



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	DJ-1210, 12 th Floor, DLF Tower-B, 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	0129-2270621
8	Website	www.stlfasteners.com
9	Financial year for which reporting is being done	FY 2024-2025
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited and Bombay Stock Exchange Limited
11	Paid-up Capital	Rs.723.69 Lakhs
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:	Pankaj Gupta Chief Financial Officer 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
14	Name of Assurance/Assessment Provider	The data provided in the BRSR Report has not been assured by any external agency.
15	Type of Assurance/Assessment obtained	Not Applicable

II. Products/services

16. 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	98.95%

17. 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 High Tensile Fasteners	25991	98.95%

III. Operations

18. 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

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	26
International (No. of Countries)	13

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

1.70 % of the total turnover of the Company is contributed through exports.

c. A brief on types of customers.

The Company is part of a diversified automotive group and is the leading producer of cold forged hi-tensile fasteners. It currently meets the fastener requirements of all major and well-known automotive Original Equipment Manufacturers (OEMs) in India. The Company has a distinguished and respected customer base. In the Commercial Vehicle segment, it supplies to major manufacturers like TATA Motors, Ashok Leyland, and Daimler. In the Passenger Car segment, its customers include Maruti Suzuki, Hyundai, and Mahindra. In the Two-Wheeler segment, the Company provides fasteners to Suzuki Motorcycles, Hero MotoCorp, and Honda Motorcycles and Scooters. In the Tractor segment, it manufactures components for Mahindra, John Deere, and Escorts. The Company also supplies parts to off-highway vehicle manufacturers such as JCB. With its high-quality cold forged hi-tensile fasteners, the Company plays a key role in supporting India's top vehicle manufacturers across various segments.

IV. Employees

20. 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)	390*	380	97.44%	10	2.56%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total employees (D + E)	390	380	97.44%	10	2.56%
WORKERS						
4.	Permanent (F)	236	236	100%	0	0%
5.	Other than Permanent (G)	1199	1161	96.83%	38	3.17%
6.	Total workers (F+G)	1435	1397	97.35%	38	2.65%

*Includes Directors & KMPs as well

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%

21. Participation/Inclusion/Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	10	1	10%
Key Management Personnel*	3	0	0%

* Managing Director (MD) is also a KMP and has been considered under both the categories of BOD and KMP. During the year, one of the KMP (Company Secretary) ceased to be associated with the Company with effect from 13th March, 2025.

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

	FY 2024-25 (Turnover rate in current FY)			FY 2023-24* (Turnover rate in previous FY)			FY 2022-23 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	33.24%	20.00%	32.90%	23.55%	40.00%	23.89%	25.23%	71.43%	26.30%
Permanent Workers	0.85%	0%	0.85%	0.84%	0%	0.84%	0.82%	0%	0.82%

* The previous year's values have been revised and regrouped wherever required.

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

23. (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 Gtack E-Mobility Limited	Subsidiary	100%	No
2	Sterling Advanced Electric Machines Private Limited	Subsidiary	100%	No
3	Sterling Overseas Pte. Limited	Subsidiary	100%	No
4	Sterling E-Mobility Private Limited	Subsidiary	100%	No
5	Sterling Tech-Mobility Limited	Subsidiary	100%	No

VI. CSR Details

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

(ii) Turnover (in ₹): 64,478.34 Lakhs

(iii) Net worth (in ₹): 46,701.56 Lakhs

VII. Transparency and Disclosures Compliances

25. 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 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes, Grievance Policy	Nil	Nil	Nil	Nil	Nil	Nil
(other than Shareholders)	Yes, Stakeholder Relationship Committee	Nil	Nil	Nil	Nil	Nil	Nil
Shareholders	Yes, Stakeholder Relationship Committee	1	Nil	All concerns were closed	4	Nil	All concerns were closed
Employees and Workers	Yes, Grievance Policy	Nil	Nil	Nil	Nil	Nil	Nil

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 2024-25 (Current Financial Year)			FY 2023-24 (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
Customers	Yes, marketing@stlfasteners.com	229	Nil	All concerns were closed	214*	Nil	All concerns were closed
Value chain partners Others (Suppliers and Government and Regulatory Bodies)	The Company through its effective internal mechanism takes care of all the grievances for all its value chain partners and dedicated to strengthen the process.	Nil	Nil	Nil	Nil	Nil	Nil

* The previous year's values have been revised and regrouped wherever required.

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 and POSH policy for 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. The 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

26. 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	Risk & Opportunity	Global climate change regulations, stakeholder expectations, and physical climate risks can disrupt operations and supply chains. Transition to low-carbon pathways creates new business opportunities.	Adoption of renewable energy, energy efficiency measures, climate-resilient infrastructure.	Negative: Higher compliance costs and capex; Positive: Cost savings from efficiency and enhanced brand value.
2	Emissions	Risk & Opportunity	Regulatory compliance on GHG and air pollutants is tightening, non-compliance may attract penalties and reputational damage.	Monitoring and reduction of Scope 1 & 2 emissions, technology upgrades, and emission controls.	Negative: Potential penalties, carbon pricing impact; Positive: Savings from reduced energy/ emission intensity.
3	Water management	Risk & Opportunity	Manufacturing is water-intensive, and water scarcity poses operational and reputational risks.	Water efficiency projects, rainwater harvesting, wastewater recycling, zero liquid discharge initiatives.	Negative: Production disruptions in case of shortages; Positive: Cost savings and long-term water security.



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	Diversity and equal opportunity	Opportunity	Diverse and inclusive workforce promotes innovation, improves retention, and enhances reputation.	Implementation of equal opportunity policies, employee training, and diversity targets.	Positive: Higher employee productivity, improved employer brand, and talent retention.
5	Responsible supply chain	Responsible supply chain	Global customers demand sustainable and ethical sourcing; lapses can cause reputational and business risks, while responsible practices enhance competitiveness.	Supplier Code of Conduct, supplier audits, capacity building, sustainable sourcing initiatives.	Negative: Audit and compliance costs; Positive: Stronger supplier relationships, access to global markets.
6	Community engagement	Opportunity	Strong community relations build goodwill, reduce social risks, and improve business continuity.	CSR initiatives in health, education, skills development, and livelihood support.	Positive: Enhanced license to operate, reduced disruptions, and long-term reputational benefits.
7	Manufacturing efficiency	Opportunity	Efficiency improvements lower costs, reduce emissions and waste, and enhance competitiveness.	Lean manufacturing, process optimization, and circular economy practices.	Positive: Reduced operational costs, improved profitability, and long-term competitiveness.

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
c. Web Link of the Policies, if available	The Company's existing policies are periodically reviewed and approved by the Board. The recently formulated applicable Policies are under the approval process by either the Board or the respective committees. This ensures that each new policy receives thorough consideration and endorsement from the appropriate governance bodies before implementation.								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
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, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	IATF 16949: 2016 ISO 45001: 2018 ISO 14001: 2015 ISO 9001: 2015 ISO 17025 ISO 27001: 2022								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The company has identified key environmental and social performance indicators and is currently formulating a comprehensive ESG roadmap. This roadmap will define clear commitments, goals, and measurable targets across the following strategic areas: <ul style="list-style-type: none"> • Comprehensive assessment of GHG emissions (Scope 1 & 2) • Implementation of zero liquid discharge systems across majority manufacturing sites • Advancement of diversity and inclusion initiatives • Enhancement of employee learning and development programs • Sustainable and efficient water resource management • Adoption of responsible waste management practices • Strengthening supply chain accountability and sustainability • Active and transparent stakeholder engagement • Promotion of employee health, safety, and well-being • Promoting innovation in products and processes • Empowerment and development of local 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 strengthened its ESG commitment by conducting detailed assessments across all manufacturing units. Carbon footprints were calculated, and sustainability goals were set for the next three years. A monitoring framework is in place, with plans to begin regular reporting on progress against these targets.								



Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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)	<p>This report aligns with the nine principles of the National Guidelines on Responsible Business Conduct (NGRBCs), offering a comprehensive view of the company's sustainability efforts. It reflects a strong commitment to responsible business practices across operations, highlighting progress in ESG challenges, measurable targets, and meaningful outcomes.</p> <p>The company is dedicated to promoting economic development while enhancing community well-being. With a focus on inclusive growth, efforts are directed toward environmental sustainability, access to education, and skill development. Initiatives like integrating solar energy across facilities reflect the company's response to climate challenges.</p> <p>Through CSR programs, the company supports marginalized communities by promoting education for differently abled children and providing skill development for sustainable livelihoods. These efforts are underpinned by strong corporate governance rooted in integrity, accountability, and transparency, ensuring compliance and long-term value creation for society and the environment.</p>								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Chairman 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 Chairman of the Company is responsible to review the sustainability related issues on annual basis.								

10. Details of Review of NGRBCs by the Company:

Subject of Review	Indicate whether review was undertaken by Director / Committee of the Board/Any other Committee*									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against above policies and follow up action Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	The Audit Committee, Risk Management Committee, and Board conduct regular assessments of all policies and procedures, either annually or at other appropriate intervals. During these evaluations, the effectiveness of operational policies is carefully examined, and any required adjustments to existing policies and procedures are enacted.																	

11.	P1	P2	P3	P4	P5	P6	P7	P8	P9
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.	No, the Company has not appointed any external agency for this purpose so far. They have been regulated internally.								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	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 categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally, and ethically responsible.

PRINCIPLE 1

Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors Key Managerial Personnel	4	<ul style="list-style-type: none"> ● Economic Outlook ● Business of the Company ● Strategy discussion ● Regulatory updates ● Key Company Highlights ● Industry Outlook 	100%
Employees other than BoDs and KMPs	120	<p>The trainings may be categorized as below:</p> <ol style="list-style-type: none"> 1. Training on behavioral development (POSH, 5'S awareness, Statutory Compliance management etc.) 2. Employee Health and Safety trainings 3. IT related trainings (PMS module, Cyber-attack awareness etc.) 4. Trainings on quality matters (Advanced Product Quality Planning (APQP), IATF-16949/ ISO-14001, CSR, POKA Yoke, 7 QC Tools, awareness of ISO 9001:2015 etc.) 5. Other technical trainings (PPAP, 4M Change Management, CQI, Data management, Control Plan, Product Knowledge, Microstructure Checking etc.) 	95%
Workers	33	<p>The training can be categorized as below:</p> <ol style="list-style-type: none"> 1. Training on Behavioral development (5'S awareness, Motivational trainings etc.) 2. Employee Health and Safety trainings (First Aid, Safety awareness and Emergency etc.) 3. Trainings on quality matters (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.) 	100%

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 INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	No material fines/penalties have been levied on the Company				
Settlement	Nil				
Compounding fee	Nil				

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			
Punishment	Nil			

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
	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.**

The Company maintains a robust Anti-Corruption and Anti-Bribery policy that reflects its commitment to integrity and transparency. It adopts a zero-tolerance stance against corruption, bribery, and any form of unethical conduct. Strong internal controls are in place to ensure that neither the Company nor its employees engage in such practices. This policy is easily accessible to all employees via the Company's Intranet.

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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2024-25 (Current Financial Year)		FY 2023-24 (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

8. Number of days of accounts payables (Accounts payable *365) / Cost of goods/services procured) in the following format:

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Number of days of accounts payables	21	24

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:

Parameter	Metrics	FY25 (Current Financial Year)	FY24 (Previous Financial Year)
Concentration of Purchases*	a. Purchases from trading houses as % of total purchases	0%	0%
	b. Number of trading houses where purchases are made from	0%	0%
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0%	0%
Concentration of Sales	a. Sales to dealers /distributors as % of total sales	11%	12%
	b. Number of dealers / distributors to whom sales are made	133	136
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors	33%	32%
Shares of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0%	0.03%
	b. Sales (Sales to related parties / Total Sales)	0.05%	0%
	c. Loans & advances (Loans & advances given to related parties/ Total loans & advances)	0%	0%
	d. Investments (Investments in related parties / Total Investments made)	79%	73%**

*This being not material in terms of value, hence not reported.

**The previous year's values have been revised and regrouped wherever required.

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
25	Focused training sessions were held to strengthen logistics quality and compliance. Key areas covered included proper material packaging, defect-free dispatches, adherence to vehicle load limits, and ensuring all vehicle certifications are up to date. The initiative aimed to improve safety, reduce errors, and ensure regulatory compliance.	5-10%

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. The Audit and Board Committees oversee and approve transactions involving board members' reciprocity. In instances of potential conflicts, individuals must disclose all pertinent details to both the Board of Directors and the Audit Committee.

In addition, the Code of Conduct of the Company outlines principles for managing conflicts of interest in order to detect any real or possible conflicts that might arise between the Company and its directors and employees when conducting business. All staff members have access to this policy via the company intranet, ensuring openness and moral behaviour.

**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	Previous Financial Year	Details of improvements in environmental and social impacts
R & D	100%	Nil	The Company has implemented a Single Station Digital Servo Controller to perform precise end-of-life testing of components. This advanced technology significantly enhances product quality and reliability, contributing to reduced material waste and operational inefficiencies.
Capex	2.66%	27.09%	The Company enhanced environmental controls at its Bangalore Plant by installing a Fume Extractor Unit and upgrading the Scrubber capacity. To reduce dependence on non-renewable energy, 900 KWP solar panels shall be installed at NCR plants during the next financial year. Additionally, a Digital Servo Controller was installed for improved component end-of-life testing, supporting product quality and resource efficiency.

2. **a. Does the entity have procedures in place for sustainable sourcing?**

The Company systematically evaluates its direct material suppliers and value chain partners across key criteria such as reliability, product quality, and operational dependency to ensure consistent performance and supply chain excellence.

- 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 incorporate the relevant requirements of sustainability in its vendor evaluation process.

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.

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.**

Not Applicable

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?

NIC Code	Name of Product/ Services	% 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 LCA for any of its products so far. However, the Company has plans to carry out the same in the consecutive FY.

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

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 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year

Not applicable, as the Company's processes do 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 2024-25 Current Financial Year			FY 2023-24 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
Battery 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	Total (A)	% of employees covered by									
		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	380	380	100%	380	100%	0	0%	0	0%	0	0%
Female	10	10	100%	10	100%	10	100%	0	0%	10	100%
Total	390	390	100%	390	100%	10	100%*	0	0%	10	100%
Other than Permanent employees											
Male	0	0	0%	0	0%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0	0%	0	0%	0	0%	0	0%	0	0%

*Employees covered under maternity benefits is disclosed as % of only female employees and not total employees.

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	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	236	236	100%	236	100%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	236	236	100%	236	100%	0	0%	0	0%	0	0%
Other than Permanent workers											
Male	1161	1119	96.38%	1119	96.38%	0	0%	0	0%	0	0%
Female	38	38	100%	38	100%	38	100%	0	0%	0	0%
Total	1199	1157	96.50%	1157	96.50%	38	100%*	0	0%	0	0%

*Employees covered under maternity benefits is disclosed as % of only female employees and not total employees.

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

	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the Company	0.11%	0.12%

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

Benefits	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total Workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	7.7%	0.42%	Yes	11.37%	0.40%	Yes
Others - Please specify	Nil	Nil	NA	Nil	Nil	NA

3. Accessibility of workplaces

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

Yes, 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 a robust grievance redressal mechanism accessible to permanent workers, other than permanent workers, permanent employees and other than permanent employees. Suggestion boxes and complaint registers are conveniently placed for addressing complaints or grievances. This mechanism ensures that complaints 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 2024-25 (Current Financial Year)			FY 2023-24 (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/workers are part of any union/association.			Not Applicable, since none of the employees/workers are part of any union/association.		
Male						
Female						
Total Permanent Workers						
Male						
Female						

**8 Details of training given to employees and workers:**

Category	FY 2024-25 Current Financial Year					FY 2023-24 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	380	259	68.16%	122	32.11%	366	195	53.28%	248	67.76%
Female	10	2	20%	0	0%	10	9	90.00%	5	50.00%
Total	390	261	66.92%	122	31.28%	376	204	54.26%	253	67.29%
Workers										
Male	236	236	100%	137	58.05%	237	237	100%	237	100%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Total	236	236	100%	137	58.05%	237	237	100%	237	100%

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

Category*	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Total (A)	No.(B)	% (B/A)	Total (C)	No.(D)	% (D/C)
Employees						
Male	380	380	100%	366	366	100%
Female	10	10	100%	10	10	100%
Total	390	390	100%	376	376	100%
Workers						
Male	236	236	100%	237	237	100%
Female	0	0	100%	0	0	0%
Total	236	236	100%	237	237	100%

*All the eligible employees and workers were considered for performance and career development reviews.

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?**

As part of its commitment to an integrated management system, all the Company's plants are certified under ISO 45001, demonstrating adherence to international standards for occupational health and safety management. This certification underscores the Company's strong focus on safeguarding the physical and mental well-being of all employees and workers. To support this, a comprehensive Health and Safety Policy has been established, outlining the Company's commitment to maintaining a safe, healthy, and supportive work environment. This policy is readily accessible to all employees through the Company's Intranet, ensuring transparency and widespread awareness across the organization.

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

The Company places the highest priority on the health and safety of its employees by implementing a robust Hazard Identification and Risk Assessment (HIRA) process. This proactive approach enables the regular identification of work-related hazards and risks, ensuring timely and effective management. In alignment with ISO 45001 standards, the Company conducts systematic risk assessments to identify potential hazards and develop comprehensive mitigation plans. These processes are established collaboratively by Manufacturing Heads and Plant Heads, following thorough risk analyses. Mitigation plans are continuously reviewed and updated to reflect any changes in materials, facility layouts, or operational processes, thereby maintaining a safe working environment. Additionally, Material Safety Data Sheets (MSDS) are prepared and utilized as key tools during ongoing risk assessments to further support workplace safety.

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 platforms for reporting work-related hazards and to remove themselves from such risks, including Safety Observation Tours, Online safety risk reporting mechanism, extensive safety training and Compliance management through online tool.

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 2024-25	FY 2023-24
		Current Financial Year	(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

* Including the contract workforce

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) Training: Training is 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 organized action plans and phase wise execution are ensured to eliminate the hazards and risks associated with 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:

Benefits	FY 2024-25			FY 2023-24		
	Current Financial Year			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:

Safety Incident /Number	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices Working Conditions	100%, All Plants were assessed by statutory authorities

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.

We are committed to ensuring every worker works in a safe and transparent environment. ESG implementation is anyway underway for STL, and we shall adhere to its conclusions effectively in due course of time.

**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, Company provides life insurance coverage for employees and workers covered under Employees State insurance Act, 1948 (ESIC), as per the ESIC Scheme. For those not covered under ESIC, the Company offers Group Personal Accident (GPA) and Group Medical Coverage (GMC) to ensure comprehensive protection and support for all permanent employees.

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 to the Company for direct material suppliers. The Company has also targeted to expand its cover to the suppliers in the coming financial years.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q1 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

Category	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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)	FY 2024-25 (Current Financial Year)	FY 2023-24 (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)

Yes, the Company retains employees in case of specific vacancies within organization on a case-to-case basis. The agreements are made on mutually agreed-upon duration and are subjected to renewal based on their performance and the availability of further vacancies in the organization.

5. Details on assessment of value chain partners:

Safety Incident /Number	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	Majority of sourcing supplier assessment through screening and regular compliance
Working Conditions	

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 were observed in the supplier's self-assessment regarding health and safety practices and working Conditions.

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 Company employs a systematic approach to identify key stakeholder groups, recognizing their material influence on the Company or on how they are materially influenced by the Company's corporate decisions and consequences of those decisions. The Company recognizes 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 & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/ Quarterly/ others- please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Board of Directors	No	Board meetings and Email Communication	Quarterly and need based	<ul style="list-style-type: none"> Compliance of law strategic decision making
Employees	No	<ul style="list-style-type: none"> Review Meetings Training programmes Performance appraisals Employee Engagement Activities Internal communication through emails, and Notice Board 	Continuous Process	<ul style="list-style-type: none"> Empowering work environment Rewards and recognition Personal development and growth Motivational Schemes
Investors & Shareholders	No	<ul style="list-style-type: none"> Press releases and publications Quarterly Presentation of results, Newspaper Publications Investor conferences Stock Exchange Announcement Chorus Call 	Periodic	<ul style="list-style-type: none"> Financial Results Business updates Response to the queries New business growth
Customers	No	<ul style="list-style-type: none"> Market surveys Personal visits and Exhibitions. trials and events Feedback mechanisms Communication through e- mail, one-to-one meetings, conference. 	Continuous Process	<ul style="list-style-type: none"> Product and service quality Complaint resolution On-time delivery.
Suppliers and Service Providers	No	<ul style="list-style-type: none"> Supplier engagement and assessments process. Email & phone calls, mails 	Continuous Process	<ul style="list-style-type: none"> Planning and execution of work orders Delivery Schedule Product Development
Government and Regulatory Bodies	No	<ul style="list-style-type: none"> Official communication channels Regulatory audits/ inspections Good governance 	Continuous Process	<ul style="list-style-type: none"> Statutory compliance, including environmental, social and governance compliance
Communities	Yes	<ul style="list-style-type: none"> CSR Activities 	Continuous Process	<ul style="list-style-type: none"> Healthcare and Sanitisation Promoting Promoting Education Promoting Sports Empowering Underprivileged section of the society and support to destitute (Rehabilitation)



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 has rooted itself in the impact it creates and intends to create on the life of its stakeholders. The company is managing the change from the current shareholders to the stakeholder's mindset throughout the organization. The Board openly discusses all policies related to best practices, Enviro- Socio impact through Governance and is in the phase of identifying and reversing its Carbon Footprint to better marks of impact. The Board has appointed third party experts to identify its current Environmental Impact and suggest better practices. The CSR committee has committed to acting towards Environmental Impact through initiatives such as Biogas plant installation, cow and community welfare, introducing clean fuel in targeted communities. These instances are examples that the Company is in the phase of developing internal mechanisms

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 is used to support the identification and management of environmental and social topics. The incorporation of stakeholder feedback into the process and policy formulation is highly valued by the Company. When necessary, stakeholder input is used to help identify and manage social and environmental issues. With this approach, the Company makes sure that the decisions taken are well-informed and take into account the various viewpoints and concerns of the people who are affected by the Company's activities.

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

The Company recognizes its responsibility and identifies underprivileged communities as disadvantaged, vulnerable, and marginalized stakeholders, and engages with them through its various CSR initiatives.

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 2024-25 Current Financial Year			FY 2023-24 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	390	390	100%	376	376	100%
Other than Permanent	0	0	0%	0	0	0%
Total Employees	390	390	100%	376	376	100%
Workers						
Permanent	236	236	100%	237	112	47.25%
Other than Permanent	1199	1199	100%	1167	374	32.05%
Total Workers	1435	1435	100%	1404	486	34.62%

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

Category	FY 2024-25 Current Financial Year					FY 2023-24 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	380	0	0%	380	100%	366	0	0%	366	100%
Female	10	0	0%	10	100%	10	0	0%	10	100%
Other than permanent										
Male	0	0	0%	0	0%	0	0	0%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0
Workers										
Permanent										
Male	236	0	0%	236	100%	237	112	47.26%	125	52.74%
Female	0	0	0%	0	0%	0	0	0%	0	0
Other than permanent										
Male	1161	585	50.39%	576	49.61%	1112	667	59.98%	445	40.02%
Female	38	25	65.79%	13	34.21%	55	41	74.55%	14	25.45%

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

a. Median remuneration / Wages#:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (In ₹)	Number	Median remuneration salary/ wages of respective category (In ₹)
Board of Directors (BoD)*	3	3,36,20,006	0	-
Key Managerial Personnel	1	98,41,600	0	-
Employees other than BoD and KMP	376	6,11,994	10	6,46,500
Workers	236	5,13,366	0	-

#Median remuneration is calculated only for individuals on the payroll as of 31 March 2025.

*Managing Director's remuneration considered in the calculation of median remuneration of the Board of Directors and excluded from that of KMP.

b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Gross wages paid to females as % of total wages	1.24%	1.27%

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 business, through its HR Policy, is dedicated to maintaining human rights in the workplace. The HR department is in charge of handling any human rights-related complaints, conducting in-depth investigations, and making sure that workers who voice concerns are not subjected to reprisal/retaliation.

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

For reporting on the internal mechanisms addressing grievances related to human rights issues, the company has implemented a structured approach to ensure transparency and effectiveness. And includes following policies:

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 2024-25 Current Financial Year			FY 2023-24 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. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees/workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

The Company has implemented a comprehensive POSH (Prevention of Sexual Harassment) policy in line with legal and ethical standards, aimed at fostering a safe, respectful, and inclusive workplace. An Internal Complaints Committee (ICC) has been established in accordance with statutory requirements to handle complaints related to harassment, discrimination, and unfair practices. The process ensures complete confidentiality, fair investigation, and protection against any form of retaliation, thereby empowering employees to voice concerns without fear.

In addition to the POSH framework, the Company has put in place a well-structured grievance redressal system that facilitates transparent and accessible reporting of complaints. This system is overseen by a dedicated team responsible for promptly analyzing and addressing issues raised by employees and workers. The mechanism ensures timely resolution, encourages open communication, and reinforces the Company's commitment to employee well-being, workplace equity, and a culture of accountability.

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

Yes, the Company's business agreements and contracts incorporate a standard clause requiring full compliance with all applicable laws, regulations, international conventions, and internal policies. By embedding these requirements into contractual obligations, the Company ensures that ethical standards and legal compliance are maintained across all partnerships and business activities.

10. 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	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	Nil

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

No significant risk or concern was found.

Leadership Indicators

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

The Company periodically familiarizes employees and workers with 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 partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Majority of sourcing suppliers assessed through evaluation forms.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
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.

Currently there were no significant risks/ concerns identified from assessments of the specified value chain partners

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

Essential Indicators

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
From Renewable Sources		
Total electricity consumption (A) (Unit: GJ)	9079.51	9,101.51
Total Fuel consumption (B) (Unit: GJ)	0	0
Energy Consumption through other sources (C) (Unit: GJ)	0	0
Total energy consumed from renewable sources (A+B+C) (Unit: GJ)	9079.51	9,101.51
From non-renewable sources		
Total electricity consumption (D) (Unit: GJ)	1,61,190.70	1,59,685.45
Total fuel consumption (E) (Unit: GJ)	81,858.44	69,666.94
Energy consumption through other sources (F) (Unit: GJ)	0	0
Total energy consumed from non-renewable sources (D+E+F) (Unit: GJ)	2,43,049.15	2,29,352.39
Total energy consumed (A+B+C+D+E+F) (Unit: GJ)	2,52,128.65	2,38,453.89
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations). (Unit: J/Rs)	0.00003910	0.00003921
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total energy consumed / Revenue from operations adjusted for PPP) (Unit: GJ/Rs)	0.0008079	0.0008101**
Energy intensity in terms of physical output (GJ/MT)	7.18	7.004

*The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 20.66 as per the 2025 update.

** The previous year's values have been revised and regrouped wherever required.

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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	38,626	69,189
(iii) Third party water	81,967	47,451
(iv) Seawater / desalinated water	0	0
(v) Others	2,497	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1,23,090	1,16,640
Total volume of water consumption (in kilolitres)	1,04,991	97,542
Water intensity per rupee of turnover (Water consumed / turnover)	0.00001628	0.00001604
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total water consumption / Revenue from operations adjusted for PPP)	0.00033641	0.00033138**
Water intensity in terms of physical output	2.99	2.86
Water intensity (optional) – the relevant metric may be selected by the entity		

*The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 20.66 as per the 2025 update.

** The previous year's values have been revised and regrouped wherever required.

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. Provide the following details related to water discharged:

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
(i) To surface Water		
- No treatment	0	0
- With treatment (please specify level of treatment)	0	0
(ii) To Ground Water		
- 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	0	0
- With treatment (please specify level of treatment)	0	0
(v) Others		
- No treatment	0	0
- With treatment (please specify level of treatment)	18,099	19,098*
Total water discharge (in KL)	18,099	19,098

* The previous year's values have been revised and regrouped wherever required.

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.

5. 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 Bengaluru. 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 plants to conserve and recycle water.

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

Parameter	Please specify unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
NOx	MT	7.29	6.12
SOx	MT	3.33	2.28
Particulate matter (PM)	MT	48.40	43.85
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.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	4,773.60	4,938.76
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	32,551.57	31,759.30
Total Scope 1 and Scope 2 emissions intensity per rupee of Turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MTCO2 Eq./ Rs.	0.0000058	0.00000603
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 emissions / Revenue from operations adjusted for PPP)	MTCO2 Eq./ Rs.	0.0001196	0.0001247**
Total Scope 1 and Scope 2 emission intensity in terms of physical output		1.062	1.078
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		-	-

*The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 20.66 as per the 2025 update.

** The previous year's values have been revised and regrouped wherever required.

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.

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

Initiative undertaken FY 24-25	Details of Initiative	Outcome of the Initiatives
Reduction in PNG consumption	Lowering operating temperature of hot water generator to save energy.	Reduction in PNG consumption resulting in reduced carbon footprint.
Capacity Increase in Heat Treatment Section in DLF Plant	Relocation of furnace from Prithla Plant to DLF Plant	Improved productivity, reduced transit expenses, and lower indirect CO ₂ emissions
Retrofit of Hot Water Generator (HWG)	Replacement of worn-out spares and blower suction system in Bangalore Plant	Reduction in energy consumption resulting in reduced carbon footprint and air emissions
Optimizing Forklift Operation	Improvement of trolley system between processes to reduce usage of Forklift	Reduction in carbon footprint and air emissions
Lighting System Upgrade	Replacing CFL lamps with energy-efficient LED lamps	Reduction in energy consumption resulting in reduced carbon footprint
Replacement of Roof Transparent Sheets	Improved daylight efficiency in forging/heat treatment area	Reduction in energy consumption resulting in reduced carbon footprint
Auto Control on Street Lights	Installation of timer circuits for street light control	Reduction in energy consumption resulting in reduced carbon footprint



Initiative undertaken FY 24-25	Details of Initiative	Outcome of the Initiatives
Scrubber Efficiency Improvement	Introduction of Variable Frequency Drives (VFD) on plating-1 blower	Reduction in energy consumption resulting in reduced carbon footprint
Overhauling of Furnace	New brick lining and additional ceramic coating	Reduction in energy consumption resulting in reduced carbon footprint
Tree Plantation	50 trees planted around the Plant	Offsetting some carbon footprint
Optimum usage of AC	Fixed the temperature of the AC to 25 degree Celsius	Reduction in energy consumption resulting in reduced carbon footprint

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	2.58	25.72
E-waste (B)	0	0.50
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)	1,492.61	1,985.20
Other Non-hazardous waste generated (H). Please specify, if any.	3,131.03	3,185.91
Total (A+B + C + D + E + F + G + H)	4,626.22	5,197.33
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.000000717	0.00000085
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.00001482	0.00001593*
Waste intensity in terms of physical output	0.13	0.15
Waste intensity (optional) – the relevant metric may be selected by the entity		
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
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	3,039.67	3,044.17
(ii) Landfilling	1,468.78	1,689.16
(iii) Other disposal operations	117.77	464.38
Total	4,626.22	5,197.71

*The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 20.66 as per the 2025 update.

** The previous year's values have been revised and regrouped wherever required.

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.

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.

The Company places strong emphasis on waste management at the source, adhering to the principles of Reduce, Reuse, and Recycle (3Rs). Various improvement initiatives are underway to minimize the generation of both hazardous and non-hazardous waste, recognizing waste reduction as a key component of the Company's environmental performance and review metrics. Hazardous waste is managed in compliance with all applicable legal requirements, using environmentally sound disposal methods. Non-hazardous waste is directed to authorized recyclers approved by the Company, ensuring responsible reuse. In addition, to minimize water wastage, the Company has installed Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) at select facilities, enabling the reuse of treated water for non-potable applications.

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 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 there of and corrective action taken, if any.
Not Applicable, since there are no operations of the Company near above mentioned areas.			

12. 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
The nature of business does not require EIA, 2006 assessment.					

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, in the following format:

Yes,

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
Not Applicable, since there is no non-compliance with the applicable environmental Laws/Regulations/Guidelines in India.				

Leadership Indicators

1. Water withdrawal, consumption, and discharge in areas of water stress (in kilolitres):

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

- (i) **Name of the area:** 1) DLF Faridabad, 2) WDU, Ballabgarh , 3) Kolar-Bengaluru, 4) Prithla - Palwal
- (ii) **Nature of operations:** Manufacturing of cold tensile fasteners
- (iii) **Water withdrawal, consumption, and discharge in the following format:**

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	38,626	69,189
(iii) Third party water	81,967	47,451
(iv) Seawater / desalinated water	0	0
(v) Others	2,497	0
Total volume of water withdrawal (in kilolitres)	1,23,090	1,16,640
Total volume of water consumption (in kilolitres)	1,04,991	97,542
Water intensity per rupee of turnover (Water consumed / turnover)	0.00001628	0.00001604
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total water consumption / Revenue from operations adjusted for PPP)	0.00033641	0.00035928**
Water intensity in terms of physical output	2.99	2.86
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		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	18,099	19,098**
Total water discharged (in kilolitres)	18,099	19,098

*The source for Purchasing Power Parity (PPP) is International Monetary Fund (IMF). The PPP rates considered is 20.66 as per the 2025 update.

** The previous year's values have been revised and regrouped wherever required.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (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	During the reporting year, the Company initiated preliminary assessments of its Scope 3 emissions. Key emission categories are being identified based on relevance and data availability, and the Company is working towards establishing a structured framework for comprehensive Scope 3 accounting in the coming year.	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 emissions per rupee of turnover			
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

3. With respect to the ecologically sensitive areas reported at Question 11 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

4. 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 FY 24-25	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Reduction in PNG consumption	Lowering operating temperature of hot water generator to save energy.	Reduction in PNG consumption resulting in reduced carbon footprint.
2	Capacity Increase in Heat Treatment Section in DLF Plant	Relocation of furnace from Prithla Plant to DLF Plant	Improved productivity, reduced transit expenses, and lower indirect CO ₂ emissions

Sr. No	Initiative undertaken FY 24-25	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
3	Retrofit of Hot Water Generator (HWG)	Replacement of worn-out spares and blower suction system in Bangalore Plant	Reduction in energy consumption resulting in reduced carbon footprint and air emissions
4	Optimizing Forklift Operation	Improvement of trolley system between processes to reduce usage of Forklift	Reduction in carbon footprint and air emissions
5	Lighting System Upgrade	Replacing CFL lamps with energy-efficient LED lamps	Reduction in energy consumption resulting in reduced carbon footprint
6	Replacement of Roof Transparent Sheets	Improved daylight efficiency in forging/heat treatment area	Reduction in energy consumption resulting in reduced carbon footprint
7	Auto Control on Street Lights	Installation of timer circuits for street light control	Reduction in energy consumption resulting in reduced carbon footprint
8	Scrubber Efficiency Improvement	Introduction of Variable Frequency Drives (VFD) on plating-1 blower	Reduction in energy consumption resulting in reduced carbon footprint
9	Overhauling of Furnace	New brick lining and additional ceramic coating	Reduction in energy consumption resulting in reduced carbon footprint
10	Tree Plantation	50 trees planted around the Plant	Offsetting some carbon footprint
11	Optimum usage of AC	Fixed the temperature of the AC to 25 degree Celsius	Reduction in energy consumption resulting in reduced carbon footprint
12	Rainwater utilization	Installation of rainwater collection tank; filtered rainwater reused in plant operations	Reduction in ground water depletion
13	Diesel Wastage Reduction	Replacement of damaged diesel pipelines	Reduction in land contamination

5. 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

6. 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).

7. 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

8. How many Green Credits have been generated or procured:

a. By the listed entity	None
b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners	This information is currently unavailable, as the Company has not conducted any such assessment so far.

**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
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The Company directly or through industry bodies and other associations puts forth several suggestions with respect to the industry in general, and our activities as is. Further, the Company is a part of different forums, where we participate in various meetings, where we present our perspectives on improving Industry practice and creating tangible beneficial impact.

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 INR)
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 a mechanism in place to receive and redress community grievances as follows:

- The company maintains an Internal Grievance Redressal Committee to handle community grievances, forwarding issues to relevant departments.
- It actively conducts CSR activities to support local community needs near plant locations.
- The company encourages direct communication between Management and plant Operations, promoting transparency.
- It engages with local communities to address concerns and foster relations.
- The company focuses on the timely resolution of community issues to enhance community-company relations.

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (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.	
Directly from within India	95.88%	98.39%

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

Location	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)*
Rural	-	-
Semi-Urban	-	-
Urban	83.58%	85.84%
Metropolitan	16.42%	14.16%

(Place to be categorized as per RBI classification system – rural / semi – urban / urban / metropolitan)

* The previous year's values have been revised and regrouped wherever required.



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 INR)
The company has not operated any CSR project under aspirational districts as all the CSR initiatives undertaken are in the localities close to operating locations but it is working on expanding its reach in the coming years.			

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

The Company does not currently have a defined policy however, it continues to engage with local and small-scale vendors wherever feasible and is evaluating options to formalize inclusive procurement practices.

- (b) From which marginalized /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
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 marginalized groups
1	Healthcare	The benefits of the initiatives are	100%
2	Training and Education	extended to the entire community,	100%
3	Promoting Sports	however, the exact number of persons	100%
4	Sponsoring Homes for Orphans and sponsoring old age homes, day care centre and such other facilities for Senior Citizens	benefitted are not available.	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 Company has established robust mechanisms to receive and address consumer complaints and feedback effectively. The Company is into B2B business, supplying products to OEMs. But the OEMs send us monthly supplier's rating, grading us on Quality, Cost, Delivery, Development, and Management. The Company's Sales and Marketing team dives into these reports, along with other stakeholders, to spot areas where we can do better. Then, the Company brainstorm strategies to improve based on 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 of 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 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
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	-
Others	Nil	Nil	-	Nil	Nil	-

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

	Number	Reasons for recall
Voluntary recalls	Nil	-
Forced recalls	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.

Yes, the entity have a framework/ policy on cyber security and risks related to data privacy. The weblink is provided: <https://stlfasteners.com/assets/upload/investors/20240705100233-14-373259091989.pdf>

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.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches:** Nil
- Percentage of data breaches involving personally identifiable information of customers:** Nil
- Impact, if any, of the data breaches:** Nil



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.

The company is a B2B supplier, it directly provides products to OEMs, who further assemble and distribute the final products to end-user customers. Thus, limits the Company's involvement in informing and educating end users 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. While the Company does not directly offer essential services, it maintains transparent communication channels with its customers and stakeholders. In the event of any foreseeable delays or disruptions in the supply of products or services, the Company proactively communicates through official emails, customer service teams, and digital platforms to minimize inconvenience and maintain trust. 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 product exclusively to OEMs, thus lacking direct visibility to end users. However, the Company prioritize customer satisfaction, implementing various methods to ensure it. Customer feedback is gathered either directly or indirectly to address any grievances, enabling the development and implementation of corrective actions. Following this, summaries detailing customer satisfaction are collated, thoroughly examined, and supervised by all relevant process stakeholders in conjunction with the company's management team.