

Business Responsibility & Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity- **L29222DL1979PLC009668**
2. Name of the Listed Entity- **Sterling Tools Limited or "The Company"**
3. Year of incorporation- **1979**
4. Registered office address- **Unit no. 515, DLF Tower-A, Jasola District Centre, New Delhi-110025**
5. Corporate address- **Plot No. 5A, DLF Industrial Estate, Faridabad-121003**
6. E-mail- **csec@stlfasteners.com**
7. Telephone- **+91 8800544965**
8. Website- **www.stlfasteners.com**
9. Financial year for which reporting is being done- **FY 2022-23**
10. Name of the Stock Exchange(s) where shares are listed- **National Stock exchange of India Limited and BSE Limited**
11. Paid-up Capital- **₹ 720.48 Lacs**
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report
Mr. Abhishek Chawla, Company Secretary
Tel: 0129-2270621
Email: csec@stlfasteners.com
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)- **Standalone basis**

II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Manufacturing of Fabricated and Metal Products, including Metal Fasteners	99.03 %

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Manufacturing of Hi-Tensile Fasteners	25991	99.03

III. Operations

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

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

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	14
International (No. of Countries)	4

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

2% of the total turnover of the Company is contributed through exports.

c. A brief on types of customers

The Company belongs to a diversified automotive group, being premier producer of cold forged hi-tensile fasteners, The Company is currently catering to the fastener's requirement of all the legendary Automotive Original Equipment Manufacturer (OEM's) in India. The Company has a distinguished and esteemed customer base, which includes Commercial Vehicle Manufacturers e.g. TATA Motors, Ashok Leyland and Daimler and in Passenger Car segment we have Maruti Suzuki & Mahindra etc. In the Two Wheelers segment, the Company works for Suzuki Motorcycles, Hero Motocorp and Honda Motorcycles and scooter, in Tractor manufacturers, the Company manufactures components for Mahindra, John Deere & Escorts and Off highway JCB to name a few.

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

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	344	339	98.55%	5	1.45%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	344	339	98.55%	5	1.45%
WORKERS						
4.	Permanent (F)	241	241	100%	0	0%
5.	Other than Permanent (G)	915	914	99.89%	1	0.11%
	Total workers (F + G)	1156	1156	100%	1	0.11%

b. Differently abled Employees and workers:

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

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	1	11.11%
Key Management Personnel	3*	0	0%

* Ms. Vaishali Singh, Company Secretary, left the Company during the year and the new Company Secretary was appointed post year end.

20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2022-23 (Turnover rate in current FY)			FY 2021-22 (Turnover rate in previous FY)			FY 2020-21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	25.23%	71.43%	26.30%	39.67%	37.50%	39.62%	14.33%	0%	14.00%
Permanent Workers	0.82%	0%	0.82%	6.00%	0%	6.01%	1.56%	0%	1.56%

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

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Sterling Gtake E-Mobility Limited	Subsidiary	100	No
2	Haryana Ispat Private Limited	Subsidiary	100	No

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)-Yes

(ii) Turnover (in ₹)- ₹ 59,765.44 Lacs

(iii) Net worth (in ₹)- ₹ 40,144.98 Lacs

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Grievance Policy Available	0	0	NIL	0	0	NIL
Investors (other than shareholders)	Stakeholder Relationship Committee	0	0	NIL	0	0	NIL
Shareholder	Grievance Policy Available	0	0	NIL	0	0	NIL
Employees and workers	Through E-mail at marketing@stlfasteners.com	145	0	All concerns were closed	125	0	All concern were closed
Value Chain Partners (other than suppliers and customers)	The Company through its strong mechanism takes care of all the grievances for all sets of its value chain partners. However, the current mechanism of data capturing needs to be further strengthened to gather the information in the required manner.						
Others (Suppliers and Government and Regulatory Bodies)		0	0	NIL	0	0	NIL

The Company interacts with a wide range of Stakeholders, including Shareholders, Board of Directors, Promoters, Customers, Suppliers, Business Partners, Employee/ Workers, Government, Institution/ Industry Bodies and Community. The Company believes in taking all sets of Stakeholders along with it in its business journey. To achieve that, there is a strong Grievance Redressal Mechanism through various policies and procedures across all Company's business operations. To be precise, the Company has a well-operated Vigil Mechanism/Whistle-Blower Policy

(<https://stlfasteners.com/investors/>), Anti-Bribery Policy on Prevention of Sexual Harassment for Women at Workplace (<https://stlfasteners.com/investors/>) for all of its women employees to for raising and expressing grievances and concerns. Furthermore, the Company has a strong escalation matrix for its value chain partners and suppliers for addressing their grievances. Over and above, respective process owners are responsible for addressing the grievances of other classes of stakeholders. Following are the platforms/ specific email-IDs for reaching out to the Company by different class of stakeholders:

- <https://stlfasteners.com/investors/investor-contact/>
- csec@stlfasteners.com
- marketing@stlfasteners.com

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

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

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	Climate Change	Opportunity	<p>The Company’s potential carbon reduction roadmap will offer distinct operational benefits and energy supply opportunities in various aspects of its business operations.</p> <p>The Company is integrating sources of clean energy into existing power networks. Also, making capital investments in distinguished assets that will serve diverse electricity and fuel retrofitting on the energy supply system.</p>		Initiatives addressing climate change will have some financial impact; however, correspondingly will also have positive impact on its business.
2	Emissions	Risk & Opportunity	As the Company continues to fight climate change and the resulting legal and compliance stringency, it must invest appropriately in measure to reduce emissions and to pace up with changing regulatory environment.	In the coming years, the Company intend to facilitate various emission reduction measures and energy conservation initiatives at across all its manufacturing facilities	We recognise and accept that investments in energy management systems and technology would have some financial impact; however, with this required investment, there would be visible positive impact on the Company’s operations. The Energy conservation initiatives will give direct financial benefits

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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)
3	Water management	Risk & Opportunity	Water, as a limited resource, will pose a risk to our Company's operations.	Reduction in raw water consumption in manufacturing. The Company is striving to ensure efficient water management so that this issue does not become impossible to overcome.	The Company has made substantial investment in waste water treatment for water conservation and maintaining Zero Liquid Discharge status in some of the plants. Similar investment will be required in future to sustain it.
4	Diversity and equal opportunity	Opportunity	The ability of the Company to ensure that its culture, hiring, and promotion policies foster the development of a diverse and inclusive workforce, makes it an opportunity for the Company.		There may be minor financial implications while strategising improved hiring techniques and systems in place.
5	Responsible supply chain	Opportunity	Building a robust supply chain has aided us in maintaining business continuity in all challenging situations, including in COVID period. Additionally, our strong supply chain has made sure that we can maintain competitive pricing, together with benefiting our customers alongside.		There may be some financial impacts while further strengthening supply chain management.
6	Community engagement	Opportunity	Along with the interests of the Company, the business must be allied with the greater interests of the community. A friendly relationship with local communities may assist businesses in further developing a positive outlook towards the society and a better brand image.		These continued initiatives would have some financial implications; however, would also contribute to the Company's brand image and the creation of value for its stakeholders.

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)
			The Company continues to engage in Corporate Social Responsibility (CSR) initiatives at all of its plants in order to strengthen connections with the community at large.		
7	Manufacturing efficiency	Opportunity	Efficient manufacturing procedures enable timely manufacture and delivery of products to our valued clients while also maintaining the sustainability of our operations. Investment in the new technology and processes to ensure the quality of the products manufactured.		This will have a positive impact on the business.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	The existing polies with the Company were approved by the Board periodically in past. All the newly drafted policies are in the process of approval by the Board/ respective committees post year.								
c. Web Link of the Policies, if available	Policies specified under the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 are accessible on the Company's website, which can be accessed via the link below: https://stlfasteners.com/investors/ Rest of the Policies are available on Company's Intranet, accessible by all employees of the Company.								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes. Some of the policies extended to the value chain partners as well.								
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ATF 16949: 2016 ISO 45001: 2018 ISO 14001: 2015 ISO 9001: 2015 ISO 17025								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company has identified some of the environmental and social Key Performance Indicators (KPIs) and is in the process of creating an Environment, Social, and Governance (ESG) Roadmap with clear commitments, goals, and targets for coming years: <ul style="list-style-type: none"> • Assessment of Green House Gas emissions. • Promoting the use of Renewable Energy and reducing overall energy consumption. • Waste and Water Management. • Promoting Gender Diversity and Human Rights. • Comply with applicable Regulatory Requirements. • Continued inclusive engagement and interactive dialogue with all sets of Stakeholders. • Rehabilitation of the under-privileged group, improvement of the local community to help the marginalised sections of society. • Focus on creating shared value for our Communities. 								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	The Company's goal has always been to integrate and comply with its objectives within the ESG framework. The Company has begun to restructure and rebuilding most of its on-going and new projects into specific ESG from FY 2023-24 onwards. As a result, it would begin reporting the entity's performance against commitments, goals, and targets in near future.								
Governance, leadership, and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (<i>listed entity has flexibility regarding the placement of this disclosure</i>)	The Company is having highest level of commitment to sustainability. It is demonstrated through various initiatives taken in the organisation. As a responsible Company it understands and is committed in creating, maintaining and ensuring a safe and clean environment. The Company is in the process of expanding its position in the existing markets but at the same time, balancing the commercial ambitions with environmental concern. The Company has adopted many green initiatives and practices to ensure to run the business more environment friendly.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Managing Director of the Company is responsible for the implementation and oversight of ESG-related issues.								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes. The The Managing Director of the Company is responsible to review the sustainability related issues on regular basis. The CSR committee also reviews the CSR initiatives undertaken by the Company on regular basis.								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)																	
		P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Audit Committee, Risk Management Committee and Board review the performance of all policies and procedures either on annual basis/ other appropriate periodic basis. Upon review, the efficacy of the working policies is scrutinised, and any necessary amendments are done to the existing policies and procedures are implemented.																		
Compliance with statutory requirements relevance to the principles, and, rectification of any non-compliances																			

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	
										No, the Company has not appointed any external agency for this purpose so far, however, these have been evaluated internally.

12. If answer to question (11) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated:

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9	
The entity does not consider the Principles material to its business (Yes/No)										Not Applicable
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)										
The entity does not have the financial or/human and technical resources available for the task (Yes/No)										
It is planned to be done in the next financial year (Yes/No)										
Any other reason (please specify)										

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 categorised 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 Indicator

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

Segment	Total number of training and awareness programmes held	Topics/ principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	4	<ul style="list-style-type: none"> Economic Outlook Business of the Company Strategy Discussion Regulatory updates Key Company Highlights Industry Outlook 	100%
Key Managerial Personnel			

Segment	Total number of training and awareness programmes held	Topics/ principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Employees other than BoDs and KMPs	164	The trainings can be categorised as below: <ol style="list-style-type: none"> 1. Training on Behavioural development- POSH, 5'S awareness, Statutory Compliance management, Supplier Handling Skills, skills to handle work force and employee Motivational trainings. 2. Employee Health and Safety trainings- First Aid, Safety Awareness and Emergency, awareness of ISO etc. 3. IT related trainings PMS module understanding, Cyber Attack awareness, Manage Engine - The one stop Ticketing application for ERP Issues and Infra issues etc. 4. Trainings on quality matters- Basic Awareness of Advanced Product Quality Planning (APQP), International Automotive Task Force (IATF-16949/ISO-14001), Customer complaint handling/CSR, POKA Yoke, 7 QC Tools, awareness of ISO 9001:2015 etc. 5. Other technical trainings- Basic Awareness of production Part Approval Process (PPAP), Knowledge of 4M Change Management, Continuous Quality Improvement (CQI), Data management, Control Plan, Product Knowledge, Microstructure Checking etc. 	66%
Workers	47	The trainings can be categorised as below: <ol style="list-style-type: none"> 1. Training on Behavioural development- 5'S awareness, skills to handle work force and employee Motivational trainings etc. 2. Employee Health and Safety trainings- First Aid, Safety awareness and Emergency etc. 3. Trainings on quality matters- International Automotive Task Force (IATF), Kaizen and Presentation Skills/Machine Setting, Awareness on MSA etc. 4. Other technical trainings- Perpetual Inventory, Rework Analysis, Daily MIS, Maru-A and Understanding Drawing and Control Plan etc. 	71%

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			Nil		
Settlement					
Compounding fee					

Non-Monetary

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

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Not Applicable	

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, the Company has an Anti-Corruption and Anti-Bribery Policy, The Company has zero tolerance approach towards corruption and bribery and other unethical practices. The Company has appropriate internal controls to ensure that the Company or its employees do not engage in unethical practices. The said policy is available on the Company's Intranet, which can be accessed by all the employees.

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

	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Director's	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

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

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

Not Applicable, as there were no cases of corruption and conflicts of interest which were reported during the year.

Leadership Indicator

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
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The trainings were held with value chain partners but a framework to track such awareness programmes is not in place yet.

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

Yes, the Company has processes in place to avoid/ manage conflict of interests involving members of the Board. As such, the Board has robust procedure to approve such kind of transaction through Audit and Board Committees. In case of any probable conflict of interest, he/she has to make full disclosure of all the facts and circumstances thereof to the Board of Directors and the Audit Committee.

Further, the Code of Conduct of the Company has principles on management of conflict of interest to identify actual of potential conflict of interest of Company with its directors and employees, which may arise during the course of its business activities. The policy is available at Company’s Intranet and can be accessed by all of its employee.

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.

	Current Financial Year 2022-23	Previous Financial Year 2021-22	Details of improvements in environmental and social impacts
R&D	NIL	NIL	NIL
Capex	17.45%	NIL	The Company has taken initiatives to reduce the dependence on non-renewable energy and hence solar panels (900 KWP) have been installed at its Bangalore plant. Furthermore, the Company is planning to further decrease this dependency even more and other measures will also be taken to improve the impact of the Company on the environment and society to be reported in the coming years of its sustainability journey.

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

Yes. The Company evaluates its direct material supplier/ vendors (value chain partners) on various parameters such as their reliability, product quality, dependency, etc.

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

As mentioned in the previous questions, as a matter of practice, all major direct material suppliers were assessed on the broad parameters, including sustainable sourcing. These suppliers are mandated to adhere to certain aspects such as Labor Laws Compliance and Human Rights, Occupational Health and Safety, Environmental Protection and Ethical Business among others. The Company is in the process to further strengthen this practice and extend this to most of its suppliers in years to come.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Not Applicable, as the Company’s products are delivered directly to OEMs, being (B2B) manufacturers. Therefore, it has limited scope for reclaiming its products at the end of its life cycle.

However, the Company ensures that the waste generated is disposed of as per Guidelines/Regulations. E-waste is disposed through authorised vendors and all the hazardous and non-hazardous waste generated is sent to the recycler. Also, the Company restricts the usage of “hazardous chemicals” in the components used in products, to the extent possible. An internal standard is created considering various national and international laws on hazardous substances.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Extended Producer Responsibility (EPR) is not applicable to the Company's activities.

Leadership Indicator

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?

NIC Code	Name of Product/ Service	% of total Turnover contributed	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.
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The Company has not carried out the LCA for any of its products so far. However, the Company has plans to carry out the same in the coming years.

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
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Not Applicable, as the Company is in the process of carrying out the LCA in the coming years.

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year

Not applicable, as the Company's processes does not involve reusing the recycled materials.

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

	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NIL	NIL	NIL	NIL	NIL	NIL
E-waste	NIL	NIL	NIL	NIL	NIL	NIL
Hazardous waste	NIL	NIL	NIL	NIL	NIL	NIL
Other waste	NIL	NIL	NIL	NIL	NIL	NIL

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
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Not Applicable, as the Company directly supplies its products to the OEM customers supplier; therefore, it has limited scope for reclaiming it at the end of its life cycle.

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B)/(A)	Number (C)	% (C)/(A)	Number (D)	% (D)/(A)	Number (E)	% (E)/(A)	Number (F)	% (F)/(A)
Permanent Employees											
Male	339	339	100%	339	100%	0	0%	0%	0%	0	0%
Female	5	5	100%	5	100%	5	100%	0%	0%	5	100%
Total	344	344	100%	344	100.0%	5	100%	0%	0%	5	100%
Other than Permanent Employees											
Male	Covered under ESIC	-	-	-	-	-	-	-	-	-	-
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Total	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B)/(A)	Number (C)	% (C)/(A)	Number (D)	% (D)/(A)	Number (E)	% (E)/(A)	Number (F)	% (F)/(A)
Permanent workers											
Male	241	241	100%	241	100%	0	0	0	0	241	100%
Female	0	0	0%	0	0	0	0	0	0	0	0%
Total	241	241	100%	241	100%	0	0%	0	0%	241	100%
Other than Permanent Employees											
Male	Covered under ESIC	-	-	-	-	-	-	-	-	-	-
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Total	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

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

Benefits	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	18%	2%	Y	7%	9%	Y
Others-please specify	NIL	NIL	NIL	NIL	NIL	NIL

3. Accessibility of workplaces

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

Yes, the Company has the requisite infrastructure to facilitate the movement of differently abled employees/workers such as wheelchairs, lifts, handrails, etc. The Company's premises/offices are largely accessible to differently abled employees and workers in addition to regular employees in alignment with the Rights of Persons with Disabilities Act, 2016, except for a few places.

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, the Company has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016, which is available on Company's Intranet and accessible to all employees. The Company does not discriminate between employees/workers on the grounds of age, sex, colour, caste, religion, nationality, language, marital status, etc.

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	Paternity benefits are not available for male employees/workers of the Company. Hence this question is not applicable.			
Female	Maternity benefits are provided to all the female employees/workers of the Company; however, none of them have availed this facility for the financial years under review. Hence this question is not applicable.			
Total	-	-	-	-

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	Yes, the Company has internal policy/ mechanism for grievance redressal, which is accessible to all of its employees and workers. Furthermore, suggestion Boxes and Registers are placed at ease of access by all the employees and workers to address the complaints or grievances raised by them. This mechanism as a whole ensures that the complaints/ grievances are addressed promptly, fairly, and impartially by the Company.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	Not Applicable, since none of the employees are part of any union/association.					
Male						
Female						
Total Permanent Workers						
Male						
Female						

8. Details of training given to employees and workers:

Category	FY 2022-23 Current Financial Year					FY 2021-22 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No.(E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	339	127	37%	186	55%	302	0	0%	0	0%
Female	5	0	0%	4	80%	8	0	0%	0	0
Total	344	127	37%	190	55%	310	0	0%	0	0%
Workers										
Male	241	108	45%	127	53%	244	0	0%	0	0%
Female	0	0	0	0	0	0	0	0	0	0
Total	241	108	45%	127	53%	244	0	0%	0	0%

To the extent available (Data not available for FY 2021-22)

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

Category	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Total (A)	No. (B)	% (B)/(A)	Total (C)	No.(D)	%(D)/ (C)
Employees						
Male	339	339	100%	302	302	100%
Female	5	5	100%	8	8	100%
Total	344	344	100%	310	310	100%
Workers						
Male	241	241	100%	244	244	100%
Female	0	0	0%	0	0	0%
Total	241	241	100%	244	244	100%

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 of such system?**

Yes, all the plants of the Company are ISO 45001:2018 (Occupational Health and safety management system) certified and hence a Health and Safety Policy is in place to focus on the physical and mental well-being of the employees and workers. Furthermore, the Company strives to maintain an environmentally friendly system for its employees and workers by taking following initiatives:

- Compliance with applicable Laws
- Encouraging innovation for prevention of pollution, injury and ill health
- Continuously improving the environmental Occupational Health and Safety performance
- Establishing an incident free work environment
- Maintaining proper storage and disposal of wastes and pollutants
- Keeping wastage to the minimum to preserve the natural resources

The Company's policy on Health and Safety is available on the Company's Intranet, which can be accessed by all the employees.

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

Hazard Identification and Risk Assessment (HIRA) is the process for identification of risks at the workplace. Also, the Company follows risk assessment/identification process as per ISO 45001 for identification of risk and development of a mitigation plan for the same. These processes are established by Manufacturing Heads in consultation with Plant Heads for implementation after conducting complete analysis of the probable risks/hazards. Further, mitigation plans are periodically updated in case of a change in material, layouts or the process to ensure safety at the workplace. A Material Safety Data Sheet is also prepared to assess the risks on a routine/non-routine basis.

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

Yes, all the sites of the Company have incident and hazard reporting procedures laid down to assist the workforce highlight unsafe working conditions and remove themselves from such situations. We have multiple platform and processes to report hazards like Safety Observation Tour (SOT) where the Concerned Line Manager goes to the workmen and ask for safety related issues, if any. Also, we have online safety risk reporting mechanism and we provide multiple trainings for Safety Risk Assessment, Mock Drill Fire-Disaster Management, Emergency Management, Driving Safety etc.

Further, the Company has a unique Compliance Management Tool called 'LEX Comply' and there is a generic email ID used across various functions within the Company.

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

Yes, the employees of the Company have access to non-occupational medical and healthcare services.

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

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

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

The health and safety of the employees and workers is Company's top priority. The Company considers employees and its workers as its most valued asset. All the plants of the Company are certified Occupational Health and Safety Management Systems as per ISO 45001. In addition to the inputs provided under question no. 10 above, several other steps are taken by the Company to provide safe and healthy working conditions for all employees, workers, and visitors as listed below:

- i) Trainings: Training are provided to the employees and workers on First aid, stress management, TPM, Fire Hydrant System, Fire and Safety, 5S Principles, product quality, product knowledge, technical training etc.
- ii) Medical rooms: These are equipped with basic emergency care equipment and medicines.
- iii) Mock Drills: Periodic mock drills are conducted to ensure Safety measures at each unit.
- iv) Action Plans: Well organised action plans and phase wise execution are ensured to eliminate the hazards and risks associated to Health, Safety and Environment.
- v) Safety Audit Process: These are regularly conducted internally.

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

	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working conditions	NIL	NIL	-	NIL	NIL	-
Health & Safety	NIL	NIL	-	NIL	NIL	-

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health & Safety practices	100% of the plants/offices were assessed by an internal team.
Working Conditions	

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

Safety at the workplace is of utmost priority for us. We have system in place w.r.t. safety inspections, operation control, monitoring, audit and assessments and others. Gaps, learnings and improvements are implemented across the Company to avoid repeated incidents. The corrective actions are driven by site leadership of each location.

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).

Yes, for those who are covered under Employees State Insurance Act, 1948 (ESIC), as per such ESIC scheme.

For others who are not covered under ESIC, Group Personal Accident (GPA) and Group Medical Coverage (GMC) has been made available.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

The Company ensures that statutory dues have been deducted and deposited the Company for direct material suppliers. Various measures are undertaken by the entity which includes ensuring that the agreements are duly executed on stamp papers, payments are monitored, and the terms and conditions mentioned in the purchase order are abided by them.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
	Employees	NIL	NIL	NIL
Workers	NIL	NIL	NIL	NIL

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

The Company engages with the retired employees or retains them in case of specific vacancies within the organisation. The agreements are made for the mutually decided period with them and it is renewed based on their performance and the further vacancies in the organisation.

5. 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	Majority of sourcing supplier assessment through questionnaire
Working conditions	Majority of sourcing supplier assessment through questionnaire

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

No significant risks/concerns observed in the self-assessment taken by suppliers for health and safety practices and working Conditions. Value Chain Partners were advised to correct/ rectify the minor incidences which were reported and follow up actions were taken.

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.

Key Stakeholders are identified on the basis of the material influence they have on the Company or on how they are materially influenced by the Company's corporate decisions and the consequences of those decisions. The Company recognises Board of Directors, Employees & workers, Investors & shareholders, Customers, Suppliers, Government and Regulatory Bodies, Suppliers, Communities and Service providers as its Key Stakeholders.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Board of Directors	No	Board meetings, one-to-one meetings and Emails	Quarterly and need based	Compliance of law and strategic decision making,
Employees & Workers	No	Monthly Review Meetings, Emails, Celebrations, SMS and Notice Board	Annually, Monthly, Weekly and need based	Employee engagement activities, suggestions, Motivational Schemes, Celebrations, Motivational initiatives and performance review
Investors & Shareholders	No	Quarterly publication of results, Newspaper advertisements, Email, Website, Analysts/Investor Calls, Annual General Meetings, Stock Exchange intimations.	Periodic	Market developments, Disclosure of Corporate Results, Resolution of queries etc.
Customers	No	Call, mail, one-to-one meetings, conference, technical meetings, trials and events. Personal visits and Exhibitions	Annually, Monthly, Weekly and need based	Quality and other terms and conditions
Suppliers	No	Meeting, mail, call & visit, face-to-face discussions, plant audits, PO, inspection, telephonic discussions, buyer net, internet and networking.	Annually, Monthly, Weekly and need based	Delivery Schedule, Payment issues, Product related

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government and Regulatory Bodies	No	Official communication channels <ul style="list-style-type: none"> Regulatory audits/ inspections Good governance 	Annually and Quarterly	Compliances and Policy related matters
Communities	Yes	CSR Activities	Periodic	Society, Health and Education related
Value Chain Partners (other than customers and suppliers)	No	Interaction through consultants & plant visits brokers - email & phone calls, mails,	Monthly and Quarterly	Insuring Company assets against fire, earthquake, claim, settlement, premium, payment etc.

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.**

The Company maintains a continuous and proactive engagement with our major stakeholders, allowing us to convey our strategy and performance at all levels. Stakeholder consultations are conducted by the relevant Company executives, business leaders, and key process heads. Based on feedback from all stakeholders, the board revisits various developments on a regular basis. The Board is apprised of all the major concerns relevant to economic, environmental and social topics during Board meetings.

- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, the Company in consultation with various stakeholders has identified material environmental and social topics. The Company makes sure to integrate stakeholders’ input while developing its processes and policies. However, the stakeholder consultation will be used to support the identification and management of environmental, and social topics whenever there will be requirement

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

The Company through its CSR initiatives, provide necessary support to the vulnerable/marginalised community. The CSR Policy of the Company is based on the belief that all are born with equal potential but not with equal opportunity. It identifies the marginalised/vulnerable sections of the community and strives to work for the betterment of this section as it realises that the aforesaid section as underprivileged.

PRINCIPLE 5 Businesses should respect and promote human rights
Essential Indicators

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

Category	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	344	97	28%	Data not available for the previous year		
Other than permanent	0	NIL	0%			
Total Employees	344	97	28%			
Workers						
Permanent	241	NIL	0%	Data not available for the previous year		
Other than permanent	915	NIL	0%			
Total Workers	1156	NIL	%			

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

Category	FY 2022-23 Current Financial Year					FY 2021-22 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent										
Male	339	-	-	339	100%	302	-	-	302	100%
Female	5	-	-	5	100%	8	-	-	8	100%
Other than permanent										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent										
Male	241	-	-	241	100%	244	-	-	244	100%
Female	0	0	0	0	0	0	0	0	0	0
Other than permanent										
Male	915	684	75%	231	25%	768	545	71%	213	28%
Female	-	-	-	-	-	-	-	-	-	-

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	2	2,03,06,400	N/A	N/A
Key Managerial Personnel	2	1,41,91,200	1	25,23,120
Employees other than BoD and KMP	336	5,46,780	5	8,73,960
Workers	241	4,31,640	N/A	N/A

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, the Company has HR Policy through which it endeavors to protect Human Rights at the workplace. The corporate HR department addresses the issues received pertaining to human rights, investigates and makes sure that no reprisal/retaliation action is taken against the employee who raised the issue.

Furthermore, respective Head of the Departments are responsible for their respective business connect for addressing human rights impacts or issues caused or contributed to by the business. The management of the Company also participates in reviewing the Human Rights Policy at an organisational level.

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

The Company has various internal mechanisms in place to redress grievances related to human rights issues which includes:

- POSH Policy (<https://stlfasteners.com/investors/>)
- Grievance Redressal Policy (<https://stlfasteners.com/investors/>)
- Vigil Mechanism/Whistle Blower Policy (<https://stlfasteners.com/investors/>)

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

	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	NIL	NIL	-	NIL	NIL	-
Discrimination at workplace	NIL	NIL	-	NIL	NIL	-
Child Labour	NIL	NIL	-	NIL	NIL	-
Forced Labour/Involuntary Labour	NIL	NIL	-	NIL	NIL	-
Wages	NIL	NIL	-	NIL	NIL	-
Other human rights related issues	NIL	NIL	-	NIL	NIL	-

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

The Company has POSH policy in place to safeguard the complainant against discrimination, victimisation, retaliation or any other unfair employment practices. In order to prevent adverse consequences to the complainant in cases of discrimination and harassment, Internal Complaint Committee has been constituted. It ensures that the identity of the complainant is not revealed and it protects the complainant from any retaliation or negative consequences that may occur from submitting the complaint. Furthermore, the organisation has established an organised system for reporting complaints and grievances, and a dedicated team is in charge of analysing and resolving any issues in a rapid and efficient manner.

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

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

9. Assessments for the year:

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

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

No significant risks / concerns were identified from the assessments carried out on the topics mentioned above during the year.

Leadership Indicators

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

The Company periodically familiarises employees and workers about their rights and duties under Company policies and procedures. However, there were no grievances/complaints reported during the current financial year.

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

Throughout the year, the Company continues to take measures to integrate human rights into its Company culture at all levels.

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?

The Company's premises/offices are largely accessible to differently abled visitors in addition to regular employees/workers.

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	Majority of sourcing supply assessed
Discrimination at workplace	Majority of sourcing supply assessed
Child labour	Majority of sourcing supply assessed
Forced/ Involuntary labour	Majority of sourcing supply assessed
Wages	Majority of sourcing supply assessed
Others- please specify	Nil

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

No significant risks/ concerns were identified from assessments of the specified value chain partners at Question 4 above.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.

Essential Indicators

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

Parameter	Units	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total electricity consumption (A)	(in Giga joules)	1,45,919	1,20,355
Total fuel consumption (B)	(in Giga joules)	71,152	68,210
Energy consumption through other sources (C)	(in Giga joules)	6,204	1,969
Total energy consumption (A+B+C)	(in Giga joules)	2,23,275	1,90,534
Energy intensity per rupee of turnover (<i>Total energy consumption/ turnover in rupees</i>)	(Giga Joule/ Crore)	368	400
Energy intensity (optional) – the relevant metric may be by the entity	Giga Joule/ Net Tonnage	6.68	6.61

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 such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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.

Not Applicable, as the Company does not have any sites / facilities identified as DCs under the PAT Scheme of the Government of India.

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	76,432	67,043
(iii) Third party water	48,217	38,331
(iv) Seawater/Desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1,24,649	1,05,374
Total volume of water consumption (in kilolitres)	1,24,649	1,05,374
Water intensity per rupee of turnover (Water consumed / turnover)	205	221
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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

No such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

Yes, the Company has implemented a mechanism for Zero Liquid Discharge plant at Prithla and Bangalore. The plant's wastewater is reused during the process, and the remaining wastewater that is not recyclable or reusable is evaporated in a boiler and sent back into the system.

The Company also takes several initiatives across all the our plants to conserve and recycle water. The other two plants at DLF and Ballabgarh are authorised to discharge the ETP treated water to the discharge line.

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

Parameter	Please specify unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
NOx	mg/NM3	400	193
SOx	mg/NM3	49.9	38.4
Particulate matter (PM)	mg/NM3	45.2	63.2
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others-please specify	-	-	-

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 such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	5,931	4,745
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	32,831	27,079
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent/ Turnover	64	57
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		0.98	0.94

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 such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

The Company strives to reduce its GHG emissions and has taken up several initiatives to achieve the same. One such initiative is reducing the dependency on non-renewable energy sources and moving to renewable sources by installing solar panels to harness solar energy. The Company also takes steps to reduce its energy consumption by recovering the waste heat from the furnaces and compressors.

Furthermore, the Company has initiated the decarbonisation strategy would start reporting these parameters from next financial year onwards.

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total waste generated (in metric tonnes)		
Plastic waste (A)	15.0	14.723
E-waste (B)	0.5	0.345
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) <i>Used Oil</i>	1,425.6	802.2
Other Non-hazardous waste generated (H). <i>Scrap trimming parts</i>	3,167	2,872.8
Total (A+B + C + D + E + F + G + H)	4,608.1	3,690.1
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	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total	0	0
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	2,941.0	2,656.0
(ii) Landfilling	1,316.0	750.0
(iii) Other disposal operations	351.1	284.1
Total	4,608.1	3,690.1

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 such assessment/evaluation/assurance was carried out by an external agency during the reporting period.

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

The primary focus is at the point of waste generation. We follow the concept of 3 R's: Reduce, Reuse, and Recycle. To reduce both hazardous and nonhazardous waste, improvement projects are being carried out. Reduction of waste is an important and critical management part of review index.

The Company follows legally prescribed procedures and applies environmentally sound disposal techniques for disposing of the hazardous waste, whereas the non-hazardous waste is sold to the authorised recyclers, as identified by the Company. Further, to reduce the wastage of water, the Company has installed ETPs and STPs at some of its plants, wherein the Company reuses the treated water for non-potable purposes.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
Not Applicable, since there are no operations of the Company near above-mentioned areas.			

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes / No)	Relevant web link
No environmental impact assessment of projects was undertaken by the Company during the current reporting Year. Hence, this requirement is not applicable.					

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

Yes, the Company is compliant with all the applicable environmental laws/ regulations/ guidelines in India.

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
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Not Applicable, since there is no non-compliance with the applicable environmental laws/ regulations/ guidelines in India.

Leadership Indicators

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
From renewable resources		
Total electricity consumption (A) (Giga Joule)	6,204	1,969
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C) (Giga Joule)	6,204	1,969
From non-renewable resources		
Total electricity consumption (D) (Giga Joule)	1,45,919	1,20,355
Total fuel consumption (E)	71,152	68,210
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F) (Giga Joule)	2,17,071	1,88,565

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. An internal assessment was carried out for energy consumption of the Company during the reporting period.

2. Provide the following details related to water discharged:

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	5,876	6,142
- With treatment – please specify level of treatment	12,998	15,357
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	402	507
- With treatment – please specify level of treatment	0	0
(v) Others (Gardening)		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	19,276	22,006

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (contd.)

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, an internal assessment was carried out by the Company during the reporting period.

3. Water withdrawal, consumption and discharge in areas of water stress (in kiloliters):

For each facility / plant located in areas of water stress, provide the following information:

- (i) Name of the area: DLF Faridabad, Ballabgarh Faridabad, Kolar-Bangalore, Palwal-Faridabad
- (ii) Nature of operations: Manufacturing of cold tensile fasteners
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	76,432	67,043
(iii) Third party water	48,217	38,331
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	1,24,648	1,05,375
Total volume of water consumption (in kilolitres)	1,24,648	1,05,375
Water intensity per rupee of turnover <i>(Water consumed / turnover)</i>	205	221
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	18,874	21,499
- No treatment	5,876	6,142
- With treatment – please specify level of treatment	12,998	15,357
(ii) Into Groundwater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties	402	507
- No treatment	402	507
- 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)	19,276	22,006

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (contd.)

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, an internal assessment was carried out by the Company during the reporting period.

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

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent		
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO2 equivalent	The Company is yet to track Scope 3 emissions and is in the process of reviewing and deciding on its future course of action in this regard.	
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

Not Applicable, as no independent assessment/ evaluation/assurance has been carried out by an external agency.

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

Not Applicable, as the Company does not have any operations in ecologically sensitive areas.

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Installation of Solar Plant	Installed 700 Kwp solar plant. With this total solar capacity is 2136 Kwp	Carbon footprint reduction
2	Installation of Dual Fuel Kit for Genset	Genset are retrofitted with dual fuel thereby reducing the exhaust emission	Carbon footprint reduction/ Reduction in air emissions
3	Waste Heat Recovery system	Multiple heat recovery projects under implementation	Reduced energy consumption
4	Collection of usage of Rainwater in process	Reduction of usage of fresh water from Borewell	Reduced ground water consumption
5	Reuse of spent acid	Use spent acid in ETP process	Reduced acid consumption

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

The Company has a robust Disaster management/Business continuity plan to handle the following natural disasters and emergencies:

- Fire Emergency.
- Earthquake Emergency
- Medical Emergency
- Food Poisoning Emergency.
- Gas Leakage Emergency.

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

There is no major environmental impact resulting from the Company's value chain (sourcing suppliers assessed for this purpose).

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

80% of all the Sourcing suppliers were assessed for their environmental impacts.

PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

1. a. **Number of affiliations with trade and industry chambers/ associations: 2**
- b. **List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to;**

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Automotive Component Manufacturers Association of India (ACMA)	National
2	Society of Indian Automobile Manufacturers (SIAM)	National

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

Name of authority	Brief of the case	Corrective action taken
Not Applicable, as the Company has not received any adverse orders from any regulatory authorities.		

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
The Company directly or through industry bodies and other associations puts forth a number of suggestions with respect to the industry in general and its activities in particular. Further, the Company is part of different forums, where we participate in different meetings for our respective inputs.					

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
Not Applicable, as there were no projects that required SIA based on applicable laws in the current financial year.					

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

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 ₹)
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Not Applicable, as there were no projects requiring an R&R.

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

The Company has an internal grievance redressal committee in place to handle the community's grievances. Any such complaint received is referred to the respective department for further action.

Further, as a matter of policy, the Company keeps undertaking various CSR activities to address the needs of the community in the vicinity of its plants premises. There is an Open Door Policy of the Company, wherein the communities can approach plant/ location and management of that respective plant.

Furthermore, the Company also accesses the communities in the vicinity of its plants premises to address their grievances.

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

	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
Directly sourced from MSMEs/ small producers	The Company procures from vendors based on quality, cost, and delivery aspects. The Company strives for a fair, transparent, and inclusive, procurement process that provides equal opportunities for all suppliers.	
Sourced directly from within the district and neighbouring districts		

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):

Details of negative social impact identified	Corrective action taken
Not Applicable, as there were no projects that required SIA based on applicable law in the current reporting year.	

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 ₹)
No CSR projects were undertaken by the Company in designated aspirational districts as identified by government bodies.			

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

The Company supports marginalised/ vulnerable groups through its CSR initiatives; however, it does not have a formal policy in place for procurement from the aforesaid mentioned group.

(b) From which marginalised /vulnerable groups do you procure?

Not Applicable.

(c) What percentage of total procurement (by value) does it constitute?

Not Applicable.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
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NIL

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the case	Corrective action taken
Not Applicable, as mentioned in Question no. 4 above.		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups
1	Healthcare and Sanitation	The benefits of the initiatives are extended to the entire community, however, the exact number of persons benefitted are not available.	100%
2	Promoting Education (Infrastructure Development of Government schools, Construction of smart classes)		100%
3	Promoting Sports		100%
4	Empowering Underprivileged section of the society and support to destitute (Rehabilitation)		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.

Robust complaint handling procedure. Enclosed separately.

The Company is into Business to Business (B2B) and supplies products to OEMs, and do not have the direct visibility for the end users. However, the Company receives monthly supplier's rating from its OEMs. The report rates us on the parameter of Quality, Cost, Delivery, Development and Management (QCDDM). This rating is analysed by Sales and Marketing department and the relevant stakeholders are addressed, in order to find areas for improvement. Appropriate actions strategies are identified to improve the feedback received.

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	NIL, as the Company is in B2B business, and the products are not meant for the end customers directly.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2022-23 (Current Financial Year)		Remarks	FY 2021-22 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	NIL	NIL	-	NIL	NIL	-
Advertising	NIL	NIL	-	NIL	NIL	-
Cyber-security	NIL	NIL	-	NIL	NIL	-
Delivery of essential services	NIL	NIL	-	NIL	NIL	-
Restrictive Trade Practices	NIL	NIL	-	NIL	NIL	-
Unfair Trade Practices	NIL	NIL	-	NIL	NIL	-
Other	NIL	NIL	-	NIL	NIL	-

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

	Number	Reasons for recall
Voluntary recalls	NIL	NIL
Forced recalls	NIL	NIL

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.

The IT framework policy of the Company was in the implementation phase as at the year end and has been completed post year end.

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

Not applicable, as the Company is not dealing with rendering the Essential services. Further, the Company has not received any complaints with respect to advertising, cyber security and data privacy of customers, re-occurrence of instances of product recalls during the reporting period nor any penalties were paid to, or actions were taken by regulatory authorities on account of safety of products / services.

Leadership Indicators

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

The official website of the Company provides information about products it offers to OEMs. The web-link for the Company's website is: <https://stlfasteners.com/>

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

Since the Company is a B2B supplier, it supplies products directly to the OEMs. They further assemble and sells the end products to the end user customers. Therefore, the Company has limited role for informing and educating the end user about the safe and responsible usage of its products.

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

Not Applicable, as the Company does not provide essential services.

4. 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)

Not Applicable, as the Company supplies products to the OEMs and there is no direct visibility for the end users. Further, the Company's endeavor is always to consider customer satisfaction as a top priority, it seeks customer satisfaction by various mechanisms. Customer's feedback is obtained directly or indirectly to identify any grievances and accordingly, corrective measures are designed and executed. Post that, customer satisfaction summaries are then collated, reviewed and monitored by the all the process owners in discussion with the management of the Company.

5. Provide the following information relating to data breaches:

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

No Instances were identified pertaining to data breach during the Current Financial Year.

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

No data breaches were identified related to personally identifiable information of customers during the Current Financial Year.