# NAHAR SPINNING MILLS LIMITED

# **BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT**

## **SECTION A: GENERAL DISCLOSURES**

# I. <u>Details of the listed entity</u>:

1.	Corporate Identity Number (CIN) of the	L17115PB1980PLC004341		
	Listed Entity			
2.	Name of the Listed Entity	Nahar Spinning Mills Limited		
3.	Year of incorporation	1980		
4.	Registered Office Address	373, Industrial Area- "A", Ludhiana, Punjab-		
		141003		
5.	Corporate Office Address	373, Industrial Area-"A", Ludhiana, Punjab-		
		141003		
6.	E-mail id	secnsm@owmnahar.com		
7.	Telephone	91-161-2600701 to 705,		
		91-161-2606977 to 980		
8.	Website	www.owmnahar.com		
9.	Financial Year for which Reporting is being	2023-24		
	done			
10.	Name of the Stock Exchange(s) where	BSE Ltd & National Stock Exchange of India		
	shares are listed	Limited		
11.	Paid-up Capital	Rs. 1803.27 Lakhs		
12.	Name and contact details (telephone, email	Mr. Brij Sharma		
	address) of the person who may be	Company Secretary and Compliance officer		
	contacted in case of any queries on the	Telephone No. +91-161-2600701		
	BRSR report	E-mail Address: secnsm@owmnahar.com		
13.	Reporting boundary - Are the disclosures	Disclosures under this report are made on a		
	under this report made on a standalone	standalone basis		
	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).			
14.	Name of assurance provider	NA		
15.	Type of assurance obtained	NA		
	I .			

# II. <u>Products/services:</u>

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

	because of business decivities (deceduring for 50% of the turnover).							
S. No.	Description of MainActivity	Description ofBusiness Activity	% of Turnover of the entity					
1.	Manufacturing	Manufacture and Export of yarns and knitted garments	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.	Textile	131	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	8	1	9
International	_	_	_

## 19. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (No. of States)	12
International (No. of Countries)	35

**b.** What is the contribution of exports as a percentage of the total turnover of the entity? The contribution of exports as a percentage of the total turnover of the entity is 53.28%.

# c. A brief on types of customers:

For export of its product, company is working Directly as well as through Agents with the overseas customers. In the domestic market the company is supplying its products to reputed Big Corporate and Medium customers in the knitted/weaving/garments and customers manufacturing products like terry towels, bed linen, denim, bottom weight, shirting and furnishing fabrics.

### IV. <u>Employees</u>

#### 20. Details as at the end of Financial Year:

# a. Employees and workers (including differently abled):

### **Employees:**

S.	Particulars	Total	Ma	Male		male
No.		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
1.	Permanent (D)	1725	1672	96.93	53	3.07
2.	Other than Permanent (E)	1	-	_	1	_
3.	Total employees (D + E)	1725	1672	96.93	53	3.07

#### Workers:

S.	Particulars	Total	Ma	Male		Female		
No.		(A)	No. (B) % (B/A)		No. (C)	% (C/A)		
1.	Permanent (D)	8719	5541	63.55	3178	36.45		
2.	Other than Permanent (E)	_	_	_	_	_		
3.	Total employees (D + E)	8719	5541	63.55	3178	36.45		

## b. Differently abled Employees and workers

## **Employees:**

S.	Particulars	Total	Ma	Male		emale
No.		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
1.	Permanent (D)	3	3	100	_	_
2.	Other than Permanent (E)	_	_	_	_	_
3.	Total employees (D + E)	3	3	100	_	_

#### Workers:

S.	Particulars	Total	Ma	Male		Female		
No.		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)		
1.	Permanent (D)	30	24	80.00	6	20.00		
2.	Other than Permanent (E)	-	_	_	_	_		
3.	Total employees (D + E)	30	24	80.00	6	20.00		

## 21. Participation/Inclusion/Representation of women:

	Total	No. and pe	ercentage of Females
	(A)	No. (B)	% (B/A)
Board of Directors (including MD)	10	1	10
Key Management Personnel	2	_	_

# 22. Turnover rate for permanent employees:

(Disclose trends for the past 3 years)

	FY 2023-24		FY 2022- 2023			FY 2021-2022			
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	19%	39%	17.5%	17%	38%	17%	16%	39%	16%
Permanent Workers	41%	44%	42%	40%	43%	41%	39%	42%	40%

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

# 23. (a) Names of holding / subsidiary / associate companies / joint ventures:

- (-)	Training of Holamig / Janusianary	,	, ,					
S.	Name of the holding /	Indicate whether	% of	Does the entity				
No.	subsidiary/ associate companies/ joint ventures (A)	holding/Subsidiary /Associate/Joint Venture	shares held by listed entity	indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)				
	Not Applicable							

# VI. CSR Details

- 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
  - (ii) Turnover Rs. 3050.01 Crores
  - (iii) Net worth Rs.1467.54 Crores

# VII. <u>Transparency and Disclosures Compliances:</u>

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

Stakeholder	Grievance		FY 2023-24		F	Y 2022-23	
group from	Redressal	Number	Number of	Remar	Number	Number of	Rema
whom	Mechanism in	of	complaints	ks	of	complaints	rks
complaint is	Place (Yes/No)	complaint	pending		complaint	pending	
received	(If Yes, then	s filed	resolution		s filed	resolution	
	provide web-link	during the	at close of		during the	at close of	
	for grievance	year	the year		year	the year	
	redress policy)						
Communities	Yes						
	http://www.owmn						
	ahar.com/spinning/	NIL	NIL	-	NIL	NIL	-
	pdf/vigil_mechanis						
	m.pdf						
Investors							
(other than			Not Appli	cable			
shareholders)							
Shareholders	Yes						
	http://www.owmn						
	ahar.com/spinning/	8	NIL	_	7	NIL	-
	share-						
	holdinginfo.php						
Employees	Yes						
	http://www.owmn						
	ahar.com/spinning/	NIL	NIL	-	NIL	NIL	-
	pdf/vigil_mechanis						
	m.pdf						
Customers	Yes						
	http://www.owmn						
	ahar.com/spinning/	NIL	NIL	-	NIL	NIL	-
	pdf/vigil_mechanis						
	m.pdf						
Value Chain	Yes						7
Partners	http://www.owmna						
	har.com/spinning/p	NIL	NIL	-	NIL	NIL	-
	df/vigil_mechanism						
	.pdf						

## 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 opportu nity (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.	Because of present Geo Political Situation several countries has started working on 'China plus one' policy. This has provided an opportunity to the textile industry to increase its share in the global markets.	0	Rationale for identifying the overseas buyer do not want to depend on the one country for their supply and they are looking at the India as the best for textile product.		Because of the prevailing Geo-Political Situation, Global buyers wants to diversify its sourcing for textile products. They don't want to depend on China alone and has started following China plus One Policy. As such we expect that the global buyers will shift some portion of their sourcing for textile products to Indian Textile Industry. This will enable the Industry to improve its top line as well as bottom line.
2.	The company has installed Solar power facility and is using the same for its Spinning units which is helping in reducing GHG and moving towards a sustainable environment. Besides the company is using clean/ green energy as it has installed boilers with bio mass fuels.	O	<ul> <li>To get uninterrupted and Clean Energy.</li> <li>The company is making use of Roof top Solar Power Plant to save on electricity cost.</li> <li>Customers value the company for its sustainable environment initiative and this will have positive impact on company's performance.</li> </ul>	NA	By using Roof top solar power Plant, company will be getting green and clean energy. This will also help the company in reducing the electricity cost. Moreover this will also save environment from pollution.
3.	Use of Good quality raw cotton for yarn production.	R	Cotton is the main raw material for the manufacturing of yarns but is dependent on Monsoon, which is getting impacted by global warming. Any change in the monsoon good or bad may impact the cotton crop as well as its prices both ways.	_	It can negatively affects company's financial performance

4.	Environmental Footprint - Water	R	Water scarcity can impair the company's operations	during emergency situation. Employee education for	Negative Implications
	Management		and disrupt business.	saving water and making efficient use of water in units, Rain water harvesting, recycling of waste water	
5.	Environmental Footprint - Waste Management	R	Inadvertent non- compliance to existing and emerging regulations around recycling and the circular economy can result in economic penalties and reputation damage.		Negative Implications
6.	Human rights	R	Human rights violations or non-compliance with statutory norms can lead to loss of reputation.	has defined policies and guidelines to ensure that principles of human rights are followed in word and spirit. The company ensures that all those connected with company's workplace, supply chain and distribution chain are treated with respect, dignity and fairness.	
7.	Corporate Governance – Board oversight, Conflict of Interest, Ethics, Risk and Compliance, Succession Planning	R	Effective compliance to the corporate governance is core to achieving the organization's mission and goals. The non compliance of SEBI (LODR) Regulations,2015 and other rules and regulations can undermine	Annexure-V to the Board's report for the annual report on Corporate Governance	Negative Implications

			stakoholdar trust damaga	1	1
			stakeholder trust, damage		
			reputation and disrupt business.		
8.	Environment, Health &	R	Emissions and hazardous	1 The Company	Risk of potential health
ο.	-	, n		has ISO 14001:	hazards and/ or
	Safety (EHS)		wastes may result in		•
			operational disruptions.	2004	accidents due to non
				(Environmental	compliance with
				Management	defined EHS norms
				Systems)	and guidelines
				certified.	resulting in production
				2. The Company	· · · · · · · · · · · · · · · · · · ·
				has in place	financial losses and
				sound	statutory fines /
				Governance	penalties
				policies and	
				procedures for	
				EHS, including	
				monitoring by	
				Senior	
				Management.	
				3. The Company	
				is committed for	•
				protection and	
				restoration of	
				the	
				environment.	
				The Company	
				treats all its	
				post-process	
				water in its	
				effluent	
				treatment plant	
				and further	
				purifies it via	
				reverse osmosis	
				before returning	
				it to the	
				environment,	
				implying Zero	
				discharge.	
9.	High Intensity of Noise	R	Machines Continuously	Company has	No Material Financial
	Pollution		Running on High Speed	provided ear	implication.
			create high intensity of	plugs to its	
			noise.	employees for	
				working in a	
				noise free and	
				soothing	
				environment	
L				C.IIII GIIIII CIIC	

#### 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.

The National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs) released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These briefly are as follows:

- P1 Business should conduct and govern themselves with Ethics, Transparency and Accountability
- P2 Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle
- P3 Businesses should promote the wellbeing of all employees
- P4 Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized
- P5 Businesses should respect and promote human rights
- P6 Business should respect, protect, and make efforts to restore the environment
- P7 Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner
- P8 Businesses should support inclusive growth and equitable development
- P9 Businesses should engage with and provide value to their customers and consumers in a responsible manner

Dis	closure Questions	Р	Р	Р	Р	Р	Р	Р	Р	Р
		1	2	3	4	5	6	7	8	9
Pol	icy and management processes									
1.	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Υ	Υ	Y	Y	Υ	Υ	Υ	Y	Υ
	<ul><li>b. Has the policy been approved by the Board? (Yes/No)</li></ul>	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ
	c. Web Link of the Policies, if available		e polic osite i			wmn	ahar.d		-	-
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ
4.	Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fair trade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	• I	Contro & GRS BCI Ce Fair Tr Oeko- ISO-90 BEPI HIGG	S ertific rade ·Tex (	ation Certifi	catio		of G	iOTS,	OCS
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	N	N	N	N	N	Y	N	N	N

6.	Performance of the entity against the specific	NA	NA	NA	NA	NA	$Y^1$	NA	NA	NA
	commitments, goals and targets along-with						(See			
	reasons in case the same are not met.						Note)			

### Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements:

I am pleased to share our Business Responsibility and Sustainability Report (BRSR) for the FY 2023-24. The Report aims to inform you of our sustainability performance. We are committed to sustainable growth by delivering products that meet the evolving needs of our overseas & domestic customers while minimizing their impact on the environment. We firmly believe that sustainability and profitability go hand-in-hand.

In present time, the success of the business is not only measured in financial terms, but also whether the business has integrated ESG (Environmental, Social and Governance) into their business. The business can succeed and sustain its good performance, if society thrives. The company is committed to making the business truly sustainable and socially responsible and is focusing to address diverse social and environmental challenges by taking steps on Environmental issues, Waste Recycling, Health & Safety, Ethics & Governance. The company support and promote community development and environmental protection.

8.	Details of the highest authority responsible for	Name: Mr. Dinesh Oswal
	implementation and oversight of the Business	Designation: Managing Director
	Responsibility policy (ies).	DIN: 00607290
9.	Does the entity have a specified Committee of	The Board of Directors of the company is
	the Board/ Director responsible for decision-	responsible for managing the sustainability
	making on sustainability-related issues? (Yes /	issues of the company.
	No). If yes, provide details.	The Board is supported by:
		Corporate Social Responsibility committee
		Risk Management Committee

Note: Y1

- The company's goal is to use maximum solar power in its spinning units. The Company has already installed 8.655 M.W. Roof Top Solar Plant at its spinning units at Village Lalru and Lehli, Distt. S.A.S.Nagar, Village Jitwal Kalan, Distt. Sangrur, Village Jodhan, Distt. Ludhiana and Village Simrai, Mandideep, Distt. Raisen(M.P.). The company is in the process of installing 3.00 M.W solar plant at company's spinning at village jitwal kalan, Distt. Sangrur. After completion of the said project, company's total roof top plant capacity will stand increased to 11.66 M.W. These Roof Top Solar Plants are generating clean & green energy and saving environment too. This has also resulted in saving of electricity cost to the company.
- The Company is replacing old machines with ultra-modern machines which are fitted with energy efficient motors. These modern machines help in lowering the power consumption and thus saving energy.
- The Company has installed digital flow meter in every bore well and taps are being checked on routine basis. In case any leakage is found, actions are taken immediately. The company has installed pizo meter to keep check on the ground water. The company has also taken initiatives to recharge rain water and installed rain water recharging pits in all of its units and has thus saved water as well as energy by improving ground water table.
- The company has upgraded waste collection system and yarn conditioning plant which will lead to
  extensive power saving at company's spinning unit at village Jitwal Kalan, Distt. Malerkotla.

10. Details of R	eviev	v of	f NG	RBC	s by	the C	omp	oany	:									
Subject for Review		Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee													y/			
	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	comr	of E mitt	irec tee r	tors evie n so	. Add ws t	lition he co and e	ally, de o	aud of bu	Board it siness ental	ar	nd po polic guid	olicie cies t leline	there s. The o alig es. The e rev	e con n wit e pol	npan th ne icies d at l	y cha w rul linke	nges les ar ed wit	the nd th
Compliance with statutory requirements of relevance to the principles, and rectification of any non- compliances	Stat	The Board of Directors reviews the Statutory Compliances on applicable laws.										C	(uart	erly				
11. Has the assessment/ ev	aluat	ion	of t	he v		ing c	of its	pol		P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
of the agency.	agene	.y:	(103	, 140)	, 11 y	cs, μ	1001	uc 11	unic	N	Ν	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	Р9
The entity does not consider the Principles material to its business (Yes/No)  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)				Not	: Арр	licab	le		
It is planned to be done in the next financial year (Yes/No) Any other reason (please specify)									

# SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

**Governance:** The Company continues to practice the principle of good Corporate Governance. It is Company's firm belief that good CORPORATE GOVERNANCE is a key to success of business. The Company believes in the conduct of the affair in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior in the organization. The Company has a Code of Conduct for its Directors, Senior Management Personnel. Their affirmation to the Code of Conduct is communicated to all stakeholders by Managing Director, through a declaration in the Annual Report. The Company's Employees also abide by the Code of Conduct, which prohibits abusive, corrupt and unfair practices. The company has Vigil mechanism / Whistle blower policy for directors and employees.

The Company communicate about the access of information about any decision that may impact any of the relevant stakeholders and fairly discloses all necessary legal and financial disclosures and disseminates it to the stakeholders through the Stock Exchanges, Company's website, Annual Report, Newspapers, etc. To ensure accountability and monitoring, the Board has constituted various committees such as the Audit Committee, Nomination and Remuneration Committee, Stakeholders' Relationship Committee, Corporate Social Responsibility Committee. These committees meet periodically during the year to supervise, review performance and advice for corrective direction.

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information: The Company has established a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and is cognizant of its responsibility towards protecting and maintaining the confidentially and disclosure of price-sensitive information in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information not only conforms to the regulatory requirements but also instils a sense of responsibility among the designated persons for protecting and maintaining confidentiality.

**Grievance Redressal Mechanism:** The Company has effective grievance redressal mechanism for receiving and dealing with the concerns, complaints of its stakeholders. The buyer / consumers can raise their concerns through emails, call or personal meetings. The Committee on Prevention of Sexual Harassment (POSH) addresses all sexual harassment complaints. The Company has received no complaints on sexual harassment during the reporting year. The company has designated email id gredressalnsml@owmnahar.com for receiving and addressing investor grievances.

		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	% age of persons in respective category by the awareness programs							
Board of	2	The company's BRSR framework- (NGBRCs	100%							
Directors		principles 1-9) conducted by Mr. Darshan Chhajer, partner of BGJC & Associates LLP, Chartered Accountants, New Delhi, Amendments in SEBI(LODR) Regulations, 2015 and Companies								

		Act, 2013	
Key Managerial Personnel	2	The company's BRSR framework- (NGBRCs principles 1-9) conducted by Mr. Darshan Chhajer, partner of BGJC & Associates LLP, Chartered Accountants, New Delhi, Amendments in SEBI(LODR) Regulations, 2015 and Companies Act, 2013	100%
	6	Fire Fighting Drills	100%
Employees	6	Use of PPE's Training	100%
other than BoD	6	Health & Safety Training	100%
and KMPs	4	Ergonomic Training	100%
	6	Chemical Handling	100%
Workers	6	Human Right Issues	100%

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

	Monetary											
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)							
Penalty/ Fine	NIL	NA	NA	NA	NA							
Settlement	NIL	NA	NA	NA	NA							
Compounding fee	NIL	NA	NA	NA	NA							
		Non-Mone	tarv									

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

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 re-enforcement agencies/ judicial
	institutions

#### **NOT APPLICABLE**

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

Yes, the company has anti-corruption or anti-bribery policy. The company is committed to upholding the highest moral and ethical standards. The company does not tolerate bribery or corruption in any form. Accordingly, zero-tolerance approach towards bribery and corruption applies in all its operations and prohibits any kind of bribery. The company has code of conduct for its Directors, Key Managerial Personnel and Senior Management Personnel. Their affirmation to the code of conduct is communicated to all stakeholders by Managing Director, through a declaration in the Annual Report. The company's

employees also abide by the code of conduct, which prohibits corrupt and unfair practices.

- 5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption: Nil
- 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	Nil	N.A	Nil	N.A
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	N.A	Nil	N.A

- 7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest. Not Applicable
- 8. Number of days of accounts payables (Accounts payable \*365) / Cost of goods/services procured) in the following format:

	FY 2023-24	FY 2022-23
Number of days of accounts payables	8 days	11 days

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
a. Concentration	a. Purchases from trading houses as % of total	89.54%	78.38%
of Purchases	purchases		
	b. Number of trading houses where purchases	722	776
	are made from		
	c.Purchases from top 10 trading houses as % of	74.65%	75.38%
	total purchases from trading houses		
b.Concentration	a. Sales to dealers / distributors as % of total	24.06%	26.99%
of Sales	sales		
	b.Number of dealers / distributors to whom	46	46
	sales are made		
	c.Sales to top 10 dealers / distributors as % of	16.34%	22.90%
	total sales to dealers / distributors		
c. Share of RPTs	a.Purchases (Purchases with related parties /	0.39%	0.62%
in	Total Purchases)		
	b.Sales (Sales to related parties / Total Sales)	1.66%	2.06%
	c. Loans & advances (Loans & advances given	_	
	to related parties / Total loans & advances)		100%
	d.Investments(Investments in related parties/	59.53%	7.45%
	Total Investments made)		

#### Notes:

- Trading house is business entity that deals in the products but are not their manufacturers
- Nil Distributors, No distributor has been appointed by the company.
- In exports, company is selling directly to overseas buyer or through agents

### **Leadership Indicators**

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

Total number of awareness Programs held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness Programs
NIL	NIL	NIL

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.

The company is engaged in the manufacturing and exports of textile products i.e. yarns and knitted garments to several countries of the world. The working and systems being followed by the company are such that conflict of interest involving member of the Board and KMPs does not arise. Moreover, Directors of the Company are required to disclose to the Board, on an annual basis, whether they, directly or indirectly, have any material interest in any transaction or matter directly affecting the Company and the company has code of conduct for its Directors, Senior Management Personnel which helps in avoiding the conflict of interest. The policy is available on our website and can be viewed at http://www.owmnahar.com/spinning/pdf/spinning-code-conduct1.pdf

# PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE:

The Company continued its efforts to adopt more sustainable raw material and process to expand the offering of sustainable products. Emphasis is given on manufacturing sustainable products like 100%, organic cotton yarn and BCI yarn. The Company has a dedicated, experienced design team comprising of professional closely tracking the global trend.

### **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.

Category	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D	0.32	0.43	The company has been able to produce high quality yarns with low energy (in units)
Сарех	0.07	0.21	and has thus helped in saving the environment too.

- 2. a. Does the entity have procedures in place for sustainable sourcing: Yes
- b. If yes, what percentage of inputs were sourced sustainably?

- The Company is using sustainable fibres like cotton, organic cotton, fair trade cotton, BCI cotton, recycled Polyester, liva (viscose), modal, tencil and bamboo fibre. We have consumed more than 50% sustainable fibre of the total fibre consumed.
- The Company ensures that the dyes and chemicals in dye house are Azo free, NPEO and APEO phenyls, and formaldehyde 100% free.
- 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.

Sr.NO	Material	Mode	Description
1	Plastics	Recycle	Under Extended Producer Responsibility (EPR) program through registered recycler under plastic waste management act
2	E-waste	Recycle	Scrap of E-waste being sold to registered recycler under government regulations.
3	Hazardous Waste	Treatment/ Safe disposal	ETP sludge is being dried and sent to Re-Sustainability Limited in notified place, at Village Ninbua, Tehsil Derabassi, Distt. Mohali, Punjab for safe disposal of sludge.  Used/Spent Oil, discarded empty drums sent to authorized vendor for recycling.
	• Batteries	Buyback	Disposed under buy back policies with OEM.
4	Other Waste		
	• Waste Water	Recycle	Waste water is treated and recycled back into process for resource conservation. The Company has also taken initiatives to recharge rain water and installed rain water recharging pits in all of its units and has thus saved water as well as energy by improving ground water level.
	Other Non- Hazardous Waste	Recycle	Sent to authorized vendor for 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.

The company is responsible for safe disposal of the waste generated during production process. For this purpose the company has signed agreement with the agencies approved by the State Pollution Control Board for disposal of ETP sludge and E waste. The plastic waste is also sold to buyers approved by the State Pollution Control Board.

#### **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?

No life cycle perspective /assessment (LCA) has been done.

- 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. 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).

%age of Recycled or Reused input material to total material (by value)	
FY 2023-24	FY 2022-23

Recycled Material	0.57	0.202
Reused Material	3.45	3.32

# 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:

NIL NIL NIL	Safely Disposed 320.087 1.41 438.345 8.602	Re-Used  NIL  NIL  NIL	NIL NIL NIL	Safely Disposed 324.662 0.486 455.79
NIL	1.41	NIL NIL	NIL	0.486
NIL	438.345	NIL		
			NIL	455.79
NIL	4.175	NIL NIL	NIL NIL	1.102 0.360
	29706.383 1760.642	3542.06 NIL	NIL 212.43	26198.64 1133.668
9	92 NIL 217.217			

# 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	
NIL		

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

Beyond Balance Sheet lies Company's singly biggest Asset Human Resources. The Company is of firm belief that the Human Resources are the driving force that propels a Company towards progress and success. The Company continued its policy of attracting and recruiting the best available talent so that it can face business challenges ahead. The Company also offers attractive compensation packages to retain and motivate the professionals so that they can give their best.

The Company's continuous endeavor is to provide a safe, productive and positive environment for our employees that are free from any form of discrimination, including but not limited to sexual harassment. The company always supports its workforce so that they can maintain a healthy work-life balance and develop their professional as well as personal skills.

The Company endeavors to provide equal opportunity to each individual by evaluating him/her on its performance and ensure that there is no discrimination amongst its employees based on caste, creed, religion, disability, gender, age, sexual orientation, race, colour, ancestry, marital status and medical background. The Company has received no complaints related to Sexual harassment, Discriminatory employment, child labour, forced labour or any form of involuntary work.

# **Essential Indicators**

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

Category	% of employees covered by											
	Total (A)	Hea Insur	_	Accide Insurai			ernity efits			ernity efits	_	Care
		Num ber (B)	% (B/A)	Num ber (C)	% (C/A)	Num ber (D)	% (D/A			% (E/A)	Num ber (F)	% (F/A)
				Peri	manent	Employe	ees					
Male	1672	1672	100	1672	100	-		-			1672	100
Female	53	53	100	53	100	53		100	N.A.		53	100
Total	1725	1725*	100	1725	100	53*	** 3	3.07			1725#	100

### **Other than Permanent Employees**

Male	
Female	N.A.
Total	

<sup>\*</sup>Covered through ESI and some employees who are exempted from ESI are getting medical allowances

**Total** 

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

Catego		% of workers covered by									
ry			Health Accider nsurance Insuran				ernity nefits	Paternity Benefits		Day Care Facilities	
		Numbe r (B)	% (B/A)	Num ber (C)	% (C/A)	Num ber (D)	% (D/A)	Num ber (E)	% (E/A)	Numb er (F)	% (F/A )
				Per	manent	t Workers	3				
Male	5541	5541	100	5541	100	-	-			5541	100
Female	3178	3178	100	3178	100	3178	100	\ 	I.A.	3178	100
Total	8719	8719*	100	8719	100	3178**	36.45			8719#	100
	Other than Permanent Workers										
Male											
Female						N.A.					

\*Covered through ESI and some employees who are exempted from ESI are getting medical

<sup>\*\*</sup>Maternity Leave (With Full Salary for 6 Months) to those female who are exempted from ESI and the females covered under ESI paid through ESI-organization.

<sup>#</sup> Have Creches in all units

#### allowances

\*\*Maternity Leave (With Full Salary for 6 Months) to those female who are exempted from ESI and the females covered under ESI paid through ESI-organization.

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 wellbeing		
measures as a % of total	0.096	0.097
revenue of the company		

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

		,						
Benefits	F	Y 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/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	99	100	Υ	100	100	Υ		
Gratuity	100	100	Υ	100	100	Υ		
ESI	43	97	Y	54	98	Υ		
Others		Nil			Nil			

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

All the premises / offices of the entity are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

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

Yes, the company has Equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016 and can be accessed at http://www.owmnahar.com/spinning/pdf/policy-for-disabled-person.pdf. The company has employees and workers with disabilities who are treated at par with other employees and workers as per the company equal opportunity policy.

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

	Permanent	employees	Permanent employees			
Gender	Return to Work	Retention Rate	Return to Work	Retention Rate		
	Rate		Rate			
Male	0	0	0	0		
Female	0	0	0	0		
Total	0	0	0	0		

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): Yes

<sup>#</sup> Have Creches in all units

### Permanent Employees/Workers

- The Company has established a whistleblower policy/vigil mechanism to address the issues relating to ethics, bribery, corruption, sexual harassment or any discrimination of permanent employees and other than permanent employees. For this purpose the Company has a dedicated e-mail id i.e. whistleblowernsml@owmnahar.com.
- The company's Vigil mechanism empowers the employees and other stakeholders who have concerns about suspected misconduct, unethical behaviour, actual or suspected fraud or violation of the Code of Conduct or ethics policy, to come forward and express their concerns without fear of punishment or unfair treatment.
- The company has also established Grievance Committee. The employees and workers can address their grievances to the committee.
- The company has placed complaint boxes in the company's units at prominent places and employees and workers can also use complaint box in case of any kind of complaint.
- The company has set up open door policy under which any worker or staff member can approach Production head or Labour Welfare Officer or Vice President (Personnel) and can raise their concerns or complaint.

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

Category		FY 2023-24		FY 2022-23				
	Total employe es / workers in respecti ve category (A)	No. of employees /workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees /workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D / C)		
Total Permanent Employees - Male - Female  Total Permanent Workers - Male - Female  - Female				h Association/l				

Category	tegory FY 2023- 2024 FY					FY 20	022- 2023	3			
	On health & safety					On health	& safety	On skill upgradation			
		measure					measures			a. (=)	
	Total (A)	No. (B)	% (B/A)	No. (C)	% (C/A)	Total (D)	No. (E)	% (E/D)	No. (F)	% (F/D)	
Employees											
Male	1672	1474	88.16	764	45.69	1635	410	25.08	433	26.48	
Female	53	50	94.34	20	37.74	53	20	37.74	18	33.96	
Total	1725	1524	88.35	784	45.45	1688	430	25.47	451	26.72	
Workers											
Male	5541	4244	76.59	2732	49.31	5414	2230	41.19	2425	44.79	
Female	3178	2944	92.64	2070	65.14	2766	968	35.00	952	34.42	
Total	8719	7188	82.44	4802	55.08	8180	3198	39.10	3377	41.28	

<sup>\*</sup> During the year under review, the Company has also conducted various other training programs, designed to meet the changing skill requirements of our employees/workers. These programs include Fire Fighting Drills, First+ Aid Training, Use of PPE's Training, Ergonomic Training and Chemica Handling Training. For mid-level and senior level executives management development program are also conducted to upgrade their knowledge and management skills.

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

Category		FY 2023- 2024	ļ	FY 2022- 2023						
	Total (A) No. (		No. (B) % (B/A)		No. (D)	% (D/C)				
	Employees									
Male	1672	639	38.22	1635	96	5.87				
Female	53	16	30.19	53	4	7.54				
Total	1725	655	37.97	1688	100	5.92				
			Workers							
Male	5541	1060	19.13	5414	488	9.00				
Female	3178	696	21.90	2766	426	15.40				
Total	8719	1756	20.14	8180	914	11.17				

### 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?

Keeping in view the nature of the industry, the company has well defined Occupational health and Safety Policy and supporting processes to ensure the safety and well being of its employees and workers. The company has Health and Safety Committee. The Meeting of the committee is held once in every 3 months by Elected Members, Management Representative and Workers for educating them on health and safety systems. Moreover workshops/training program conducted on skill development.

# 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 is engaged in the manufacturing of yarns as well as garments. The company has risk management system in place. The company identifies the occupational health and safety risks, for its business activities, processes, products or services and access the risk on routine basis.

### C. Whether you have processes for workers to report the work related hazards and to remove

#### themselves from such risks.

The company periodically educating and providing training to workers regarding benefits of using PPE'S, Getting Annual Medical Checkup of workers working in sensitive areas. The company has reporting risk management system and all the workers can report all work-related incidents (which include accidents, unsafe conditions and unsafe acts). The company investigate and takes necessary corrective actions so that such incident would be eliminated.

# D. Does all the employees/ workers of the entity have access to non-occupational medical and healthcare services? (Yes/ No):

The company recognizes the overall physical and mental well being of its employees and workers. The company undertakes several well-being programs for the mental health, physical health, safety at home, hospital services, occupational health services and organizes medical camps for their employees and workers.

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

Safety Incident/ Number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR)	Employees	Nil	Nil
(per one million-person hours worked)	Workers	3	Nil
Total recordable work-related injuries	Employees	1	Nil
	Workers	37	Nil
No. of fatalities	Employees	0	Nil
	Workers	1	Nil
High consequence work-related injury or	Employees	Nil	Nil
ill-health (excluding fatalities)	Workers	Nil	Nil

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

The Company always make efforts to provide a safe, productive and positive environment for employees/workers. The company has also taken several measures to prevent and mitigate significant occupational health & safety impacts which are given hereunder:

- Provision and maintenance of fire detection, alarm and suppression systems
- Regular site review, inspections and audits to assess safety preparedness
- Regular mock drills for fire as well as medical emergencies
- Employee engagement campaigns on health & safety topics such as fire safety, road safety, emergency evacuation etc.
- Regular meetings and training educating workers and employees regarding safety and healthy workplace.

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 resoluti on at the end of year	Remarks	
Working Conditions	Nil	Nil	N. A	Nil	Nil	N. A	
Health & Safety	Nil	Nil	N. A	Nil	Nil	N. A	

#### 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 Safety at the workplace/ office premises is one of the highest priority of the company. The company has established systems to address safety related incidents, if any. Moreover the company is undertaking safety inspections including installation and checking of fire fighting equipments, educating and providing required PPE'S to workers, conducting St. John ambulance training Program for workers and educating them about using PPE's at regular intervals. The deviations/gap and findings, if any, are identified and corrective actions are taken to improve upon the systems.

## **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
- 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 educates the value chain partners so that they deduct statutory dues and deposit with the Authority as per applicable laws, rules and regulations. In case of any difficulty by the value chain partner they can approach the company for help. Further, some value chain partners have also submitted certificate to the company, in respect of compliance with statutory rules and regulations applicable to them.

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

	Total no. o employees	of affected s/workers	No. of employees th and placed in suital whose family membe in suitable e	ole employment or ers have been placed		
	FY 2023-24	FY 2022-23	FY 2023-24 FY 2022-			
Employees	N	lil	N	1		
Workers	IN IN	111	IN	II		

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

The company has no transition assistance program. However the company's continued skill development and up gradation during their working career helps the employees/workers in their employment after retirement.

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	Nil
Working Conditions	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.

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 as well as external stakeholders to deepen its insights into their needs and expectations and to develop sustainable strategies for the short, medium and long term. Key stakeholders identified by the Company are Shareholders/Investors, Government and Regulators, Employees, Customers and Suppliers.

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

stakenoider gi	•		Т	
Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board) Other	Frequency of engagement (Annually, Half yearly, Quarterly, others- please specify)	Purpose and scope of engagement including key topic and concerns raised during such engagement
Shareholders /Investors	No	Meetings conferences and correspondence-The company interacts with Shareholders/Investor s through Financial results Announcement, Annual reports and Meetings. The company's website is updated regularly to provide information to them. The Annual General Meeting provides them opportunity to interact directly with the Directors and Management of the company.	As per the requirement and in compliance of Laws and Regulations applicable to company.	<ul> <li>The company is educating investors regarding company's model and wealth creation.</li> <li>Understanding investors expectations</li> <li>Resolving investors concerns regarding company's policies, strategy etc.</li> </ul>
Government and Regulators	No	Email, E filling Newspaper, Advertisement, Website	The company meets/interacts with the government authorities as and when required during the course of its business.	<ul> <li>Communicate         Company's         performance and         ensure 100%         compliance to Rules         and Regulations         applicable to the         company.</li> <li>Maintain Statutory         Records as per the         requirement of the         laws applicable to         the company.</li> </ul>
Employees/	No	Video conferences,	The company	■ To boost their

Workers		audio conference calls, Inter office memos, one- on-one counseling, Email, Website, Meetings	engages with its employees/workers on regular basis.	morale and motivate them to perform in their work.  Compensation structure Building a safety culture and inculcating safe work practices among workers/employee. Provide equal opportunities for them To nurture talent and develop their creativity.
Customers	No	Email, Customer visits, brochures, advertisements, website, calls, surveys	The company's sale staff/marketing staff meets them as per the requirement on regular basis.	<ul> <li>Understanding consumer behavior and their needs/requirement s regarding quality and usefulness of the company's product.</li> </ul>
Suppliers	No	Meetings/Calls, Email, Visits, Website	The company meets its supplier as per the needs/requirement.	<ul> <li>To know about their ability and financial strength for regular supply of material in time and without any interruption.</li> <li>To develop Stronger Partnership</li> <li>Ethical Behaviour</li> </ul>

### **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.

As a good corporate, company continues to take care of our all stakeholders: customers, employees, shareholders, business partners and above all the planet and society. The consultation on Economic, Environmental, and Social topics has been delegated to the respective departments who are responsible for engaging with stakeholders on continuous basis. The feedback of the department is shared with the Board.

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.

The consultation with the stakeholders always helps the company in devising company's policy on

economic, environmental, and social topics.

Permanent

1725

94

5.45

1631

94.55

1688

53

3.13

1635

96.86

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

The Company tries to identify the disadvantaged, vulnerable and marginalized stakeholder groups through need assessment and engage with such marginalized communities through CSR Activities. The Company is committed to the welfare of disadvantaged, vulnerable and marginalized section of the society. The Company through self and in association with M/s Oswal Foundation has taken special initiatives for the benefit of local communities and other disadvantaged and marginalized stakeholders. The Company's endeavour is to help them in Healthcare, Education, and Sustainable Livelihood etc. All the projects undertaken CSR activities are based on the needs of the communities. The Company's vision, in a nutshell, epitomizes inclusive growth and dignifying the lives of the underprivileged.

#### PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

The Company advocates the supremacy of Human Rights, and all its policies acknowledge the same principle. Your Company's human rights policy recognizes the following priority issues:

Compliance with applicable labour laws, zero tolerance to the child, forced or compulsory labour in operations and supply chains, equal opportunity, provide opportunities for all employees to express concerns and seek redressal, health and safety of our employees. No complaints were received regarding human rights violation during the financial year under review.

			Ess	ential Inc	dicators					
1. Employees in the following		been prov	vided tra	aining on	human	rights issu	ues and	policy(ie	es) of the	entity,
Category	Ī	FY	2023-24	1			F	Y 2022-2	23	
	Total (A	emp wo	o. of loyees, orkers ered (B)	% (	B/A)	Total (C	em <sub>l</sub>	lo. of ployees, orkers ered (D)		(C/D)
	l .	I.		Emplo	oyees			• •	<u>,                                    </u>	
Permanent	1725	1	406	81	51	1688		1688		100
Other than Permanent	_		_		_	_		_		_
Total Employees	1725	1	406	81	51	1688	688 1688		-	100
				Wor	kers		•			
Permanent	8719	5	867	67	'.29	8180		7853		96
Other than Permanent	_		_		_	_		_		_
Total Workers	8719	5	867	67	7.29	8180		7853		96
2. Details of m	ninimum w	ages paid	to emp	loyees in	the follo	wing for	mat:		<u>,                                    </u>	
Category		FY 2	2023-24				F	Y 2022-2	.3	
	Total (A)	Equa Minir Wa	num	More Minin Wa	-	Total Equal to More than (D) Minimum Minimum Wage Wage				mum
		No.(B)	% (B/A)	No.(C)	% (C/A)		No.(E)	% (E/D)	No.(F)	% (F/D)
				Emple	oyees					

Male	1672	84	5.02	1588	94.98	1635	50	3.00	1585	96.94
Female	53	10	18.87	43	81.13	53	3	5.66	50	94.33
Other than										
Permanent					NII	ı				
Male					NI	L				
Female										
				Wo	rkers					
Permanent	8719	4895	56.14	3824	43.86	8180	6285	76.8	1895	23.16
Male	5541	2755	49.72	2786	50.28	5414	3868	71.44	1546	28.55
Female	3178	2140	67.34	1038	32.66	2766	2417	87.38	349	12.61
Other than										
Permanent	NIII									
Male		NIL								
Female										

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

		Male	Female			
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category		
*Board of Directors (BoD) (including MD)	9	40,000	1	40,000		
Key Managerial Personnel	2	2946799	_	_		
Employees other than BoD and KMP	1672	326520	53	240144		
Workers	5541	183108	3178	170712		

<sup>\*</sup> Board of Directors are being paid Rs. 10,000 for attending Board Meeting.

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	30.15%	27.00%

- **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 appointed Vice President (personnel) and Labour Welfare Officers who are responsible for addressing the human rights impacts or issues caused or contributed to by the business.
- 5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

The company has formulated and adopted Vigil Mechanism/Whistle Blower Policy for its directors and employees/workers and value chain partners. The aim of the policy is to provide a channel to the directors and employees/workers to report their genuine concerns about unethical behavior, actual or suspected fraud or violation of the code of conduct. Reporting avenues have been provided for company's employees, customers, suppliers and other stakeholders who can raise concerns or make disclosures when they become aware of any actual or potential violation of the Company Code, policies or law including human rights violation. Representations made in the reporting avenues are reviewed and appropriate action is taken on violations.

6. Number of Complaints on the following made by employees:					
	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
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of	0	0
female employees / workers		
Complaints on POSH upheld	0	0

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

All complaints can be made without fear of reprisal and with the assurance that the Company will stands by you. The company does not tolerate any form of retaliation against anyone reporting good faith concerns. Anyone involved in targeting such a person raising such complaints is liable for disciplinary action. The company has formulated and adopted Vigil Mechanism/Whistle Blower Policy for its directors and employees/workers to prevent adverse consequences to the complainant in discrimination and harassment cases. In Exceptional circumstances, the complainant can also approach to the chairman of Audit Committee.

# **9.** Do human rights requirements form part of your business agreements and contracts? (Yes/No) The Company always advocates the supremacy of Human Rights.

### 10. Assessments for the year:

	% of your offices that were assessed (by entity or	
	statutory authorities or third parties)	
Child labour	100% assessed. Regular audits are conducted by	
Forced/involuntary labour	third parties on request of Brands. Moreover, the	
Sexual harassment	company has also internal system for monitoring	
Discrimination at workplace	compliance of all relevant laws and policies	
Wages	pertaining to these issues. No adverse	
Others – please specify	observation was observed during the financial	
	year 2023-24.	

# 11. Provide details of any corrective actions taken or underway to address significant risks / concerns

#### arising from the assessments at Question 9 above: Not Applicable

#### **Leadership Indicators**

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

The company is committed to providing a safe and positive work environment. This is achieved through a well-established Grievance Resolution Mechanism. The Company advocates the supremacy of Human Rights and all its policies acknowledge the same in principle and spirits.

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

The Company's Human rights policy recognizes the following priority issues:

- Compliance to labour laws,
- Zero tolerance to the child, forced or compulsory labour in operations and supply chains,
- Equal opportunity for all employees,
- Provide opportunities for all employees to express concerns and seek redressal,
- Health and Safety of our employees/workers/staff.
- 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?

All the offices and workplace are accessible to differently abled visitors as per the requirement of Rights of Persons with Disabilities Act, 2016.

workplace in respect of wages and working hours

and other welfare matters.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	The company exports garment to reputed
Forced/involuntary labour	International Brands. The accessories and other
Sexual harassment	material are procured through approved,
Discrimination at workplace	nominated and validated vendors. These vendors
Wages	are audited by independent external parties
Others – please specify	appointed by the garment brands. This ensures
	compliance to human rights issues of the
	companies' value chain partner. Further, some
	value chain partners have also submitted
	certificate to the company, confirming to the
	compliance with Human Rights issue like No child
	labour/forced labour/involuanry labour, no
	Sexual harassment and no discrimination at

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:

As a responsible corporate entity, company is fully aware of its obligation and responsibility to maintain highest standard of Environmental Management, as the climate changes and Global Warming are posing great threat to the global environment and to the Human kind. The company uses multiple energy sources in its daily operations and electricity being the primary source. The

company has increased the share of renewable electricity (RE) over the years through Rooftop solar generation. The Company has set up Roof top solar plants at its Spinning Units at different location in the state of Punjab and Madhya Pardesh.

Parameter	FY 2023-24	FY 2022-23	
	(Giga Joules)	(Giga Joules)	
From renewable sources			
Total electricity consumption	0	0	
(A)	0	0	
Total fuel consumption (B)	622000	601000	
Energy consumption through	24,000	24000	
other sources (C)	31000	24000	
Total energy consumed from	653000	625000	
renewable sources (A+B+C)			
From non-renewable sources			
Total electricity consumption	1460000	1099000	
(D)			
Total fuel consumption (E)	12000	0.00	
Energy consumption through	0	0	
other sources (F)			
Total energy consumed fromnon-	1472000	1099000	
renewable sources (D+E+F)			
Total energy consumed	2125000	1724000	
(A+B+C+D+E+F)			
Energy intensity giga joules per	0.0000697	0.0000616	
rupee of turnover (Total energy			
consumed / Revenue from			
operations)			
Energy intensity giga joules per \$			
(Dollar) of turnover adjusted for			
Purchasing Power Parity (PPP)	0.00159	0.00141	
(Total energy consumed / Revenue			
from operations adjusted for PPP)			
Energy intensity in terms of	20.40	23.105	
physical output (Giga Joules per			
m.ton of Spinning Production)			
Energy intensity (optional) – the	0.00	0.00	
relevant metric may be selected			
by the entity			

assessment/ external agency.

Note: Indicate if any independent The independent assessment/ evaluation/Energy Audit has evaluation/assurance been carried out by Namdhari Eco Energy Pvt. Ltd. in the year has been carried out by an external 2021. The Audit has been carried out once in every three agency? (Y/N) If yes, name of the years. The company has appointed M/s Innovative Energy conservation solutions, Punjab for conducting the next audit which is due in November 2024 / January 2025.

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.

Yes, Sites of the company have been identified as designated consumer (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India. All the sites / facilities of the company had achieved the targets set under the PAT scheme and awarded Energy Saving Certificates (EScerts).

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

The company optimizes water consumption through conservation, sewage treatment and reuse, and rainwater harvesting. All units have been designed for higher water efficiencies, recycling and treatment of sewage, and rainwater harvesting. The detailed break up is given below:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kiloliters)		
(i) Surface water	0	0
(ii) Groundwater	1531726	2145913
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal	1531726	2145913
(in kilolitres) (i + ii + iii + iv + v)		
Total volume of water consumption	1531726	2145913
(in kilolitres)		
Water intensity per rupee of turnover	0.0000502	0.0000767
(Water consumed / turnover)		
Water intensity Kiloliters per \$ (Dollar) of		
turnover adjusted for Purchasing Power	0.00115	0.00176
Parity (PPP) (Total water consumption /	0.00220	0.00=7.0
Revenue from operations adjusted for PPP)  Water intensity in terms of physical output	14.71	28.76
(kiloliters per m.ton of spinning production)	14.71	26.70
Water intensity (optional) – the	0.00	0.00
relevant metric may be selected by theentity		
Note: Indicate if any independent assessment/	No independent assessmer	nt/ evaluation has been
evaluation/assurance has been carried out by	carried out by an external	· ,
an externalagency? (Y/N) If yes, name of the	•	the company makes
external agency.	assessment/evaluation of water consumption internally. The company has put electronic flow meters	
	to check the extraction of	
	treated effluent.	mater and discharge of

<sup>\*</sup>The company is maintaining the records on the daily as well as monthly basis of water consumption, it is pertinent to mention here that as and when water is on higher side the company take necessary steps accordingly to reduce the water consumption.

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

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatr	nent (in kilolitres)	
(i) To Surface water	635068	617945
- No treatment		
- With treatment – please specify level of	As per norms of respective SPCB	
treatment		
(ii) To Groundwater	1	NIL
- No treatment		
- With treatment – please specify level of		
treatment		
(iii) To Seawater	ſ	NIL
- No treatment		
- With treatment – please specify level of		
treatment		
(iv) Sent to third-parties	1	NIL
- No treatment		
- With treatment – please specify level of		
treatment		
(v) Others	576833	655584
- No treatment		
- With treatment – please specify level of	As per norms o	f respective SPCB
treatment		
Total water discharged (in kilolitres)	1211901	1273529
Note: Indicate if any independent assessment/	•	ssment/ evaluation has
evaluation/assurance has been carried out by an	-	external agency related to
externalagency? (Y/N) If yes, name of the external	=	However the company
agency.	makes assessment/consumption internally.	evaluation of water

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

- The company has installed a 600 KLD zero discharge system in one of its production facility at Mandideep (M.P). After treatment of effluent in STP, the treated effluent is feed into the two stage filtration system, Ultra filtration system followed by Reverse Osmosis. The treated water is used in the humidification plant of the facility.
- The company has total Six sewage treatment plants at its Spinning units with a total capacity of 2175 K.L / day. The discharged water of these plant is used for horticulture and gardening.

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

The Company has a biomass captive power plant in one of its unit, the plant is registered under clean development mechanism. The company has installed Electro Static precipitator to minimize air

pollution, around 99% of total energy used in this facility is from renewable source of energy in the year 2023-24.

Parameter	unit	FY 2023-24	FY 2022-23
NOx	M.ton	226.046	226.13
SOx	M.ton	9.068	5.098
Particulate matter	M.ton	36.131	40.699
(PM)			
Persistent organic			
pollutants (POP)			
Volatile organic	No.		
compounds (VOC)	Nil		
Hazardous air			
pollutants (HAP)			
Others- Carbon Monoxide		_	_
Percentage			
Note: Indicate if any	Yes, it is monitored on regular basis by external agencies like SPCB,		
independent assessment/	SIMA Lab-Delhi.		
evaluation/assurance has			
been carried out by an external			
agency? (Y/N)			

# 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	Metric		
(Break-up of the GHG	tonnesof CO2		
intoCO2, CH4, N2O,	equivalent	1888.76	1828.84
HFCs, PFCs,	equivalent	1000.70	1020.04
SF6, NF3, if available)			
Total Scope 2 emissions	Metric	29046.475	21857.20
(Break-up of the GHG	tonnesof CO2		
intoCO2, CH4, N2O,	equivalent		
HFCs, PFCs,			
SF6, NF3, if available)			
Total Scope 1 and Scope 2		0.000010	0.0000085
emissions intensity per			
rupee of Turnover			
Total Scope 1 and Scope 2			
emission intensity M.ton			
per \$ (Dollar) of turnover			
adjusted for Purchasing		0.000023	0.000019
Power Parity (PPP) (Total			
Scope 1 and Scope 2 GHG			
emissions / Revenue from			

operations adjusted for PPP)		
Total Scope 1 and Scope 2		
emission intensity in terms		
of physical output (M. ton	0.297	0.317
per ton of spinning		
production)		
Total Scope 1 and Scope 2	0.00	0.00
emission intensity		
(optional)		
– the relevant metric may be		
selected by the entity		
Note: Indicate if any	Yes, the company has deputed	M/S Green stitch
independent assessment/	Technology Pvt. Ltd., to calcula	ite Carbon Emission.
evaluation/assurance has		
been carried out by an		
externalagency? (Y/N) If yes,		
name of the external agency.		

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

- The company's goal is to use maximum solar power in its spinning units. The Company has already installed 8.655 M.W. Roof Top Solar Plant at its spinning units at Village Lalru and Lehli, Distt. S.A.S.Nagar, Village Jitwal Kalan, Distt. Sangrur, Village Jodhan, Distt. Ludhiana and Village Simrai, Mandideep, Distt. Raisen(M.P.).
- The company is in the process of installing 3.00 M.W solar plant at company's spinning at village jitwal kalan, Distt. Sangrur. After completion of the said project, company's total roof top plant capacity will stand increased to 11.66 M.W. These Roof Top Solar Plants are generating clean & green energy and saving environment too. This has also resulted in saving of electricity cost to the company.
- The company's energy usage from renewable sources is around 30% of the total energy used.
- Installation of Zero liquid Discharge Plants on STP, Conservation of water in operation by implementation of various recovery systems helps to reduce water consumption and minimize environmental impact.

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

Parameter	FY 2023-24	FY 2022-23
_		
Tot	al Waste generated (in metric tonn	ies)
Plastic waste <i>(A)</i>	320.087	324.662
E-waste (B)	2.461	0.486
Bio-medical waste <i>(C)</i>	_	_
Construction and demolition	_	_
waste <b>(D)</b>		
Battery waste (E)	4.175	0.36
Radioactive waste (F)	_	_

Other Hazardous waste.		
Please specify, if any <b>(G)</b>		
<ul><li>E.T.P Sludge</li><li>Used Oil</li></ul>	448.385	453.47
	8.602	2.689
Other Non-hazardous waste		
generated. <i>Please specify, if</i>		
any <b>(H)</b>		
<ul> <li>Textile Waste (M.Ton)</li> </ul>	36112	29174
Other Non-hazardous	1760.642	1346.10
waste		
Total (A+B + C + D + E + F + G	38656.494	31301.767
+ H) Waste intensity M. ton per	0.0000127	0.0000112
rupee of turnover (Total waste	0.0000127	0.0000112
generated/Revenue from		
operations)		
Waste intensity M.ton per	0.000029	0.0000257
\$(Dollar) adjusted for	0.00023	0.0000237
Purchasing Power Parity (PPP)		
(Total waste generated/		
Revenue from operations		
adjusted for PPP)		
Waste intensity in terms of	0.371	0.419
physical output (M.ton per ton		
of spinning production)		
Waste intensity (optional) –	0.00	0.00
the relevant metric may be		
selected by the entity		
	enerated, total waste recovered t	
	recovery operations (in metric to	onnes)
Category of waste	10.000	0.00
(i) Recycled (ii) Re-used <b>M. Ton</b>	19.696	0.00
(iii) Other recovery operations	4840.592 217.217	3542.064
Total (M. Ton)		212.430
For each category of waste gener	5077.505	3754.494
metric tonnes)	ateu, totai waste uisposeu by Ilai	ure of disposal illetitod (III
Category of waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations		
a) Plastic Waste	320.087	324.662
b) E. Waste	1.41	0.486
c) Battery Waste	4.175	0.360
d) E.T.P Sludge	438.345	455.790
e) Used Oil	8.602	1.102
f) Textile Waste	29706.383	26198.640
g) Other Waste	1760.642	1346.10
Total (M. Ton)	32239.644	28327.14

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

No independent assessment/ evaluation has been carried out by an external agency related to waste management. However the company make assessment/ evaluation of waste management internally.

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.

Hazardous waste is being kept in a separate room/ place as per guidelines of State Pollution Control Board. Such waste is disposed off only through the firms authorized by the State Pollution Control Board for the purpose. There are two categories of process waste

- Useable waste of raw cotton which is used in same process as raw material.
- Saleable waste of raw cotton and fabric which is sold to the local buyers who use it to make courser yarn and to fill mattresses etc.
- 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:

Location of operations/offices	Туре	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 as no s	pinnin	g/garment unit of	the company is situated in and around
ecologically sensitive a	areas.		

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

Name and brief	EIA	Date	Whether	Results	Relevant	
details ofproject	Notification		conducted by	communicated	Web	
	No.		independent	in public	link	
			external agency	domain		
			(Yes / No)	(Yes / No)		
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:

Yes, the company is in compliance with the applicable environmental law / regulations / guidelines in India. No fine/penalty/action was initiated against the entity under any of the applicable environmental laws/regulation/guidelines.

S. No.	Specify the law /	Provide	Any fines /	Corrective	action			
	regulation /	details of the	penalties / action	taken, if any				
	guidelines which was	non-	taken by regulatory					
	not complied with	compliance	agencies such as					
			pollution control					
			boards or by courts					
	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 the spinning units in the state of Punjab and Madhya Pradesh have their own sewage treatment plants.
- (ii) **Nature of operations:** The Company is engaged in manufacturing of yarns and garments under the main head Textile Industry.
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24	FY 2022-23		
Water withdrawal by source (in kilolitres)				
(i) Surface water	0	0		
(ii) Groundwater	1531726	2145913		
(iii) Third party water	0	0		
(iv) Seawater / desalinated water	0	0		
(v) Others	0	0		
Total volume of water withdrawal	1531726	2145913		
(in kilolitres)				
Total volume of water consumption	1531726	2145913		
(in kilolitres)				
Water intensity per Lacs rupee of turnover (Water consumed / turnover)	5.02	7.67		
Water intensity (optional)- the				
relevant metric may be selected by the				
entity				
Water discharge by destination and level of	treatment (in kilolitres)			
(i) Into Surface water	635068	617945		
- No treatment	0	0		
- With treatment – please	As per norms of respective SPCB			
specify level of treatment				
(ii) Into Groundwater	NI	L		
- No treatment				
- With treatment – please				
specify level of treatment				
(iii) Into Seawater	NIL			

- No treatment			
- With treatment – please			
specify level of treatment			
(iv) Sent to third-parties	NIL	•	
- No treatment			
- With treatment – please specify level of treatment			
(v) Others	576833	655584	
- No treatment			
<ul> <li>With treatment – please specify level of treatment</li> </ul>	As per norms of respective SPCB		
Total water discharged (in kilolitres)	1211901	1273529	
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.	No independent assessment/ evaluation has been carried out by an external agency related to water consumption. However the company makes assessment/ evaluation of water consumption internally. The company has put electronic flow meters to check the extraction of water and discharge of treated effluent.		

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

Parameter	Unit	FY 2023-24	FY 2022-23				
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent						
Total Scope 3 emissions per rupee of turnover							
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		Not Cal	culated				
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.							

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:

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative	Corrective action taken, if any
1	Installation of Solar Plants	The company has installed Roof top Solar Power Plants at its spinning units.	The total power generated through Solar power plants during the FY 2023-24 is approx. 8491 MW.	NA
2	Use of Renewable Fuel in Boilers / Thermopac	The industry is using Renewable fuels in Boilers & Thermopac to reducing the GHG impact.	The total Carbon Emission reduced by using renewable fuel during the FY 2023-24 is approx 1160 m.ton.	NA
3	Installation of ESP for Boiler flue gases	The company has installed ESP on its Boilers to minimize the emission of pollutants.	It helps to reduce the level of pollutants significantly.	NA
4	Water Conservation Through Zero Liquid Discharge on STP's.	Water Conservation and minimize the water consumption is top priority of the company:  The company has installed Zero Liquid Discharge plant in one of its production facility at Mandideep (Bhopal).  Modification of STP's at company's spinning unit at village Lalru and at village jitwal kalan, distt. Malerkotla. The treated water is used for Humidification plant of the mill, gardening, flushing etc.	Optimization of water consumption helped to maintain Ground water level of the area.	NA
5	Ground Water Recharging System	To contribute towards the replenishment of ground water, the company has installed	To maintain Ground water level through rain water harvesting systems	NA

		24 Rain water harvesting pits in its production facilities.		
6	Tree Plantation	The company promotes tree plantation in & around the industry and maintains the green areas within the facility premises. Employees are also motivated to take participation in tree plantation drive.	The company undertook tree plantation in 27 acre of land to reduce air pollution.	NA

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

The company has a standardized procedure to maintain business continuity and ensure effective management of incidents. A risk-based approach is followed to identify credible business risks and is reviewed regularly. In addition, to safeguard our data and IT systems, the company have a Data Recovery Capability Standard. The purpose of this Standard is to specify controls to ensure that our data, applications and systems can be recovered to meet business operational requirements following a disruptive cyber incident.

The company has disaster management team which respond to any unforeseen eventuality such as Earthquake, Flood, Fire, Chemical spill and Medical Emergency. This plan is subjected to periodic testing to ascertain the realistic applicability of the plan and to outline the steps to be taken to prepare for and respond to an emergency affecting the company. The goals of this disaster management plan include:

- a. The safety of all staff, workers & visitors.
- b. The physical and emotional well-being of staff, workers & visitors.
- c. The timely stabilization of an emergency situation.
- d. The protection of company's facility, property, and the belongings of staff, workers & visitors.
- 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.

No significant adverse impact envisaged from company's value chain.

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

We are in touch with value chain partners to provide us such data.

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

#### **Essential Indicators**

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

The Company is a member of **Six trade** and chamber or association. The Company participates in the discussions, meetings and seminar organized by these associations and actively put forth its viewpoint on various policy matters and inclusive development policies. The Company utilizes these forums for pushing new policy initiatives

# 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	Federation of Indian Export Organizations (FIEO)	National		
2	Apparel Export Promotion Council	National		
3	Confederation of Indian Industry [CII]	National		
4	The Cotton Textiles Export Promotion Council (TEXPROCIL)	National		
5	The Synthetic and Rayon Textiles Export Promotion Council (SRTEPC)	National		
6	Northern India Textile Mills Association (NITMA)	National		

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

The Company has not engaged in any anti-competitive conduct.

### **Leadership Indicators**

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

The company focuses on developing and maintaining partnerships with relevant government officials, business organizations, industry associations, and community organizations for the purpose of developing mutually-beneficial partnerships.

S. No.	Public policy advocated	Method resorted for such advocacy available	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ others- please specify	Web link, if available
	The company is member of industry association and the Company's Policy on Responsible Advocacy provides the framework for necessary interface with Government/ Regulatory Authorities	The Company works with apex industry institutions that are engaged in policy advocacy, like the Northern India Textile Mills Association, The Cotton Textiles Export Promotion Council, Synthetic And Rayon Textiles Export Promotion Council, Federation of Indian Export Organisations Undertakings, Apparel Export Promotion Council, Confederation of Indian Industry [CII].  The Company's engagement with the relevant authorities is	Yes	As and when required	

guided by the values of	
commitment, integrity,	
transparency and taking into	
consideration interests of all	
stakeholders.	

#### PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

As a responsible organization focused on inclusive growth, your Company has followed a proactive approach towards Corporate Social Responsibility (CSR). The Company has a detailed CSR policy in place, and the CSR activities are monitored by the Board appointed CSR committee. The company has been undertaking CSR projects through Oswal Foundation, which is a Registered Society formed in 2006, having its charitable objects in various fields. The key focus areas of Company's CSR programs are the promotion of education, preventive healthcare, rural development, skill enhancement, environment protection and other areas as defined in Schedule VII of the Companies Act, 2013.

The Company internally performs an impact assessment of its initiatives at the end of each year to understand the efficacy of the program in terms of delivery of desired benefits to the community and to gain insights for improving the design and delivery of future initiatives.

#### **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		Date of Notification	Whether conducted by independent external agency (Yes / No)	public domain (Yes	Relevant Web link		
None of the projects undertaken by the company in FY 2023-24 required Social Impact Assessments							

None of the projects undertaken by the company in FY 2023-24 required Social Impact Assessments (SIA)

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	State	District	No.	of	Project	%	of	PAFs	Amounts paid to
	Project	for			Affec	ted	<b>Families</b>	cov	ered by	/ R&R	PAFs in the FY (In
	which	R&R			(PAF	s)					INR)
	is ongoi	ng									
		•									
NIL											

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

The company undertakes interaction with the community to discuss, identify & address any issues, complaints or grievances of the community. The company has also dedicated email address i.e. gredressalnsml@owmnahar.com for the purpose redressing grievances and complaint received from any investors and community. The grievances/complaints received through the said mail is being looked after by the compliance officer of the company so that the grievances/complaints resolved at earliest. No complaints/grievances were received by the company pertaining to CSR related activities.

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

	FY 2023-24	FY 2022-23	
Directly sourced from MSMEs / small producers	13.90%	6.56%	
Directly from within the India	MSME/Small producer is 13.90% out of which 1.88% is	6.56% out of which 2.34% is	
	from the state of Punjab and the balance 12.02% is from the rest of India.		

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 2023-24	FY 2022-23
Rural	48.91	47.54
Semi-urban	12.43	11.94
Urban	-	-
Metropolitan	38.66	40.52

(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	
Not Applicable		

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

Sr. No.	Sr. No. State Aspirational Dist		Amount spent (In INR)
1.	Punjab	Ludhiana	*5,86,50,000.00

<sup>\*</sup> The company's total CSR liability for the FY 2023-24 was Rs. 586.47 Lakhs. However, after adjustment of excess amount of Rs. 76 Lakhs spent during the financial year 2022-23 on 'Health Care Project', the company spent an amount of Rs. Rs. 510.50 Lakhs on 'Rural Development Project' to be undertaken by Oswal Foundation.

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

The company does not have any preferential procurement policy at present. However, we try to procure goods & services from MSME vendors and schedule there payments within stipulated period.

- (b) From which marginalized /vulnerable groups do you procure? Please refer to the above answer.
- (c) What percentage of total procurement (by value) does it constitute? Please refer to answer for Q.4 in Principle 8, Essential Indicators.
- 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			
Not Applicable					

No.

of

Persons % of beneficiaries

6. Details of beneficiaries of CSR Projects:

**CSR Project** 

Sr.

No.	CSK Project	benefitted from CSR	from vulnerable
		Projects	and marginalized groups
1.	To meet its CSR obligation under section 135 of the companies Act, 2013 company is undertaking CSR activities in collaboration with the group companies through Oswal Foundation, which is a Registered Society formed in 2006, having its charitable objects in various fields.  The total CSR obligation of the company for the financial year 2023-24 was Rs. 586.47Lakhs. However, after adjustment of excess amount of Rs. 76 Lakhs spent during the financial year 2022-23 on 'Health Care Project', the company was required to spend an amount of Rs. 510.47 Lakhs on CSR activities for the financial year 2023-24 under CSR, Board on the recommendation of CSR Committee	state of Punjab, and union territ have benefitted for CSR Project. Ludhiana distribution distribution are getting treatment at reassess.  • Rural Development	nunity living in the Himachal Pradesh ory of Chandigarh from the company's The resident of rict are more the CSR project as g quality medical conable rate.
	contributed an amount of Rs. 510.50 Lakhs to the Oswal Foundation for undertaking 'Rural Development Project', which is covered under Schedule VII of the Companies Act, 2013.  Refer Annexure-I to the Board's report for the annual report on CSR activities [Pursuant to Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended.	living in the state and union territ	y of India especially of Punjab, Haryana ory of Chandigarh nefits from the said

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

The Company places its customers at the centre of all its business policies and conducts. The Company strive to continue growth by adopting national and international standards and embracing ethical means in harmony with the environment, ensuring customer delight, stakeholder trust and social responsibility.

#### **Essential Indicators**

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

The Company organizes buyer meets for better market research and customer service. Feedback is also taken by the management during the visit of Customers at the manufacturing facilities. Customers' satisfaction is the Company's primary goal, which motivates the Company to keep its products as per the consumer's requirements. To understand the customers better, the Company adopts several procedures including customer surveys, customer audits and direct feedback. There is also a team dedicated to attend and address consumer feedback and queries.

# 2. Turnover of products and/services as a percentage of turnover from all products/servicethat carry information about:

	As a percentage to total turnover
Environmental and social parameters relevant to the	
product	100%
Safe and responsible usage	
	100%
Recycling and/or safe disposal	
	90%

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

	ı	)23-24	Remarks		22-23	Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy						
Advertising						
Cyber						
security						
Delivery of						
essential						
services		NIL	NA		NIL	NA
Restrictive						
Trade						
Practices						
Unfair Trade						
Practices						
Other						

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

The company has not recalled its product on account of safety issues.

Category	Number	Reason for recall
Voluntary recalls	Nil	N.A.
Forced recalls	Nil	N.A.

# 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.

This Cyber Security Policy is a formal set of rules by which people who are given access to company technology and information. The company has internal generated policy on cyber security and risks related to data privacy. The Policy serves several purposes. The main purpose is to inform company users: employees, contractors and other authorized users of their obligatory requirements for protecting the technology and information assets of the company. The Cyber Security Policy describes the technology and information assets that we must protect and identifies many of the threats to these assets. The Policy also describes the user's responsibilities and privileges and contains procedures for responding to incidents that threaten the security of the company computer systems and network. From a cyber security aspect, the company has implemented cutting edge security tools to protect itself from external as well as internal threats. The policy is being used internally and is not uploaded on company's website.

### Implementation of Firewall throughout the Organization:

To prevent the network from the outside agencies, the company installed the firewalls throughout the group. Our Network is not exposed to external agencies. The company has implemented the Security policies through this firewall. Given the limited access of the internet as per the business requirements. All Social sites are blocked to reduce the risk of vulnerability and compromisation of the resources. Access of all applications is through this firewall. Unauthorized person will not be able to access our network, applications etc. No Person can download & install the unauthorized software on their respective computers. On routine basis all infra is being monitored through the Firewall for the threat attacks & blocking of the PCs showing abnormal behavior based on certain parameters.

In case any Cyber security Attack/Threats/Notice is found the information is shared to the Senior Management/CEO and he will share such incident to our Business Partners, Vendors, Suppliers and Local Authorities or Government Agency.

- 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:

During the financial year 2023-24, no data breaches regarding customer privacy from outside parties etc. has happened.

- b. Percentage of data breaches involving personally identifiable information of customers: 0%
- c. Impact, if any, of the data breaches: NA

### **Leadership Indicators**

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

The information on company's products can be accessed though company's website i.e. www.owmnahar.com. Moreover, the companies share the said information through brochures/pamphlet, catalogue etc.

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

The Company arranges technical visits regularly to educate the customers where they find solution to their problems. Further, for outstation customers conference calls are organized to understand their requirements and try to meet the same.

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

As the company is engaged in the manufacturing of yarns/garments business, no such mechanism is applicable to company.

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.

The company display only mandated product information on cartons.

5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Yes, the company undertakes telephonic survey with regard to consumer satisfaction relating to the products of our company

FOR AND ON THE BEHALF OF THE BOARD

Place: Ludhiana

Dated: 12th August, 2024

JAWAHAR LAL OSWAL (CHAIRMAN) (DIN: 00463866)