

July 05, 2024

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor,
Plot No. C-1, G Block,
Bandra Kurla Complex, Bandra (East)
Mumbai - 400 051.

BSE Limited

Phirozee Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Sub.: Submission of Business Responsibility and Sustainability Report for FY2023-24

Ref.: Scrip ID - STLTECH/ Scrip Code - 532374

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for the financial year ended March 31, 2024, which forms part of Annual Report for FY2023-24.

The same is also being uploaded on the website of the Company at <https://www.stl.tech/>

Kindly take the same on record.

Thanking you.

Yours faithfully,

For **Sterlite Technologies Limited**

Amit Deshpande

General Counsel & Company Secretary (ACS 17551)

Encl.: As above.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

| | | | | |
|--------|--|---|----------------------------|--|
| 1 | Corporate Identity Number (CIN) of the Company | L31300PN2000PLC202408 | | |
| 2 | Name of the Company | STERLITE TECHNOLOGIES LIMITED | | |
| 3 | Date of Incorporation | March 24, 2000 | | |
| 4 | Registered office address | 4 th Floor, Godrej Millennium, Koregaon Road 9, STS 12/1, Pune-411001, Maharashtra | | |
| 5 | Corporate office address | Godrej Millenium 9, Koregaon Road, Pune - 411 001 Maharashtra, India | | |
| 6 | E-mail id | stl.communications@stl.tech | | |
| 7 | Telephone | +91 20 30514000 | | |
| 8 | Website | https://www.stl.tech | | |
| 9 | Financial year for which reporting is being done | April 01, 2023 to March 31, 2024 (FY 2023-24) | | |
| 10 | Name of the Stock Exchange(s) where shares are listed | | | |
| S. No. | Name of stock exchange | Description of other stock exchange | Name of the country | |
| a. | National Stock Exchange of India Limited (NSE) | - | India | |
| b. | BSE Limited (BSE) | - | India | |
| 11 | Paid-up capital | ₹ 79.82 Crores | | |
| 12 | Name and contact details of the person who may be contacted in case of any queries on the BRSR report | Anjali Byce, Chief Human Resources Officer +91-20-30514000; anjali.byce@stl.tech | | |
| 13 | Reporting Boundary | Standalone basis | | |
| 14 | Whether the company has undertaken reasonable assurance of the BRSR Core? | No | | |
| 15 | Name of assurance provider | - | | |
| 16 | Type of assurance obtained | - | | |

II. Products/services

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

| S. No | Description of main activity | Description of business activity | % Of turnover |
|-------|--|----------------------------------|---------------|
| 1 | STL is a leading global optical company. Telecom operators, cloud companies, citizen networks, and large enterprises recognise and rely on STL for advanced capabilities in optical connectivity | Optical Networking Business | 59.54% |
| 2 | Global services offer system integration services in ICT space by integrating different technological products, networks, data centre and applications. | Global Service Business | 32.89% |
| 3 | STL Neox is a leading provider of cutting-edge Next Generation Voice Services with a strong global market presence and unmatched expertise in IP technology. Neox is a Unified Communication platform, featuring a comprehensive suite of UCaaS, CCaaS, and CPaaS offerings. | STL Digital | 0.35% |
| 4 | The Optical Connectivity Solution has been created to help telecom operators, ISPs, citizen networks, and major corporations build out networks more quickly, more effectively, and more affordably. We are offering end-to-end functionality, including optical fibre components, pre-connectorized kits, and post-sales support. | Optical Interconnect | 7.22% |

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

| S. No. | Product/Service | NIC Code | % Of total turnover contributed |
|--------|-------------------------------------|----------|---------------------------------|
| 1 | Optical fibre cable | 2731 | 30.33% |
| 2 | Optical fibre | 2310 | 18.59% |
| 3 | Copper telecom cables | 2732 | 10.61% |
| 4 | Fibre optical cable laying services | 4321 | 32.89% |
| 5 | Software Business | 4651 | 0.35% |
| 6 | Optical Interconnect | 2620 | 7.22% |

III. Operations**19. Number of locations where plants and/or operations/offices of the entity are situated**

| Location | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National | 5 | 3 | 8 |
| International | 0 | 0 | 0 |

20. Markets served by the entity**a. Number of locations**

| Locations | Number |
|----------------------------------|--------|
| National (No. of states) | 28 |
| International (No. of countries) | 32 |

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

27%

c. A brief on types of customers

STL manufacturing facilities serve diverse customers across the entire value chain-

- Telecom companies
- Cloud companies
- Large enterprises

IV. Employees**21. Details as on March 31, 2024****a. Employees and workers (including differently abled)**

| S. No. | Particulars | Total (A) | Male | | Female | | Other | |
|------------------|------------------------------|-------------|-------------|---------------|------------|---------------|----------|--------------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (H) | % (H/A) |
| EMPLOYEES | | | | | | | | |
| 1 | Permanent (D) | 1274 | 1125 | 88.30% | 149 | 11.70% | 0 | 0.00% |
| 2 | Other than Permanent (E) | 825 | 767 | 92.97% | 58 | 7.03% | 0 | 0.00% |
| 3 | Total employees (D+E) | 2099 | 1892 | 90.14% | 207 | 9.86% | 0 | 0.00% |
| WORKERS | | | | | | | | |
| 1 | Permanent (F) | 22 | 18 | 81.82% | 4 | 18.18% | 0 | 0.00% |
| 2 | Other than Permanent (G) | 1825 | 1615 | 88.49% | 210 | 11.51% | 0 | 0.00% |
| 3 | Total workers (F+G) | 1847 | 1633 | 88.41% | 214 | 11.59% | 0 | 0.00% |

b. Differently abled employees and workers

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

22. Participation/inclusion/representation of women

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

23. Disclose trends for the past 3 years

| | Turnover rate in current FY24 | | | | Turnover rate in previous FY23 | | | | Turnover rate in the year prior to the previous FY22 | | | |
|---------------------|-------------------------------|--------|-------|--------|--------------------------------|--------|-------|--------|--|--------|-------|--------|
| | Male | Female | Other | Total | Male | Female | Other | Total | Male | Female | Other | Total |
| Permanent Employees | 22.40% | 34.23% | 0.00% | 23.78% | 20.03% | 31.69% | 0.00% | 21.37% | 23.40% | 35.31% | 0.00% | 25.09% |
| Permanent Workers | 0.00% | 0.00% | 0.00% | 0.00% | 19.23% | 16.67% | 0.00% | 18.75% | 0.00% | 0.00% | 0.00% | 0.00% |

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

24.

a. Names of holding / subsidiary / associate companies / joint ventures:

| S. No. | Name of Holding/Subsidiary/ Associate Companies/Joint Venture (A) | Indicate whether Holding/ Subsidiary/ Associate/Joint Venture | % Of shares held by listed entity | Does the entity indicated in column A, participate in the Business Responsibility initiatives of listed entity? (Yes/No) |
|--------|---|---|-----------------------------------|--|
| 1 | Twin Star Overseas Limited, Mauritius (Immediate holding company) | Holding | 52.47% | No |
| 2 | Jiangsu Sterlite Fiber Technology Co. Ltd. | Subsidiary | 100% | Yes |
| 3 | Sterlite Global Ventures (Mauritius) Limited | Subsidiary | 100% | No |
| 4 | Sterlite Technologies UK Ventures Limited | Subsidiary | 100% | No |
| 5 | Speedon Network Limited | Subsidiary | 100% | No |
| 6 | Elitecore Technologies (Mauritius) Limited | Subsidiary | 100% | No |
| 7 | Elitecore Technologies SDN BHD. (Malaysia) | Subsidiary | 100% | No |

| S. No. | Name of Holding/Subsidiary/ Associate Companies/Joint Venture (A) | Indicate whether Holding/ Subsidiary/ Associate/Joint Venture | % Of shares held by listed entity | Does the entity indicated in column A, participate in the Business Responsibility initiatives of listed entity? (Yes/No) |
|--------|---|---|-----------------------------------|--|
| 8 | Sterlite (Shanghai) Trading Company Limited | Subsidiary | 100% | No |
| 9 | Sterlite Tech Holding Inc. | Subsidiary | 100% | No |
| 10 | Sterlite Technologies Inc. | Subsidiary | 100% | Yes |
| 11 | Metallurgica Bresciana S.p.A | Subsidiary | 100% | Yes |
| 12 | Sterlite Innovative Solutions Limited | Subsidiary | 100% | No |
| 13 | STL Digital Limited | Subsidiary | 100% | Yes |
| 14 | Sterlite Tech Cables Solutions Limited | Subsidiary | 100% | Yes |
| 15 | STL Digital UK Limited | Subsidiary | 100% | No |
| 16 | PT Sterlite Technologies Indonesia | Subsidiary | 100% | No |
| 17 | Sterlite Technologies Pty. Ltd | Subsidiary | 100% | No |
| 18 | Sterlite Technologies DMCC | Subsidiary | 100% | No |
| 19 | STL Optical Interconnect S.p.A. | Subsidiary | 100% | Yes |
| 20 | Optotec S.p.A. | Subsidiary | 100% | Yes |
| 21 | Optotec International S.A. | Subsidiary | 100% | No |
| 22 | STL Networks Limited | Subsidiary | 100% | No |
| 23 | STL Tech Solutions Limited, UK | Subsidiary | 100% | Yes |
| 24 | STL UK Holdco Limited, UK | Subsidiary | 100% | No |
| 25 | STL Digital Inc. (USA) | Subsidiary | 100% | No |
| 26 | Clearcomm Group Limited, UK | Subsidiary | 100% | Yes |
| 27 | STL Optical Tech Limited | Subsidiary | 100% | No |
| 28 | STL Solutions Germany GmbH | Subsidiary | 100% | No |
| 29 | Sterlite Condu spar Industrial Ltda | Jointventure | 50% | No |

VI. CSR Details

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

- a. Turnover (in ₹) - 3951.53 Crores
- b. Net worth (in ₹) - 1720.88 Crores

VII. Transparency and Disclosures Compliances

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

| Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct | | | | | | | | |
|--|---|---|--|--|---------|--|--|---------|
| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) | (if yes, then provide web-link for grievance redress policy) | FY24 | | | FY23 | | |
| | | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 0 | 0 | - | 0 | 0 | - |
| Investors (other than shareholders) | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 0 | 0 | - | 0 | 0 | - |

| Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct | | | | | | | | |
|--|---|---|--|--|---------|--|--|---------|
| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) | (if yes, then provide web-link for grievance redress policy) | FY24 | | | FY23 | | |
| | | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Shareholders | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 909 | 0 | - | 596 | 0 | - |
| Customers | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 0 | 0 | - | 0 | 0 | - |
| Value Chain Partners | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 0 | 0 | - | 0 | 0 | - |
| Employees and workers | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 0 | 0 | - | 0 | 0 | - |
| Other | Yes | https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf | 115 | 9 | - | 68 | 7 | - |

27. Overview of the entity’s material responsible business conduct issues

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

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate. | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|-----------------------------|--|---|---|--|
| 1 | Carbon pricing | R | Carbon pricing mechanisms are being implemented to encourage companies to reduce their carbon footprint. | STL has taken a goal to be Net zero and is working towards reducing its carbon footprint | Negative Implications |
| 2 | Sustainable supply chain | O | Customers and investors are increasingly demanding that companies adopt sustainable practices throughout their supply chains. | STL is identifying and assessing the sustainability of its suppliers and taking steps to ensure that they meet our sustainability standards | Positive Implications |
| 3 | Climate-related regulations | R | Worldwide regulations are being implemented to promote energy efficiency and reduce greenhouse gas emissions. | STL is investing in energy efficiency measures and exploring possibilities of renewable energy | Positive Implications |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate. | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|--|---|---|--|
| 4 | Raw material availability | R | Disruptions in supply chain are being observed leading to uncertain raw material availability and volatility in prices. | STL is working towards increasing its local procurement to minimise these disruptions | Negative Implications |
| 5 | Health and safety risks | R | Companies must ensure the health and safety of their employees, particularly those working in hazardous or high-risk environments. | STL is consistently assessing the health and safety risks associated with its operations and implement appropriate measures to protect its employees. | Negative Implications |
| 6 | Innovation | O | Companies that fail to innovate and adopt new technologies and business models risk falling behind and losing market share | STL is investing in research and development to develop new sustainable technologies and business models | Positive Implications |
| 7 | Resource efficiency | O | With global increase in prices of raw materials, there is an increased focus on achieving the resource efficiency. | STL is taking active measures to achieve the resource efficiency for raw materials, energy, water and materials management. | Positive Implications |
| 8 | Cyber security | R | As companies become more reliant on technology, they face increasing cybersecurity risks | STL strives to implement robust cybersecurity measures to protect its data, systems, and operations from cyber-attacks and data breaches | Negative Implications |
| 9 | Data privacy | R | Companies must also comply with data privacy regulations to protect the personal data of their customers and employees | STL ensures that it complies with data privacy regulations in India and take steps to protect personal data from unauthorised access. | Negative Implications |
| 10 | Labour and human rights | R | Companies face risks associated with labour and human rights violations in their supply chains, such as forced labour, child labour, and unsafe working conditions. | STL assesses its suppliers' labour and human rights practices and works with them to improve conditions and eliminate any violations | Negative Implications |
| 11 | Diversity and inclusion | R | Companies that lack diversity and inclusivity risk reputational damage and loss of talent. | STL continually assesses its diversity and inclusion policies and practices and work to promote diversity and inclusivity within our workforce | Positive Implications |

SECTION B: MANAGEMENT AND PROCESS DISCLOSURE

| Disclosure Question | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|---|--|--|--|---|---|---|---|--|--|
| POLICY AND MANAGEMENT PROCESSES | | | | | | | | | |
| 1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| b. Has the policy been approved by the Board? (Yes/No) | Y | Y | N | Y | N | Y | Y | Y | Y |
| c. Web link of the policies, if available | Code of Conduct https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf | Sustainable sourcing policy https://www.stl.tech/pdf/coc/Sustainable%20Sourcing%20policy.pdf Conflict free sourcing policy https://www.stl.tech/pdf/coc/Conflict%20Free%20Sourcing%20Policy.pdf | Employee well-being policy https://www.stl.tech/pdf/Employee-well-being-policy.pdf | Sterlite Business partner code of conduct https://www.stl.tech/pdf/coc/Sterlite%20Business%20Partner%20Code%20of%20Conduct.pdf | Human Rights Policy https://www.stl.tech/pdf/coc/Human-Rights-Policy-V_2_0.pdf | Waste Management Policy https://www.stl.tech/pdf/coc/Waste-Management-Policy.pdf | Code of Conduct https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf | CSR Policy https://www.stl.tech/pdf/corporate-social-responsibility-policy-2021.pdf | Privacy Policy https://www.stl.tech/privacy-policy/ |
| 2. Whether the entity has translated the policy into procedures. (Yes / No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/ No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 4. Name the national and international codes/certifications/labels/ standards | - | ISO 14001 certified all Indian plants. ISO 45001 certified all Indian plants. | - | - | SA8000 certified all Indian plants. | ISO 14001 Certified all Indian plants. ISO 14021 (Zero Liquid Discharge) Certified all Indian plants. | - | - | ISO 27001 Certified all Indian plants. |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any | Principle 6 1. Net-zero emissions by 2030 2. Ensuring water positivity across STL locations globally by 2030 3. Zero waste to landfill at manufacturing plants by 2030 4. 100% of Lifecycle assessment of products by 2030 Principle 8 1. Transforming 5 million lives by 2025 2. Replenishing 5 million cubic meters of water in communities by 2025 3. Undertaking 5 million plantations by 2025 | | | | | | | | |
| 6. Performance of the entity against specific commitments, goals and targets | Principle 6 1. Goal: Net-zero emissions by 2030. Performance: we have committed to Science Based Target Initiatives in FY23. 2. Goal: Ensuring water positivity across STL locations globally by 2030. Performance: All Indian plants are Zero liquid discharge certified. 3. Goal: Zero waste to landfill at manufacturing plants by 2030. Performance: All Indian plants are Zero waste to landfill certified. 4. Goal :100% of Lifecycle assessment of products by 2030. Performance: LCA model and reports have been prepared for 9 products. Principle 8 1. Goal: Transforming 5 million lives by 2025. Performance: Transforming 4.2 million lives. 2. Goal: Replenishing 5 million cubic meters of water in communities by 2025. Performance: 2.69 million cubic meters. 3. Goal: Undertaking 5 million plantations by 2025. Performance: 2.9 L plantation done and being maintained. | | | | | | | | |

GOVERNANCE, LEADERSHIP AND OVERSIGHT**7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)**

In light of the profound shifts brought about by the recent global challenges, ensuing economic fluctuations, there has been a fundamental re-evaluation of societal and business strategies worldwide. Amidst these evolving socioeconomic landscapes, the significance of Environmental, Social, and Governance (ESG) principles has grown substantially. Notably, discussions at governmental and corporate levels now invariably encompass concerns regarding climate change, sustainable development, and broader ESG considerations.

Our company's ESG objectives encompass a comprehensive range of initiatives aimed at fostering sustainable practices and societal impact. These include commitments to sustainable sourcing and manufacturing, achieving net-zero emissions, ensuring water positivity across our global locations, and eliminating waste to landfills. Moreover, we prioritise product lifecycle assessments to minimise environmental footprints.

To effectuate meaningful and enduring change, we recognize the importance of action throughout our value chain and within the communities we serve. Accordingly, we engage with partners both upstream and downstream to reduce packaging, waste, and address global challenges such as gender inequality, healthcare disparities, and digital education gaps. Furthermore, our focus extends to building world's digital backbone - depicts how we are enabling nations to become a digital economy in the communities where we operate, underscoring our commitment to inclusivity and empowerment.

In conclusion, our commitment to ESG principles reflects our belief in their fundamental importance in navigating today's dynamic landscape. With our expertise and unwavering dedication, we remain steadfast in our mission to create a greener, safer, and more inclusive world for generations to come.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility & Sustainability (BRSR) Policy

Name-Ankit Agarwal

Designation-Managing Director

9. Does the entity have a specified committee of the board/ director responsible for decision making on sustainability related issues? (Yes/ No). If yes, provide details.

Yes, within our organisational structure, we have established a dedicated Sustainability and Corporate Social Responsibility (CSR) committee, operating under the oversight of the Board of Directors. This committee serves as a pivotal body responsible for facilitating the company's adherence to environmental, social, and governance (ESG) standards, while also overseeing the execution of our CSR and ESG policies.

The committee's core mandate entails providing guidance and support to ensure that the company effectively fulfils its obligations across environmental, social, and governance dimensions.

Through the diligent oversight and strategic direction provided by this committee, we reinforce our commitment to responsible business practices and sustainable development, thereby advancing our mission to create value for all stakeholders while safeguarding the interests of future generations.

10. Details of Review of the National Guidelines on Responsible Business Conduct (NGRBC) by the company:

| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee | | | | | | | | | Frequency: Annually (A) / Half yearly (H) / Quarterly (Q) / Any other - please specify | | | | | | | | |
|---|--|----|----|------------------------|----------|----|----|----|----|--|----|----|----|-----------|----|----|----|----|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies & follow up action | | | | | Director | | | | | | | | | Annually | | | | |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | | | | Committee of the Board | | | | | | | | | | Quarterly | | | | |

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

| P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|----|----|----|----|----|----|----|----|----|
| Y | Y | Y | Y | Y | Y | Y | N | Y |

Yes, the working of the above policies except CSR policy was verified by Intertek during SA 8000 audits.

SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

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

PRINCIPLE 1- BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

Essential Indicators

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

| Segment | Total number of training and awareness programmes held | Topics/ principles covered under the training audits impact | % of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|---|---|
| Board of Directors | 3 | 1. Exco Offsite 2. External Seminar 3. Compliance (POSH + CoC + BCP + IP +Infosec) | 100% |
| Key Managerial Personnel (KMP) | 3 | 1. Exco Offsite 2. External Seminar 3. Compliance (POSH + CoC + BCP + IP +Infosec) | 100% |
| Employees other than BoD and KMPs | 395 | 1. Skill Upgradation 2. Technical upskilling 3. Hi-Potential Development 4. Induction 5. Compliance (POSH + CoC + BCP + IP + Infosec) | 95% |
| Workers | 17 | 1. Data Analytics 2. Induction 3. Compliance (POSH + CoC + BCP + IP + Infosec) 4. Excel with Excel 5. Competency Development 6. Program Management Course 7. SAP invoice processing | 91% |

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

| Monetary | | | | | |
|-----------------|-----------------|--|---------------|-------------------|--|
| | NGRBC Principle | Name of the regulatory/enforcement agencies/ judicial institutions | Amount (In ₹) | Brief of the Case | Has an appeal been preferred? (Yes/No) |
| Penalty/ Fine | 0 | 0 | 0 | 0 | - |
| Settlement | 0 | 0 | 0 | 0 | - |
| Compounding fee | 0 | 0 | 0 | 0 | - |

| Non-Monetary | | | | |
|--------------|-----------------|---|-------------------|--|
| | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Brief of the Case | Has an appeal been preferred? (Yes/No) |
| Imprisonment | 0 | 0 | 0 | - |
| Punishment | 0 | 0 | 0 | - |

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

| Case Details | Name of the regulatory/ enforcement agencies/ judicial institutions |
|--------------|---|
| NA | NA |
| NA | NA |
| NA | 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, STL's Code of Conduct and Ethics comprehensively addresses its anti-corruption and anti-bribery policy. The company strictly prohibits engagement in any form of illicit practices, including offering, making, or promising payments, gifts, or other valuables to government officials, customers, vendors, consultants, and other stakeholders. Such actions, whether perceived as intended or occurring directly or indirectly, are expressly forbidden if they are aimed at improperly influencing business decisions, actions or inactions, the perpetration of fraud, or the creation of opportunities for fraudulent activities.

https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf

<https://www.stl.tech/pdf/coc/Sterlite%20Business%20Partner%20Code%20of%20Conduct.pdf>

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

| Particulars | FY24 | FY23 |
|-------------|------|------|
| Directors | 0 | 0 |
| KMPs | 0 | 0 |
| Employees | 0 | 0 |
| Workers | 0 | 0 |

6. Details of complaints about conflict of interest

| Particulars | FY24 | | FY23 | |
|--|--------|---------|--------|---------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | 0 | - | 0 | - |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | 0 | - | 0 | - |

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.

None

8. Number of days of accounts payables

| Particulars | FY24 | FY23 |
|---|--------|--------|
| i) Accounts payable x 365 days | 831010 | 761635 |
| ii) Cost of goods/services procured | 3426 | 4066 |
| iii) Number of days of account payables | 243 | 187 |

9. Open-ness of business – provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances & investments, with related parties, in the following format

| | | FY24 | FY23 | |
|--|--|-------------------------------------|------|---|
| Concentration of Purchases | a. i) Purchases from trading houses | - | - | |
| | ii) Total purchases | - | - | |
| | iii) Purchases from trading houses as % of total purchases | - | - | |
| | b. Number of trading houses where purchases are made from | - | - | |
| | c. i) purchases from top 10 trading houses | - | - | |
| | ii) Total purchases from trading houses | - | - | |
| | iii) Purchases from top 10 trading houses as % of total purchases from trading houses | - | - | |
| | Concentration of Sales | a. i) Sales to dealer/ distributors | - | - |
| | | ii) Total Sales | - | - |
| iii) Sales to dealers / distributors as % of total sales | | - | - | |
| b. Number of dealers / distributors to whom sales are made | | - | - | |
| c. i) Sales to top 10 dealers/ distributors | | - | - | |
| ii) Total sales to dealer/distributors | | - | - | |
| Share of RPTs in | iii) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors | - | - | |
| | a. i) Purchases (Purchases with related parties) | - | - | |
| | ii) Total Purchases | - | - | |
| | iii) Purchases (Purchases with related parties / Total Purchases) | - | - | |
| | b. i) Sales (Sales to related parties) | - | - | |
| | ii) Total Sales | - | - | |
| | iii) Sales (Sales to related parties / Total Sales) | - | - | |
| | c. i) Loans & advances given to related parties | - | - | |
| | ii) Total loans & advances | - | - | |
| | iii) Loans & advances (Loans & advances given to related parties / Total loans & advances) | - | - | |
| | d. i) Investments in related parties | - | - | |
| | ii) Total investments made | - | - | |
| iii) Investments (Investments in related parties / Total Investments made) | - | - | | |

Leadership Indicators

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

| Total number of awareness programmes held | Topics / principles covered under the training | %age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|---|--|
| 27 | Child Labour, Forced Labour, Health & Safety, Freedom of association & right to collective Bargaining, Discrimination, Disciplinary Practices, Working Hours, Remuneration & Management Systems | 3.28% |

2. Does the entity have processes in place to avoid / manage conflicts of interest involving members of the Board? (Yes / No) If yes, provide details of the same.

Yes, at the onset of each year, members of the Board diligently disclose any interests they hold in other entities, including directorships or ownership positions. Additionally, throughout the year, any changes to these interests are promptly communicated to the company. Should any proposal arise in which a Board member has a vested interest, they conscientiously abstain from participating in the voting process concerning that particular matter, ensuring transparency and upholding the highest standards of corporate governance.

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.

| | FY24 | FY23 | Details of improvements in environmental and social impact |
|-------|--------|--------|--|
| R&D | 21.05% | 54.69% | 1. MCF - Development of multi-core fibre technology that is novel and 4x less material intensive than traditional fibre 2. IBR & Microcable - Reduce diameter of cable resulting in lower raw material consumption. 3. ISP/ OSP IBR cable- Improved human safety and used in fire prevention requirements 4. And other Cable Process improvement projects |
| Capex | 0% | 1.94% | No capex investment in FY24 |

2.

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

Yes

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

3.28%

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.

| Type of Waste | Name of Policy/ Process | Policy/ Process Description |
|--------------------------------|-------------------------|--|
| Plastics (including packaging) | Waste Management Policy | Fibre spools containing fresh fibre manufactured at the Optical Fibre plants are dispatched to captive plants for consumption. These new spools are received at the Optical Fibre Cable plants. Post consumption of fibre, the spools are cleaned and sent back to OF plants for re-use. |
| E-waste | Waste Management Policy | - |
| Hazardous waste | Waste Management Policy | - |
| Other waste | Waste Management Policy | - |

4. Whether Extended Producer Responsibility (If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessment) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes

Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

Yes

| NIC Code | Name of Product/Service | % of total Turnover contributed (FY 2023-24) | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/No) If yes, provide the web-link. |
|----------|---|--|--|---|--|
| 27310 | 24F ADSS G.652D Single Jacket 150 M Span | 0.4% | Cradle to gate | Yes | No |
| 27310 | 48F Micro-Lite G.652D Single Jacket OFC | 0.4% | Cradle to gate | Yes | No |
| 27310 | 48F MLT G.652D Armoured OFC | 1.1% | Cradle to gate | Yes | No |
| 27310 | 432F Celesta (IBR) G.657 A2 Ribbon Duct OFC | 5.5% | Cradle to gate | Yes | No |
| 27310 | 36F Yoyalite G.657 A1 ULW OFC | 1.2% | Cradle to gate | Yes | No |
| 27310 | 48F Yoyalite G.657 A2 Duct OFC (L1091) | 0.2% | Cradle to gate | Yes | No |
| 27310 | 144F Yoyalite G.657 A2 Duct OFC (L1091-15) | 0.8% | Cradle to gate | Yes | No |
| 27310 | 36F Yoyalite G.657 A2 Duct/ ADSS OFC | 2.5% | Cradle to gate | Yes | No |
| 27310 | 144F Yoyalite G.657 A2 Duct / ADSS OFC | 1.7% | Cradle to gate | Yes | No |

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

| Name of Product / Service | Description of the risk / concern | Action Taken |
|---------------------------|-----------------------------------|--------------|
| None | - | - |

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

| Type of Waste | FY24 | | | FY23 | | |
|--------------------------------|---------|----------|---------------------------------|---------|----------|---------------------------------|
| | Re-Used | Recycled | Safely Disposed (Metric Tonnes) | Re-Used | Recycled | Safely Disposed (Metric Tonnes) |
| Plastics (including packaging) | 711 | - | - | 662 | - | - |
| E-waste | - | - | - | - | - | - |
| Hazardous waste | - | - | - | - | - | - |
| Other waste | - | - | - | - | - | - |

PRINCIPLE 3- BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

Essential Indicators

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

| Category | Total (A) | % Of employees covered by | | | | | | | | | |
|---------------------------------------|-------------|---------------------------|----------------|--------------------|----------------|--------------------|---------------|--------------------|---------------|---------------------|----------------|
| | | Health insurance | | Accident insurance | | Maternity benefits | | Paternity benefits | | Day care facilities | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| PERMANENT EMPLOYEES | | | | | | | | | | | |
| Male | 1125 | 1125 | 100.00% | 1125 | 100.00% | - | - | 1125 | 100.00% | 1125 | 100.00% |
| Female | 149 | 149 | 100.00% | 149 | 100.00% | 149 | 100.00% | - | - | 149 | 100.00% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Total | 1274 | 1274 | 100.00% | 1274 | 100.00% | 149 | 11.70% | 1125 | 88.30% | 1274 | 100.00% |
| OTHER THAN PERMANENT EMPLOYEES | | | | | | | | | | | |
| Male | 767 | 767 | 100.00% | 767 | 100.00% | - | - | 548 | 71.45% | 739 | 96.35% |
| Female | 58 | 58 | 100.00% | 58 | 100.00% | 58 | 100.00% | - | - | 44 | 75.86% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Total | 825 | 825 | 100.00% | 825 | 100.00% | 58 | 7.03% | 548 | 66.42% | 783 | 94.91% |

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

| Category | Total (A) | % Of workers covered by | | | | | | | | | |
|-------------------------------------|-------------|-------------------------|----------------|--------------------|----------------|--------------------|---------------|--------------------|---------------|---------------------|----------------|
| | | Health insurance | | Accident insurance | | Maternity benefits | | Paternity benefits | | Day care facilities | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| PERMANENT WORKERS | | | | | | | | | | | |
| Male | 18 | 18 | 100.00% | 18 | 100.00% | - | - | 18 | 100.00% | 18 | 100.00% |
| Female | 4 | 4 | 100.00% | 4 | 100.00% | 4 | 100.00% | - | - | 4 | 100.00% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Total | 22 | 22 | 100.00% | 22 | 100.00% | 4 | 18.18% | 18 | 81.82% | 22 | 100.00% |
| OTHER THAN PERMANENT WORKERS | | | | | | | | | | | |
| Male | 1615 | 1615 | 100.00% | 1615 | 100.00% | - | - | 805 | 49.85% | 1615 | 100.00% |
| Female | 210 | 210 | 100.00% | 210 | 100.00% | 210 | 100.00% | - | - | 209 | 99.52% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Total | 1825 | 1825 | 100.00% | 1825 | 100.00% | 210 | 11.51% | 805 | 44.11% | 1824 | 99.95% |

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following formant:

| | FY24 | FY23 |
|--|-----------------|-----------------|
| (i) Cost incurred on wellbeing measures (well-being measures means well-being of employees and workers (including male, female, permanent and other than permanent employees and workers)) | 9,53,20,322 | 9,01,60,985 |
| (ii) Total revenue of the company | 39,51,53,00,000 | 53,49,68,00,000 |
| (iii) Cost incurred on wellbeing measures as a % of total revenue of the company | 0.24% | 0.17% |

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

| Benefits | FY24 | | | FY23 | | |
|------------------------|---|--|---|--|--|---|
| | No. of employees covered (as a % of total employee) | No. of workers covered (as a % of total workers) | Deducted & deposited with the authority (Yes/No/NA) | No. of employees covered (as a % of total employees) | No. of workers covered (as a % of total workers) | Deducted and deposited with the authority (Yes/No/NA) |
| PF | 100% | 100% | Yes | 100% | 100% | Yes |
| Gratuity | 100% | 100% | Yes | 100% | 100% | Yes |
| ESI | 1.94% | 100% | Yes | 1.5% | 100% | Yes |
| Others- Please Specify | - | - | - | - | - | - |

3. Accessibility of workplaces

Are the premises/offices accessible to differently abled employees 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

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, https://www.stl.tech/pdf/coc/Human-Rights-Policy-V_2_0.pdf

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

| Gender | Permanent employees | | Permanent Workers | |
|--------|---------------------|----------------|---------------------|----------------|
| | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male | 100% | 100% | 100% | 100% |
| Female | 100% | 100% | 100% | 100% |
| Other | 0% | 0% | 0% | 0% |
| Total | 100% | 100% | 100% | 100% |

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

Yes

| | Yes/No (If yes, then give details of the mechanism in brief) |
|---------------------------------------|--|
| Permanent Employees | <p>Yes, our commitment to upholding the highest ethical and business standards across our global operations is a cornerstone of our corporate ethos. This commitment, however, relies heavily on the collaboration and dedication of our stakeholders and employees.</p> <p>Every member of our workforce is expected to adhere unwaveringly to our code of business conduct and ethics, ensuring that our principles are upheld at every level of our organisation.</p> <p>To foster a culture of transparency and accountability, we have implemented a robust whistle-blower policy. This policy empowers not only our employees but also off-roll employees, workers, and business partners to voice concerns regarding any malpractice, impropriety, abuse, or misconduct at an early stage, without fear of reprisal or discrimination. Importantly, this policy has been extended to encompass external stakeholders, including vendors and customers, ensuring that all voices are heard and valued. Additionally, the toll free number and email ID that can be used for making a complaint are displayed in all offices.</p> <p>Moreover, we have established a Prevention of Sexual Harassment Committee (PSHC) to oversee and address complaints effectively. Our commitment to creating a safe and respectful workplace is further underscored by annual training sessions provided to employees, equipping them with the knowledge and resources to identify and report instances of harassment through appropriate channels.</p> <p>Recognizing the importance of holistic well-being, both mental and emotional, we launched STL Care in FY22. This initiative is dedicated to promoting the wellness of our employees, underscoring our commitment to fostering a supportive and nurturing work environment. Through STL Care, we provide resources and support mechanisms to prioritise the mental and emotional well-being of our workforce, ensuring that they feel valued and supported in their professional journeys.</p> |
| Other than Permanent Employees | |
| Permanent Workers | |
| Other than Permanent Workers | |

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

| Category | FY24 | | | FY23 | | |
|---------------------------|--|--|-----------|--|--|-----------|
| | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B / A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D / C) |
| Total Permanent Employees | 0 | 0 | 0.00% | 0 | 0 | 0.00% |
| - Male | 0 | 0 | 0.00% | 0 | 0 | 0.00% |
| - Female | 0 | 0 | 0.00% | 0 | 0 | 0.00% |
| Total Permanent Workers | 0 | 0 | 0.00% | 0 | 0 | 0.00% |
| - Male | 0 | 0 | 0.00% | 0 | 0 | 0.00% |
| - Female | 0 | 0 | 0.00% | 0 | 0 | 0.00% |

8. Details of training given to employees and workers

| Category | FY24 | | | | | FY23 | | | | |
|------------------|-------------|--------------------------------------|---------------|----------------------|---------------|-------------|--|---------------|----------------------|---------------|
| | Total (A) | On health & safety/wellness measures | | On skill upgradation | | Total (D) | On health and safety measures/wellness | | On skill upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. F | % (F/D) |
| EMPLOYEES | | | | | | | | | | |
| Male | 1892 | 767 | 40.54% | 1714 | 90.59% | 2286 | 2148 | 93.96% | 1857 | 81.23% |
| Female | 207 | 58 | 28.02% | 182 | 87.92% | 227 | 172 | 75.77% | 167 | 73.57% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 1 | 1 | 100.00% | 0 | 0.00% |
| Total | 2099 | 825 | 39.30% | 1896 | 90.33% | 2514 | 2321 | 92.32% | 2024 | 80.51% |
| WORKERS | | | | | | | | | | |
| Male | 1633 | 1615 | 98.90% | 1629 | 99.76% | 2691 | 2689 | 99.93% | 2678 | 99.52% |
| Female | 214 | 210 | 98.13% | 213 | 99.53% | 467 | 467 | 100.00% | 459 | 98.29% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0 | 0.00% | 0 | 0.00% |
| Total | 1847 | 1825 | 98.81% | 1842 | 99.73% | 3158 | 3156 | 99.94% | 3137 | 99.34% |

9. Details of performance and career development reviews of employees and workers

| Category | FY24 | | | FY23 | | |
|------------------|-------------|-------------|---------------|-------------|-------------|---------------|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) |
| EMPLOYEES | | | | | | |
| Male | 1892 | 1875 | 99.10% | 2286 | 2059 | 90.07% |
| Female | 207 | 203 | 98.07% | 227 | 213 | 93.84% |
| Other | 0 | 0 | 0.00% | 1 | 1 | 100.00% |
| Total | 2099 | 2078 | 99.00% | 2514 | 2273 | 90.41% |
| WORKERS | | | | | | |
| Male | 1633 | 175 | 10.72% | 2691 | 64 | 2.38% |
| Female | 214 | 18 | 8.41% | 467 | 17 | 3.64% |
| Other | 0 | 0 | 0.00% | 0 | 0 | 0.00% |
| Total | 1847 | 193 | 10.45% | 3158 | 81 | 2.56% |

10. Health and safety management system:

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

Yes, our company boasts a meticulously structured Occupational Health & Safety (OH&S) management system, meticulously implemented and upheld in accordance with our established procedures and legal mandates. Clear delineation of roles and responsibilities within the EHS team ensures effective oversight, with regular monitoring facilitated through comprehensive management reviews.

Furthermore, our unwavering commitment to excellence is underscored by the ISO 45001 and 14001 certifications obtained by all our manufacturing facilities. These internationally recognized certifications serve as a testament to our dedication to ensuring the highest standards of occupational health, safety, and environmental management across our operations.

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

As an ISO 45001 certified organisation, we prioritise the safety and well-being of our workforce through comprehensive risk assessment and management practices. Utilising our internal tool, we systematically evaluate risks associated with our processes on both routine and non-routine bases, ensuring proactive identification and mitigation of potential hazards.

Our commitment to maintaining high environmental and safety standards is further demonstrated through the governance of all manufacturing processes by our Quality, Environment, Health, and Safety (QEHS) policy. Each operational area is meticulously monitored through ISO 14001 certified Environment Management Systems and ISO 45001 Occupational Health and Safety management systems, facilitating the continuous improvement of our practices and the identification of any gaps.

To ensure that our workforce remains aware of potential hazards and risks, we

provide access to policies such as the Quality, Environment, Health, and Safety policy, as well as Hazard Identification and Risk Assessment (HIRA) procedures. Standard Operating Procedures (SOPs) are readily available to guide workers in navigating potential risks and preventing injury or ill health while on duty.

In the event of work-related incidents, our robust accident investigation procedures are promptly activated, allowing for thorough examination and analysis to prevent recurrence. Additionally, our plant implementation committees play a crucial role in spearheading initiatives such as Project Abhay, aimed at fostering cultural transformation in our EHS practices and continually optimising our safety protocols.

Key processes and SOPs are in place to systematically identify work-related hazards and assess risks, including:

- Identification of occupational safety hazards and risks for all activities, with mandatory adherence to control measures as per procedure. Non-routine or hazardous tasks require a Permit to Work (PTW) for initiation.
- Regular implementation of hazard identification and risk assessment for both routine and non-routine activities.
- Rigorous investigation of work-related incidents through established accident and investigation procedures, facilitating continuous improvement and preventative action implementation.

Through these structured approaches, we remain steadfast in our commitment to ensuring the safety and well-being of our employees while fostering a culture of continuous improvement in our environmental and safety practices.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/ No)

Yes

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

Yes

11. Details of safety related incidents

| Safety Incident/Number | Category | FY24 | FY23 |
|---|-----------|------|------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 0 | 0.21 |
| | Workers | 0 | 0.10 |
| Total recordable work-related injuries | Employees | 0 | 1 |
| | Workers | 0 | 1 |
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | Workers | 0 | 0 |

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

In FY22, our company introduced the STL Care program, dedicated to promoting the holistic well-being of our employees, with a primary focus on mental and emotional wellness. This program encompasses a range of policies and initiatives aimed at encouraging individuals to adopt healthy lifestyles while fostering professional success. Complementing this initiative, we have also established an Employee Well-being Policy, which outlines our commitment to supporting the well-being of our workforce. [Link to the policy: <https://www.stl.tech/pdf/Employee-well-being-policy.pdf>]

In addition to our well-being initiatives, we have implemented a comprehensive framework of systems and processes designed to ensure a safe work environment for all employees, minimising the risk of injury or adverse health effects. To enhance preparedness for potential emergencies, we operate on three key fronts:

- 1. Technological Foundation and Compliance:** Our systems are underpinned by a robust technological infrastructure, enforced through stringent compliance standards that govern every aspect of our operations.
- 2. Leadership and Management Oversight:** Leadership and management systems

are actively involved in supervising the implementation of our safety policies, ensuring their effective execution across all levels of the organisation.

- 3. Continuous Awareness:** We prioritise the transmission of information and behaviours that promote a safety-conscious culture throughout our workforce, fostering a collective commitment to workplace safety.

Furthermore, our employees have access to policies such as the Quality, Environment, Health, and Safety (QEHS) policy, as well as Hazard Identification and Risk Assessment (HIRA) procedures. These resources provide valuable awareness regarding workplace hazards, risks, and measures for preventing injury or illness. In the event of work-related incidents, thorough investigations are conducted through established accident and investigation procedures, allowing us to learn from each incident and further enhance our safety protocols.

Through these concerted efforts, we remain steadfast in our commitment to safeguarding the well-being of our employees and cultivating a culture of safety and resilience across our organisation.

13. Number of complaints on working conditions and health and safety made by employees and workers.

| Category | FY24 | | | FY23 | | |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | 0 | 0 | - | 0 | 0 | - |
| Health & Safety | 0 | 0 | - | 0 | 0 | - |

14. Assessments for the year

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

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

At STL, we prioritise the safety and well-being of our workforce and the environment through a comprehensive approach to governance and monitoring. All manufacturing processes are governed by our Quality, Environment, Health, and Safety (QEHS) policy, ensuring adherence to high standards of environmental sustainability and occupational health and safety. Additionally, each process is rigorously monitored through ISO 14001 certified Environment Management Systems and ISO 45001 Occupational Health and Safety management systems.

This integrated approach enables us to uphold stringent environmental and safety standards across all our facilities, facilitating the proactive identification of any potential gaps and allowing for prompt mitigation through appropriate action.

To further enhance awareness among our employees, we provide access to tools such as Hazard Identification and Risk Assessment (HIRA), Hazard and Operability Study (HAZOP), and standard operating processes. These resources equip our workforce with the

knowledge needed to identify hazards, assess risks, and prevent injury or illness while carrying out their duties. In the event of work-related incidents, thorough investigations are conducted using established accident and investigation procedures, enabling us to learn from each incident and continually improve our safety protocols.

Moreover, our commitment to excellence is reinforced by the dedicated efforts of our plant implementation committees. These committees, established within each manufacturing unit, are tasked with implementing initiatives such as Project Abhay. Through initiatives like Project Abhay, we aim to foster a cultural transformation in our current EHS practices, driving continuous improvement and optimization across our operations.

By prioritising safety, environmental sustainability, and continuous improvement, we strive to create a workplace that is not only safe and healthy but also conducive to the overall well-being of our employees and the communities in which we operate. SA-8000 certification, demonstrates our commitment to social accountability and ethical business practices, ensuring fair and safe working conditions for our employees, and promoting responsible and sustainable business operations.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N)?

| | |
|-----------|-----|
| Employees | Yes |
| Workers | Yes |

2. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment

| | Total no. of affected employees/ workers | | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment | |
|-----------|---|-------------|--|-------------|
| | FY24 | FY23 | FY24 | FY23 |
| Employees | 0 | 0 | 0 | 0 |
| Workers | 0 | 0 | 0 | 0 |

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

4. Details on assessment of value chain partners:

| % of value chain partners (by value of business done with such partners) that were assessed | |
|---|-------|
| Health & Safety practices | 3.28% |
| Working Conditions | 3.28% |

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Periodic audits are conducted to uphold environmental, health, and safety (EHS) standards. Corrective and preventive actions are tracked until closure, ensuring continuous improvement. Additionally, audits at vendors' premises ensure compliance with our EHS expectations, promoting responsible supply chain management. After conducting assessments on health and safety practices, we received SA-8000 certification, demonstrating our commitment to social accountability and ethical business practices, ensuring fair and safe working conditions for our employees, and promoting responsible and sustainable business operations.

PRINCIPLE 4- BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

Essential Indicators

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

The STL Sustainability program meticulously documents and implements the stakeholder identification and engagement process. Recognizing the invaluable perspectives of stakeholders, we regularly interact with them to comprehend and proactively address their concerns. This ongoing and effective communication fosters transparency and collaboration with our stakeholders, who encompass entities and individuals impacted by or capable of influencing our operations.

Our stakeholders encompass a diverse range, including employees, customers, suppliers, vendors, investors, leadership, and non-governmental organisations (NGOs). This thorough identification enables us to categorise material issues aligned with our Environmental, Social, and Governance (ESG) priorities.

To facilitate continuous and unbiased feedback from stakeholders, we employ both direct and indirect mechanisms. These established channels ensure that we remain responsive to the evolving needs and expectations of our stakeholders, thereby enhancing our sustainability efforts and overall performance.

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

| Key Stakeholders | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others | Frequency of engagement | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|-----------------------|--|--|-------------------------|--|
| Employee | No | Email | Quarterly | Feedback, grievances, talent management |
| Customers | No | Email | Quarterly | Feedback, grievances, new product development |
| Suppliers and Vendors | No | Email | Quarterly | Supplier satisfaction, material compliance, joint development, mutual value creation |
| NGOs | No | Email | Quarterly | Development projects according to the identified needs, support to social causes |
| Leadership | No | Email | Quarterly | Economic value creation, ESG disclosures, sector and program related |
| Investors | No | Email | Quarterly | Economic value creation, ESG disclosures, sector and program related, Quarterly earning calls, Annual general meeting. |

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 are committed to addressing material issues identified through our policies, objectives, indicators, and performance targets. These actions are transparently articulated in our reporting, providing our organisation and stakeholders with a reliable basis for informed decision-making.

Our company has undertaken various initiatives to prioritise environmentally friendly practices, ensure occupational health and safety, and implement effective measures for emergency handling, control, and risk management across our operations. These responses to material aspects are clearly outlined in our reports, including disclosures on STL's policies, management systems and also shared feedback taken in the ESG committee meetings including governance.

We believe that our reporting effectively adheres to this principle, providing a comprehensive overview of our efforts to address material issues and demonstrating our commitment to transparency and accountability.

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, Stakeholder consultation plays a crucial role in informing our identification and management of environmental and social topics. We incorporate inputs from stakeholders to ensure a comprehensive understanding of relevant issues. This collaborative approach allows us to prioritise areas of concern and effectively address them in our sustainability strategies and initiatives.

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

Our engagement initiatives demonstrate our commitment to driving positive social impact through technology and innovation. We have designed program models to ensure education for children from less privileged families, provide equitable healthcare access to all, and empower women financially through vocational training. These inclusive, tech-driven, and sustainable initiatives help improve living standards and create safer, healthier, more inclusive, and greener communities.

A. Women Empowerment:

- Jeewan Jyoti Program:
- Engagement: Empowered rural women in Maharashtra with vocational skills, leadership training, and childcare.
- Actions Taken: Since its inception in 2014, the program has benefited over 28,035 women in Velhe, Bhor, and Haveli blocks, generating ₹ 19 million in revenue through micro-financing linkages. The program also extended to urban youth in Aurangabad, equipping them with industry-relevant skills and guaranteeing employment upon course completion. We have touched over 280,000 lives across 100 villages.

B. Equitable Education:

- Digital Equalizer and Improved Learning (DEIL) Program:
- Engagement: Bridged the digital divide for rural and marginalized students.
- Actions Taken: Provided STEM-focused education and digital literacy training, benefiting over 89,000 lives in FY24 across 300 educational institutes. To date, quality education has been made accessible to over 1.13 million beneficiaries from low-income families, covering 1,700+ government schools.
- RoboEdge Program:
- Engagement: Tackled educational inequality by providing future skills like robotics, coding, and AI.
- Actions Taken: Aimed to reach over 3,500 underprivileged students in 11 government schools across Maharashtra and Dadra Nagar Haveli. Over 1,150 students have already benefited, empowering them for a brighter future.

C. Quality Healthcare:

- Hybrid Healthcare Program:
- Engagement: Combined telemedicine with on-site care in Gadchiroli, Nandurbar, and rural Chhatrapati Sambhaji Nagar.
- Actions Taken: Provided consultations, women's health camps, free medication, and various medical services. In FY24, the program impacted over 100,000 lives and conducted 30,000+ tele-consultations. To date, it has impacted approximately 3 million lives. STL's Mobile Medical Unit in Silvassa and other initiatives have provided healthcare access at doorsteps, including 24x7 free teleconsultation, screening for COVID-19, medication, and homecare treatment.

D. Environment:

- Holistic Water & Afforestation Program:
- Engagement: Focused on afforestation, biodiversity restoration, and water conservation in Aurangabad, Maharashtra.
- Actions Taken: Partnered with governments and NGOs to promote climate-resilient agriculture, raise water awareness, and enhance groundwater levels. Since inception, we have planted 290,000 trees and replenished 2.69 million m³ of water, impacting over 3.8 million lives. In FY24 alone, 77,000+ lives benefited from the program, and 1.50 million m³ of water was replenished across 36 villages.

PRINCIPLE 5 - BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS**Essential Indicator**

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

| Category | FY24 | | | FY23 | | |
|------------------------|-------------|---------------------------------------|---------------|-------------|---------------------------------------|---------------|
| | Total (A) | No. of employees/ workers covered (B) | % (B/A) | Total (C) | No. of employees/ workers covered (D) | % (D/C) |
| EMPLOYEES | | | | | | |
| Permanent | 1274 | 1180 | 92.62% | 1591 | 1541 | 96.86% |
| Other than Permanent | 825 | 789 | 95.64% | 923 | 839 | 90.90% |
| Total employees | 2099 | 1969 | 93.81% | 2514 | 2380 | 94.67% |
| WORKERS | | | | | | |
| Permanent | 22 | 20 | 90.91% | 32 | 32 | 100.00% |
| Other than Permanent | 1825 | 1563 | 85.64% | 3126 | 3108 | 99.42% |
| Total workers | 1847 | 1583 | 85.71% | 3158 | 3140 | 99.43% |

2. Details of minimum wages paid to employees and workers:

| Category | FY24 | | | | | FY23 | | | | |
|-----------------------------|-------------|-----------------------|--------------|------------------------|----------------|-------------|-----------------------|--------------|------------------------|----------------|
| | Total (A) | Equal to minimum wage | | More than minimum wage | | Total (D) | Equal to minimum wage | | More than minimum wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| EMPLOYEES | | | | | | | | | | |
| Permanent | 1274 | 0 | 0.00% | 1274 | 100.00% | 1591 | 0 | 0.00% | 1591 | 100.00% |
| Male | 1125 | 0 | 0.00% | 1125 | 100.00% | 1408 | 0 | 0.00% | 1408 | 100.00% |
| Female | 149 | 0 | 0.00% | 149 | 100.00% | 183 | 0 | 0.00% | 183 | 100.00% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0 | 0.00% | 0 | 0.00% |
| Other than Permanent | 825 | 0 | 0.00% | 825 | 100.00% | 923 | 0 | 0.00% | 923 | 100.00% |
| Male | 767 | 0 | 0.00% | 767 | 100.00% | 878 | 0 | 0.00% | 878 | 100.00% |
| Female | 58 | 0 | 0.00% | 58 | 100.00% | 44 | 0 | 0.00% | 44 | 100.00% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 1 | 0 | 0.00% | 1 | 100.00% |
| WORKERS | | | | | | | | | | |
| Permanent | 22 | 0 | 0.00% | 22 | 100.00% | 32 | 0 | 0.00% | 32 | 100.00% |
| Male | 18 | 0 | 0.00% | 18 | 100.00% | 26 | 0 | 0.00% | 26 | 100.00% |
| Female | 4 | 0 | 0.00% | 4 | 100.00% | 6 | 0 | 0.00% | 6 | 100.00% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0 | 0.00% | 0 | 0.00% |
| Other than Permanent | 1825 | 0 | 0.00% | 1825 | 100.00% | 3126 | 214 | 6.86% | 2912 | 93.15% |
| Male | 1615 | 0 | 0.00% | 1615 | 100.00% | 2665 | 81 | 3.04% | 2584 | 96.96% |
| Female | 210 | 0 | 0.00% | 210 | 100.00% | 461 | 133 | 28.85% | 328 | 71.14% |
| Other | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0 | 0.00% | 0 | 0.00% |

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

| | Male | | Female | | Other | |
|---------------------------------|--------|---|--------|---|--------|---|
| | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| Board of Directors (BoD) | 7 | 44.00 Lakh | 1 | 45.00 Lakh | 0 | 0 |
| KMP (other than BoD) | 2 | 211.36 Lakh | 0 | 0 | 0 | 0 |
| Employees other than BOD & KMP* | 1120# | 11.09 Lakh | 149# | 13.74 Lakh | 0 | 0 |
| Workers | 18* | 3.69 Lakh | 4* | 3.53 Lakh | 0 | 0 |

Disclaimer: #This number only include salary of permanent employees

*This number only includes salary of permanent workers

b. Gross wages paid to females:

| | FY24 | FY23 |
|---|----------------|----------------|
| Gross wages paid to females | 25,66,31,851 | 43,67,82,613 |
| Total wages | 2,29,90,38,131 | 3,75,78,49,830 |
| Gross wages paid to female (Gross wages paid to female as % of total wages) | 11.16% | 11.62% |

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?

Adherence to the code of business conduct and ethics is a fundamental expectation for all our employees. Our whistle-blower policy, inclusive of employees, off-roll employees, workers, and business partners, enables the reporting of concerns regarding malpractice, impropriety, abuse, or misconduct without fear of reprisal. Extending beyond internal stakeholders, this policy also encompasses external stakeholders such as vendors and customers.

In FY 22, we introduced STL Care, a program dedicated to promoting the mental and emotional well-being of our employees. This initiative underscores our commitment to fostering a healthy work environment where employees feel supported and valued.

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

| Category | FY24 | | | FY23 | | |
|-----------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|--|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Sexual Harassment | 0 | 0 | - | 1 | 0 | This complaint was closed in April 2023. |
| Discrimination at workplace | 0 | 0 | - | 0 | 0 | - |
| Child Labour | 0 | 0 | - | 0 | 0 | - |
| Forced /Involuntary Labour | 0 | 0 | - | 0 | 0 | - |
| Wages | 0 | 0 | - | 0 | 0 | - |
| Other issues | 0 | 0 | - | 0 | 0 | - |

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

| | FY24 | FY23 |
|---|-------------|-------------|
| i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (POSH) | 0 | 1 |
| ii) Female employees/workers | 0 | 149* |
| iii) Complaints on POSH as a % of female employees/workers | 0.00% | 0.67% |
| iv) Complaints on POSH upheld | 0 | 1 |

Disclaimer: * Permanent female employees

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

Our company upholds a commitment to fostering a fair and inclusive workplace environment, where all employees are treated with dignity and respect, free from sexual harassment and discrimination based on gender. Our Prevention of Sexual Harassment policy aligns with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (POSH Act).

To ensure compliance with the POSH Act, we have established a Prevention of Sexual Harassment Committee, tasked with addressing complaints related to sexual harassment. This committee follows a formalised process for conducting fair and timely inquiries into complaints, maintaining transparency and accountability throughout the process.

During this financial year, the company received no complaints under the POSH Act.

We assure employees who raise genuine concerns under this policy that they will not face any adverse consequences, including job loss or retribution. Additionally, we prioritise the protection of confidentiality and anonymity for complainants to the fullest extent possible, facilitating a conducive environment for conducting thorough and unbiased reviews.

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

Yes

10. Assessments for the year:

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

Disclaimer: *All 5 Indian plants are covered under SA8000:2014 certification.

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

Not applicable

Leadership Indicators

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

Our company remains steadfast in its commitment to fostering a safe and conducive work environment for all employees. Embracing an open-door policy, we provide various avenues for employees to raise concerns or issues they encounter in the workplace. This includes accessible forums and a robust grievance resolution mechanism, facilitated by our Stakeholders' Relationship Committee and resolution hubs.

In our collaborations with partners, we prioritize the protection of human rights. Regular supplier assessments and audits are conducted to ensure alignment with our values and policies, particularly concerning environmental practices, fair labour, and anti-corruption measures. Upholding stringent standards, we conduct thorough due diligence when sourcing raw materials, ensuring ethical practices throughout our supply chain.

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

Human rights and fair labour practices are not only among our top material topics, but also integral considerations driven by partners across our value chain. To uphold these standards, we have implemented robust policies and ensure strict adherence to them. Periodic audits of both our facilities and partners are conducted to assess compliance with these parameters.

In addition to our commitment to ethical practices, we prioritise providing a secure working environment at all our plants. All our Indian plants have attained SA8000:2014 certification, demonstrating our dedication to upholding international labour standards.

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

4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed |
|-----------------------------------|--|
| Sexual Harassment | 3.28% |
| Discrimination at workplace | 3.28% |
| Child Labour | 3.28% |
| Forces Labour/ Involuntary Labour | 3.28% |
| Wages | 3.28% |
| Others - please specify | - |

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

One of the suppliers was assessed having incomplete documentation and was not adhering to the standard supply chain practices as per company's internal audit checklist. It was suggested to the supplier to maintain proper documentation and improve its ESG practices in line with STL's ESG practices.

PRINCIPLE 6- BUSINESS 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:**

Whether total energy consumption and energy intensity is applicable to the company?

Yes

| Parameter | FY24 (in GJ) | FY23 (in GJ) |
|---|--------------------|---------------------|
| From renewable sources | | |
| Total electricity consumption (A) | 3,273.71 | 1,020.72 |
| Total fuel consumption (B) | - | - |
| Energy consumption through other sources (C) | - | - |
| Total Energy consumed from renewable sources (A+B+C) | 3,273.71 | 1,020.72 |
| From Non-renewable sources | | |
| Total electricity consumption (D) | 6,21,348.01 | 9,47,276.05 |
| Total fuel consumption (E) | 1,29,061.03 | 1,50,035.00 |
| Energy consumption through other sources (F) | - | - |
| Total energy consumed from non-renewable sources (D+E+F) | 7,50,409.04 | 10,97,311.05 |
| Total energy consumed (A+B+C+D+E+F) | 7,53,682.75 | 10,98,331.77 |
| Energy intensity per rupee of turnover (total energy consumption/ turnover in rupees) | 0.000019 GJ/₹ | 0.000021 GJ/₹ |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) | 0.00044 GJ/₹ | 0.00047 GJ/₹ |
| Energy intensity in terms of physical Output | 287.44 GJ/CKM*## | 335.79 GJ/CKM*## |
| Energy intensity (Optional) the relevant metric may be selected by the entity | - | - |

Disclaimer: *Energy intensity is for Optical fibre cable manufacturing facilities, the unit for energy intensity is GJ per kilometre of cable manufactured.

#Furthermore, the energy intensity for optical fibre manufacturing facilities for FY2023-24 is 29.19 GJ per fibre kilometre and FY 2022-23 is 24.72 GJ per fibre kilometre.

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

No

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

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

| Parameter | FY24 | FY23 |
|--|--------------------|--------------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | - | - |
| (ii) Ground Water | 91,015.00 | 1,17,967.00 |
| (iii) Third Party Water | 3,54,381.34 | 5,12,116.74 |
| (iv) Seawater/Desalinated Water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 4,45,396.34 | 6,30,083.74 |
| Total volume of water consumption (in kilolitres) | 4,45,396.34 | 6,29,513.74 |
| Water intensity per rupee of turnover (total water consumption / Revenue from operations) | 0.000011 KL/₹ | 0.000012 KL/₹ |

| Parameter | FY24 | FY23 |
|--|----------------|----------------|
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP) | 0.00026 KL/₹ | 0.00027 KL/₹ |
| Water intensity in terms of physical output | 0.279 KL/CKM*# | 0.283 KL/CKM*# |
| Water intensity (Optional) the relevant metric may be selected by the entity | - | - |

Disclaimer: *Water intensity is for Optical fibre cable manufacturing facilities, the unit for water intensity is kilolitre per kilometre of cable manufactured.

#Furthermore, the water intensity for optical fibre manufacturing facilities for FY2023-24 is 0.0157 kilolitre per fibre kilometre and FY 2022-23 is 0.0132 kilolitre per fibre kilometre.

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

No

4. Provide the following details related to water discharged:

| Parameter | FY24 | FY23 |
|--|----------|----------|
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) Surface water | 0 | 0 |
| - No treatment | 0 | 0 |
| - With treatment - please specify level of treatment | 0 | 0 |
| (ii) Ground Water | 0 | 0 |
| - No treatment | 0 | 0 |
| - With treatment - please specify level of treatment | 0 | 0 |
| (iii) To Seawater | 0 | 0 |
| - No treatment | 0 | 0 |
| - With treatment - please specify level of treatment | 0 | 0 |
| (iv) Sent to third - parties | 0 | 0 |
| - No treatment | 0 | 0 |
| - With treatment - please specify level of treatment | 0 | 0 |
| (v) Others | 0 | 0 |
| - No treatment | 0 | 0 |
| - With treatment - please specify level of treatment | 0 | 0 |
| Total water discharged (in kilolitres) | 0 | 0 |

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

No

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

Yes, all our Indian manufacturing units have achieved 100% Zero Liquid Discharge (ZLD) certification, demonstrating our commitment to environmental sustainability. Our efforts include the installation of Effluent Treatment Plants (ETP) and Multi-Effect Evaporator (MEE) plants, along with various in-plant modifications to our processes.

Before treatment in the ETP, a comprehensive study of wastewater parameters is conducted, enabling us to reduce the load on the plant effectively. This process includes treating wastewater from scrubber processes, silicon tetrachloride (SiCl₄), and softener plants. Through chemical treatments and a three-stage centrifuging process in the MEE plant, solid particles and chlorine are removed from the water, allowing for its reuse in boiler and scrubber processes.

The implementation of Effluent and Sewage Treatment Plants has facilitated zero liquid discharge at all our Indian facilities.

The ZLD certification, conducted by DQS in accordance with Circular Water Management, Compliances, and ISO 14021:2016 Environmental labels and declarations, attests to our adherence to globally accepted standards.

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format: Whether air emissions (other than GHG emissions) by the entity is applicable to the company?

Yes

| Parameter | Please specify unit | FY24 | FY23 |
|-------------------------------------|---------------------|-------|-------|
| NOx | Tonne | 1.58 | 1.29 |
| SOx | Tonne | 0.92 | 0.51 |
| Particulate matter (PM) | Tonne | 50.56 | 60.33 |
| Persistent organic pollutants (POP) | NA | - | - |
| Volatile organic compounds (VOC) | NA | - | - |
| Hazardous air pollutants (HAP) | NA | - | - |
| Others- please specify | NA | - | - |

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

No

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format: Whether greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity is applicable to the company?

Yes

| Parameter | Unit | FY24 | FY23 |
|---|--------------------------|-------------|-------------|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 7,516.51 | 8,913.18 |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 1,23,504.14 | 2,13,052.30 |
| Total Scope 1 and Scope 2 emissions intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | tCO ₂ e/₹ | 0.0000033 | 0.0000041 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emission/ Revenue from operations adjusted for PPP) | tCO ₂ e/₹ | 0.000076 | 0.000095 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | tCO ₂ e/CKM*# | 0.056 | 0.074 |
| Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity | - | - | - |

Disclaimer: *Total Scope 1 and Scope 2 emission intensity is for Optical fibre cable manufacturing facilities, the unit for Scope 1 and Scope 2 emission intensity is tCO₂e per kilometre of cable manufactured.

#Furthermore, the total Scope 1 and Scope 2 emission intensity for optical fibre manufacturing facilities for FY2023-24 is 0.0050 tCO₂e per fibre kilometre and FY 2022-23 is 0.0049 tCO₂e per fibre kilometre.

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

No

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

Yes, our company is dedicated to optimising operations and enhancing efficiency through several strategic initiatives:

- A. **Cooling Tower Optimisation:** A centralised control system coupled with fan driven through temperature sensor for cooling towers has yielded impressive results. This approach has led to a yearly saving of 2.36 lakh units of electricity and a reduction of water evaporation losses by a remarkable 86 lakh liters.
- B. **UPS System Upgrade:** By implementing the latest IGBT technology with a highly efficient (95%) UPS system featuring an N+1 paralleling scheme, we have achieved an estimated 10% reduction in energy consumption compared to the previously used technology.
- C. **PHE System Integration:** The integration of a PHE system for buffering and sheathing machines has resulted in improved efficiency and reduced chiller operation. This innovative approach has led to a combined annual saving of 7.8 lakh units across the FG and buffering sections.
- D. **Circulation Pump Optimisation:** Modifications made to water pipeline units have optimised circulation pumps, leading to yearly energy savings of 81,360 units.
- E. **Rooftop Solar Power:** The installation of a rooftop green solar system, along with a new roof sheet and skylights, has yielded multiple benefits. During daylight hours, the skylights provide natural light, reducing the need for artificial plant lighting. This has resulted in the yearly saving of 1 lakh units of electricity and cost savings of ₹ 6.5 lakh.
- F. **Dry-type Resin Cast Transformer:** The adoption of a dry-type resin cast transformer boasts high efficiency and eliminates the need for annual maintenance, generating savings of ₹ 1.2 lakh. Additionally, this oil-free design aligns with our commitment to achieving zero waste to landfill.

These initiatives underscore our commitment to sustainable practices and continuous improvement, contributing to both environmental stewardship and operational excellence.

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

| Parameter | FY24 | FY23 |
|--|------------------|------------------|
| Total waste generated (in metric tonnes) | | |
| Plastic waste (A) | 1,736.57 | 4,411.76 |
| E-Waste (B) | 7.02 | 8.82 |
| Bio-Medical Waste (C) | 0.03 | 0.03 |
| Construction and demolition waste (D) | 0 | 0 |
| Battery For (E) | 1.68 | 65.31 |
| Radioactive waste (F) | 0 | 0 |
| Other Hazardous waste. Please specify, if any. (G) | 2,570.32 | 8,934.37 |
| Other Non-hazardous waste generated (H). Please specify, if any. | 19,790.48 | 32,802.87 |
| Total (A+B+C+D+E+F+G+H) | 24,105.10 | 46,223.16 |
| Waste intensity per rupee of turnover (Total waste generated/ Revenue from operation) | 0.00000061 MT/₹ | 0.00000086 MT/₹ |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/ Revenue from operation adjusted for (PPP) | 0.000014 MT/₹ | 0.000020 MT/₹ |
| Waste intensity in terms of physical output | 0.0109 MT/CKM*# | 0.0177 MT/CKM*# |
| Waste intensity (optional) - the relevant metric may be selected by the entity | - | - |

| Parameter | FY24 | FY23 |
|--|------------------|------------------|
| For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes) | | |
| Category of waste | | |
| (i) Recycled | 20,451.12 | 40,478.23 |
| (ii) Re-used | 1,817.60 | 4,663.37 |
| (iii) Other recovery operations (safely disposed) | - | - |
| Total | 22,268.72 | 45,141.60 |
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) | | |
| Category of waste | | |
| (i) Incineration | 88.30 | 84.42 |
| (ii) Landfilling | 1748.08 | 997.14 |
| (iii) Other disposal operations | - | - |
| Total | 1,836.38 | 1,081.56 |

Disclaimer: *Waste intensity is for Optical fibre cable manufacturing facilities, the unit for waste intensity is metric tonne per kilometre of cable manufactured.

#Furthermore, the waste intensity for optical fibre manufacturing facilities for FY2023-24 is 0.0009 metric tonne per fibre kilometre and FY 2022-23 is 0.0010 metric tonne per fibre kilometre.

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

Yes, For the previous year (FY22-23) the data was evaluated by TUV SUD and Zero waste to landfill certificate was issued. This year (FY23-24) the evaluation process is under way.

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

Waste management stands at the forefront of our sustainability initiatives, embodying our commitment to resource efficiency and environmental responsibility. Our strategy revolves around waste elimination and resource optimization, both within our operations and across our supply chain.

We meticulously select vendors who share our environmental values and are approved by the Pollution Control Board, ensuring alignment with stringent environmental standards. To instill a culture of waste reduction and recycling, we educate and empower our employees and workers on the importance of waste segregation and recycling at our corporate offices and manufacturing facilities.

We rigorously monitor both hazardous and non-hazardous waste on a monthly basis, ensuring compliance with waste management regulations in each country of operation.

Through diligent waste monitoring and analysis, we continuously enhance process efficiency and identify preventive measures to minimize waste generation. This comprehensive approach has culminated in our company being recognized as the world's first integrated optic fibre and cables manufacturer to achieve 100% Zero Waste to Landfill certification for all Indian manufacturing units.

By treating waste as a valuable resource, we optimize resource utilization and operate in a more efficient and eco-friendly manner, underscoring our commitment to sustainability and environmental stewardship.

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

Not applicable.

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in FY 2024

| Name and brief details of project | EIA Notification Number | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes/No) | Relevant Web Links |
|-----------------------------------|-------------------------|------|---|--|--------------------|
| NA | NA | NA | NA | NA | NA |

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

Yes

Leadership Indicators

1. Please provide details of total Scope 3 emissions & its intensity, in the following format: Whether total Scope 3 emissions & its intensity is applicable to the company?

Yes

| Parameter | Unit | FY24 | FY23 |
|--|----------------------|------------|------------|
| Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e* | 12,187.60 | 16,473 |
| Total Scope 3 emissions per rupee of turnover | tCO ₂ e/₹ | 0.00000031 | 0.00000031 |
| Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity | - | - | - |

Disclaimer: *The boundary of Scope 3 calculations includes STL standalone boundary + Sterlite tech cable solutions limited (STCSL) + Metallurgica Bresciana S.P.A Italy.

2. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

3. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|--------|----------------------------|--|---|
| 1 | Rooftop Solar Power | The installation of a rooftop green solar system, along with a new roof sheet and skylights, has yielded multiple benefits. During daylight hours, the skylights provide natural light, reducing the need for artificial plant lighting. | This has resulted in the yearly saving of 1 lakh units of electricity and cost savings of ₹ 6.5 Lakh |
| 2 | Cooling Tower Optimization | A centralised control system coupled with fan driven through temperature sensor for cooling towers has yielded impressive results. | This approach has led to a yearly saving of 2.36 lakh units of electricity and a reduction of water evaporation losses by a remarkable 86 lakh liters |
| 3 | PHE System Integration | The integration of a PHE system for buffering and sheathing machines has resulted in improved efficiency and reduced chiller operation. | This innovative approach has led to a combined annual saving of 7.8 lakh units across the FG and buffering sections |

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|--------|---|---|---|
| 4 | Ensuring zero liquid/effluent discharge into communities | To ensure Zero liquid discharge, a detailed study of parameters has been done on the wastewater before its treatment in the ETP which has in turn helped reduce the load on the plant. https://www.stl.tech/esg/ | Each of our manufacturing units in Aurangabad and Silvassa are all zero-liquid discharge certified. Effluent treatment (ETP) and multi-effective evaporator (MEE) plants installed, in addition to several in-plant modifications to our processes help us ensure this. |
| 5 | Ensuring 100% manufacturing facilities to be Zero Waste to Landfill certified | We ensure our processes comply with stringent waste management rules in the countries we operate, we also verify the approaches our recyclers adopt. This assures us that they are operating according to the prescribed laws and our by-products or waste are further reused, promoting a circular economy. https://www.stl.tech/esg/ | All Indian manufacturing units are Zero waste to landfill certified. |
| 6 | Eco-label methodology | We have launched third-party verified ecolabel methodology. It is of utmost importance as it adds credibility and trust to the environmental claims made by the company. | This methodology places company's sustainability efforts in the top quadrant of environmental leadership, classifying its gold-rated eco-labelled products as "Sustainable and Green". |

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

Yes, assessing both acute and chronic climate-related risks to our company's assets is an integral component of our business continuity and disaster management plan. These risks encompass a range of potential scenarios, including local incidents such as water shortages, temperature fluctuations, building fires, and natural calamities, as well as broader national events like pandemic outbreaks, among others.

To address these risks effectively, we have implemented a robust business continuity program designed to monitor and mitigate potential disruptions. Through proactive measures and contingency plans, we aim to ensure the ongoing reliability of our operations even in the face of adverse climate-related events.

5. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

As we progress on our ESG journey, we are committed to forging strategic partnerships throughout our value chain, selecting vendors who share our commitment to environmental, social, and regulatory responsibility. Currently, we have identified and are actively monitoring potential risks within our value chain, ensuring that there is no significant adverse impact on the environment.

Looking ahead, we have set a goal to achieve 100% sustainable sourcing by 2030, underscoring our dedication to responsible procurement practices and sustainable supply chain management. Through collaborative efforts and ongoing diligence, we aim to further strengthen our ESG performance and contribute positively to the well-being of society and the planet.

PRINCIPLE 7- BUSINESS, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

Essential Indicator

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

Eight

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

| S. No. | Name of the trade and industry chambers / associations | Reach of trade and industry chambers/ associations (State/National) |
|--------|--|---|
| 1 | Confederation of Indian Industry (CII) | National |
| 2 | Federation of Indian Chambers of Commerce & Industry (FICCI) | National |
| 3 | Associated Chambers of Commerce and Industry of India (ASSOCHAM) | National |
| 4 | Telecom Export Promotion Council (TEPC) | National |
| 5 | Broadband India Forum (BIF) | National |
| 6 | Voice of Indian Communication Technology Enterprises (VoICE) | National |
| 7 | Public Affairs Forum of India (PAFI) | National |
| 8 | CII INDIA BUSINESS FORUM (CII-IBF) | International |

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.**

None

Leadership Indicators

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

| S. No. | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others - please specify) | Web Link, if available |
|--------|--|--|--|---|------------------------|
| 1 | Govt upgrading GR of 'A' fibre standards | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |
| 2 | Govt including standards for A fibre in Bharat-Net RFP | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |
| 3 | Govt mandating OFC & data cable in amended Building Code | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |
| 4 | Govt rolling out Bharat-Net III RFP | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |
| 5 | Govt imposing Anti-Dumping Duty (ADD) on Single Mode Optical Fiber | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |

| S. No. | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others - please specify) | Web Link, if available |
|--------|---|--|--|---|------------------------|
| 6 | Govt increasing Basic Customs Duty on Import of Preform | Direct representations to the Govt. | Yes | Quarterly* | - |
| 7 | Govt increasing the BCD on import of Data Cable | Direct representations to the Govt. and joint industry representation. | Yes | Quarterly* | - |
| 8 | Govt rolling out Mandatory Testing & Certification of Telecom Equipment | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |
| 9 | Govt amending PPP-MII for using only India-make OFC | Direct representations to the Govt. and through industry associations. Media articles. | Yes | Quarterly* | - |
| 10 | NTIA waiving BABA Guidelines for STL US Operations | Direct representations to the Govt. | Yes | Quarterly* | - |
| 11 | Govt approval to SPECS incentives on Capex for SiCl4 | Direct representations to the Govt. | No | Quarterly* | - |
| 12 | Indian Govt supporting Indian Companies on Anti-dumping investigation in EU | Direct representations to the Govt. and through industry associations. | Yes | Quarterly* | - |
| 13 | Availing Cross Utilization of GST (CGST only) | Direct representations to the Govt. and through industry associations. | Yes | Quarterly* | - |

Disclaimer: *Reviewed quarterly by MD and senior management.

PRINCIPLE 8-BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

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

| Name and brief details of project | SIA Notification No. | Date of notification | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/No) | Relevant Web link |
|-----------------------------------|----------------------|----------------------|---|--|-------------------|
| NA | NA | NA | NA | NA | NA |

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity.

| S. No. | Name of Project for which R&R is ongoing | State | District | No. of Project Affected Families (PAFs) | % of PAFs covered by R&R | Amounts paid to PAFs in the FY (In ₹) |
|--------|--|-------|----------|---|--------------------------|---------------------------------------|
| NA | NA | NA | NA | NA | NA | NA |

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

GRIEVANCE REDRESSAL SYSTEM

- We have a dedicated email address & toll-free number to receive community complaints and maintain a copy of the physical register at the program site where possible.
- Once the complaint is received from the community members, within 24 hours it is directed to the respective program manager. These complaints shall be resolved within 5 working days and the team should report back on the central team along with a detailed report on the complaint resolution.
- Central team shall prepare a monthly report on the complaints received during the month by 10th of following month

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

| | FY24 | FY23 |
|--|--------|--------|
| Directly sourced from MSMEs/ small producers | 43.64% | 43.14% |
| Sourced directly from within the district and neighbouring districts | 12.75% | 8.33% |

5. Job Creation in Smaller towns- Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/ on contract basis) in the following locations, as % of total wage cost:

| | FY24 | FY23 |
|--|-------------------|-------------------|
| 1. Rural | | |
| i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) | 6,05,00,000.00 | 0.00 |
| ii) Total wage cost | 3,63,89,15,208.62 | 3,74,64,80,118.75 |
| iii) % of Job creation in Rural areas | 1.66% | 0.00% |
| 2. Semi-urban | | |
| i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) | 8,67,43,057.00 | 53,89,148.00 |
| ii) Total wage cost | 3,63,89,15,208.62 | 3,74,64,80,118.75 |
| iii) % of Job creation in Semi - Urban areas | 2.38% | 0.14% |

| | FY24 | FY23 |
|--|-------------------|-------------------|
| 3. Urban | | |
| i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) | 79,21,04,766.00 | 61,62,37,180.00 |
| ii) Total wage cost | 3,63,89,15,208.62 | 3,74,64,80,118.75 |
| iii) % of Job creation in Urban areas | 21.77% | 16.45% |
| 4. Metropolitan | | |
| i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) | 2,69,95,67,385.62 | 3,12,48,53,790.75 |
| ii) Total wage cost | 3,63,89,15,208.62 | 3,74,64,80,118.75 |
| iii) % of Job creation in Metropolitan areas | 74.19% | 83.41% |

Disclaimer: *Data for Global service business (GSB) is not included in FY23.

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential indicators above)

NA

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

| S No. | State | Aspirational district | Amount spent (in ₹) |
|-------|-------------|-----------------------|---------------------|
| 1 | Maharashtra | Nandurbar | 33,89,142 |

3. Details of beneficiaries of CSR projects

| S. No. | CSR Projects (in FY 2022-23) | No. of persons benefitted from CSR Projects | % Of beneficiaries from vulnerable and marginalized groups |
|--------|---|---|--|
| 1 | Digital Equaliser and Improved Learning program (ed-tech) | 89,771 | 100% |
| 2 | Holistic Water Program | 77,115 | 100% |
| 3 | Jeewan Jyoti Women Empowerment Program | 1145 | 100% |
| 4 | Liver Transplant Support | 63 | 100% |
| 5 | RoboEdge - NextGen Education Program | 1576 | 100% |
| 6 | Employee Volunteering | 18,529 | 100% |

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

Essential Indicators

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

The mechanism to receive and respond to consumer complaints has been provided below.

- Customer raises concern on mail/ phone to account manager.
- Account manager raises case in salesforce. The case comes to QA team.
- QA Team give acknowledgement of receipt of complaint within 24 working hrs.
- QA teams ask for details like batch ID, images, video of the problem for analysis.
- Account manager shares the details, QA team shares the containment action within 48Hrs.
- Account Manager plans the sample/ site visit if required.
- QA Team analyses the case with CFT Team (based on images, videos, Samples, Site visit)
- QA Team validates the complaint as valid and invalid.
- QA team shares the analysis report with the account manager.
- For invalid cases, if the customer is convinced, the case is closed in system. If the customer is not convinced, then respond to the queries till they are convinced and then the case is closed.
- For valid cases, share the CAPA and have agreement on the RCA.
- Raise request for claim settlement.
- Once approved, send the credit note/ replacement.

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 | 0 |
| Safe and responsible usage | 0 |
| Recycling and/or safe disposal | 0 |

3. Number of consumer complaints:

| | FY24 | | | FY23 | | |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------|-----------------------------------|---------|
| | Received during the year | Pending resolution at end of year | Remarks | Received during the year | Pending resolution at end of year | Remarks |
| Data privacy | 0 | 0 | - | 0 | 0 | - |
| Advertising | 0 | 0 | - | 0 | 0 | - |
| Cyber-security | 0 | 0 | - | 0 | 0 | - |
| Delivery of essential services | 0 | 0 | - | 0 | 0 | - |
| Restrictive Trade Practices | 0 | 0 | - | 0 | 0 | - |
| Unfair Trade Practices | 0 | 0 | - | 0 | 0 | - |
| Other (Complaints) | 115 | 9 | - | 68 | 7 | - |

4. Details of instances of product recalls on accounts of safety issues

| | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | 0 | 0 |
| Forced recalls | 0 | 0 |

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

Yes, [URL:https://www.stl.tech/privacy.php](https://www.stl.tech/privacy.php)

6. **Provide details of any corrective actions taken or underway on issues relating to advertising and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

All the complaints were satisfactorily addressed, and no corrective actions were undertaken.

7. **Provide the following information relating to data breaches:**

- a. Number of instances of data breaches along-with impact **Zero**
- b. Percentage of data breaches involving personally identifiable information of customers **0%**
- c. Impact, if any, of the data breaches **Not Applicable**

Leadership Indicators

1. **Channels / platforms where information on products and services of the Company can be accessed.**

STL Corporate Website: www.stl.tech

2. **Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes, the Information displayed on the products are decided along with the customer. It contains the branding of the Organization, manufacturing details, length Marking (In case of Cable), Batch ID.