------|----|----------------------|----------------------|---------|-----------|--|
| Category | On Health and<br>Total (A) safety measures |         |           | On Skill upgradation |           |    | alth and<br>measures | On Skill upgradation |         |           |  |
|          |  | No. (B) | % (B / A) | No. (C)              | % (C / A) |    | No. (E)              | % (E / D)            | No. (F) | % (F / D) |  |
|          | Employees Employees                        |         |           |                      |           |    |                      |                      |         |           |  |
| Male     | 30   | 30      | 100%      | 3                    | 10%       | 25 | 25                   | 100%                 | -       | -         |  |
| Female   | 13   | 13      | 100%      | 2                    | 15%       | 11 | 11                   | 100%                 | -       | -         |  |
| Total    | 43   | 43      | 100%      | 5                    | 12%       | 36 | 36                   | 100%                 | -       | -         |  |
|          |  |         |           | W                    | orkers    |    |                      |                      |         |           |  |
| Male     |  |         |           |                      |           |    |                      |                      |         |           |  |
| Female   |  | NA      |           |                      |           |    |                      |                      |         |           |  |
| Total    |  |         |           |                      |           |    |                      |                      |         |           |  |

9 Details of performance and career development reviews of employees and worker: Rewards and Recognition programme conducted

| Catagorius |                             | FY 2023   |     | FY 2022 |    |           |  |
|------------|-----------------------------|-----------|-----|---------|----|-----------|--|
| Category   | Total (A) No. (B) % (B / A) |           |     |         |    | % (D / C) |  |
|            | -                           | Employees |     |         |    | - '       |  |
| Male       | 30                          | 22        | 73% | 25      | 22 | 88%       |  |
| Female     | 13                          | 8         | 62% | 11      | 7  | 64%       |  |
| Total      | 43                          | 30        | 70% | 36      | 29 | 81%       |  |
|            |                             | Workers   |     |         |    |           |  |
| Male       |                             |           |     |         |    |           |  |
| Female     |                             | NA        |     |         |    |           |  |
| Total      |                             |           |     |         |    |           |  |

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

The Company doesn't have occupational health or safety hazard considering its business operations. However, health risks related to long hours at desk, exposure to electronic devices like laptop, mobile, etc. is expected. Employee well-being continues to be a priority of the Company. Considering the well-being of our employees we conduct yoga sessions, health awareness campaigns on various topics affecting our employees. Periodic trainings on fire safety and fire-fighting equipment are provided along with evacuation drills.

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

This is not directly applicable given the nature of business. However, the Company regularly conducts seminars by leading health practitioners on areas of health affecting our employees.

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

This is not applicable as the Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.



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

Yes. All of the Company's employees are covered under its health insurance policy.

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

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

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

To create a safe and healthy work environment, the Company has implemented several measures:

- a. Fire alarm systems, smoke detectors, and fire extinguishers are installed at all premises to ensure prompt detection and effective response in case of fire incidents.
- b. The Company organizes various programs and events to promote good health and well-being among employees. Examples include Wow Wednesdays, Independence Day Quiz, Women's Day celebration, and a Cricket Tournament, which encourage employee engagement and foster a healthy work culture.
- c. Interactive webinars on various health, awareness and well-being related topics are conducted to provide employees with valuable knowledge and skills. These webinars cover subjects such as Anti-Smoking Session, Proactive Skills to Manage Stress, Arthritis & Osteoporosis, Yoga At Your Desk, Achieve Harmonic Balance in Life with Nada Yoga, Sound Meditation & Music, Digital Minimalism Choosing a focused life in the noisy world, Cancer Awareness, Interactive session on Diet & Nutrition.
- d. The Company ensures that proper ventilation systems are in place to maintain good indoor air quality. This helps to reduce the concentration of pollutants, allergens, and pathogens, contributing to a healthier work environment.
- 13 Number of Complaints on the following made by employees and workers:

|                                       |                             | FY 2023  |          | FY 2022                     |  |          |
|---------------------------------------|-----------------------------|--|----------|-----------------------------|--|----------|
|                                       | Filed<br>during the<br>year | Pending<br>resolution<br>at the end<br>of year | Remarks  | Filed<br>during the<br>year | Pending<br>resolution<br>at the end<br>of year | Remarks  |
| Working Conditions<br>Health & Safety | -                           | -  | NA<br>NA | -                           | -  | NA<br>NA |

| 14 <b>Assessments for the year:</b>            | FY 2023   |
|--|---|
|  | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
| Health and safety practices Working Conditions | No assessment has been done by statutory authorities or third parties.                                |

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

No corrective actions required this year due to zero accidents. However, the policy and practice is reviewed for adequacies annually by the HR Team.

#### **Leadership Indicators**

- Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).
  - Yes, the Company extends support to families in the event of an employee's death. This includes Term life Policy, Future Service Gratuity Policy and Retrial benefits (PF, gratuity and Employees Deposit Linked Insurance Scheme).
- 2 Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.
  - The Company is compliant with deduction of statutory dues of employees towards income tax, provident fund, professional tax, ESIC etc. as applicable from time to time. Value chain partners (vendors) are equally responsible to comply as per the contract with the Company. The Company has statutory and internal audit procedures to ensure the above.
- Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

|           |                 | cted employees/<br>kers | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |         |  |  |
|-----------|-----------------|-------------------------|---|---------|--|--|
|           | FY 2023 FY 2022 |                         |   | FY 2022 |  |  |
| Employees | -               | -                       | NA  | NA      |  |  |
| Workers   | -               | -                       | NA  | NA      |  |  |



## BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

#### **Essential Indicators**

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

The key stakeholders are identified in consultation with the Company's management. Considering the business activities of the Company, stakeholders are Investors (includes Shareholders), Communities, Government & Regulatory Bodies, Vendors/Clients and Employees.

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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<br>identified as<br>Vulnerable &<br>Marginalized<br>Group (Yes/<br>No) | Channels of communication<br>(Email, SMS, Newspaper,<br>Pamphlets, Advertisement,<br>Community Meetings,<br>Notice Board, Website),<br>Other | Frequency of<br>engagement<br>(Annually/ Half<br>yearly/ Quarterly<br>/ others - please<br>specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement   |
|--------------------------------------|--|--|---|---|
| Investors (includes<br>Shareholders) | No   | Email, SMS, Newspaper,<br>Notice, Website, Stock<br>Exchange Intimations   | At least Quarterly<br>and need based  | To update about material developments of the Company, performance of the Company, information mandated to be provided as per regulations              |
| Communities                          | No   | Through Centrum Foundation.  | Need based  | To reach out to the under privileged and needy.   |
| Government &<br>Regulatory Bodies    | No   | Email  | Need based  | Seeking clarifications and relaxation, communicating challenges and providing recommendations, knowledge sharing, regulatory inspections and queries. |
| Vendors/Clients                      | No   | Emails, Meetings, Website  | Ongoing   | Superior customer service throughout the engagement life cycle  |
| Employees                            | No   | Email, Meetings, Internal communication platforms  | Ongoing   | Career development, salary<br>and other perquisites, work<br>ethics, policy communication,<br>team building   |

#### **Leadership Indicators**

- 1 Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board
  - We prioritize stakeholder consultation on economic, environmental, and social topics to ensure a comprehensive approach to our Environmental, Social, and Governance (ESG) framework. We engage in careful deliberations with the management to identify our key internal and external stakeholders, which include Investors (includes Shareholders), Communities, Government & Regulatory Bodies, Vendors/Clients and Employees. Through this inclusive approach, we gather valuable insights and feedback from our stakeholders. These inputs are integrated into our decision-making processes, allowing us to align our business imperatives with the critical needs of our stakeholders and the broader society. This information serves as a crucial input for informed decision-making, enabling us to navigate economic, environmental and social considerations responsibly and sustainably.
- 2 Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity
  - Yes. The engagement with stakeholders on a continuous basis helps in meeting the expectations for enabling the Company to serve its stakeholders better. As a result of engaging with our employees, the Company in the recent years has installed a electric vehicle charging point to encourage employees to use electric vehicles.

### 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:

|                        |  | FY 2023 |      | FY 2022   |           |   |  |  |
|------------------------|--|---------|------|-----------|-----------|---|--|--|
| Category               | No. of employees Total (A) / workers % (B / A) covered (B) |         |      | Total (C) | % (D / C) |   |  |  |
| Employees              |  |         |      |           |           |   |  |  |
| Permanent              | 43   | 43      | 100% | 36        | -         | - |  |  |
| Other permanent        | -  | -       | -    | -         | -         | - |  |  |
| <b>Total Employees</b> | 43   | 43      | 100% | 36        | -         | - |  |  |
|                        |  | Worke   | ers  |           |           |   |  |  |
| Permanent              |  |         |      |           |           |   |  |  |
| Other permanent        |  | NA      |      |           |           |   |  |  |
| <b>Total Workers</b>   |  |         |      |           |           |   |  |  |

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

|                  | FY 2023   |                                    |           |                           |           | FY 2022   |                          |           |                           | -         |
|------------------|-----------|------------------------------------|-----------|---------------------------|-----------|-----------|--------------------------|-----------|---------------------------|-----------|
| Category         | Total (A) | Equal to<br>Total (A) Minimum Wage |           | More than<br>Minimum Wage |           | Total (D) | Equal to<br>Minimum Wage |           | More than<br>Minimum Wage |           |
|                  |           | No. (B)                            | % (B / A) | No. (C)                   | % (C / A) |           | No. (E)                  | % (E / D) | No. (F)                   | % (F / D) |
|                  |           |                                    |           | Em                        | ployees   |           |                          |           |                           |           |
| Permanent        | 43        | 0                                  | 0%        | 43                        | 100%      | 36        | 0                        | 0%        | 36                        | 100%      |
| Other            | -         | -                                  | -         | -                         | -         | -         | -                        | -         | -                         | -         |
| permanent        |           |                                    |           |                           |           |           |                          |           |                           |           |
| Total            | 43        | 0                                  | 0%        | 43                        | 100%      | 36        | 0                        | 0%        | 36                        | 100%      |
| <b>Employees</b> |           |                                    |           |                           |           |           |                          |           |                           |           |
|                  |           |                                    |           | W                         | orkers    |           |                          |           |                           |           |
| Permanent        |           |                                    |           |                           |           |           |                          |           |                           |           |
| Other            |           |                                    |           |                           |           |           |                          |           |                           |           |
| permanent        |           |                                    |           |                           | N/        | A         |                          |           |                           |           |
| Total            |           |                                    |           |                           |           |           |                          |           |                           |           |
| Workers          |           |                                    |           |                           |           |           |                          |           |                           |           |

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

|                                  |  | Male        | Female |   |  |  |
|----------------------------------|--|-------------|--------|---|--|--|
| Gender                           | Median remuneration/<br>Number salary/ wages of respective<br>category (₹) |             | Number | Median remuneration/<br>salary/ wages of respective<br>category (₹) |  |  |
| Board of Directors (BOD)         | 12   | 4,00,000    | 2      | 2,50,000  |  |  |
| Key Managerial Personnel         | 3  | 2,21,98,876 | -      | NA  |  |  |
| Employees other than BOD and KMP | 27   | 23,40,000   | 13     | 15,12,498   |  |  |
| Workers                          | NA   | NA          | NA     | NA  |  |  |

Key Managerial Personnel are Executive Chairman, Chief Financial Officer and Company Secretary of the Company

### C T N T R U M

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

Yes

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

The Company has Internal Complaints Committee ("ICC"), under Section 4(1) of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. ICC has one presiding member, an external member and other members. Any complaint can be emailed to the presiding officer and the grievance will be redressed by the committee in the appropriate manner.

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

|                       |                          | FY 2023  |         | FY 2022                     |  |         |  |
|-----------------------|--------------------------|--|---------|-----------------------------|--|---------|--|
|                       | Filed during<br>the year | Pending<br>resolution<br>at the end<br>of year | Remarks | Filed<br>during the<br>year | Pending<br>resolution<br>at the end<br>of year | Remarks |  |
| Sexual Harassment     | -                        | -  | -       | -                           | -  | -       |  |
| Discrimination at     | -                        |  | -       | -                           | -  | -       |  |
| workplace             |                          |  |         |                             |  |         |  |
| Child Labour          | -                        | -  | -       | -                           | -  | -       |  |
| Forced Labour/        | -                        | -  | -       | -                           | -  | -       |  |
| Involuntary Labour    |                          |  |         |                             |  |         |  |
| Wages                 | -                        | -  | -       | -                           | -  | -       |  |
| Other human           | -                        |  | -       | -                           | -  | -       |  |
| rights related issues |                          |  |         |                             |  |         |  |

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

In cases of complaints of Sexual Harassment made in good faith, the Aggrieved Person lodging the Complaint and any person providing information or any witness, are protected from any form of retaliation. While dealing with Complaints, the Internal Complaints Committee ensures that the Aggrieved Person or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the Aggrieved Person while the investigation is in progress can be reported by the Aggrieved Person to the Internal Complaints Committee. Disciplinary action can be recommended by the Internal Complaints Committee to the Management Team against any such Complaints.

Further, in case of complaints made with malicious intent, the internal complaints committee may recommend appropriate disciplinary against the complainant. The persons who are victims of such frivolous or false complaints may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

In cases of Whistle Blower Complaints, no unfair treatment is meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under the Whistle Blower Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Complete protection is given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his/ her duties/ functions including making further Protected Disclosure.

As per the Whistle Blower Policy, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure etc.

The identity of the Whistle Blower is kept confidential. Any other Employee assisting in the said investigation is also protected to the same extent as the Whistle Blower.

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

No

9 Assessments for the year:

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

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

No corrective actions were required given that no inspection were undertaken.

#### **Leadership Indicators**

- 1 Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints
  - No corrective actions on the current procedure were initiated as the current system in place was found adequate and also since no incidence of violation took place, indicating a greater possibility of an effective system in place.
- 2 Details of the scope and coverage of any Human rights due-diligence conducted
  - Not Applicable
- 3 Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?
  - Yes, our offices are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.
- 4 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above
  - No corrective actions on the current procedure were initiated as the current system in place was found adequate and also since no incidence of violation took place, indicating a greater possibility of an effective system in place.



### PRINCIPLE - 6

# BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

#### **Essential Indicators**

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

| Parameter  | FY 2023          | FY 2022          |
|--|------------------|------------------|
| Total electricity consumption (A)  | 374.37 Gigajoule | 315.82 Gigajoule |
| Total fuel consumption (B)   | 14.83 Gigajoule  | 7.86 Gigajoule   |
| Energy consumption through other sources (C)   | -                | -                |
| Total energy consumption (A+B+C)   | 389.20 Gigajoule | 323.68 Gigajoule |
| Energy intensity per rupee (in lakhs) of turnover (Total energy consumption / turnover in lakhs) | 0.14             | 0.09             |
| Energy intensity (optional) – the relevant metric may be selected by the entity                  | -                | -                |

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

2 Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

No site / facilities is identified as designated consumers (DCs) under the 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 2023   | FY 2022   |
|---|-----------|-----------|
| Water withdrawal by source (in kilolitres)  |           |           |
| (i) Surface water   | NA        | NA        |
| (ii) Groundwater  | NA        | NA        |
| (iii) Third party water   | 642.86 kl | 384.49 kl |
| (iv) Seawater / desalinated water   | NA        | NA        |
| (v) Others  | NA        | NA        |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)              | 642.86 kl | 384.49 kl |
| Total volume of water consumption (in kilolitres)                                     | 642.86 kl | 384.49 kl |
| Water intensity per rupee (in lakhs) of turnover (Water consumed / turnover in lakhs) | 0.25      | 0.10      |
| Water intensity (optional) – the relevant metric may be selected by the entity        | -         | -         |

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

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

No.

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

| Parameter                           | Please specify unit | FY 2023                 | FY 2022                 |
|-------------------------------------|---------------------|-------------------------|-------------------------|
| NOx                                 | NA                  | Not measured separately | Not measured separately |
| SOx                                 | NA                  | Not measured separately | Not measured separately |
| Particulate matter (PM)             | NA                  | Not measured separately | Not measured separately |
| Persistent organic pollutants (POP) | NA                  | NA NA                   | NA NA                   |
| Volatile organic compounds (VOC)    | NA                  | NA                      | NA                      |
| Hazardous air pollutants (HAP)      | NA                  | NA                      | NA                      |
| Others – please specify             | NA                  | NA                      | NA                      |

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

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

| Parameter   | Unit                            | FY 2023            | FY 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 |                    |         |
| Total Scope 2 emissions<br>(Break-up of the GHG into CO2, CH4, N2O, HFCs,<br>PFCs, SF6, NF3, if available)  | Metric tonnes of CO2 equivalent | Refer Note 1 Below |         |
| Total Scope 1 and Scope 2 emissions per rupee of turnover   |                                 |                    |         |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity |                                 | Refer Note 1 Below |         |

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

Note: 1. Being an Investment Banking Company, we typically do not have significant Scope 1 emissions since our core operations typically involve financial services rather than activities that directly generate greenhouse gas emissions. However, there may be some limited instances where the company may have minor Scope 1 emissions. The Company is actively working to collect more data on Scope 1 and 2 emissions. Due to the nature of our business and our limited direct emissions sources, we have determined that the impact of Scope 1 emissions is negligible. Similarly, our Scope 2 emissions, which are associated with the consumption of purchased electricity, are not reported as we are unable to obtain reliable and verifiable data on the emission factors specific to our electricity sources. We acknowledge the importance of transparent reporting and taking responsibility for our environmental impact. We are committed to continuously improving our sustainability practices and exploring opportunities for comprehensive emissions reporting in the future.

7 Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details No.



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

| Parameter  | FY 2023                       | FY 2022           |
|--|-------------------------------|-------------------|
| Total Waste generated (in metric   | tonnes)                       |                   |
| Plastic waste (A)  | Not measured                  | Not measured      |
|  | separately                    | separately        |
| E-waste (B)  | E-waste is disposed th        | hrough recognised |
|  | vendo                         | ors.              |
| Bio-medical waste (C)  | NA                            | NA                |
| Construction and demolition waste (D)  | NA                            | NA                |
| Battery waste (E)  | Battery is disposed the vendo |                   |
| Radioactive waste (F)  | NA                            | NA                |
| Other Hazardous waste. Please specify, if any. (G)                           | NA NA                         | NA                |
| Other Non-hazardous waste generated (H). Please specify, if any.             | NA                            | NA                |
| (Break-up by composition i.e. by materials relevant to the sector)           | -                             | -                 |
| Total (A+B + C + D + E + F + G + H)  | -                             | -                 |
| operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used |                               | -                 |
| ` '  | -                             | -                 |
| (iii) Other recovery operations Total  | -                             | <u>-</u>          |
| For each category of waste generated, total waste disposed by nat            | ture of disposal method (     | in metric         |
| tonnes)  | ture or disposar method (     | in metric         |
| Category of waste  |                               |                   |
| (i) Incineration   | Not measured                  | Not measured      |
|  | separately                    | separately        |
| (ii) Landfilling   | Not measured                  | Not measured      |
|  | separately                    | separately        |
| (iii) Other disposal operations  | Not measured                  | Not measured      |
|  | separately                    | separately        |
| Total  | Not measured                  | Not measured      |
|  | separately                    | separately        |

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

9 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.

Company's business activities provides limited opportunities to incorporate recycled materials as processed inputs. The Company disposes of waste (like paper, plastic, etc.) through the state's municipal authorities, while e-waste is discarded via authorised vendors. In an effort to minimise the usage of plastics in offices and branches, Company has actively encourages use of alternative materials. Due to the nature of the Company's business it is not required to directly use hazardous and toxic materials for its products / processes.

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:

| Sr.<br>No. | Location of operations/<br>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 office does not                | have aparations/offices in/ | around ecologically sensitive areas  |

The office does not have operations/offices in/around ecologically sensitive areas

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

| Name and brief<br>details of project   | EIA Notification<br>No. | Date | Whether<br>conducted by<br>independent<br>external agency<br>(Yes / No) | Results communicated<br>in public domain<br>(Yes / No) | Relevant Web<br>link |
|--|-------------------------|------|---|--|----------------------|
| The office does not have operations/offices in/around ecologically sensitive areas |                         |      |   |  |                      |

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:

| Sr.<br>No. | Specify the law /<br>regulation / guidelines<br>which was not<br>complied with | Provide details<br>of the non-<br>compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action<br>taken, if any |  |
|------------|--|--|---|------------------------------------|--|
|            | Yes, Company is compliant with all the applicable laws.                        |  |   |                                    |  |

#### **Leadership Indicators**

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

| Parameter  | FY 2023          | FY 2022          |
|--|------------------|------------------|
| From renewable sources                                   |                  |                  |
| Total electricity consumption (A)                        | -                | -                |
| Total fuel consumption (B)                               | -                | -                |
| Energy consumption through other sources (C)             | -                | -                |
| Total energy consumed from renewable sources (A+B+C)     | -                | -                |
| From non-renewable sources                               |                  |                  |
| Total electricity consumption (D)                        | 374.37 Gigajoule | 315.82 Gigajoule |
| Total fuel consumption (E)                               | -                | -                |
| Energy consumption through other sources (F)             | -                | -                |
| Total energy consumed from non-renewable sources (D+E+F) | 374.37 Gigajoule | 315.82 Gigajoule |

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

# C**₹**NTRUM

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

Yes. All critical IT services required for business operations like email and collaboration and file storage are hosted with reputed SaaS providers on redundant private / public cloud. Users are provided computers to access cloud services to perform business processes using multi-factor authentication. Data for SaaS service is archived and can be restored from archive even in case user deletes the data. Financial accounting solution is hosted on-premises and its data is backed up on the cloud on daily basis. In case of primary site goes down, data can be restored on the cloud and normal operations can be resumed from there.

PRINCIPLE - 7

BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

#### **Essential Indicators**

- 1 a. Number of affiliations with trade and industry chambers/ associations 3
  - 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.

| Sr.<br>No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/<br>associations (State/National) |
|------------|---|--|
| 1          | Association of Investment Bankers of India            | National   |
| 2          | All India Association of Industries                   | National   |
| 3          | Federation of Indian Chamber of Commerce and Industry | National   |

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

PRINCIPLE - 8

#### BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

#### **Essential Indicators**

- 1 Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year Not Applicable
- 2 Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity Not Applicable
- 3 Describe the mechanisms to receive and redress grievances of the community.
  - Centrum Foundation works closely with communities in areas like education, health care, disaster relief, etc. from time to time. Company employees also volunteer in the activities of Centrum Foundation.
- 4 Percentage of input material (inputs to total inputs by value) sourced from suppliers Not applicable, as we are not in manufacturing of goods and sourcing of goods is not a part of our core activities.



# BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

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

We have a robust mechanism in place to receive and respond to consumer complaints and feedback. As a company committed to delivering exceptional services, we recognize the importance of actively engaging with our valued customers and addressing their concerns promptly and effectively. Our customers can reach out to the respective business heads and alternatively write to <a href="mailto:igmbs@centrum.co.in">igmbs@centrum.co.in</a> for redressal of their complaint or to share their feedback.

The consumer complaints are duly responded to by respective Business Heads.

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

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

3 Number of consumer complaints in respect of Data Privacy, Advertising, Cyber-security, Delivery of Essential Services, Restrictive Trade Practices, Unfair Trade Practices

There are no consumer complaints in respect of Data Privacy, Advertising, Cyber-security, Delivery of Essential Services, Restrictive Trade Practices, Unfair Trade Practices for FY 2021-22 and FY 2022-23.

- 4 Details of instances of product recalls on account of safety issues: Not Applicable
- 5 Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.
  - Company has a cyber security framework that covers important aspects like IT governance, end user training, cyber incident and crisis management plan, identification and securing of critical information and assets, secure transfer of information and anti-malware solutions. Access to information and systems are restricted by "need-to-know" and "need-to-have" basis to mitigate risk. Multi-factor authentication is required to access critical IT resources. Safe disposal of storage medium is followed.
- 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.

No corrective actions required for the period as there were no instances of breach and routine procedures were found effective in review.

#### **Leadership Indicators**

- 1 Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).
  - Information on products and services of the Company can be accessed on www.centrum.co.in
- 2 Provide the following information relating to data breaches:
  - a. Number of instances of data breaches along with impact Nil
  - b. Percentage of data breaches involving personally identifiable information of customers Nil