

The Manager,  
Listing Department,  
**National Stock Exchange of India Ltd.,**  
'Exchange Plaza' C-1, Block G,  
Bandra-Kurla Complex, Bandra (E),  
Mumbai-400 051.  
**Security ID: SUBROS**

Dy. General Manager,  
Department of Corporate Services,  
**BSE LIMITED,**  
First Floor, P.J. Towers,  
Dalal Street, Fort,  
Mumbai – 400001.  
**Security ID: 517168**

Dear Sir/Madam,

**Sub: Business Responsibility and sustainability Report for the financial year 2023-24**

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), we are enclosing the Business Responsibility and Sustainability Report of the Company, which also forms a part of our Annual Report for the financial year 2023-24.

We request you to kindly take the same on record.

Thanking you,

Yours faithfully,  
For **SUBROS LIMITED**

**Kamal**  
**Samtani**  
Digitally signed  
by Kamal  
Samtani  
Date: 2024.08.26  
19:56:29 +05'30'  
Kamal Samtani  
Company Secretary

## BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT 2023-24

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity : L74899DL1985PLC020134
2. Name of the Listed Entity: SUBROS LIMITED
3. Year of incorporation: 1985
4. Registered office address: LGF, World Trade Centre, Barakhamba Lane, New Delhi-110001
5. Corporate address: LGF, World Trade Centre, Barakhamba Lane, New Delhi-110001
6. E-mail: [kamal.samtani@subros.com](mailto:kamal.samtani@subros.com)
7. Telephone: 011-23414946 - 49
8. Website: [www.subros.com](http://www.subros.com)
9. Financial year for which reporting is being done: 2023-24
10. Name of the Stock Exchange(s) where shares are listed: Bombay Stock Exchange Limited (BSE) and the National Stock Exchange of India Limited (NSE)
11. Paid-up Capital: Rs 13.05 Crore
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:
 

Mr. Parmod Kumar Duggal  
Whole-time Director & CEO  
Tel. No. 0120-4021000  
[Email-pduggal@subros.com](mailto:Email-pduggal@subros.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):
 

The disclosures in this report are prepared on a standalone basis.
14. Name of assurance provider: Not Applicable
15. Type of assurance 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 of Thermal Products	The Company manufactures air conditioning systems/parts and components (automotive/residential/ commercial) and are majorly sold to original equipment manufacturers	100%

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 Air Conditioning systems, including Compressors, HVAC System and radiators	34300	100%

#### 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	9	16	25
International	-	-	-

19. Markets served by the entity:

- a. Number of locations

Locations	Number
National (No. of States)	15
International (No. of Countries)	None



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

The exports are negligible (0.002%).

- c. A brief on types of customers:

The sales follow a Business-to-Business (B2B) model, primarily catering to original equipment manufacturers (OEMs) in sectors such as passenger cars, commercial vehicles, air conditioners, railways, etc.

#### 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)
<b>EMPLOYEES</b>						
1.	Permanent (D)	1127	1089	96.63%	38	3.37%
2.	Other than Permanent (E)	0	0	0%	0	0%
<b>3.</b>	<b>Total employees (D + E)</b>	<b>1127</b>	<b>1089</b>	<b>96.63%</b>	<b>38</b>	<b>3.37%</b>
<b>WORKERS</b>						
4.	Permanent (F)	2561	2378	92.85%	183	7.15%
5.	Other than Permanent (G)	1310	1310	100.00%	0	0%
<b>6.</b>	<b>Total workers (F+G)</b>	<b>3871</b>	<b>3688</b>	<b>95.27%</b>	<b>183</b>	<b>4.73%</b>

- b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	4	3	75%	1	25%
2.	Other than Permanent (E)	0	0	0%	0	0%
<b>3.</b>	<b>Total differently abled employees (D+E)</b>	<b>4</b>	<b>3</b>	<b>75%</b>	<b>1</b>	<b>25%</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	19	18	94.74%	1	5.26%
5.	Other than permanent (G)	20	20	100.00%	0	0%
<b>6.</b>	<b>Total differently abled workers (F+G)</b>	<b>39</b>	<b>38</b>	<b>97.44%</b>	<b>1</b>	<b>2.56%</b>

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	12	3	25.00%
Key Management Personnel	4	1	25.00%

22. Turnover rate for permanent employees and workers:

(Trends for the past 3 years)

	FY 2023-2024 (Turnover rate in current FY)			FY 2022-2023 (Turnover rate in previous FY)			FY 2021-2022 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Permanent Employees</b>	18%	22%	20%	19%	33%	26%	15%	15%	15%
<b>Permanent Workers</b>	31%	55%	43%	28%	47%	38%	20%	36%	28%

#### 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	DENSO Subros Thermal Engineering Centre India Private Limited	Associate	26%	No

#### VI. CSR Details

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

(ii) Turnover (in Rs.): 3070.57 Crores

(iii) Net worth (in Rs.): 955.85 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)  (If Yes, then provide web-link for grievance redress policy)	FY 2023-24			FY 2022-23		
		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	-	-	NA	-	-	NA
Investors (other than shareholders)	Yes	-	-	NA	-	-	NA
Shareholders	Yes*	-	-	NA	-	-	NA
Employees and workers	Yes*	-	-	NA	-	-	NA
Customers	Yes	-	-	NA	-	-	NA
Value Chain Partners	Yes	-	-	NA	-	-	NA
Other (Please specify)	-	-	-	-	-	-	-

\*<http://www.subros.com/policy.html>

26. Overview of the entity's material responsible business conduct issues are as follows:

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	GHG Emission	R	To meet the increased volumes demanded by customer, GHG emission will increase	Adopting new & advance technology to reduce GHG Emissions	Negative: Adopting new technology for GHG reduction will have financial implications



2	Energy Management	O	Continuous improvement of process and systems for energy efficiency	Renewable power usage, LED lights, day light utilization on the shop floor, energy-efficient gadgets, air conditioners, and motors are the primary measures for enhancing energy efficiency at Subros	Positive: Enhancing energy efficiency will lead to cost savings
3	Employee Health & Safety	R	Health and safety can impact productivity	The Company take timely initiatives related to employee health and safety sustainability	Positive: Employee health and Safety will save cost and improve productivity and profits
4	Waste Management	O	Working continuously on Process & systems for minimum waste generation to a reasonable level	Utilizing regrind material, implementing paperless approvals, and implementing a year-on-year waste reduction strategy align with waste management practices	Positive: Enhancing waste management will lead to cost savings
5	Water Management	R	Limited natural resources can impact operations	Utilizing treated water for operations, employing sewage treatment plant (STP) water for gardening, minimizing groundwater usage, and striving for zero water discharge, alongside process optimization	Positive: Beneficial for society and industry
6	Labour Management	R	Changing labour regulations are impacting manpower management	Compliance with all requirements related to the labour law	Negative : Failure to comply with laws can have financial consequences and higher productivity
7	Supply Chain Management	O	Resilient supply chain ensures business continuity during adverse times, ensuring competitive pricing	The Business Continuity Plan (BCP) and risk management plan address all associated risks comprehensively	Positive: Developing resilience in our supply chain has contributed to long-term outcomes

## 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.

### Principle-wise (as per NGRBC)

- P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
- P2 Businesses should provide goods and services in a manner that is sustainable and safe.
- P3 Businesses should respect and promote the well-being of all employees, including those in their value chains.
- P4 Businesses should respect the interests of and be responsive to all its stakeholders.
- P5 Businesses should respect and promote human rights.
- P6 Businesses should respect and make efforts to protect and restore the environment.
- P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- P8 Businesses should support inclusive growth and equitable development.
- P9 Businesses should engage with and provide value to their consumers in a responsible manner.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Policy and management processes</b>									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board?(Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	(1)	(1)	(1)	(2)	(1)	(3)	(1)	(1)	(1)
Note (1) Code of the Company: <a href="http://www.subros.com/code-conduct-ethics.html">http://www.subros.com/code-conduct-ethics.html</a> (2) Policies: <a href="http://www.subros.com/policy.html">http://www.subros.com/policy.html</a> (3) Environment Policy: <a href="http://www.subros.com/policy.html">http://www.subros.com/policy.html</a>									
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	N	N	Y	Y	N	N	N
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 byyour entity and mapped to each principle.	d	a, b	b, c	d	c, d	b, c	a	d	a
5. Specific commitments, goals and targets set by theentity with defined timelines, if any.	These policies are integral to our system and serve as guiding principles, therefore they cannot be confined by deadlines or targets.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	None								
<b>Governance, leadership and oversight</b>									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.	Sustainability is fundamental to our Company's values, guiding our product design philosophy. Our strategic roadmap involves a gradual shift towards renewable energy, aiming to fulfill 35% of our energy requirements through sustainable sources. Our commitment to this transition is reflected in our selection of inputs: <ul style="list-style-type: none"> <li>Gases: R1234f and R32, chosen for their low environmental impact and compatibility with renewable energy technologies.</li> </ul> Our operations are aligned with our renewable energy goals and contribute to a more environmental friendly future to achieve the Scope 1 and 2 of the SDG goals.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Parmod Kumar Duggal Whole-time Director and CEO								
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.	Mr. Parmod Kumar Duggal Whole-time Director and CEO								



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)								
	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
Performance against above policies and follow up action	Director									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Director									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. No	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	N

Note: a. IATF-16949:2016, b. EMS- (ISO-14001:2015), c. OH SMS-(ISO-45001:2018), and d. ERM- (ISO-31000: 2018)

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)	None								
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	5	The Board receives updates on the Company's sustainability initiatives and is briefed on various business, economy, regulatory, environment, safety and health matters to ensure they are well-informed and able to make timely decisions.	100%
Key Managerial Personnel	12	Coverage of the Environmental, Social and Governance, Fire safety, Information Security Management System, Enterprise Risk Management, Employee policy and Company Policy	100%



Segment	Total number of training and awareness programmes held	Topics /principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Employees other than BoD and KMPs	173	Coverage of the code of conduct, policies and procedures, ethics, safety, fire drill, social responsibilities, risk, sustainability and waste management.	49%
Workers	118		26%

2. Details of fines/penalties /punishment/ award/ compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year, in the following format:

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

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes, all business operations conducted by the Company and the actions of its employees, officers, and directors must comply with applicable laws, uphold the core values of the business, and adhere to internal corporate guidelines. The Company has a code of conduct and ethics policy.

<https://www.subros.com/code-conduct-ethics.html>

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 2023-24	FY 2022-23
Directors	-	-
KMPs	-	-
Employees	-	-
Workers	-	-

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

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	None	NA	None	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	None	NA	None	NA

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

Not Applicable





8. Number of days of accounts payables (Accounts payable \*365) / Cost of goods/services procured) as below:

	FY 2023-24	FY 2022-23
Number of days of account payables	81.20	82.96

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	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchase from trading houses as % of total purchases	None	None
	b. Number of trading houses where purchases are made from	Not Applicable	Not Applicable
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable	Not Applicable
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	2.50%	2.40%
	b. Number of dealers/ distributors to whom sales are made	91	81
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors	52%	51%
Share of RPTs in	a. Purchases (Purchases with related parties/ Total Purchases)	20.17%	22.00%
	b. Sales (Sales to related parties/ Total Sales)	86.24%*	1.18%
	c. Loans and advances (Loans and advances given to related parties/ Total loans and advances)	0.00	0.00
	d. Investments (Investments in related parties/ Total Investments made)	37.08%	7.14%

\*two related parties included w.e.f. 01/04/2023

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
-	-	-
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 established policies and procedures to effectively manage conflicts of interest. These include a Vigil Mechanism, Corporate Gifting Policy, Code of Conduct, and Insider Trading Policy. Additionally, all employees are required to disclose any personal interests they may have in material, financial, and commercial transactions that could potentially conflict with the interests of the Company.		

**PRINCIPLE 2 Businesses should provide goods and services in a manner that is sustainable and safe****Essential Indicators**

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D (Recurring)	100%	100%	Development of the products energy efficiency and use of the Green gases
R& D (Capex)	100%	100%	
Others (Capex)	100%	Nil	Renewable Energy set up at Karsanpura

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

Yes

- b. If yes, what percentages of inputs were sourced sustainable?

100%. The Company prioritizes green procurement by carefully selecting, evaluating, and auditing suppliers based on their sustainability practices and compliance with regulations. Due to the diverse range of materials sourced from various suppliers, it is challenging to determine the exact percentage of items obtained from recycled sources. However, decisions regarding the use of recycled materials are made in collaboration with OEMs, considering the scale and nature of the business.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing off at the end of life, for

(a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

The Company's business operations are driven by processes aimed at minimizing waste generation through the adoption of innovative ideas and technologies. These processes are regularly reviewed at each level of the production cycle to ensure the effectiveness of the system. The Company's products are used in vehicles manufactured by Original Equipment Manufacturers (OEMs) and the exact dispose off the Company's product may not be determined.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).

Yes. The waste collection plans are in line with regulations.

**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 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.
Nil					

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
-	-	-

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 2023-24	FY 2022-23
The input materials are being re-used/re-cycled in the manufacturing process, wherever feasible		

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 2023-24			FY 2022-23		
	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
-	-

**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)
<b>Permanent employees</b>											
Male	1089	1089	100%	1089	100%	0	0%	0	0%	564	51.79%
Female	38	38	100%	38	100%	38	100%	0	0%	21	55.26%
<b>Total</b>	<b>1127</b>	<b>1127</b>	<b>100%</b>	<b>1127</b>	<b>100%</b>	<b>38</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>585</b>	<b>51.91%</b>
<b>Other than Permanent employees</b>											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent workers</b>											
Male	2378	2378	100%	2378	100%	0	0%	0	0%	1648	69.30%
Female	183	183	100%	183	100%	183	100%	0	0%	155	84.70%
<b>Total</b>	<b>2561</b>	<b>2561</b>	<b>100%</b>	<b>2561</b>	<b>100%</b>	<b>183</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>1803</b>	<b>70.40%</b>

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)
<b>other than Permanent workers</b>											
Male	1310	1310	100%	1310	100%	0	0%	0	0%	482	36.79%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
<b>Total</b>	<b>1310</b>	<b>1310</b>	<b>100%</b>	<b>1310</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>482</b>	<b>36.79%</b>

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

	FY 2023-24	FY 2022-23
Cost incurred on well- being measures as a % of total revenue of the Company	0.10%	0.09%

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

Benefits	FY 2023-24			FY 2022-23		
	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/NA)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	NA	100%	100%	NA
ESI	0%	100%	Y	0%	100%	Y
Others*- Workmen Compensation	100%	100%	NA	-	-	-

\*Wherever applicable

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 is actively working towards ensuring that all locations become accessible and friendly for differently abled individuals, facilitating easy access to office areas. In the future, the Company is planning to include the installation of ramps and handrails, provision of accessible washrooms, availability of wheelchairs, and designation of accessible seats and parking spaces in their premises based on suitability.

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.

The Company has a framework to provide equal opportunities with gender equality, education, training & innovation without any kind of discrimination. Subros upholds an equal opportunities policy at the workplace, accessible to all our employees on the intranet. This policy ensures no discrimination based on disability, race, gender, age, religion, sexual orientation or other beliefs. The Company persist in our efforts to provide equal opportunities for individuals with disabilities across all employment facets, encompassing recruitment, training, promotions, and working conditions. The policy is available at <https://www.subros.com/policy.html>

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	-	-	-	-
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	The Company has implemented a fair online grievance redressal system, facilitated by various committees such as the Internal Complaints Committee (ICC) for Sexual Harassment, Works Committee, Safety Committee, Canteen Committee, and Transport Committee.
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 2023-24			FY 2022-23		
	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)
<b>Total Permanent Employees</b>	<b>1127</b>	<b>0</b>	<b>0%</b>	<b>1041</b>	<b>0</b>	<b>0%</b>
Male	1089	0	0%	1015	0	0%
Female	38	0	0%	26	0	0%
<b>Total Permanent Workers</b>	<b>2561</b>	<b>204</b>	<b>7.97%</b>	<b>2600</b>	<b>221</b>	<b>8.50%</b>
Male	2378	204	8.58%	2508	221	8.81%
Female	183	0	0%	92	0	0%

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23				
	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)
<b>Employees</b>										
Male	1089	590	54.18%	1019	93.57%	1015	325	32.02%	907	89.36%
Female	38	24	63.16%	33	86.84%	26	10	38.46%	25	96.15%
<b>Total</b>	<b>1127</b>	<b>614</b>	<b>54.48%</b>	<b>1052</b>	<b>93.35%</b>	<b>1041</b>	<b>335</b>	<b>32.18%</b>	<b>932</b>	<b>89.53%</b>
<b>Workers</b>										
Male	2378	487	20.48%	1274	53.57%	2508	408	16.27%	1563	62.32%
Female	183	96	52.46%	174	95.08%	92	23	25.00%	81	88.04%
<b>Total</b>	<b>2561</b>	<b>583</b>	<b>22.76%</b>	<b>1448</b>	<b>56.54%</b>	<b>2600</b>	<b>431</b>	<b>16.58%</b>	<b>1644</b>	<b>63.23%</b>

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	1089	0	0%	1015	0	0%
Female	38	0	0%	26	0	0%
<b>Total</b>	<b>1127</b>	<b>0</b>	<b>0%</b>	<b>1041</b>	<b>0</b>	<b>0%</b>
<b>Workers</b>						
Male	2378	204	8.58%	2508	221	8.81%
Female	183	0	0%	92	0	0%
<b>Total</b>	<b>2561</b>	<b>204</b>	<b>7.97%</b>	<b>2600</b>	<b>221</b>	<b>8.50%</b>

## 10. Health and safety management system:

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

The Company has integrated all its plants and employees into a comprehensive system certified to ISO 45001. Moreover, it adheres to multiple other standards, ensuring adherence to established processes. This holistic approach to occupational health and safety management aims to proactively prevent workplace injuries and illnesses, enhance compliance with legal requirements, and foster worker engagement through educational initiatives.

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

The Company conducts both internal and external audits, emphasizing the importance of rigorous evaluation. It has also implemented the principle of Hazard Identification and Risk Assessment (HIRA) across all sections, demonstrating a proactive approach to identifying and mitigating potential risks. Moreover, the Company prioritizes the identification of top risks in each department, utilizing near-miss reporting as a valuable tool. Safety measures are meticulously implemented in accordance with various factory and labor laws, underscoring the Company's commitment to regulatory compliance and employee well-being.

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

Yes, the Company has established procedures for workers to report work-related hazards and remove themselves from such risks. This is facilitated through the promotion of a reporting system and engagement in Kaizen activities focused on enhancing workplace conditions.

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

Yes, Employees/workers are covered under ESIC/Medical Insurance or Accidental insurance and have access to non-occupational medical and healthcare services, encompassing access to dispensaries across all locations. Additionally, avenues such as regular health checkups, health talks, yoga sessions, and partnerships with hospitals/pathology centers are available for employees/workers to utilize for non-occupational medical and healthcare needs.

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

Safety Incident/Number	Category*	FY 2023-2024	FY 2022-2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	–	–
	Workers	–	–
Total recordable work-related injuries	Employees	–	–
	Workers	–	–
No. of fatalities	Employees	–	–
	Workers	–	–
High consequence work-related injury or ill-health (excluding fatalities)	Employees	–	–
	Workers	–	–

\* Including into the contract workforce

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

The Company has implemented the principle for the strict use of PPEs such as helmets, gloves, and safety shoes. Each and every shop floor employee undergoes a mandatory six-days induction program about safety before deployment. Safety month is celebrated, and awareness programs are organized through classroom training and Nukkad Natak, among other methods. Periodic mock drills are conducted for all possible scenarios, including fire, earthquake, chemical spills, and electrocution and so on. The Company has also implemented ISO 45001 certification for a safe workplace, and internal safety audits are regularly conducted.

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

	FY 2023-24			FY 2022-23		
	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	–	–	No complaints registered	–	–	No complaints registered
Health & Safety	–	–		–	–	



14. Assessments for the year:

	% of your plants and office 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 Company rigorously follows Behavior-Based Safety practices, placing a strong emphasis on incident and near-miss reporting. Safety-themed months and activities are regularly organized, with safety being prominently highlighted in Long Term Settlement (LTS) and employee appointment letters. Moreover, the Company maintains a zero-tolerance policy towards safety practice violations.

**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, specific benefits of insurance are provided to both employees and workers in the event of mishaps and also to support employees' families in the event of the death.

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 the collection of all documentary evidence for the deduction and deposit of statutory dues, supported by management declarations. Additionally, it holds payments to value chain partners in case of defaults.

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	
	FY 2023-2024	FY 2022-2023	FY 2023-2024	FY 2022-2023
Employees	-	-	-	-
Workers	-	-	-	-

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)

No

5. Details on assessment of value chain partners: Nil

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 such risks or concerns were identified during the year.

**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 identified stakeholders based on gender, including groups of females, employees associated with unions, groups of trainees under skill upgradation frameworks, and groups of vendor partners etc. These groups are integrated into the Company's overall group framework, governed by policies and procedures.

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 engagement (Annually/ Half yearly/ Quarterly/ others)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees and Workers	No	Emails, Internet, Meetings, Notice Board, Newsletters etc	Regular	Collective knowledge, and experience, capacity building, productivity enhancement, physical safety, work related safety, human and legal rights, work related issues, industrial harmony, well beings, and facilities etc
Community	No	Community Meetings, Advertisements, CSR Initiatives, Notice Board	Ongoing/need based	Promote awareness on social issues, lives of people, local development, education, for under privileges, disaster management and preventive healthcare etc
Regulatory Authorities	No	Industry Association, Liaosining	Regular	Policy strengthening, social-economic benefits to all stakeholders
Vendor Partners	No	Meetings, Emails, SMS, Website, Advertisement etc	As & when required	Value addition to product, skill enhancement, govt policies, environment & sustainability, cost & quality etc.
Investors/ Shareholders	No	Website, Press releases, Stock Exchanges announcements, Regulatory filings, Conferences/calls etc	Quarterly financial results earning calls, Company updates as and when required	Educating the Investors and other stakeholders and fulfilling their requirements within statutory norms.
Customers	No	Meetings, Emails, Website, Trade shows, Fairs etc	Regular	New product development, future business opportunities, quality checks, feedback and improvement

#### 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.

Summary reports and meeting minutes are shared with management on a monthly or quarterly basis during management reviews.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No).

Yes

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

None





**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 2023-2024			FY 2022-2023		
	Total (A)	No. employees of workers/ covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	1127	455	40.37%	1041	265	25.46%
Other than permanent	0	0	0%	0	0	0%
<b>Total Employees</b>	<b>1127</b>	<b>455</b>	<b>40.37%</b>	<b>1041</b>	<b>265</b>	<b>25.46%</b>
<b>Workers</b>						
Permanent	2561	614	23.98%	2600	131	5.04%
Other than permanent	1310	0	0%	992	0	0%
<b>Total Workers</b>	<b>3871</b>	<b>614</b>	<b>15.86%</b>	<b>3592</b>	<b>131</b>	<b>3.65%</b>

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

Category	FY 2023-2024					FY 2022-2023				
	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)
<b>Employees</b>										
<b>Permanent</b>	<b>1127</b>	<b>0</b>	<b>0%</b>	<b>1127</b>	<b>100%</b>	<b>1041</b>	<b>0</b>	<b>0%</b>	<b>1041</b>	<b>100%</b>
Male	1089	0	0%	1089	100%	1015	0	0%	1015	100%
Female	38	0	0%	38	100%	26	0	0%	26	100%
<b>Other than Permanent</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
<b>Workers</b>										
<b>Permanent</b>	<b>2561</b>	<b>0</b>	<b>0%</b>	<b>2561</b>	<b>100%</b>	<b>2600</b>	<b>0</b>	<b>0%</b>	<b>2600</b>	<b>100%</b>
Male	2378	0	0%	2378	100%	2508	0	0%	2508	100%
Female	183	0	0%	183	100%	92	0	0%	92	100%
<b>Other than Permanent</b>	<b>1310</b>	<b>1310</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>992</b>	<b>992</b>	<b>100%</b>	<b>0</b>	<b>0%</b>
Male	1310	1310	100%	0	0%	992	992	100%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%

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

- a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (Rs.)	Number	Median remuneration/ salary/ wages of respective category (Rs.)
Executive director(s)	1**	127.34	1*	226.92
Key Managerial Personnel	2**	59.87	0	-
Employees (Median in Rs.)	1086	63035	37	44508
Workers (Median in Rs.)	2378	16763	183	15185

\* Represent remuneration (other than commission) of Chairperson & Managing Director (Rs. in Lakhs)

\*\* Represent remuneration (Rs. in Lakhs)



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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	2%	3%

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

Yes, the Company has designated focal points for addressing human rights through Local Plant HR and Plant Heads at each location of the Company's plants and in case of non-redressal the same can be addressed to Central HR at the corporate level for further attention.

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

The Company has a mechanism in place for whistle blower and protection system, where any person (internal or external) can reach out to the HR Head/Plant Head for their grievance. The mechanism ensures that their concerns are addressed promptly and effectively.

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

	FY 2023-2024			FY 2022-2023		
	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 human Rights related issues	-	-	-	-	-	-

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

	FY 2023-2024	FY 2022-2023
Total Complaints reported under Sexual Harassment on of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	-	-
Complaints on POSH as a % of female employees/ workers	-	-
Complaints on POSH upheld	-	-

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

The Company has implemented comprehensive policies to address both whistle blowing and the prevention of sexual harassment, aiming to safeguard complainants from adverse consequences. These policies ensure unbiased treatment at all employment levels, irrespective of disability, race, gender, age, religion, sexual orientation, or other beliefs.

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

Yes, the Company incorporates human rights into all agreements and contracts. These provisions cover aspects such as the use of safety measures, adherence to minimum wage standards, payment of statutory dues, and the employment of adult workers etc.

10. Assessments for the year:

	% of your plants and offices that were assessed by the entity
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
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.

None

#### Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.  
None
2. Details of the scope and coverage of any Human rights due-diligence conducted.  
None
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 is committed to offering equal opportunities to differently abled visitors and is actively taking steps to establish infrastructure support for these persons across all offices and locations. Specifically, modifications such as stair modifications and the installation of ramps have been implemented in the plants.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Nil  No assessment has been carried out
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others	

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

None

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

##### Essential Indicators

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

Parameter	FY 2023-2024 (in Giga Joules)	FY 2022-23 (in Giga Joules)
<b>From renewable sources</b>		
Total electricity consumption (A) Solar	58356	61476
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumed from renewal sources (A+B+C)</b>	<b>58356</b>	<b>61476</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	111449	96598
Total fuel consumption (E)	16534	19166
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewal sources (D+E+F)	127983	115764
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>186339</b>	<b>177240</b>
<b>Energy intensity per crores rupee of turnover (Total energy consumed/Revenue from operations)</b>	<b>60.69</b>	<b>63.16</b>
<b>Energy intensity per rupee of turnover adjusted for purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP)*</b>	0.001345	0.001415
<b>Energy intensity in terms of physical output**</b>	11.68	10.87
<b>Energy intensity (optional)- the relevant metric may be selected by the entity</b>	-	-

\*For the purpose of PPP adjustment, conversion rate of INR 22.167/USD (for 2023) and INR 22.401/USD (for 2024) has been taken as per the latest information available on the IMF.

\*\*The energy intensity for total number of units consumed by Company has been given as required by this report and this may not be correct representation of "energy intensity by physical output" as multiple products manufactured by the Company are not comparable using a common unit of measurement.

No independent assessment/ evaluation/assurance has been carried out by an external agency.



2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any. No
3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 2023-24 (in kiloliters)	FY 2022-23 (in kiloliters)
Water withdrawal by source		
(i) Surface water	0	0
(ii) Ground water	179613	173812
(iii) Third party water	26556	21384
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (i + ii + iii + iv + v)</b>	<b>206169</b>	<b>195196</b>
<b>Total volume of water consumption</b>	<b>150150</b>	<b>81882</b>
<b>Water intensity per crores rupee of turnover ( Total water consumption/ Revenue from operations)</b>	<b>48.90</b>	<b>29.18</b>
Water intensity per rupee of turnover adjusted for purchasing Power Parity (PPP) (Total water consumption/ revenue from operations adjusted for PPP)*	0.001084	0.000654
Water intensity in terms of physical output**	10.55	9.87
Water intensity (optional)- the relevant metric may be selected by the entity	-	-

\*For the purpose of PPP adjustment, conversion rate of INR 22.167/USD (for 2023) and INR 22.401/USD (for 2024) has been taken as per the latest information available on the IMF.

\*\*The water intensity for total number of units consumed by Company has been given as required by this report and this may not be correct representation of "water intensity by physical output" as multiple products manufactured by the Company are not comparable using a common unit of measurement.

No independent assessment/ evaluation/assurance has been carried out by an external agency.

4. Provide the following details related to water discharged:

Parameters	FY 2023-2024 (in kilolitres)	FY 2022-2023 (in kilolitres)
Water discharge by destination and level of treatment		
(i) To Surface water	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(ii) To Groundwater	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(iv) Sent to third- parties	56019	108674
- No treatment	0	0
- With treatment- please specify level of treatment	56019	108674
(v) Others	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
<b>Total water discharged</b>	<b>56019</b>	<b>108674</b>

No independent assessment/ evaluation/assurance has been carried out by an external agency

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

Yes, the Company has system in place for zero liquid discharge and has been working to utilize the wastages within the process itself.



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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx	Kg	6079.82	4329.57
Sox	Kg	56.238	40.0485
Particulate matter (PM)	Kg	303.991	216.478
Persistent organic pollutants (POP)	–	–	–
Volatile organic compounds (VOC)	–	–	–
Hazardous air pollutants (HAP)	–	–	–
Others–please specify	–	–	–

No independent assessment/ evaluation/assurance has been carried out by an external agency.

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	1388.31	3484
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	23466.30	24592
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and scope 2 GHG emissions/ Revenue from operations)	tCO <sub>2</sub> /mn of RS	8.06	10.00
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)	tCO <sub>2</sub> e/cr	194.33	224.11
Total Scope 1 and Scope 2 emission intensity in terms of physical output		0.01142	0.01458
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		Not Applicable	

No independent assessment/ evaluation/assurance has been carried out by an external agency.

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

Yes, the Company has undertaken multiple projects aimed at enhancing resource efficiency and minimizing environmental emissions. These initiatives include measures to mitigate the impacts of climate change and enhance energy efficiency, leading to a reduction in greenhouse gas emissions. Projects encompass the installation of dual fuel and RECD kits, the implementation of VFD on air compressors, the establishment of solar plants with renewable power purchase agreements, and the replacement or elimination of hydraulic power packs for bending machines, oil cooler fan motors, and other components.

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

Parameter	FY 2023-24	FY 2022-23
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	60.17	37.29
E-waste (B)	2.18	2.57
Bio-medical waste (C)	0.01	0.01
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste (G)	29.77	159.96
Other Non-hazardous biodegradable waste generated (H).	777.43	954.78
Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	NA	NA
<b>Total (A+B+C+D+E+F + G+ H)</b>	<b>869.56</b>	<b>1154.61</b>

Parameter	FY 2023-24	FY 2022-23
Waste intensity per rupee of turnover ( Total waste generated/ Revenue from operations)	0.28	0.41
Waste intensity per rupee of turnover adjusted for purchasing Power Parity (PPP) (Total waste generated/ revenue from operations adjusted for PPP)	6.2775	9.216621
Waste intensity in terms of physical output	0.00040	0.00060
Waste intensity (optional)- the relevant metric may be selected by the entity	0	0
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	5026.27	184.14
(ii) Re-used	0	40.94
(iii) Other recovery operations	0	2.57
<b>Total</b>	<b>5026.27</b>	<b>227.65</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.157	0.126
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
<b>Total</b>	<b>0.157</b>	<b>0.126</b>

Assessment has been carried out under the environment management system ISO 14001 Certification issued by Bureau Veritas Certificate.

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

The Company has implemented a waste management process and adheres to relevant guidelines based on the nature of the waste.

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, and 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
Nil				



### 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: All manufacturing locations
- (ii) Nature of operations: Manufacturing
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameters	FY 2023-2024 (in kilolitres)	FY 2022-2023 (in kilolitres)
<b>Water withdrawal by source</b>		
(i) Surface water	0	0
(ii) Ground water	179613	173812
(iii) Third party water	26556	16744
(iv) Seawater/ desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal</b>	<b>206169</b>	<b>190556</b>
<b>Total volume of water consumption</b>	<b>150150</b>	<b>81882</b>
Water intensity per rupee of turnover (water consumed/ turnover)	48.90	29.18
Water intensity (optional)- the relevant metric may be selected by the entity*	-	-
<b>Water discharge by destination and level of treatment</b>		
(i) Into Surface water	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(iii) Into Groundwater	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(iv) Into Seawater	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(v) Sent to third- parties	56019	108674
- No treatment	0	0
- With treatment- please specify level of treatment	56019	108674
(vi) Others	0	0
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
<b>Total water discharged</b>	<b>56019</b>	<b>108674</b>

\*For the purpose of PPP adjustment, conversion rate of INR 22.167/USD (for 2023) and INR 22.401/USD (for 2024) has been taken as per the latest information available on the IMF.

No independent assessment/ evaluation/assurance has been carried out by an external agency.

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

Parameter	Unit	FY 2023-24	FY 2022-23
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	9303.75	11554
<b>Total Scope 3 emissions per rupee of turnover</b>	tCO <sub>2</sub> / Cr	3.02	4.12
<b>Total Scope 3 emission intensity</b> (optional)- the relevant metric may be selected by the entity	-	-	-

No independent assessment/ evaluation/assurance has been carried out by an external agency.

Note: Assessment for Scope-3 is dynamic & new inputs related to Emission are under evaluation.

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

Not Applicable



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 (Web-link, if any, may be provided along – with summary)	Outcome of the initiative
1	Rooftop Solar	NA	Annual generation of 17.8 Lakhs KWh
2	Energy Efficient HVLS fan for cooling	NA	Annual Saving of 1.1 Lakhs KWh
3	Reuse of WLT water in Cooling Tower	NA	Annual Saving of 3000 KL

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

Yes, the Company has established a business continuity and disaster management plan. Specifically, a disaster recovery plan is designed to mitigate the organization's business risk stemming from unforeseen disruptions of critical IT functions or operations essential for business continuity. This plan outlines specific actions, allocated resources, and procedures to be followed in the event of a disaster. Additionally, the IT team conducts routine data recovery drills to assess the effectiveness of the process and plan.

Moreover, the Company's supply chain also ensures business continuity during natural calamities, socio-political situations, supply shortages, and implements various measures to minimize supply disruptions, thereby ensuring business continuity.

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.

None

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

Not Applicable

**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.

The Company has affiliations with four trade and industry chambers/ 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 (ACMA)	National
2	Confederation of Indian Industry (CII)	National
3	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
4	Society of Automotive Engineers India (SAE INDIA)	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		

**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/Other-please specify)	Web Link, if available
Not Applicable					





**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.

The Company has not undertaken any SIAs 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
None					

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 No. 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)
None						

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

The Company has launched a wide range of CSR initiatives tailored to address the specific needs of communities. Additionally, there is a mechanism in place to address social issues in the vicinity of each plant.

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

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Directly sourced from MSMEs/ small producers	0.39%	0.62%
Directly from within India	77.00%	75.00%

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 2023-2024	FY 2022-2023
Rural	7.92%	7.15%
Semi-urban	4.98%	4.56%
Urban	85.81%	87.03%
Metropolitan	1.29%	1.26%

(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 action taken
None	

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)
None			

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

No

- (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 action taken
None		

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.	Enhancing Vocational Skills Benefits	1320	100
2.	Project Prayas	1000	100
	<b>Total</b>	<b>2320</b>	

**PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner**

**Essential Indicators**

- Describe the mechanisms in place to receive and respond to consumer complaints and feedback.  
The Company has a Complaint Management System in place to address and resolve grievances, ensuring timely resolution.
- Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

	As a percentage to total turnover
Environment and Social Parameters relevant to the Product	100%
Safe and responsible usage	100%
Recycling and / or safe disposal	100%

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

	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil					
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	Reason for recall
Voluntary recalls	-	-
Forced recalls	-	-

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 policy is available at <https://www.subros.com/policy.html>.



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

7. Provide the following information relating to 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).

Details available at <https://www.subros.com/products.html>.

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

The Company has adopted a step-by-step approach to inform and educate consumers about the safe and responsible usage of products and/or services. These efforts are entirely focused on ensuring safety.

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

Not Applicable

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)

Being undertaken as the part of process.