

Business Responsibility and Sustainability Report for the financial year 2023-24

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity: L35999TN1962PLC004943
2. Name of the Listed Entity: Sundram Fasteners Limited (SFL)
3. Year of incorporation: 1962
4. Registered office address: No. 98-A, VII Floor, Dr. Radhakrishnan Salai, Mylapore, Chennai 600 004
5. Corporate office address: No. 98-A, VII Floor, Dr. Radhakrishnan Salai, Mylapore, Chennai - 600 004
6. E-mail: hq@sfl.co.in / investorshelpdesk@sfl.co.in
7. Telephone: +91 44 28478500
8. Website: www.sundram.com
9. Financial year for which reporting is being done: FY 2023-24
10. Name of the Stock Exchange(s) where shares are listed: National Stock Exchange of India Limited ('NSE') and the BSE Limited ('BSE')
11. Paid-up Capital: ₹ 21.01 crores
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:
Sri R Ganesh, Senior General Manager – Finance & Projects
+91 44 2847 8500
investorshelpdesk@sfl.co.in
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 the assurance provider: Not applicable for the year under review
15. Type of assurance obtained: Not applicable for the year under review

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	Metal and metal products	56%
2		Plastics products, non-metallic mineral products, rubber products, fabricated metal products	34%

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	High Tensile Fasteners	25991	38%
2	Parts and accessories for motor vehicles	2930	56%

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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	18	5	23
International	2	0	2

* Includes the offices/plants of the Subsidiary Companies

19. Markets served by the entity

a. Number of locations

Locations	Number
National (No. of States)	28 States and 8 Union Territories
International (No. of Countries)	35

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

For FY 2023-24, exports contributed about 29% of the total turnover

c. A brief on types of customers:-

The Company manufactures a diverse range of products for varied customer segments namely from automotive, wind energy, aerospace, defense, farm equipment and industrial amongst others with significant contribution coming from the automotive segment.

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)	2,043	1,904	93.20%	139	6.80%
2.	Other than Permanent (E)	-	-	-	-	-
3.	Total employees (D + E)	2,043	1,904	93.20%	139	6.80%
WORKERS						
4.	Permanent (F)	1,015	1,013	99.80%	2	0.20%
5.	Other than Permanent (G)	6,640	5,070	76.36%	1,570	23.64%
6.	Total workers (F + G)	7,655	6,083	79.46%	1,572	20.54%

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)	2	1	50%	1	50%
2.	Other than Permanent (E)	-	-	-	-	-
3.	Total differently abled employees (D + E)	2	1	50%	1	50%
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	5	5	100%	-	-
5.	Other than permanent (G)	-	-	-	-	-
6.	Total differently abled workers (F + G)	5	5	100%	-	-

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	4	50%
Key Managerial Personnel (excludes Managing Director, Whole-time Director, if any)	2	0	-

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	Financial Year 2024 (Turnover rate in current FY)			Financial Year 2023 (Turnover rate in previous FY)			Financial Year 2022 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	11.06%	15.11%	11.40%	10.50%	18.70%	11.00%	10.00%	26.30%	11.10%
Permanent Workers	-	-	-	-	-	-	-	-	-

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

23. 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 in / by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	TVS Sundram Fasteners Private Limited	Promoter / Holding	48.51% (along with Promoter Group)	No
2	TVS Upasana Limited	Wholly-owned subsidiary	100.00%	No
3	Sundram Non-Conventional Energy Systems Limited	Subsidiary	52.94%	No
4	Sundram Fasteners Investments Limited	Wholly-owned subsidiary	100.00%	No
5	TVS Next Limited	Subsidiary	67.65%	No
6	Sundram International Limited, United Kingdom	Wholly owned subsidiary	100.00%	No
7	Sundram Fasteners (Zhejiang) Limited, China	Step-down subsidiary	100.00%	No
8	Cramlington Precision Forge Limited, United Kingdom	Step-down subsidiary	100.00%	No
9	Sundram International Inc., USA	Wholly-owned subsidiary	100.00%	No
10	TVS Next Inc. USA	Step-down subsidiary	67.65%	No

VI. CSR Details

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

(ii) Turnover (in ₹) – 4,905.65 crores

(iii) Net worth (in ₹) – 3,279.22 crores

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) <i>(If Yes, then provide web-link for grievance redressal policy)*</i>	Financial Year 2024 (Current Financial Year)			Financial Year 2023 (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	Y	0	0	-	0	0	-
Investors (other than shareholders)	Y	0	0	-	0	0	-
Shareholders	Y	0	0	-	0	0	-
Employees and workers	Y	0	0	-	0	0	-
Customers	Y	0	0	-	0	0	-
Value Chain Partners	Y	0	0	-	0	0	-
Others (please specify)	NA	0	0	-	0	0	-

* The policy for internal stakeholder is available on the intranet portal of the organisation and for external stakeholder in the website www.sundram.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	Energy and GHG Management	Opportunity	This is critical for reducing and managing emissions and moving towards decarbonization.	The Company has implemented measures to lower scope 1 emissions by reducing the dependency on Diesel and LPG through a variety of initiatives (battery operated electric forklift). The Company has also reduced its Scope 2 emission intensity through energy efficiency measures and procurement of renewable energy.	Positive implication
2	Waste Management	Risk	This represents the company's responsibility towards managing waste generated in the business and transitioning towards environmental preservation.	Through partnerships with authorized agencies, the Company constantly strives to develop mechanisms of recycling and reusing hazardous and Non-hazardous waste generated across its operations.	Positive implication
3	Water Management	Risk	This implies the company's judicious use of a shared resource as our operations are located in water scarce areas.	Constant efforts (recycling of water) are being made to lower the consumption of water in processes and domestic use, and to promote recycling and reusing of water wherever possible.	Partly Negative implication

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S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Product Stewardship	Opportunity	This holds significance as it is crucial for brand reputation and ensuring customer and end-user safety.	–	Positive implication
5	Biodiversity	Opportunity	To care about the flora and fauna around the Company's operations is equally important.	–	Positive implication
6	Human Rights and Labor Practices	Opportunity	SFL always stands for the rights and respect of its employees and firmly believes in non-tolerance and non-discrimination.	–	Positive implication
7	Employee well-being	Opportunity	Employee wellbeing is of utmost importance to SFL. SFL continuously works towards the mental, physical, and financial needs of its employees.	–	Positive implication
8	Occupational Health and Safety	Opportunity	SFL continuously strives to provide a safe workplace for its employees.	–	Positive implication
9	Training and Development	Opportunity	Enabling employees to grow professionally as well as upskill them at work is cornerstone to SFL's success as an organization.	–	Positive implication
10	Diversity and Inclusion	Opportunity	SFL firmly believes in providing opportunities to everybody and thereby becoming an inclusive organization.	–	Positive implication
11	CSR and Impact Assessment	Opportunity	SFL continuously works to provide for and uplift the communities around its operations and cater to the needs of the under privileged.	–	Positive implication
12	Fair Business Practices	Opportunity	Working ethically is central to long term sustenance of an organization. This is central to the company's vision.	–	Positive implication

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)
13	Supply chain Management	Opportunity	Management of supply chain is crucial in manufacturing the products and thereby meeting the Company's business objectives.	–	Positive implication
14	Economic Performance	Opportunity	Consistent profitability and strong financial fundamentals are necessary for the business to remain resilient and expand globally.	–	Positive implication
15	Customer Centricity	Opportunity	To become a trusted and preferred player in the market is important to growth as an organization.	–	Positive implication
16	Stakeholder Engagement	Opportunity	Stakeholders hold great significance inside and outside the organization.	–	Positive implication
17	Data Security	Risk	This emphasizes privacy and confidentiality of information of all stakeholder groups involved across the organization.	The Company has currently adopted leading industry security standards and practices such as ISO 27001 and TISAX to develop and implement a robust information security management framework.	Positive implication
18	Innovation Management	Opportunity	Innovation is imperative for building new products and meeting the needs of the company's customers.	–	Positive implication

List of Principles covered under Section B of the Business Responsibility and Sustainability Report:-

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

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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 National Guidelines on Responsible Business Conduct (NGRBC) Principles and Core Elements.

Disclosure Questions			P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9								
Policy and management processes																			
1.	a.	Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y								
	b.	Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y								
	c.	Web Link of the Policies, if available	https://www.sundram.com/corpgov.php																
2.	Whether the entity has translated the policy into procedures. (Yes / No)		Y	Y	Y	Y	Y	Y	N	Y	Y								
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)		Y	Y	Y	Y	Y	Y	N	Y	Y								
4.	Name of the national and international codes / certifications / labels / standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, and Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.		SFL is certified with IATF 16949, ISO 14001, ISO 45001, ISO/IEC 17025 at most of its manufacturing locations																
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.		Based on stakeholder inputs and materiality assessment, the Company has identified focus areas to develop commitments, goals, and targets with defined timelines																
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.		The Company has goals that fructify from financial year 2025 and hence, the performance will be captured in next year's report.																
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) - The statement by Ms. Arathi Krishna, Managing Director forms part of the ESG report available at https://www.sundram.com/esgreport.php																		
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).		Ms. Arathi Krishna, Managing Director																
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.		Ms. Arathi Krishna, Managing Director is responsible for decision making on sustainability related issues.																
10.	Details of Review of NGRBCs by the Company:																		
	Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)																
			P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8
	Performance against above policies and follow up action	Y	Y	Y	Y	Y	Y	N	Y	Y	Quarterly								
	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Y	Y	Y	Y	Y	Y	N	Y	Y	Quarterly								
11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	Frequency																	
		P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
		N	N	N	N	N	N	N	N	N	N	-	N	N	N	N	N	N	N

12.	If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated:									
	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
	The entity does not consider the principles material to its business (Yes/No)	Considering the nature of Company’s business, principle 7 has limited applicability. The Company complies with Regulations governing its operations and has taken initiatives to promote inclusive growth and environmental sustainability								
	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 programs on any of the principles during the financial year:

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and its impact	% of persons in respective category covered by awareness programs
Board of Directors Key Managerial Personnel	Seven training and awareness programs	<ul style="list-style-type: none"> • CSR Progress – Discussions pertaining to SFL’s CSR programs, and the outcomes • An overview of the legal function covering Principles 1,2,4,5,6,8 and 9 and extension of SFL’s ESG perspectives to its Value Chain Partners • Program on Governance areas (Section B-Management and Process Disclosure). • Update on SFL’s ESG Program. 	100%
Employees other than Board and KMP	252 internal training programs 217 external training programs	<ul style="list-style-type: none"> • On becoming Effective Manager • Talent Capacity Building • Lean Six Sigma • World Class Supply Chain Management • IR Practice and Legal Compliances • Team Development Program • Women Wellbeing Workshop • Communicate to Succeed • Step Up Leadership • Customer Centricity • Behavior Based Safety • Create a Workable Budget 	100%
Workers	Multiple sessions	Health and safety Skill upgradation	100%

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- 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 Requirements) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of regulatory/ enforcement agencies/ Judicial Institutions	Amount in INR	Brief of the case	Has an appeal been preferred (Yes/No)
Penalty/Fine	Nil				
Settlement					
Compounding fee					
Non-Monetary					
	NGRBC Principle	Name of regulatory/ enforcement agencies/ Judicial Institutions	Brief of the case	Has an appeal been preferred (Yes/No)	
Imprisonment	Nil				
Punishment					

- 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 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 organization's business-as-usual activities, strategies, manufacturing systems, and stakeholder engagement practices are guided by its policies such as the Code of Conduct, Code of Fair Practices, and Whistleblower Policy, covering the internal stakeholders, thereby promoting a transparent business culture, a safe working environment, and increased long-term stakeholders' sustainable value.

The Code of Conduct policy document ensures compliance with the regulatory requirements, including but not limited to anti-corruption or anti-bribery policy, lays out the roles and responsibilities to be carried out with honesty and integrity. The policy is available on the Company's website: www.sundram.com.

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

	Financial Year 2024	Financial Year 2023
Directors	Nil	
KMPs		
Employees		
Workers		

- 6) Details of complaints with regard to conflict of interest:

	Financial Year 2024		Financial Year 2023	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of directors	Nil			
Number of complaints received in relation to issues of conflict of interest of KMPs				

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 payable ((Accounts payable * 365) / Cost of goods / services procured) in the following format:

	Financial Year 2024	Financial Year 2023
Number of days of accounts payable	74	70

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	Financial Year 2024	Financial Year 2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Nil	Nil
Concentration of sales	a. Sales to dealers / distributors as % of total sales	11.61%	10.72%
	b. Number of dealers / distributors to whom sales are made	142	131
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	13.59%	14.53%
Share in RPTs in	a. Purchases (Purchases with Related parties / total purchases)	0.47%	0.25%
	b. Sales (Sales to related parties / Total Sales)	2.79%	2.83%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	89.38%	89.90%
	d. Investments (Investments in related parties / Total investments made)	89.15%	91.22%

Leadership Indicators

1) Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programs held	Topic/principles covered under training	% of value chain partners covered (by value of business done with partners) under awareness programs
Multiple sessions	The programs include providing training on processes and topics such as 5S, Safety, product inspection and handling FMEA, SOP, 7QC tools, QC story and tools, Kaizen, Quality Manual, Kanban, Green Supply chain, PPAP (Production Part approval process) and other Quality Management Systems related topics. Total Quality Management (TQM) training is extended to sub-contractors to support them in manufacturing and supplying high quality products.	100% of downstream value chain partners

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- 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 Code of conduct defines clauses related to conflict of interest, confidentiality maintenance, protection of assets, and corporate opportunities to avoid exploitation of organisation properties for personal gain.

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.

	Financial Year 2024	Financial Year 2023	Details of improvement in environment and social aspects
R&D	-	-	-
Capex	6.20%	0.90%	Capex investments in renewable energy projects and other specific technologies to improve environmental and social aspects.

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

The Organization is currently developing a Supplier code of conduct with a comprehensive coverage of all ESG principles aligned with UNGC and other ESG standards. The Company further intends to prioritize procurement from local suppliers which shall also be included in the supplier code of conduct.

- b. If yes, what percentage of inputs was sourced sustainably? Not Applicable

- 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.

To substitute usage of plastic packaging, the Company has introduced sustainable packaging where bio-degradable plastic is used as packaging material. The Company also promotes the usage of gunny bags instead of plastics. Consumption of virgin packaging materials like cartons and wooden pallets have been greatly reduced by reusing them wherever possible across all the sites.

Through partnerships with authorized agencies, the Company constantly strives to develop mechanisms of recycling and reusing hazardous waste generated across its operations. Since majority of the Company's products are composed of steel, therefore the MS scrap is re-used as an input material by feeding the scrap into steel melting furnaces. Other waste are disposed through authorised agencies for reusing / recycling.

- 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.

Yes. EPR is applicable to the Company's activities, since plastics are used in packaging materials in its products. One of the Company's manufacturing facilities has partnered with registered plastic waste processors to recycle plastic waste in conformance to its plan submitted to the Pollution Control Board for fulfillment of its EPR obligation.

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 / service	% of total turnover contributed	Boundary for which 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
The organization has not conducted any Life Cycle Assessments (LCA).					

- 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 risk/concern	Action taken
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 reused input material to total material	
	Financial Year 2024	Financial Year 2023
Not Applicable		

- 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:

	Financial Year 2024			Financial Year 2023		
	Re-used	Recycled	Safely disposed	Re-used	Recycled	Safely disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

- 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
Not Applicable	

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

Essential Indicators

- 1) (a) Details of measures for the well-being of employees

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	1,904	1,904	100%	1,904	100%	-	-	1,904	100%	-	-
Female	139	139	100%	139	100%	139	100%	-	-	139	100%
Total	2,043	2,043	100%	2,043	100%	139	100%	1,904	100%	139	100%
Other than Permanent employees											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

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

Workers engaged on contractual basis are paid gratuity subject to completion of five years and as per the Company's policy. ESI is applicable for employees engaged on contractual basis. For employees on the rolls of the Company, a separate insurance cover is available covering the employee and family members.

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	1,013	1,013	100%	1,013	100%	-	-	1,013	100%	-	-
Female	2	2	100%	2	100%	2	100%	-	-	2	100%
Total	1,015	1,015	100%	1,015	100%	2	100%	1,013	100%	2	100%
Other than Permanent workers											
Male	5,070	5,070	100%	5,070	100%	-	-	-	-	-	-
Female	1,570	1,570	100%	1,570	100%	-	-	-	-	1,570	100%
Total	6,640	6,640	100%	6,640	100%	-	-	-	-	1,570	100%

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

	Financial Year 2024	Financial Year 2023
Cost incurred on well-being measures as a % of total revenue of the Company	0.09%	0.07%

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

Benefits	Financial Year 2024			Financial Year 2023		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	100%	100%	Y	100%	100%	Y

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.

The Company has engaged persons who are differently abled primarily in office functions. In the corporate office, there is a provision for lift to facilitate persons approaching office have easy access. Most of the Company's operations are out of factories located in ground floor. In the plants, most of the offices are planned to be on the ground floor with clear identifications for approaching any location.

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

Yes, Equal opportunity employment process is reflected throughout SFL's policies and procedures. SFL does not discriminate employment opportunities based on race, colour, religion, caste, community, language, gender, national, origin, age, or disability.

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	100%	100%	100%	100%
Female	100%	100%	100%	100%
Total	100%	100%	100%	100%

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
Other than permanent workers	Yes
Permanent employees	Yes
Other than permanent employees	Yes

Proper channels have been provided for workers and employees of the Company to discuss any workplace-related complaints with their factory HR personnel. There is also a provision of an escalation matrix if their concerns are not satisfactorily resolved, i.e., through immediate supervisor / Head of Department / Unit or Divisional HR heads / Unit Head / Divisional Presidents / Head HR / Management.

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

Category	Financial Year 2024			Financial Year 2023		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of associations or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of associations or Union (D)	% (D / C)
Total Permanent Employees	2,043	Nil	-	1,896	Nil	-
- Male	1,904	Nil	-	1,773	Nil	-
- Female	139	Nil	-	123	Nil	-
Total Permanent workers	1,015	934	92%	1,061	941	89%
- Male	1,013	933	92%	1,056	940	89%
- Female	2	1	50%	5	1	20%

8) Details of training given to employees and workers:

Category	FY2023-24 Current Financial Year					FY2022-23 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (A)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (B)	% (B / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Permanent Employees										
Male	1,904	1,904	100%	1,904	100%	1,773	1,738	98%	1,738	98%
Female	139	139	100%	139	100%	123	123	100%	123	100%
Total	2,043	2,043	100%	2,043	100%	1,896	1,861	98%	1,861	98%
Other than Permanent Employees										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-

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Category	FY2023-24 Current Financial Year					FY2022-23 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (A)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (B)	% (B / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Permanent Workers										
Male	1,013	1,013	100%	1,013	100%	1,056	1,056	100%	1,056	100%
Female	2	2	100%	2	100%	5	5	100%	5	100%
Total	1,015	1,015	100%	1,015	100%	1,061	1,061	100%	1,061	100%
Other than Permanent Workers										
Male	5,070	5,070	100%	5,070	100%	5,118	5,118	100%	5,118	100%
Female	1,570	1,570	100%	1,570	100%	1,363	1,363	100%	1,363	100%
Total	6,640	6,640	100%	6,640	100%	6,481	6,481	100%	6,481	100%

1. Training on health and safety can include general training on health and safety as well as training on specific work-related hazards, hazardous activities, or hazardous situations. It can also include training on mental health.
2. Training programs on skill upgradation can include both internal training courses and funding support for external training or education.

9) Details of performance and career development reviews of employees and workers:

Category	Financial Year 2024			Financial Year 2023		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1,904	1,904	100%	1,773	1,773	100%
Female	139	139	100%	123	123	100%
Total	2,043	2,043	100%	1,896	1,896	100%
Workers						
Male	1,013	1,013	100%	1,056	1,056	100%
Female	2	2	100%	5	5	100%
Total	1,015	1,015	100%	1,061	1,061	100%

10) Health and safety management system:

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

Yes. SFL has implemented occupational health and safety measures across all the manufacturing locations. Most of the locations are certified for ISO 45001.

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

Each site at SFL has its own safety department and its own safety goals and objectives. The sites follow the Plan, Do, Check, Act (PDCA) framework in meeting the objectives. Once the PDCA is complete, it is followed by the assessment of the safety impacts. To identify the safety-related risks across all the sites, the company performs Hazard Identification and Risk Assessment (HIRA).

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

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

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

Safety Incident / Number	Category	Financial Year 2024	Financial Year 2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	Nil	Nil
	Workers	0.05	0.11
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	1	3
No. of fatalities	Employees	Nil	Nil
	Workers	Nil	Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

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

Company's top management conducts timely review of all the factories with regards to Health and Safety compliance. External application is used by factories to monitor legal compliance. The factories also conduct monthly safety audits, and the critical areas are identified, tracked, and closed. Employees and Workers at all levels receive relevant and necessary Health and Safety Executive training and education periodically.

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

	Financial Year 2024			Financial Year 2023		
	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	NIL	NIL
Health & Safety	NIL	NIL	NIL	NIL	NIL	NIL

14) Assessments for the year:

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

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

The workers are involved in case of any safety related incident and their feedback is collected on how the incident could have been mitigated. The safety teams prepare risk reduction strategies and implement the necessary measures to enhance the safety standards of the workspace.

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)?

In the event of any unfortunate death of an employee or worker, the Company ensures that the families are covered through Employees' Deposit Linked Insurance Scheme to ensure their stability and well-being.

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

Every month invoice from the value chain partners is processed upon production of documents evidencing remittance of statutory dues for the previous month.

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

	Total no. of affected employees / workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	Financial Year 2024	Financial Year 2023	Financial Year 2024	Financial Year 2023
<i>Employees</i>	NIL	NIL	Not Applicable	Not Applicable
<i>Workers</i>	NIL	NIL	Not Applicable	Not Applicable

- 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. During the tenure SFL support employee schemes comprising defined benefit and contribution plans, such as gratuity, group terminal plan, and provident fund provisions. The Company has a dedicated financial well-being program which focuses on addressing the career ending resulting from retirement. SFL have also extended the working tenure of talent resources.

- 5) Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%. The Company's conducts annual supplier audits for all its value chain partners through site visits to their respective facilities. The Company reviews their safety standards and working conditions and ensures that the partners comply with all relevant laws and regulations. In addition to the audits, the Company also conducts workshops and training programs to help the suppliers improve the overall ESG performance.
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. Not Applicable

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 has mapped its internal and external stakeholders based on analyzing the impact of the stakeholders on the company's operations. It uses both formal and informal mechanisms to engage with various stakeholders to understand their concerns and expectations. Individual departments within the organization have roles and responsibilities identified and defined to engage with various stakeholders. The company has developed a stakeholder engagement framework that outlines how the company will engage with each stakeholder group to address their needs and concerns and build mutually beneficial relationships.

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)	Channel of communication (Email, SMS, Newspaper, Pamphlet, Advertisement, Community meetings, notice board, website), others	Frequency of engagement (Annually/ Semi-annually/ quarterly/others please specify)	Purpose and scope of engagement including key topics and concerns raised during each engagement
Employees	No	- Internal communication platforms - Learning and Development programs - Engagement initiatives	Continuous	High Performance Work Culture Talent development and retention fulfilment of Company's vision, mission and achieving sustainability objectives Professional capacity building Cordial industrial relation Occupational health and safety and safe working environment

Stakeholder group	Whether identified as vulnerable/ marginalized group (Yes/ No)	Channel of communication (Email, SMS, Newspaper, Pamphlet, Advertisement, Community meetings, notice board, website), others	Frequency of engagement (Annually/ Semi-annually/ quarterly/others please specify)	Purpose and scope of engagement including key topics and concerns raised during each engagement
Customers	No	- Digital platforms and applications - In - person engagement - Customer satisfaction survey - Feedback mechanisms	Continuous	Product and service quality Complaint resolution On-time delivery
Suppliers	No	- In - person engagement - Supplier meetings - Supplier assessment - Trainings and workshops	Continuous	Product and service quality Complaint resolution On-time delivery
Investors	No	- Press releases and publications - Investor conferences - Annual General Meeting - Stock Exchange announcements	Need-based / Continuous	Financial performance Business updates Growth plans Product innovation pipeline ESG performance
Regulators	No	- Mandatory compliance reports	Continuous	Statutory compliance requirements: environmental, social and governance
Local Communities & NGOs	Yes	- Corporate Social Responsibility initiatives	Need-based	Improved access to healthcare, education Welfare measures and financial assistance to the underprivileged Community development measures

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.

Making use of both formal and informal channels, the Company interacts with stakeholders to learn about the economic, environmental, and social concerns that are important to them. Throughout these interactions, the Company keeps them informed about the organization's development and solicit their input, ideas, needs, and concerns.

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, SFL's primary ESG material topics have been determined through stakeholder discussions. Taking the inputs into consideration, the Company has developed strategies to mitigate the risks arising from critical material topics.

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

SFL takes part in community engagements predominantly focusing on education and healthcare for vulnerable groups. In the early 90s, certain requests of the people of Aviyur village near SFL Krishnapuram operations were considered and SFL's leadership decided to bring education to the community through development of a school. It was decided to start an English medium school for the people from the village offering quality education. The Sundram Medical Centre was established to support and offer free healthcare facilities to the villages near SFL's Krishnapuram operations. This medical centre has benefitted over 2500 families by providing them with quality medical care and enabling education and training for people on health-related aspects. SFL offers financial support for the Sundram Matriculation Higher Secondary School and Sundram Medical Center.

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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	Financial Year 2024			Financial Year 2023		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	2,043	2,043	100%	1,896	1,896	100%
Other than permanent	-	-	-	-	-	-
Total Workers	2,043	2,043	100%	1,896	1,896	100%
Workers						
Permanent	1,015	1,015	100%	1,061	1,061	100%
Other than permanent	6,640	6,640	100%	6,481	6,481	100%
Total Workers	7,655	7,655	100%	7,542	7,542	100%

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

Category	Financial Year 2024					Financial Year 2023				
	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	2,043	-	-	2,043	100%	1,896	-	-	1,896	100%
Male	1,904	-	-	1,904	100%	1,773	-	-	1,773	100%
Female	139	-	-	139	100%	123	-	-	123	100%
Workers										
Permanent	1,015	-	-	1,015	100%	1,061	-	-	1,061	100%
Male	1,013	-	-	1,013	100%	1,056	-	-	1,056	100%
Female	2	-	-	2	100%	5	-	-	5	100%
Other than Permanent	6,640	-	-	6,640	100%	6,481	-	-	6,481	100%
Male	5,070	-	-	5,070	100%	5,118	-	-	5,118	100%
Female	1,570	-	-	1,570	100%	1,363	-	-	1,363	100%

- 3) Details of remuneration/salary/wages

As a responsible manufacturing company, SFL believes in fair remuneration for all the employees, regardless of their level within the organization. The Company indulges in promoting a culture of transparency and openness when it comes to remuneration. The Company's compensation practices are regularly reviewed to ensure that they are aligned with SFL's values and that they are fair and equitable across all levels of the organization.

a) Median remuneration / wages:

₹ in crores

	Male		Female	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration / salary / wages of respective category
Board of Directors (BOD)	4	0.14	4	2.67
Key Managerial Personnel	2	0.59	-	-
Employees other than BoD and KMP	1,902	0.06	139	0.06
Workers	1,013	0.07	2	0.02

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

	Financial Year 2024	Financial Year 2023
Gross wages paid to females as % of total wages	3.65	3.30

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

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

Proper channels have been provided for workers and employees to discuss any workplace-related complaints with their individual HR. There is also a provision of an escalation matrix if their concerns are not satisfactorily resolved.

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

	Financial Year 2024			Financial Year 2023		
	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	-	-	-	-	-	-
Discrimination at workplace	-	-	-	-	-	-
Child Labour	-	-	-	-	-	-
Forced Labour/Involuntary Labour	-	-	-	-	-	-
Wages	-	-	-	-	-	-
Other than human rights issues	-	-	-	-	-	-

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

	Financial Year 2024	Financial Year 2023
Total Complaints reported under Sexual Harassment 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	NA	NA

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

The Company's policy protects complainants wishing to raise a concern about any serious irregularities within the Company. Employees are assured that they will not be identified as the complainant and that the information received is truly confidential.

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The Code of Conduct also includes provisions that address topics such as discrimination, harassment, ethical behavior among others that fosters a sense of trust and safety, promotes, and enhances the overall reputation of an organization.

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

10) Assessments for the year:

SFL strictly prohibits any forms of Child labor, forced labor, and ensures the same as a prerequisite to value chain partners. In the key agreements, the Company generally incorporates clauses that mandates value chain partners to bind themselves for ensuring compliances with all the laws applicable to them.

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

11) Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above. Not Applicable

Leadership Indicators

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

There has been no such event requiring the Company to modify / introduce a process as a result of addressing human rights grievances / complaints.

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

The coverage of human rights policy being exercised at the Company is applicable to all stakeholders and not merely restricted to the employees in the workplace.

3) Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes. The Company has engaged persons who are differently abled primarily in office functions. In the corporate office, there is a provision for lift to facilitate persons approaching offices have easy access. Most of the Company's operations are out of factories located on the ground floor. In the plants, most of the offices are planned to be on the ground floor with clear identifications for approaching any location.

4) Details on assessment of value chain partners

	% of value chain partners (by value of business done with such partners) that were assessed
Child Labor	100%
Forced/involuntary Labor	100%
Sexual Harassment	-
Discrimination at workplace	-
Wages	-
Others - please specify	-

5) Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above - Not Applicable

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	Financial Year 2024	Financial Year 2023
From renewable sources (GJ)		
Total electricity consumption (A)	4,71,968	3,88,927
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	4,71,968	3,88,927
From non-renewable sources (GJ)		
Total electricity consumption (D)	5,17,541	5,75,348
Total fuel consumption (E)	2,70,036	2,86,419
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F) (GJ)	7,87,577	8,61,767
Total energy consumed (A+B+C+D+E+F) (GJ)	12,59,545	12,50,693
Energy intensity per rupee of turnover (Total energy consumed/Revenue from operations)	0.0000257	0.0000254
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.00058745	0.00058139
Energy intensity in terms of physical output	411.89	422.96
Energy 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

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, since the Company is not identified as designated consumer.

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

Parameter	Financial Year 2024	Financial Year 2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	2,06,554	2,03,882
(iii) Third party water	4,25,222	4,00,830
(iv) Seawater / desalinated water	-	-
(v) Others- Rainwater	3,826	1,718
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	6,35,602	6,06,431
Total volume of water consumption (in kilolitres)	6,29,227	6,00,171
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.0000128	0.00000122
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.000293	0.000279
Water intensity in terms of physical output	205.76	202.97
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Not Applicable.

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4. Provide the following details related to water discharged:-

Parameter	Financial Year 2024	Financial Year 2023
Water discharge by destination and level of treatment (in Kilo liters)		
(i) To Surface water		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) To Groundwater		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) To Seawater		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third parties		
- No treatment	-	-
- With treatment – please specify level of treatment	6,375	6,260
(v) Others		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
Total Water discharged (in Kilo liters)	6,375	6,260

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.

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 Zero Liquid Discharge (ZLD) across most of the units, eliminating discharge of waste water. At Uttarakhand Unit, to comply with the common effluent treatment plant (CETP) requirements to provide water to the nearby locality, the treated waste water is being discharged to CETP for further use. The ZLD system makes use of Effluent treatment plants, Ultra filtration, Reverse Osmosis, Multiple Effect Evaporator and ATFD (Agitated thin film drier) to effectively recycle water and eliminate discharge.

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

Parameter	Please specify unit	Financial Year 2024	Financial Year 2023
NOx	Tons	93.97	84.53
SOx	Tons	47.07	45.77
Particulate matter (PM)	Tons	86.55	83.50
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 - Not Applicable

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

Parameter	Unit	Financial Year 2024	Financial Year 2023
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	<i>Metric tonnes of CO₂ equivalent</i>	21,425	22,652
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	<i>Metric tonnes of CO₂ equivalent</i>	1,17,884	1,31,052
Total Scope 1 and Scope 2 emissions per rupee of Turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)		0.00000284	0.00000312
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)		0.000065	0.000071
Total Scope 1 and Scope 2 emission intensity in terms of physical output		45.56	51.98
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	tCO ₂ e/ton of production	-	-

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

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

Yes. The Company has implemented measures to lower scope 1 emissions by reducing the dependency on Diesel and LPG through a variety of initiatives such as the use of battery-operated forklifts instead of their diesel counterparts. The Company has also reduced its Scope 2 emission intensity through energy efficiency measures including process modifications and retrofits at the manufacturing locations and has increased the capacity of the onsite solar plant by 5.78 MW in FY24. The company procures around 47.25% of the power from offsite renewable sources.

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

Parameter	Financial Year 2024	Financial Year 2023
Total Waste generated (in metric tonnes)		
Plastic waste (A)	75.00	56.00
E-waste (B)	2.38	4.02
Bio-medical waste (C)	0.015	0.016
Construction and demolition waste (D)	-	-
Battery waste (E)	1.91	5.91
Radioactive waste (F)	-	-
Used Oil (G)	516.00	411.00
Oil laden waste (H)	513.00	561.00
Metal scrap (I)	21,606.00	21,692.00
Other Hazardous waste. Please specify, if any. (J) (Empty discarded barrel)	6,709.00	6,687.00
Other Non-hazardous waste generated (K) . (Plastic, Wood, Food, etc.)	3,535.00	3,615.00
Total (A+B + C + D + E + F + G + H+I+J+K)	32,958.30	33,031.95
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.000000672	0.000000671
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.000015372	0.000015355

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<i>Parameter</i>	Financial Year 2024	Financial Year 2023
Waste intensity in terms of physical output	10.78	11.17
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	29,283.79	29,528.99
(ii) Re-used	-	-
(iii) Other recovery operations	511.50	539.94
Total	29,795.29	30,068.93
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.01	0.02
(ii) Landfilling	3,163.00	3,233.00
(iii) Other disposal operations	-	-
Total	3,163.01	3,233.02

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

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.

Through partnerships with authorized agencies, the Company constantly strives to develop mechanisms of recycling and reusing hazardous waste generated across its operations. Since the majority of the Company's products are composed of steel, the MS scrap generated is being recycled and re-used by feeding the scrap into steel melting furnaces. The company's manufacturing operations have been optimized to reduce the usage of hazardous chemicals in the processes. Hazardous waste like chemical sludge, waste or residues containing oil are directed to cement industries for co-incineration as per Tamil Nadu Pollution Control Board (TNPCB) norms.

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 thereof and corrective action taken, if any.
Not Applicable			

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
Not Applicable					

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:

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				

Yes. The Company is compliant with all applicable environmental laws and regulations in India. To ensure compliance, the Company has implemented a comprehensive environmental management system that monitors environmental performance and enhances the decision-making processes.

Leadership Indicators

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

The Company recognizes the importance of water resources and the urgent need to protect and conserve them. As a responsible organization, the Company is committed to taking proactive steps to reduce the water footprint through investments in technologies and practices for optimizing water use efficiency. The Company works closely with stakeholders and local communities to raise awareness about water scarcity, encourage responsible water use, and support initiatives that enhance water availability and quality.

2. Please provide details of total Scope 3 emissions & its intensity:

SFL is in the process of assessing its scope 3 emissions based on the GHG Protocol. The Company is developing the necessary capabilities to account the emissions of the applicable scope 3 categories.

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:

S. No	Initiative undertaken	Details of the initiative (<i>Web-link, if any, may be provided along-with summary</i>)	Outcome of the initiative
1	Improve and sustain the Power factor to control the Maximum Demand	Merger of Hosur CE-II plant EB service connection at 11kV with Main plant EB service connection at 33 kV resulting in multiple benefits	1. 810 kVA demand reduction saving ₹ 54 lakhs. 2. 1,000 kVA transformer switched off reducing constant losses saving 0.31 lakh units (equivalent to 25 tCO ₂ e) 3. Reducing Group captive power wheeling distribution losses by 1.23%

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

The Company has a dedicated Emergency Response team (ERT) across all the sites to address all potential risks and ensure the continuity of operations and protect the business's bottom line. The ERT members are trained on potential incidents and mock drills are conducted to identify the gaps and ensure the right process is followed.

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 significant adverse impact to the environment, arising from the value chain of SFL.

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

Supplier assessment includes aspects such as environmental, legal compliance, health, and safety, training, business continuity, financial sustainability, and product quality, among many others. The Organization is currently developing a Supplier code of conduct with a comprehensive coverage of all ESG principles aligned with UNGC. The Company further intends to prioritize procurement from local suppliers.

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

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	National
2	Madras Chamber of Commerce & Industry	State
3	The Confederation of Indian Industry	National
4	Employer's Federation of South India	National
5	The Indian Roads & Transport	National
6	Indo American Chamber of Commerce	National
7	Indo German Chamber of Commerce	National
8	Engineering Export Promotion Council	National
9	Federation of Indian Export	National
10	Export Promotion Council of EOUs and SEZ	National
11	Indian Wind Power Association	National
12	Tamil Nadu Electricity Consumer's Association	State
13	The Aerospace Industry Development Association of Tamil Nadu	State

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
-	-	-

Leadership Indicators

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

S. Nos.	Public policy advocated	Method resorted for such advocacy	Whether information is available in public domain (Yes/No)	Frequency of review by board (Annually/Half yearly/Quarterly/ Others please specify)	Web link if available
The Company has not advocated any public policy					

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 Number	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant web link
Not Applicable					

- 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	Number of project affected families (PAFs)	% of PAFs covered by R&R	Amount paid to PAFs in FY (INR)
Not Applicable						

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

The Company's HR teams from the respective manufacturing units are tasked with receiving and redressing grievances of the communities close to the units. Any major grievances are taken up by the Company's corporate HR team.

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

	Financial Year 2024	Financial Year 2023
Directly sourced from MSMEs/ small producers	SFL procures from vendors based on quality, cost, and delivery aspects. SFL strives for a fair, transparent, and inclusive, procurement process that provides equal opportunities for all suppliers.	
Directly from within India		

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

Location	Financial Year 2024	Financial Year 2023
Rural	22.92%	21.99%
Semi-Urban	7.05%	8.98%
Urban	17.98%	18.04%
Metropolitan	52.05%	50.99%

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

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 actions taken
Not Applicable	

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 (INR)
1	Tamil Nadu	Virudhunagar	₹ 1.70 Crore for Krishna Educational Society (KES) [Sundram Matriculation Higher Secondary School], Aviyur, Virudhunagar District

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

No, the Company does not have a preferential procurement policy for the marginalized/vulnerable group. SFL procures from vendors based on quality, cost, and delivery aspects. Preference of the customers are also taken into consideration for procurement. SFL strives for a fair, transparent, and inclusive, procurement process that provides equal opportunities for all suppliers.

- (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
Not Applicable				

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 actions taken
Not Applicable		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	Number of person benefitted from the CSR project	% of beneficiaries from vulnerable and marginalized groups
1	Krishna Educational Society (KES) [Funding for Sundram Matriculation Higher Secondary School]	467	100%
2	Banyan Academy for Leadership in Mental Health (BALM)-SFL Centre for Social Action and Research	353	-
3	Sugun Thomas Foundation- Mentoring for economically challenged students	26	100%
4	Mithra Trust -Conceptual framework and actionable tools for an individual to work through their feelings during emotional stress	491	-
5	Clarke School for Deaf- Supporting specially abled students	78	100%
6	NAPS/ Apprentice Scheme- Stipend paid to apprentices towards skill building	-	-
7	Uttarakhand School Project	50	-
8	Vaastu Foundation- Medical Welfare Project	-	-
9	Ray of Light Foundation- Holistic Treatment of Paediatric Cancer	5	100%
10	MIOT Hospitals, Chennai- Children's Heart Internationale-Funding for emergency and trauma care	28	100%
11	Cancer Institute- Support setup of a 3D live cell facility	-	-
12	Vijayaganga Trust - Support purchase equipment / machineries for aiding Orthopaedics surgery and Mammogram	-	-
13	Gramalaya Trust - Construction of 75 smart toilets in Kodamangulam Village (Sanitation) for the benefit of Women, senior citizens, and young girls in the village	75	-
14	Manjappai Vending Machine - Environmental sustainability which would help in the implementation of single use plastic bag ban policy	-	-

S. No.	CSR Project	Number of person benefitted from the CSR project	% of beneficiaries from vulnerable and marginalized groups
15	Production of a documentary on Wildlife Tamil Nadu	-	-
16	Restoration of Rangappa Pond in Thenmelpakkam village	-	-
17	Thirumayyar Charitable Trust - (Sri Sathyamurthi Perumal Temple)	-	-
18	HelpAge India	800 Families and 20 Old age Homes	-
19	Kambikudi Panchayat Union Middle School and Aviyur Govt Higher Secondary School – Support construction of a new borewell	485	-
20	Contribution to Yoga Deepika – Support for construction of a fully equipped high school and Pre-University College	169	-

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.

SFL conducts customer satisfaction surveys annually on the basis of QCD (Quality, Cost and Delivery) aspects which includes quality, delivery, logistics, and new product development. The Company reviews customer feedbacks and prioritizes addressing the complaints within seven days with detailed action plans. Trends of customer satisfaction is also tracked and monitored regularly for all manufacturing units.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	The Company's products comply with all relevant statutory requirements. They are regularly tested to ensure compliance with relevant safety.
Safe and responsible usage	
Recycling and/or safe disposal	

- 3) Number of consumer complaints in respect of the following:

	Financial Year 2024		Remarks	Financial Year 2023		Remarks
	Received during the year	Pending resolution at the end of year		Received during the year	Pending resolution at the end of year	
Data privacy	Not Applicable		SFL supplies domestic and global OEMs and after market segments. The materials supplied by SFL then goes into end products manufactured by the OEMs. There is no direct sale to consumers.	Not Applicable		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

- 4) Details of instances of product recalls on account of safety issues:

	Number	Reasons for recall
Voluntary recalls	Not Applicable	
Forced recalls		

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- 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 Company has developed an information security policy which has been made available to all the employees. The policy guides the employees about the principles to protect critical information assets of the organization from any data breaches.

- 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.

There have been no issues related to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls.

- 7) Provide the following information relating to the data breaches:

- a. Number of instances of data breaches: **Nil**
- b. Percentage of data breaches involving personally identifiable information of customers: **Not Applicable**
- c. Impact, if any, of the data breaches: **Not Applicable**

Leadership Indicators

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

Information regarding the products and services can be accessed via the link mentioned below:-

www.sundram.com

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

SFL supplies to domestic and global OEMs and after market segments. The materials supplied by SFL then goes into end products manufactured by the OEMs. To the extent legally required, SFL captures the details about safe and responsible usage of products it manufactures.

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

SFL supplies to domestic and global OEMs and after market segments. The materials supplied by SFL then goes into end products manufactured by the OEMs. Consequently, there is no interaction with the consumers directly.

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

Yes. SFL carries out customer satisfaction (domestic and global OEMs) surveys across all manufacturing locations to collect feedback on aspects such as quality, cost, and delivery.