



BUSINESS RESPONSIBILITY REPORTING IN INDIA: Disclosures and Practices

APRIL 2019

Business Responsibility Reporting

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PREFACE

At the outset, Stakeholders Empowerment Services (SES) thank NSE for providing this opportunity to present our second study on “Business Responsibility Report-Disclosures and Practices in India”. Undoubtedly, this would not have been possible without the initiative taken by NSE and its guidance & support provided to SES team on a continual basis.

“Corporate Governance” which was treated as a routine regulatory requirement with scanty regard from corporate sector just a few decades ago, has become a critical component world over for enhancing shareholder value through increased transparency, disclosures and accountability. Companies no more work in isolation. Investors and stakeholders now critically evaluate company’s commitment to “Corporate Governance” while reviewing financial performance of the company. Additionally, sustainability and responsive business operations have assumed critical factor for evaluation by investors worldwide. Investors are increasingly demanding that businesses must focus on social impact and discharge their social responsibilities adequately. For disclosure and ease of comparison globally various agencies, viz, IIRC & GRI have prescribed set formats. These formats serve not only as standard template but enable benchmarking as well and assess progress over time. It was in this context and to be in line with global reporting standards, the concept of “Sustainability Reporting” was introduced by SEBI for the Indian corporates. Sustainability in simple term can be defined as “*the ability to sustain and continue at a given or enhanced level.*”

It is increasingly being recognised that new parameter for evaluation will be sustained operations rather than immediate and short term performance. To put this in perspective, companies need to use resource responsibly and in an efficient way, without compromising on quality of products or services which they offer to the society at large. To re-iterate, companies are now rated and assessed by their strategies to deal with global issues such as global warming, optimal utilisation of resources, fair and equitable treatment of various stakeholders, ethical practices etc.

In response to the above, to enhance shareholders’ value, companies are strengthening their governance structure and focusing on sustainable growth, caring for environment and society while sourcing materials and services. Many companies which hitherto had only profit centric approach, are now realizing the only option to have a continuous potential of value creation is by following the sustainable practices.

Considering the significant attention that Sustainability Reporting has generated, particularly in the last decade, The National Voluntary Guidelines were published by Ministry of Corporate Affairs in 2012. The same were followed by the mandate for top 100 listed companies to publish Business Responsibility Report by SEBI. These two measures were the tipping point on reporting of Sustainable Development by the Corporates in India. SEBI has further extended this mandate to top 500 companies and has also re-iterated that these companies should voluntarily adopt integrated reporting format for disclosure on financial and non-financial parameters.

The aim of conducting this study is to analyse the disclosure practices while reporting on non-financial parameters among the top 100 listed companies in India. Our study has found that as far as compliance is concerned, all the top 100 companies have complied with the mandate. However, the study also indicates that almost 50% of the sample companies in both years FY 16-17 & FY 17-18 were voluntarily publishing a Sustainability Report in globally accepted GRI Standards published by Global Reporting Initiatives. Further, 22 companies in FY 17-18 adopted Integrated Reporting. This is a paradigm shift in disclosure by India Inc and establishes that these companies view that disclosure on non-financial parameters is important to benchmark them and such disclosures are increasingly finding place in evaluation by fund managers globally. Such benchmarking and acceptability by investors is not only beneficial to the company as also to its stakeholders. It is realised that if not disclosed either the

stakeholders would demand and force it on the Company or dump if the company fails to adopt best practices.

While analysing the disclosures, it was also observed that the mandate for disclosure of Business Responsibility Reporting in India are not as elaborate and comprehensive when compared with the international reporting guidelines. This is a pointer to the fact that many Indian companies still need to scale up their sustainability practices to be in tandem with global integrated reporting framework on sustainability reporting. However, keeping in mind developments in the area, it is expected that India Inc will match global practices soon and may do better than their global peers.

I hope that the Report will help the readers, in general, and regulators, company boards and the stakeholders in particular, to understand the disclosure practices in the Business Responsibility Report of the top listed companies.

I express my sincere gratitude to all my colleagues in SES and in particular Ms. Aditi Chandani, Ms. Shailja Gupta and Ms. Shraddha Bansode for their untiring efforts in compiling and analysing voluminous data and shaping up the Report in the present form



J.N. Gupta

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EXECUTIVE SUMMARY OF THE STUDY

OBJECTIVE OF STUDY

- To assess and compare the Disclosure practices of Top 100 Listed Companies Business Responsibility Report (BRR) for FY 2016-17 and FY 2017-18
- To compare the disclosure of these companies across various non-financial parameters.
- To note changes in reporting pattern over two years.

Business Responsibility Report (BRR), as per the template prescribed by SEBI in its circular, is divided into five sections. The study has analysed BRR as well as Sustainability Reports of the sample companies by capturing data which is either straight forward quantitative or which can be quantified and data from polar questions from the BRR as well as Sustainability Reports of the sample companies, for the purpose of a comparative analysis amongst them and comparison of answers between the sample companies for FY 16-17 and FY 17-18.

PARTS OF THE STUDY

Reporting Framework

- SEBI Circular provides Companies with the option to publish either BRR in the framework prescribed by SEBI or publish a Sustainability Report along with mapping of the principles of BR enlisted in the SEBI circular.
- Based on analysis and comparison of reports of sample 100 companies over two-year period, findings are given in detail in the Report. Following are the key takeaways
 - In terms of compliance with requirement of providing a Report, all companies were compliant.
 - Almost 50% companies published only Business Responsibility Report both in FY 16-17 and FY 17-18.
 - In terms of completeness of the report, approximately 95% of the companies had complied with the format prescribed in terms of completeness of information reported.
- **Sustainability Reports**
 - Remaining 50% companies published Sustainability Report along with BRR or provided mapping with BR Principles.
 - Total 50 companies stated in their annual report that they have prepared a Sustainability Report. However, Sustainability Reports of 5 companies was unavailable for FY 2017-18.
- **Integrated Reports**
 - 22 out of top 100 listed entities published an Integrated Report for FY 2017-18 as compared to 10 companies for FY 2016-17.
- **Assurance Statement of the Report** - SEBI does not mandate companies publishing BRR to seek an assurance statement for the disclosures in their BRR. Globally, also although not mandated by Global Reporting Initiative (GRI) standards, GRI Standard advise companies (on voluntary basis) to provide an assurance for their Sustainability Report.
 - In FY 16-17, approximately 79% of the Companies which had published Sustainability Report provided an assurance statement which was a marginal improvement over FY 16-17, where 76% had provided an assurance statement.

The report has captured certain Data from each Section of the BRR. The summary of the Report is also presented Section-wise:

Section A- General Information about the Company

Under this Section Companies disclose information regarding the identity of the Company.

Section B- Financial Details of the Company.

Under this Section, companies are required to disclose Financial Details such as PAT, total turnover, paid up capital etc. Further, the Companies are required to disclose the expenditure on CSR initiatives and sectors of expenditure. The details of CSR are also covered under Section E: Principle 8. The observations of the study relating to CSR are disclosed under Section E: Principle 8.

Section C

- Participation of other entities in BR initiatives of the Company.
 - Around 90% of the companies had provided response to the question in FY 17-18 as compared to 85% in FY 16-17.
 - However, the question required companies to disclose the % of participation of other entities in BR initiatives of the Company and only 25% (approx.) of the companies in FY 17-18 and 21% in FY 16-17 had provided response in percentage.
 - Although 90% of the Companies provided response, however, a much lesser % provided response in terms of percentage of participation.
 - Responses of many companies were either less than 30% or more than 60%, and therefore it does not communicate any conclusive information as less than 30% can mean anything between 0-30% and more than 60% can mean anything between 60-100%.
 - Based on disclosures of 100 companies, it is felt that SEBI should provide a more detailed guidelines for the companies to respond to the question and measure % of participation in BR initiatives. Questions should be more directive and participation of each stakeholder would vary as not all stakeholder would participate in all BR initiatives. It appears that there was no standard response format for the question and hence a guidance is required by the regulator.

Section D- Assessment of the disclosure on the policies for 9 principles along with disclosures on implementation and framing of the policies. Each principle is divided into 10 questions/ information regarding its implementation, audit/ evaluation, approval etc.

The study analysed the disclosure of the companies under this question and assigned 1 mark for each answer making maximum score to 90.

- It was observed that scores of 49 companies in FY 17-18 and 41 companies in FY 15-16 were in the range of 81-90. Implying that these companies did answer positively to most questions under the Section.
- While there is also an improvement in the bottom end. In FY 16-17 two companies had a score, which was below 40 however, in FY 17-18 there was only 1 company which scored below 40.

Further, the study also analysed the response of the Companies to the question 1 “*If there was a policy for P1 to P9?*” From the responses it was observed that

- All companies had disclosed data under this question. It was observed that for P1, P3 and P8 all the companies had framed a policy
- Further, 95% of the companies had framed a policy for all principles except for Principle 7. Among all the principles, P7 “*Principle on public advocacy*” had the least number of companies which had framed a specific policy.

The study has also analysed the responses of the Company on the question “*Does the company have specified committee of the Board/ Directors/ official to oversee implementation of the policy?*” From the data collected it was observed that

- For policy on P1, P3 and P8 all companies which had framed a policy had a specified committee to oversee the implementation.

Section E- Principle wise performance.

- **Principle 1-** Disclosure on applicability of policy relating to ethics, bribery and corruption was applicable to the Company only or to its Group/ Joint Ventures/ Suppliers etc. The responses to this question could not be quantified. However, the responses of the Company are depicted in the extract of the sample company in Annexure 3.

Further for the study, data was also collected on stakeholder complaints received during the year and pending at the end of Financial Year. However, the data was not comparable since under Stakeholder Complaints the disclosure of companies varied. Companies had disclosed either Consumer Complaints, Ethical Complaints, shareholder grievances, whistle blower complaints or more than one of the mentioned types of complaints. Since, stakeholder in itself has a wide connotation and includes shareholders, consumers, suppliers, employees and environment. Therefore, for clarity SEBI must issue clear guidelines on the requirement of disclosure under this question.

- **Principle 2-** Disclosure on sustainable sourcing was analysed. Companies are required to disclose the percentage of inputs that were sustainably sourced along with details of procedures adopted:

- Less than 10% of the sample companies had disclosed the percentage of input that were sustainably sourced in both FY 17-18 and FY 16-17.
- Although, 70 companies in both FYs had disclosed details of procedures adopted for sustainable sourcing. Subjective disclosure regarding sustainable sourcing was more common compared to response in terms of percentage of inputs that were sustainably sourced.

Further, data was also collected on responses of the Company on mechanism to recycle/ reuse products/ waste.

- The trend of disclosing abstract rather than the quantitative assessment extended for responses disclosed by sample companies under this question as well. 43 companies in FY 17-18 and 45 companies in FY 16-17 have provided subjective response regarding details of mechanisms to recycle/ reuse adopted by the Company without providing any quantified details of the % of waste / product recycled or reused.
- **Principle 3-** Disclosure on percentage of women employees and percentage of employees with disability compared to the total permanent employees.
 - Data shows that companies in IT and Banking Sector (barring a few) had more women employees as compared to any other sector in both FYs.
 - In more than 50% of the sample companies, women as part of the total permanent employees consisted of less than 10% in both FYs.
 - Maximum % of participation of women employees to total employees was observed in Interglobe Aviation in FY 17-18.
 - Within the private sector, the participation of disabled employees is still not widely prevalent. Highest participation of disabled employees in private sector was in Titan Company Ltd. In public sector highest disabled employees were in Coal India Ltd.

Companies are also required to disclose complaints of Sexual Harassment, Child Labour and Discriminatory employment under Principle 3.

- No complaints were reported on Child Labour in FY 17-18 and FY 16-17.
- Highest complaints of sexual harassment were reported in banking and IT sector. However, maximum participation of women is also observed in these sectors. From the complaints reported compared to the number of women employees, it was observed that maximum 0.43% of women employees in a Company had reported of sexual harassment complaints in FY 17-18 and FY 16-17.
- **Principle 4-** Companies were required to disclose if they had mapped their internal and external stakeholder.

- Both in FY 17-18 and FY 16-17, except six companies all companies had mapped their internal and external stakeholders.
- Further, companies were required to disclose, if they had identified any stakeholder(s) which are vulnerable, marginalised and disadvantaged. Approx. 90% companies had responded to the question.
- Data was also collected on special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders. The same has been disclosed in the extract of BRR for companies under Annexure 3.
- **Principle 5-** Companies were required to disclose if the Policy prepared for principle 5 extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others. Further, Companies were required to disclose number of stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management.
 - Data for stakeholder complaints was collected under Principle 1. Therefore, the same has not been analysed again to avoid repeating.
- **Principle 6-** Disclosure of identified environmental risks.
 - Almost 90% of the companies have stated that they have identified environmental risk.
 - Further, company's response to the question "*Does the company have any project related to Clean Development Mechanism*" were also analysed.
Only 40% of companies from the sample stated that they have projects related to clean development mechanism
- **Principle 7-** The Company is required to disclose if it is a member of any trade association or chamber and provide their names if any. Since this data would not be comparable hence the same was not collected for the purpose of this study.
- **Principle 8-** Inclusive Development. For the purpose of analysis on initiatives of the Company towards inclusive development, data was collected on the expenditure on Corporate Social Responsibility initiatives by the companies.
 - In FY 16-17 more than 50% of the companies from the sample had spent the mandated 2% expenditure of the net average profit of last 3 financial years on CSR initiatives. This increased to more than 60% of the companies from the sample in FY 17-18.
 - CSR expenditure initiatives were classified under several categories such as Health, Sanitation & Social Empowerment, Women Empowerment, Education Vocational Training & Livelihood, Rural Development Environmental Sustainability & Disaster management. Expenditure by each company was then segregated based on the sectors above and the data gathered was analysed to identify the sectors on which most and least expenditure was incurred.
 - It was observed that companies spent most on Education, Livelihood and Vocational Training and least expenditure was incurred on women empowerment in both FYs.
- **Principle 9-** Companies are required to disclose data on consumer cases and customer complaints received during the financial year and pending at the end of FY. However, the data could not be compared as the companies either disclosed consumer cases or customer complaints or both in case of few companies. The data captured is disclosed under the extract of BRR report of each Company under Annexure 3, without any in-depth analysis.
Data was also collected on whether the companies conduct a consumer survey or evaluate consumer feedback.
 - 83 companies from the sample carried out a consumer survey in FY 17-18 as compared to 79 companies in FY 2016-17.

COMPARISON OF DISCLOSURES UNDER GLOBAL REPORTING INITIATIVE – GRI STANDARD WITH BUSINESS RESPONSIBILITY REPORT

A comparison was made on the general disclosures required under the GRI Standards with the disclosure under BRR. From the comparison of disclosure under both the guidelines it is evident that the disclosure requirement under GRI guidelines are far more comprehensive and encompassing in terms of the content as compared to the BRR format provided by SEBI. The disclosures under GRI are split in 2 parts- General Standard Disclosures and Specific Standard Disclosures. **GRI reporting provides reporting framework which is sector specific also.** However, similar option is not available in BRR. As questions or data relating to response in sustainability reporting and initiatives to work towards a sustainable development are not same across all sectors, logically reporting requirement shall also be different. SEBI mandated questions are to be answered by all companies. However, one size does not fit all and so the mandated questions should be tweaked as per the sectors so that transparency is meaningful and rightful disclosures are made by the reporting companies, making reporting and analysis meaningful.

However, from the data analysis it can be stated that India Inc is making progress on BR front. Requiring Companies to disclose the efforts made by them towards non-financial parameters is first of many steps in towards the goal of Sustainable Development. Therefore, from data it can be concluded that more companies are making efforts to be transparent about their initiatives and their existing impacts on the environment and society around them.

Areas of improvement- From objective evaluation of answers, it was observed that not all responses to questions were sharp & to the point. Some questions were answered in detail, while in case of others, the answers were short & at times incomplete. Policies on certain principles such as ethics and bribery, inclusive development were framed by all companies while formulation of specific policy on public advocacy was still to be adhered to by many companies.

SUSTAINABILITY REPORTING AND REGULATORY FRAMEWORKS

In my view the successful companies of the future will be those that integrate business and employees' personal values. The best people want to do work that contributes to society with a company whose values they share, where their actions count and their views matter.

Jeroen van der Veer, Chairman of Philips

Sustainability can be explained as “the quality of being able to continue over a period of time” or “the quality of causing little or no damage to the environment and therefore able to continue for a long time.” Sustainability takes into account the ability to continue a defined behaviour for a longer time without compromising the future. For finance professional, it is akin to surviving and prospering on returns generated without touching capital. There are three pillars of Corporate sustainability:

Profit/Economic:

This is the genesis and core reason for existence of most organization. For being sustainable the organisation needs to generate profits, however, for long term interest and sustainably that should not be achieved by compromising the other two pillars

People/Social:

An organisation cannot survive in isolation, it is part of the society. A healthy society and healthy relationship with the community is prerequisite for sustained prosperity. A company should be giving back to community for resources it uses directly and indirectly. A sustainable business should have support and approval of its employees, stakeholders and the community it operates in. The organisation must ensure that it contributes to incremental betterment of quality of life while utilizing human resources.

Planet/Environment:

While it would not be fair to give any ranking, however in terms of importance Environment is most important as existence of society itself is dependent on environment. Organizations must realise importance of Environmental and ideally ensure that resources like land, water and air are used in most responsible manner without causing any destruction.

Companies are entities which are part of the entire ecosystem and share the greater responsibility towards the environment as they use environment for the objective of making profit, whereas humans use the environment for their basic needs. Although humans also have responsibility for protection of environment. Today, companies as well as human beings are seeking growth irrespective of geographies on one hand and on the other hand increasingly recognising their responsibilities towards the society at large and the environment. Companies are adopting strategies to conduct their business responsibly to discharge such responsibilities effectively.

Companies are rightfully expected to own their responsibility to protect the environment, what we have received from our ancestors and to save the planet and its resources for use by future generations. To protect and save the planet, 3R's have been defined in sustainability i.e. Reduce, Reuse, Recycle.

Reduce: First step is to use resources as little as possible, to run the business. Reduction in use of resources is important because it will also lead to lesser expenditure on energy and lead to recycling of the used products.

Reuse: Second step is to reuse the resources more than once instead of discarding them after single or limited use.

Recycle: Recycle is the step to convert waste material into new form to make it consumable again. Though, converting them into new material also requires energy, however, it prevents old material to get wasted.

Companies are now getting more progressive towards 3R of the Sustainability and adopting sustainable practices and also providing disclosures related to their practice.

Companies are trying to reduce their carbon emission, water waste, water usage and their overall effect on environment. Companies' are now working towards improvement of air quality, integrity and sustainability of their resources and focusing on the elements that place stress on the environment.

Historical Evolution of Sustainability Reporting- Origin of Global Reporting Initiatives (GRI)

Sustainability reporting is a process that assists organizations in understanding the linkage between sustainability and the organization's plans and strategy, goal setting, performance measurement and management of change towards a sustainable global economy. Sustainability is a concept that combines profitability with social responsibility and environmental care. In essence, sustainability report is the organization's views and vision on the most critical (or material) aspects of the organization's economic, social and environmental impacts and the relation of those with its performance.¹

World over various bodies have published standards for reporting on these parameters. Lawmakers in various countries have adopted these standards and recommended the Companies to publish reports for their stakeholders to understand the Company's outlook towards sustainability. In accordance with these guidelines organizations are required to make disclosures about the policies formulated and key steps taken by them related to Environmental, Social and Governance factors.

The First Step:

The Global Responsibility Initiative's Sustainability Reporting Standards (GRI Standards) were the first and most widely adopted global standards for sustainability reporting. Global Responsibility Initiative (GRI) was founded in Boston, USA and its roots lie in the US non-profit organizations "The Coalition for Environmentally Responsible Economies" referred to as CERES and the "Tellus Institute". Former CERES Executive Director Dr. Robert Massie and acting Chief Executive Dr. Allen White pioneered a framework for environmental reporting in the early 1990s, and as a result, the Global Reporting Initiative project department was set up in 1997 in order to develop the framework. The United Nations Environment Programme (UNEP) was also involved in the establishment of GRI.

GRI helps businesses and governments worldwide understand and communicate their impact on critical sustainability issues such as climate change, human rights, governance and social well-being. This enables real action to create social, environmental and economic benefits for everyone. The GRI Sustainability Reporting Standards are developed with true multi-stakeholder contributions and rooted in the public interest.²

Global framework for Sustainability Reporting gives a platform to companies to disclose their sustainability issues which they have identified related to their business operations and activities. These transparent disclosures empower the stakeholders and help them to understand the risks associated with the Company. This platform helps the stakeholders to make informed decisions.

In year 2000, GRI launched the first version of global standards for comprehensive sustainability reporting. Eventually, after the evolution of G1, G2 and G3 guidelines, GRI G4 was launched in May

¹ Global Reporting Initiative- Research and Development Series; <https://www.globalreporting.org/resource/library/GRI-Assurance.pdf>

² Global Reporting Initiative: <https://www.globalreporting.org/Information/about-gri/Pages/default.aspx>

2013. Further, in October 2016, GRI has launched the most recent guidelines on Sustainability Reporting which is known as **GRI Standard**. Companies which are publishing their sustainability reports in accordance with GRI are required to follow the GRI Standard guidelines.

Structure of the GRI guidelines has been created to accommodate the broader and comprehensive disclosures in sustainability reporting on various parameters such as Climate Change, Human Rights, Ethics & Governance and Employee wellbeing. GRI is continuously updating the guidelines to the most recent changes in the world so that the companies can provide the vital information to their key stakeholders. Periodic review and changes in the guidelines provide more updated and credible sustainability report standards that are adopted world over.

GRI-Standard: GRI standard has been upgraded from the GRI-G4 guidelines. As per the GRI website “Developed by the Global Sustainability Standards Board (GSSB), the **GRI Standards enable all organizations to report publicly on their economic, environmental and social impacts** – and show how they contribute towards sustainable development. The GRI Standards are also a trusted reference for policy makers and regulators, and have a modular structure so they can be kept up-to-date and relevant.

The GRI Standards include all the main concepts and disclosures from the GRI G4 Guidelines, enhanced with a more flexible structure, clearer requirements, and simpler language.”

Based on the GRI guidelines, sustainability reports are more comprehensible, hence, it provides the holistic view about the Company to its stakeholders.

The GRI guidelines are presented in 2 parts:

Part 1: Reporting principles and Standard Disclosures. These are the guidelines which are to be adopted by the companies to provide sustainability report in accordance with GRI.

Part 2: Implementation manual: It contains interpretive guidance which helps an organization to prepare its sustainability report.

The GRI has also incorporated principles enunciated and has harmonized guidelines with United Nations Global Compact’s Ten Principles, 2000; the OECD’s Guidelines for Multinational Enterprises, 2011; and the UN’s Guiding Principles on Business and Human Rights, 2011.

IIRC INTEGRATED REPORTING

The International Integrated Reporting Council (IIRC) (previously the International Integrated Reporting Committee) was formed in August 2010 and aims to create a globally accepted framework for a process that results in communications by an organisation about value creation over time.

IIRC is a global coalition of regulators, investors, companies, standard setters, the accounting profession and NGOs. Together, this coalition shares the view that communication about value creation should be the next step in the evolution of corporate reporting³

Core of the integrated reporting is value creation process, which incorporates the vision from different members of organization, different functions and background to achieve strategic objective.

The primary purpose of integrated reporting is to explain that how will an organization create value over time. This requires analysis of the combination of quantitative and qualitative information consisting of six types of capital. These six capitals are as follows:

- Financial
- Manufactured

³ The International <IR> Framework, Page 1- About the IIRC, <https://integratedreporting.org/wp-content/uploads/2013/12/13-12-08-THE-INTERNATIONAL-IR-FRAMEWORK-2-1.pdf>

- Intellectual
- Human
- Social and Relationship
- Natural

IIRC has structured its format under following guiding principles:

- Strategic focus and future orientation
- Connectivity of information
- Stakeholder relationships
- Materiality
- Conciseness
- Consistency and comparability

All guiding principles when combined, describe the organization's strategy and show a holistic picture of interrelatedness and dependencies of various capital on each other to create a value of an organization in the short, medium and long term. Integration of all vital information related to the Company leads to more self-explanatory integrated report.

Business Responsibility Report (BRR)- Indian Scenario

The first step taken by the law makers in India was the [National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business](#). Ministry of Corporate Affairs (MCA) in July 2011 published NVG guidelines. NVG elaborates on '9 Principles' of responsible business which should be adopted by the Companies as part of their practices. The "9 principles" lay emphasis on different areas like the employees, stakeholders and environment. Collectively these 9 principles enable the Company to follow responsible practices. Companies were asked to prepare a Business Responsibility Report by providing stakeholder information about their initiatives, impacts and future course of action across these principles.

While, initially the disclosures were voluntary for the listed companies from FY 2011-12. On the basis of these Guidelines Securities and Exchange Board of India (SEBI), Regulator for the securities market in India, vide its Circular dated [13th August 2012](#) mandated top 100 listed Companies, based on their market capitalisation, to submit a Business Responsibility Report (BRR or BR Report).

Pursuant to notification of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the circular dated August 13, 2012 was rescinded. The requirement of publishing a BRR was made part of the Listing Regulations itself for the top 100 listed Companies by market capitalisation. As per clause (f) of sub regulation (2) of regulation 34 of Listing Regulations the annual report shall contain a business responsibility report describing the initiatives taken by the listed entity from an environmental, social and governance perspective, in the format as specified by the Board. Further, SEBI LODR was amended in 2015 and w.e.f. 1st April 2016 top 500 companies based on market capitalization have to publish a BRR.

BRR requires the Companies to make disclosure on the 9 principles of Business Responsibility which includes Environmental, Social and Governance factors. Investors are not only keen in seeing profitability or growth in financial terms, but their focus has now shifted towards sustainability and corporate governance as well. For Indian companies to attract future investments they will have to disclose their performance on ESG factors along with financial factors. This would require them to publish BRR and sustainability reports.

SEBI Circular contains guidelines, and, also a template for preparing a BR report which is required to be followed by the companies. Major sections of this template are viz. General Information about the Company, Financial Details, Information related to Business Responsibility initiatives and Principle

wise performance of the Company. Standard format helps the companies to publish their BR Report in a structured manner and it also helps in comparative analysis as it provides the same parameters for all the companies to be compared.

SEBI in its Circular dated 6th February 2017 has discussed about the integrated reporting in India and suggested that the same should be voluntarily adopted by listed entities. SEBI has stated in its Circular as follows:

“It has been observed that certain listed entities in India and other jurisdictions have been making disclosures by following the principles of integrated reporting. Towards the objective of improving disclosure standards, in consultation with industry bodies and stock exchanges, the listed entities are advised to adhere to the following:

a. Integrated Reporting may be adopted on a voluntary basis from the financial year 2017-18 by top 500 companies which are required to prepare BRR.

b. The information related to Integrated Reporting may be provided in the annual report separately or by incorporating in Management Discussion & Analysis or by preparing a separate report (annual report prepared as per IR framework).”

In FY 2016-17, 10 companies and in FY 17-18, 22 companies published their annual report following IIRC reporting. Few companies have also provided sustainability report in GRI format and Annual report as integrated report.

The Nine Principles of BRR

Collectively, these 9 principles represent the Environmental, Social and Economic factors. NVG and SEBI both laid down the practices and objectives to be achieved from implementation of these principles. The 9 principles of Business Responsibility are as follows:

Principle 1: Ethics, Transparency and Accountability: *Businesses should conduct and govern themselves with Ethics, Transparency and Accountability*

Principle 2: Product Life-Cycle Sustainability: *Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle*

Principle 3: Employees' Well-being: *Businesses should promote the wellbeing of all employees*

Principle 4: Stakeholder Engagement: *Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized*

Principle 5: Human Rights: *Businesses should respect and promote human rights*

Principle 6: Environment: *Business should respect, protect, and make efforts to restore the environment*

Principle 7: Public Advocacy: *Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner*

Principle 8: Inclusive Growth: *Businesses should support inclusive growth and equitable development*

Principle 9: Customer Value: *Businesses should engage with and provide value to their customers and consumers in a responsible manner*

All companies which are required to prepare a Business Responsibility Report, must adhere to these principles and disclose answers to all questions for all 9 principles. Template of the BR Report prescribed by SEBI is provided as *Annexure 2*.

Present Study

ESG is the buzz word and tonic for future growth and survival. Environmental awareness has increased rapidly among the companies and their stakeholders especially over the past decade. Awareness is not only limited to the financial but also non-financial disclosure by the companies. Companies are realising the need of the disclosures regarding the environment related climate risks and also publishing their reports by covering the aspects of sustainability. More than the companies, governments and regulators are realising the importance of conducting business responsibly and are either mandating or recommending as best practice to adopt various standards and guidelines. This study was conducted to understand the impact of regulatory dictate and quality of disclosures by companies. The study was conducted to also understand whether the companies are providing objective responses that can be compared within peers.

SEBI has also provided the specific format to be followed for Business Responsibility practices by the companies. The SEBI Format provides minimum disclosure requirements as set by SEBI however, companies have freedom to provide more elaborate and comprehensive disclosures, to follow the globally adopted standards.

Analysis and Findings of the Study

Core purpose of this analysis and study is to evaluate the disclosures made by the companies and prepare a comparative of the disclosure practices followed within the sample companies as disclosed by them in their respective BR Reports. Parameters of analysis were completeness and comprehensiveness of the responses in the BR report.

Study of the BRR inter alia, contain the best practices of disclosure made by sample companies and also any shortcomings noticed.

Sample companies & sample size for the Compendium, Analysis & findings:

This study is a second study in the series that has been conducted on analysing the Business Responsibility related disclosures. The first study on BRR conducted by SES together with NSE had taken into account, top 100 listed companies as per market capitalisation as on 31st March, 2015. For the present Study we have taken into account top 100 listed companies as on 31st March 2017 and disclosures made in their report for year 2017-18.

In the top 100 companies listed based on market capitalisation on 31st March 2017, there were 24 companies that were not part of the previous study conducted. Thus 24 companies which were not part of the previous study were replaced by companies which were not in the top 100 companies as on 31st March 2017. For these new 24 companies that were part of top 100 list as on 31st March 2017, data was collected for both FY 2016-17 and 2017-18.

Annexure 3- Compendium comprising of 100 sample companies and an extract of disclosures in their respective BR report.

Comparison of disclosure requirement under SEBI reporting framework vis a vis the Global Reporting Initiative

The report provides a comparison of the globally adopted framework “Global Reporting Initiative (GRI)” vis-à-vis SEBI regulation of BRR.

Annexure 1- It consists of comparative study of GRI standard framework and SEBI regulations. Comparison has been done on the General Disclosures of GRI Standard with disclosure requirement of in the Indian Legal Framework such as under Companies Act and as per SEBI LODR. The annexure also contains the comparison of disclosure requirement in GRI-G4, previous version of GRI Standard.

BRR- Best Practices Guide (BPG)

Best Practice Guide was prepared on the basis of responses to the questions as given by the sample companies. The best responses were identified on the basis of their completeness, clarity and accuracy. We have compiled the most elaborated, descriptive and in -depth answers.

Source

Source of the data gathered is either the Business Responsibility Reports as published on the website of the companies or published in Annual Reports for the financial years 2016-17 and 2017-18, or Sustainability reports if any published by the sample companies.

Data for analysis on Corporate Social Responsibility initiatives has been also collected from the annexures published on CSR initiatives by the companies in Annual Reports for FY 2016-17 and FY 2017-18.

Methodology and Scope of the Study

As per SEBI format, BR Report template has been divided in to five different sections related to information about the Company, governance related to BR, general questions about the BR initiatives taken by the Company and detailed question answers about the BR.

For the purpose of comparative analysis, mostly quantitative data such as number of women employees, number of customer complaints has been captured or objective responses such as yes or no answer such as whether the Company has a policy on the 9 principles.

Qualitative data has been captured to prepare the brief summary of the BR reports of sample companies. The findings in Analysis and Findings of the Study are mainly restricted to objective data as Yes/No answers and quantitative data as the companies have disclosed in their Business Responsibility Report or Annual Reports or Sustainability Reports. SES has not undertaken comparative analysis of subjective data to avoid the possible subjectivity in its analysis.

However, for the purpose of BRR- Best Practices Guide (BPG) of this Report, we have analysed the detailed answers provided by the Companies in Business Responsibility Reports. Objective of preparing the Best Practice Guide is to provide a reference of the most comprehensive answers, which were not only more informative about the processes of the respective company but also more reader friendly and provide benchmarks for comparison and reflect the responsible practices adopted by the Company.

For the purpose of analysis of this report, the data has been captured from all 5 sections of BR Reports as prescribed in BR template.

- **Section A- General Information of the Company-** As the section is self-explanatory, it requires the Company to disclose the information and data about the Company. This section contains general information about the reporting Company. As the data differ company wise, hence, no comparison can be made. It was observed that all the companies have provided the data in this section.
- **Section B- Financial Details of the Company-** This section emphasises on the disclosure of financial details of the Company and the CSR expenditure. The Company discloses the total turnover, PAT and total expenditure on CSR as a % of PAT. The Company also disclose information about CSR expenditure in this section. It was observed that few companies have disclosed the sectors on which they have spent, and some companies have disclosed the total amount spent on CSR activities. Further, some Companies have also disclosed on CSR activities in a separate annexure as a part of Annual Report.

- **Section C Information of BR Initiatives of subsidiary companies and other entities.** Quantitative data has been collected for the purpose of analysis from this section to analyse the percentage of participation of other entities in the BR initiatives of the Company.
- **Section D covers information on the policies under each principle.** This section contains the information regarding the authority which is responsible for the BR initiative of the Company. This section also contains the policies formulated by the Company and principle wise disclosures regarding the policies and other questions regarding the weblinks, implementation and audit of the respective policy or procedures. Data was collected to extract following information for the purpose of analysis:
 - Details of compliance- Principle-wise BR Policy/policies- (Reply in Y/N)
 - Governance related information i.e. Frequency with which the Board of Directors, Committee of the Board or CEO assess BR performance of the Company.
 - And, Does the Company publish a BR or a Sustainability Report? Has the Company provided hyperlink for viewing this report?
- **Section E covers disclosure on all the 9 principles.** This section contains quantitative and qualitative data and from this section the following information has been collected for the purpose of analysis:
 - **Principle 1: Ethics, Transparency and Accountability**
 - Disclosure regarding Stakeholder complaints received in the past financial year and what percentage was satisfactorily resolved?
 - **Principle 2: Product Lifecycle**
 - Does the company have procedures in place for sustainable sourcing? If yes, what percentage of your inputs was sourced sustainably
 - Does the company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste.
 - **Principle 3: Employee Wellbeing**
 - % of women employees as part of the total permanent employees
 - Disclosure on permanent employees with disabilities
 - Does the Company have an employee association that is recognized by management? What percentage of the permanent employees are members of this recognized employee association?
 - Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.
 - **Principle 4: Engaging Stakeholders**
 - Has the company mapped its internal and external stakeholders? Yes/No
 - Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders
 - **Principle 6: Environment**
 - Does the company identify and assess potential environmental risks? Y/N
 - Does the company have any project related to Clean Development Mechanism?
 - Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?
 - Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.
 - **Principle 8: Inclusive Growth**

- Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?
- Has the Company done any impact assessment of their initiative?
- **Principle 9: Providing Customer Value**
 - What percentage of customer complaints/consumer cases are pending as on the end of financial year?
 - Did the company carry out any consumer survey/ consumer satisfaction trends?
- **Corporate Social Responsibility (CSR)**

As per section 135(5) of the Companies Act 2013:

*“(5) The Board of every company referred to in sub-section (1), shall ensure that the company spends, in every financial year, **at least two per cent. of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy**”*

CSR is a responsibility of an organization towards the society. It is mandated by law for the companies to take initiatives for the Corporate Social Responsibility. Considering the importance of the above fact we have also analysed CSR initiatives taken by the Company and the data for sector wise expenditure.

For the purpose of the report, data has been captured on the following basis:

- Total amount of CSR expenditure
- Sector – wise CSR expenditure
- Whether the Company has spent the full prescribed amount on its CSR activities?
- If the company has not spent full amount on its CSR activities, any reason provided?

ANALYSIS & FINDINGS OF THE STUDY

REGULATORY REQUIREMENT

SEBI by its Circular dated [4th November 2015](#), provided as follows:

- *“As per clause (f) of sub regulation (2) of regulation 34 of [Listing Regulations](#), the annual report shall contain a business responsibility report describing the initiatives taken by the listed entity from an environmental, social and governance perspective, in the format as specified by the Board. Accordingly, listed entities shall be guided by the format as per Annexure I”*
- *“Those listed entities which have been submitting sustainability reports to overseas regulatory agencies/stakeholders based on internationally accepted reporting frameworks need not prepare a separate report for the purpose of these guidelines but only furnish the same to their stakeholders along with the details of the framework under which their BR Report has been prepared and a mapping of the principles contained in these guidelines to the disclosures made in their sustainability reports.”*

Hence, listed entities can follow either of the two options to publish their BR initiatives to comply with the SEBI mandate:

- Companies can publish their BR Reports as per the Format prescribed in the SEBI Circular.
- Or, if the Companies are progressive towards the disclosures and follow an internationally accepted reporting framework to publish their sustainability reports, these companies are not required to publish as separate BR Report as per SEBI Format. The companies can provide mapping of the BR Principles as stated in the SEBI Circular with their sustainability reports.

It was observed from the data collected, that companies have published BR Report as per the template provided by SEBI (referred to as ‘SEBI Format’) as well as some companies have published Sustainability Report and provided mapping with BR principles. It was observed that Sustainability Report were published as per international reporting standard such as GRI and IIRC. However, some Companies have not followed any format while publishing a Sustainability Report.

REPORTING FORMAT

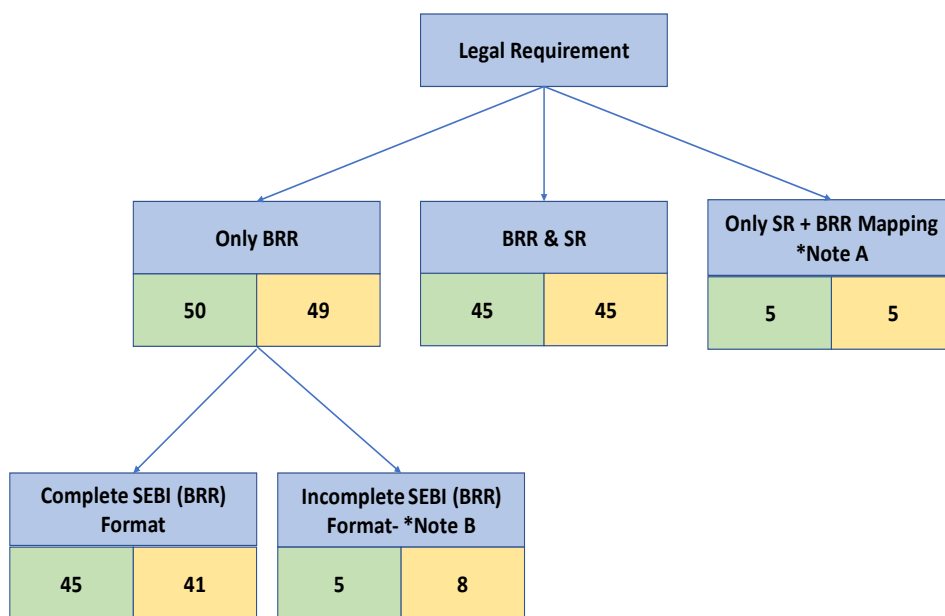
The break-up of type of Reporting formats followed by the Companies included in the study is depicted as follows:

SES has considered top 100 listed companies based on the market cap as on 31st March, 2017 for the purpose of this study. Comparison has been provided for 2 years, hence, the sample companies remains same for both years despite change in their ranking.

It was observed that during FY 16-17, Cairn India Ltd was merged with Vedanta Ltd, hence, SES has excluded Cairn India Ltd for the purpose of analysis of 100 companies. SES included Bajaj Holding Ltd which was ranked 101 as per market capitalisation, in the study to retain the sample size as 100 companies. SES realises that for holding companies BRR may not be as relevant as for operating companies, however, SES has taken top 100 companies based on market cap.

Further, Avenue Supermarts Ltd was listed on stock exchange on 21st March, 2017 and was within the top 100 listed entities as on 31st March 2017. However, the Company was not required by law to publish the Report for FY 16-17. Therefore, for FY 16-17 the sample consists of 99 companies.

Flow Diagram 1: Disclosures of BR Reports and Sustainability Report in FY 17-18 and FY 16-17.



	Indicates number of companies from the sample for FY 16-17
	Indicates number of companies from the sample for FY 17-18
BRR	Business Responsibility Report
SR	Sustainability Report

Note A- Companies that published only sustainability Reports along with mapping of BR principles. The companies are compliant with the Law.

FY 2017-18	FY 2016-17
Coal India Ltd	Coal India Ltd
Hindalco Industries Ltd	Hindalco Industries Ltd
ITC Ltd	ITC Ltd
State Bank of India	State Bank of India
Tata Steel Ltd	Tata Steel Ltd

Note B- Companies that did not provide a complete BR report as per SEBI format

FY 2017-18	FY 2016-17
Bajaj Auto Limited	Bajaj Auto Limited
Bajaj Finserv Ltd.	Bajaj Finserv Ltd.
Bajaj Finance Limited	Bajaj Finance Limited
Bajaj Holdings & Investment Ltd	Bajaj Holdings & Investment Ltd
Indiabulls Housing Finance Ltd	Indiabulls Housing Finance Ltd
	Eicher Motors Ltd
	HDFC Ltd
	Titan Company Limited

Observations:

- 8 companies had not provided BRR as per SEBI format in FY 16-17 and 5 companies have not prepared BRR as per SEBI format in FY 17-18.
- Numbers have improved in 2017-18 over 2016-17

Positives:

- HDFC Ltd had not provided responses to Question 2 and 3 of section D of the Business Responsibility Report in FY 16-17. However, in FY 2017-18, HDFC Ltd has provided a complete BR Report as per SEBI format.
- Similarly, Eicher Motor Limited had also not provided response to Question 2 and 3 of section D of the Business Responsibility Report in FY 16-17. However, in FY 2017-18, Eicher Motor Ltd has provided a complete BR Report as per SEBI format.
- In FY 2016-17 Titan Company Ltd had not published BR Report as per SEBI Format. However, in FY 2017-18 the Company has provided the complete BR Report as per SEBI Format.

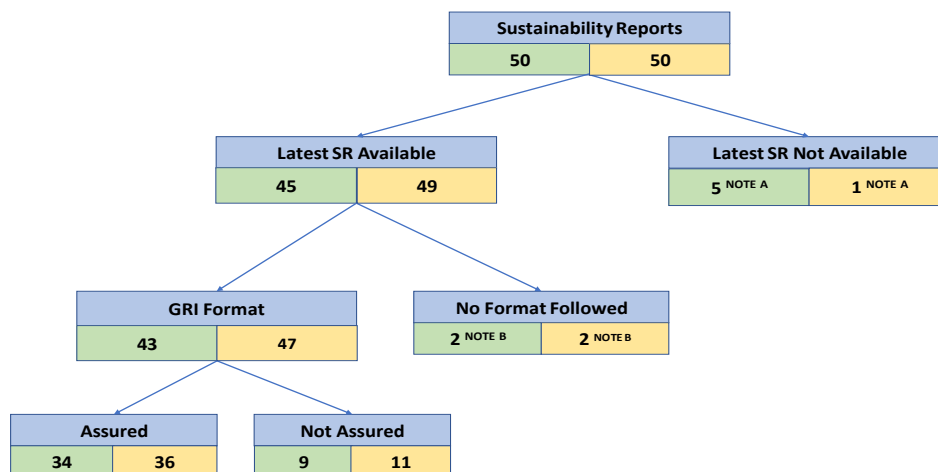
No change:

- Bajaj Auto Ltd, Bajaj Finserv Ltd, Bajaj Holdings & Investment Ltd, Bajaj Finance Ltd and Indiabulls Housing Finance Ltd have furnished BR reports which are not complete as per the SEBI prescribed template for both FY 16-17 and FY 17-18. Answers for certain questions or certain section of the BR template are found missing in the BR reports of these companies.

Sustainability Reporting:

Only 50 out of 100 companies in sample have prepared sustainability report. Companies that prepared Sustainability Report mostly followed two type of internationally accepted Reporting Format such as Global Reporting Initiatives - Standard (GRI) or IIRC for disclosure on non-financial parameters.

Flow diagram 2: Disclosures regarding Sustainability Reporting in FY 17-18 and FY 16-17.



	Indicates number of companies from the sample for FY 16-17
	Indicates number of companies from the sample for FY 17-18
SR	Sustainability Report

Note A- Companies which have not provided latest Sustainability Report upto 15th March 2018

FY 2017-18	FY 2016-17
HCL Technologies Ltd	HCL Technologies Ltd
GAIL (India) Ltd	
Bharat Heavy Electricals Ltd	
NMDC Ltd	
ONGC Ltd	

These companies have stated in their Annual Reports that they are publishing their sustainability reports annually. However, the same were not available on their website. These companies had provided Business Responsibility Reports in SEBI Format in their Annual Reports or website therefore these companies were compliant with SEBI LODR.

Note B- Companies which did not use GRI or IIRC format for Sustainability Report

FY 2017-18	FY 2016-17
Asian Paints Ltd	Asian Paints Ltd
Bharat Electronics Ltd	Bharat Electronics Ltd

These companies have also published a Business Responsibility Report as per SEBI Format, thus they are compliant with requirement under SEBI LODR

- 45 out of 50 companies have published their latest sustainability reports for FY 2017-18. 43 out of 45 which have published the SR have followed GRI standards for preparing SR in FY 17-18.
- 50 companies from the sample companies in FY 16-17 had disclosed that they publish Sustainability Report. Except HCL Technologies Ltd, all other companies have published their sustainability reports for FY 2016-17. 47 out of 49 which have published the SR and have followed GRI standards for preparing SR in FY 16-17.
- There are 16 companies in FY 17-18, which had provided disclosures as per GRI standards as well as integrated reporting format
- Asian Paints Ltd and Bharat Electronics Ltd had prepared Sustainability Report, however, SR have not been prepared in accordance with GRI G4 or IIRC. However, these companies have published a Business Responsibility Report as per SEBI Format. They have not followed any format for their sustainability reports for FY 17-18 and FY 16-17.

Third Party Assurance for Sustainability Reporting – GRI / IIRC Format

Financial information provided by the Company in India and world over is subject to an Audit annually. The practice is followed so that the data reported by the Company is verified and is presented in an acceptable and specified format so that stakeholders are able to compare the figures of the latest year with the past year figures.

Similarly, Sustainability Reporting is a report via which Companies report on the organization's economic, social and environmental impacts and make standard disclosure of company's performance on non-financial parameters. An audit or verification of information being provided by the Company would add to the credibility of the Report.

GRI guidelines promote external assurance for sustainability reports. GRI states **“use of external assurance for sustainability reports in addition to any internal resources but does not require it.”** This is not a mandate; however, assurance statement increase accuracy and trust on the information disclosed.

SEBI has provided BR Report format via which companies make disclosure on non- financial parameters. However, SEBI has not prescribed that such a Report is subject to any kind of audit or verification for accuracy of the disclosure.

As the companies are progressing towards sustainability reporting and are trying to publish their sustainability reports by following a prescribed standard format, hence, authentication or verification from the independent party is important to increase the qualitative value of the reports. Being a third line of defence in the corporate governance, independent audit is required which may help to gain investors confidence in transparency and quality of the Sustainability Report.

From the flow diagram 2 it can be observed that almost 80% (i.e. 34 out of 43) SR in 17-18 were assured and approximately 77% (i.e. 36 out of 47) SR in FY 16-17 were independent assured.

Integrated Reporting

Integrated Reporting as defined by IIRC means *“Providing investors with the information they need to make more effective capital allocation decisions will facilitate better long-term investment returns.”* It

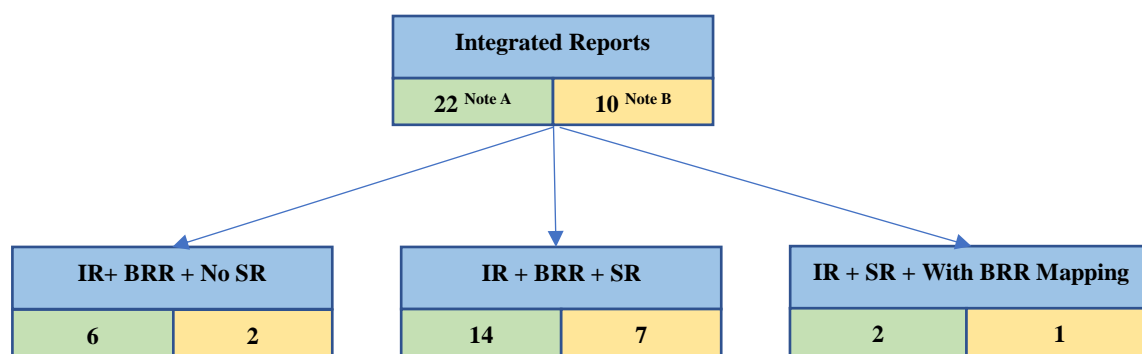
is an integrated representation of performance of the Company related to financial and non-financial factors. Since wide range of factors determine value of an organisation some of which cannot be quantified, IIRC has defined framework to report on both financial and non-financial parameters affecting a company. Integrated report contains organization's strategy, governance, performance and prospects which lead to the creation of value over short and long run. Purpose of the Integrated reporting is to provide a more detailed form of reporting in light of business model and non-financial resources such as human, social and intellectual capitals as well as financial capitals.

Integrated Reporting has grown considerably since the inception of IIRC in 2010. Some countries like South Africa and Brazil have made the same mandatory.

In line with this, SEBI has also issued a [Circular on 6th February 2017](#) advising top 500 listed companies which are required to prepare BRR to adopt IR on a voluntary basis from the financial year 2017-18.

SEBI has stated in its circular “*Today an investor seeks both financial as well as non-financial information to take a well-informed investment decision. An integrated report aims to provide a concise communication about how an organisation's strategy, governance, performance and prospects create value over time. Further it may be noted that the concept of integrated reporting is being discussed at various international forums. The purpose of integrated reporting is to provide shareholders and interested stakeholders with relevant information that is useful for making investment decisions.*”

Flow diagram 3: Disclosures regarding Integrated Reporting in FY 17-18 and FY 16-17.



	Indicates number of companies from the sample for FY 16-17
	Indicates number of companies from the sample for FY 17-18
SR	Sustainability Report
BRR	Business Responsibility Report
IR	Integrated Report

Note A- FY 2017-18		Note B- FY 2016-17
Ambuja Cements Ltd	Mahindra & Mahindra Ltd	Dabur India Ltd
Bharti Airtel Ltd	Power Fin Corp Ltd.	IndusInd Bank Ltd
Cipla Ltd	Power Grid Corp. Ltd.	Mahindra & Mahindra Ltd
Dabur India Ltd	Reliance Industries Ltd	Reliance Industries Ltd
HDFC Ltd	Tata Motors Ltd	Tata Motors Ltd
IndusInd Bank Ltd	Tata Power Co Ltd	Tata Power Co Ltd
Bharti Infratel Ltd.	Tata Steel Ltd	Tata Steel Ltd
Indian Oil Corp Ltd	Titan Company Ltd	Titan Company Ltd
ITC Ltd	Vedanta Ltd	Wipro Ltd
JSW Steel Ltd	Wipro Ltd	Yes Bank Ltd
Larsen & Toubro Ltd.	Yes Bank Ltd	

Out of the sample of 99 companies, in FY 2016-17, 10 companies had followed integrated reporting which increased to 22 companies in FY 2017-18.

Ten companies had published Integrated Report in FY 16-17 even before SEBI had suggested the adoption of Integrated Reporting in its circular. SES understands that good governance demand initiating right policies even before the same are translated into law.

After SEBI circular the number of companies that provided integrated report in FY 17-18 increased to 22. A jump of 120% in number of companies.

PARTICIPATION OF OTHER ENTITIES IN BR INITIATIVES OF THE COMPANY

Regulatory Requirement: Section C- Other details- Q 3

“Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]”

Companies do not exist in isolation; their supply chain is integral part of their operations and is of utmost importance. Sustainability initiatives of the Company in isolation would leave the Company unprepared and open to risks from possible unsustainable operations of its Business Partners. Extending business responsibility initiatives of the Company across its supply chain including its suppliers, associates, distributors can have a lasting impact on the company’s performance and preparedness in the long run.

To this effect under Section C of the SEBI format, companies are required to respond to the question whether any other entity/entities that the Company does business with, participate in the BR initiatives of the Company. This potentially ensures that policy of the Company on its Business responsibility is not limited to the Company only and its applicable to its business partners as well.

Further, as per the question companies are also required to provide quantitative figures on the percentage of entities that participate in the BR initiatives.

In the Table 1 summary of participation of other entities in the BR initiative of the Companies in FY 16-17 and FY 17-18 has been provided.

Table 1: Participation of other entities in BR initiatives of the Company

Categories	2017-18	2016-17
Companies that disclosed % of other entities participating	26	21
No of Companies which have not disclosed % but given subjective response to participation of other entities	16	16
No. of companies that disclosed that the question is not applicable to the company	5	3
Companies that disclosed none of the other entities participate	44	44
Companies that have not disclosed participation of entities or omitted the question on participation of entities	9	15
Total	100	99*

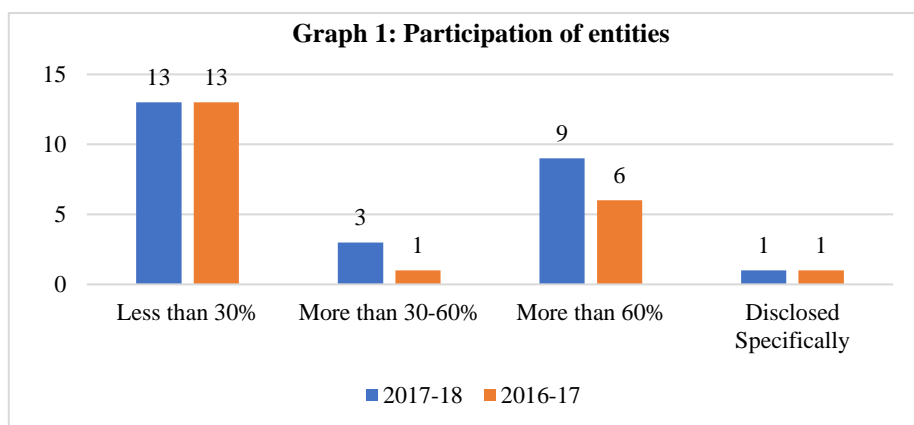
*In FY 16-17 sample size is of 99 companies as, Avenue Supermart Ltd had not published BR Report for FY 16-17.

- From the disclosure by the sample companies in the Table 1 it can be observed that only approximately 21% in FY 16-17 and 26% in FY 17-18 of the companies from the sample had disclosed the percentage of participation of other entities in BR initiative. There is a minor positive improvement.
- About 15% companies in 2016-17 and about 9% in 2017-18, did not disclose the data on participation by third parties in its BR initiative. Again, indicating an improvement in disclosing.
- Of the sample, 44% of the companies in 2016-17 and in 2017-18 stated that none of the other entities participate in the BR initiatives of the Company. This reflects that a large portion of the companies have not taken the idea of sustainable operation to their supply chain entities.

Changes observed:

- While IndusInd Bank and Shriram Transport Finance Company Ltd had stated in FY 16-17 that no other entities participate in BR initiative of the Bank, in FY 17-18, both have stated that the question is not applicable to them.
- Reliance Industries Ltd., Tata Steel Ltd, Tech Mahindra Ltd, Titan Industries Ltd and Indian Oil Corporation had not disclosed the percentage of participation of other entities in FY 16-17, however, the data on percentage was disclosed by these companies in FY 17-18.
- HDFC Ltd and Hindalco Industries Ltd had not made any disclosure in 2016-17, while in FY 2017-18 they have stated that none of the other entities participated in BR initiatives of the Company.

Amongst the companies that have disclosed percentage of participation of other entities (26 companies in 17-18), it was observed that the disclosure did not follow any set guidelines. While, some companies provided an elaborated response along with each category of other entity and its participation, other companies only provided responses such as, “less than 30%” or “more than 30%” etc. The responses have been categorized in various sub categories and are depicted in the Graph 1.



- The companies have not answered uniformly to this question and answers varied from company to company. Few companies have provided a response such as less than 30% or more than 60% which cannot be quantified in terms of available information to conduct any meaningful analysis. This information does not provide the correct picture of the participation. However, the primary purpose of the question was to enquire about, whether, the policy of the company is applicable to the company only or also to the entities which are interacting with the Company. Because, the ideal situation is when the entities like suppliers, distributors and customers are also participating in the BR initiative of the Company which ensures that the policy of the Company is effectively applicable in all directions.
- Among the 21 companies in FY 16-17 and 26 companies in FY 17-18 that disclosed the percentage of entities that participate in BR initiatives of the Company majority have disclosed that less than 30% of the other entities participate in the BR initiatives of the Company.
- Most of the Companies have provided a range or upper limit as % of participation of other entities in BR initiatives of the Company and not an exact percentage.

It was observed that only Dabur India Ltd in its report for FY 16-17 and FY 17-18 disclosed the % of other entities participation in BR initiatives of the Company individually for each of other entities viz. Suppliers, Customers, Distributors. The detailed response of Dabur Ltd is provided under BPG for reference.

SECTION D

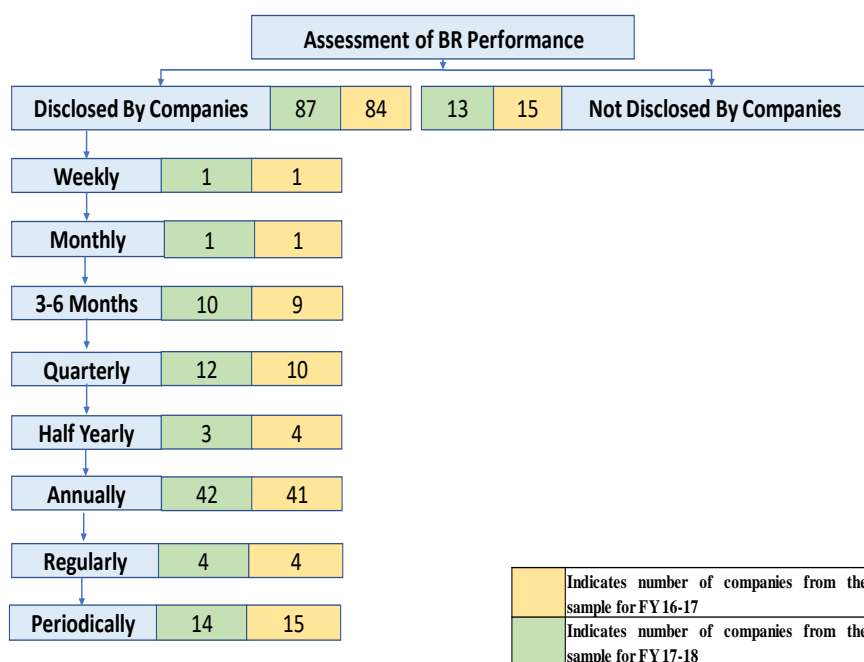
ASSESSMENT OF BUSINESS RESPONSIBILITY PERFORMANCE OF THE COMPANY

Section D; Question 3a) “Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year”

The response to above question intends to communicate to stakeholders about the frequency at which BR initiatives of the Company are assessed by the designated members of the Company, who are responsible for implementation of BR initiatives. Regular assessment/ evaluation is as essential as it is to decide on BR objectives and initiatives to be undertaken. It is essential to know for stakeholders that there are certain members who are responsible and who would oversee the progress and actions taken on those objectives and review the progress enabling them to take corrective action as may be necessary. In view of this, the Company is required to disclose, if the performance assessment is being conducted and the interval at which such an assessment is conducted.

Data was collected for 99 sample companies for FY 16-17 and 100 companies for FY 17-18, it was observed that in 2017-18 about 13% of the Companies (Flow Diagram 4) have not disclosed the information, while, 87% companies have disclosed the frequency with which BR performance is monitored, there is marginal improvement in 2017-18 compared to 2016-17.

Flow Diagram 4: Assessment of BR performance



Changes observed in disclosure of the sample companies from FY 16-17 to FY 17-18:

- Companies which moved from “Non-Disclosure” to “Disclosure” category are HDFC Bank Ltd and Titan Company Ltd. In FY 16-17 both had not disclosed the information regarding the assessment of BR, however, in FY 17-18, HDFC Bank Ltd has disclosed that it assesses the BR performance “Annually” and Titan Company Ltd has disclosed that it assesses the BR performance “Quarterly”.

- Further, Avenue Supermart had not published its BRR in FY 16-17 as it was not listed, however, it has published BRR in 17-18 and had responded to question on the assessment of BR initiatives.
- Cipla Ltd had disclosed in FY 16-17 that BR performance is assessed annually, while in FY 17-18, the Company has not disclosed the data.
- Maruti Suzuki India Ltd has stated that *“the Company’s top management along with the Managing Director reviews the Company’s performance on a weekly basis through Business Review Meetings”*. Hence, Maruti Suzuki was considered in the weekly category.
- Oil India Ltd has stated that *“Board of OIL meets 12-13 times in a year wherein issues related to the CSR, Health, Safety and Environment, are discussed besides the business and financial performance”*. Hence, Oil India has been considered in “Monthly” category.
- Alkem Laboratories Ltd had disclosed in FY 16-17 that the Company assessed BR performance annually, while in FY 17-18, the Company has disclosed that the Company reviewed its BR performance “Quarterly”.
- In FY 16-17, Colgate Palmolive Ltd., had stated that the Company assessed its BR performance periodically, while, in FY 17-18, has stated that the Company assessed BR performance Quarterly.
- HDFC Ltd had disclosed in FY 16-17, that it assess the BR Performance “Periodically” and in FY 17-18, it has stated that it assess the BR Performance “Annually”.

Assessor of BR performance:

While data was collected it was observed that many companies have also disclosed who is authorised to assess the BR performance of the Company even though the same is not required as per the SEBI Template. Disclosure of authority provides information to the reader about the concerned authority if any identified by the Company for accessing Company’s BR initiatives. As the financial report of the company is checked by the Audit Committee and reviewed, similarly, BR performance should also be reviewed by a designated committee or persons within the organisation. In the data collected it was observed that most of the Companies in the sample have disclosed responsible authority that assessed the BR performance of the Company.

In FY 16-17, 62 companies and in FY 17-18, 65 companies have disclosed about the authority who reviewed the BR performance of the Company.

From the data collected it was observed that in most of the Companies CSR committee, BR Committee or CEO and Board reviews the BR performance. Some of the Companies have also stated that BR performance was assessed by Management or Specialised committee of the Company or a combination of these.

Few companies have also disclosed in detail about the assessment of BR performance of the Company. MRF ltd has provided in detail and step wise review of the BR performance. The Company has stated that *“The Board of Directors of the Company, annually reviews the various initiatives forming part of the BR performance of the Company. The CSR Committee reviews the implementation of the projects/ programmes/activities once in about 6 months. The Chairman & Managing Director and the Vice Chairman & Managing Director deliberate on issues relating to the BR when the respective functional review is done”*.

GAIL India Ltd has disclosed in a tabular format by describing that BR performance of the Company is reviewed at various levels from time to time. The Company has stated that *“In FY 17-18 total 2 meetings were held by Sustainable Development Committee, further GAIL has various related sub committees of Board which meets from time to time to review aspects related to Business Responsibility. In FY 17-18 total 2 meetings were held by Sustainable Development Committee, further*

GAIL has various related sub committees of Board which meets from time to time to review aspects related to Business Responsibility.”

An extract of the responses by GAIL India Ltd and MRF Ltd is provided under BPG for reference.

COMPARISON OF SCORES OF COMPANIES BASED ON DISCLOSURE ON POLICIES

Section D, Question 2a) Principle-wise (as per NVGs) BR Policy/policies.

(a) Details of compliance (Reply in Y/N)

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	<i>Do you have a policy(ies) for principle</i>									
2	<i>Has the policy been formulated in consultation with the relevant stakeholders?</i>									
3	<i>Does the policy conform to any national / international standards? If yes, specify (50 words).</i>									
4	<i>Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?</i>									
5	<i>Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?</i>									
6	<i>Indicate the link for the policy to be viewed online</i>									
7	<i>Has the policy been formally communicated to all relevant internal and external stakeholders?</i>									
8	<i>Does the Company have an in-house structure to implement the policy / policies?</i>									
9	<i>Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy / policies?</i>									
10	<i>Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?</i>									

Under Section D, a company is required to provide answers to various questions on different policies formulated by the Companies on the 9 principles of BR Report and on the implementation of these policies.

Companies have to reply only in yes/no format in the above template. So, the Companies are required to disclose answers to 10 questions based on 9 principles of Business Responsibility as mandated by SEBI. Hence, total 90 questions are under this metrics.

For evaluation, data was collected across the above metrics and every response given by the Company in the metrics was scored. For each 'Yes' response 1 point has been given and therefore, for each principle 10 points are given (10 question of 1 mark each). Total marks across each metrics if all questions on all 9 principles are answered in positive is 90 marks.

Since, the data is objective no justification was provided by the Company supporting their answers. Therefore, data is collected on the face value of the answer given by the Company which is assumed to be accurate and hence all the Companies are scored on basis of their disclosure in the metrics.

Graphical Representation of Total Scores of Sample Companies

9 companies from FY 17-18 and 13 Companies from FY 16-17 have been excluded from the analysis of comparison of marks given as per the disclosure given in tabular format by the Company. Reasons for such exclusion is given in the Table 2:

Table 2: Following Companies has been excluded from analysis due to reasons provided below

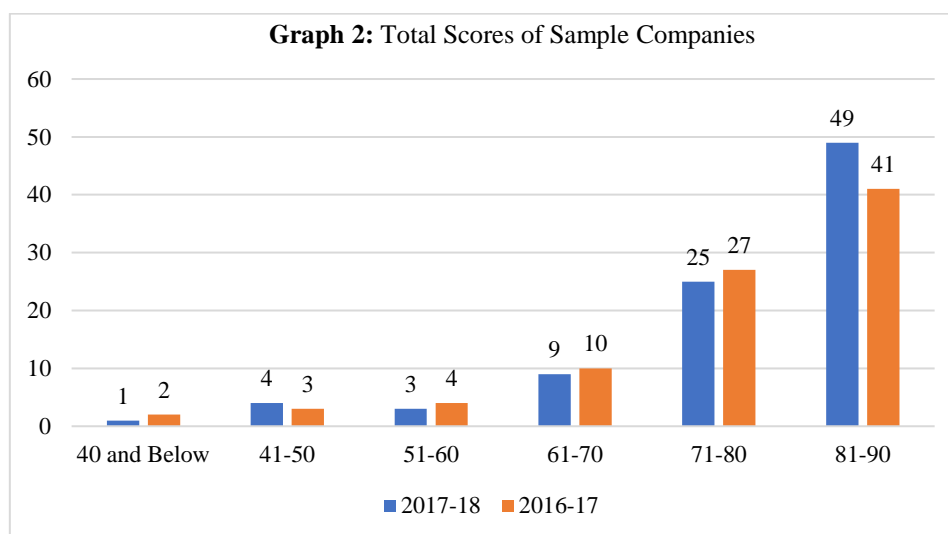
Company	FY from which excluded	Reason for excluding
Bajaj Auto Ltd	FY 16-17 and FY 17-18	These Companies have not provided BR Report as per SEBI Format
Bajaj Finserv Ltd.		
Bajaj Finance Ltd		
Bajaj Holding & Investment Ltd		
Eicher Motors Ltd	FY 16-17	
HDFC Ltd		
Titan Company Ltd		
Coal India Ltd	FY 16-17 and FY 17-18	
ITC Ltd		
Tata Steel Ltd		
Hindalco Industries Ltd		
Indiabulls Hsg Fin Ltd	FY 16-17 and FY 17-18	Company has not provided BR report in tabular format
Avenue Supermarts Ltd	FY 16-17	Company was not listed in FY 16-17, hence Company did not publish a BRR for FY 16-17. Company has been included in sample in 17-18 only.

Therefore, the sample for FY 16-17 was 87 companies and 91 companies in FY 17-18 which had provided the responses for Section D Q2a as per the SEBI prescribed format.

Positives changes from FY 16-17 in FY 17-18:

Eicher Motors Ltd, HDFC Ltd and Titan Company Ltd had not followed the prescribed SEBI format for FY 16-17, however, in FY 17-18, these companies have followed the prescribed format for BR Report.

Total Score of Sample Companies:



Graph 2 and Table 3 depicts the scores of the Companies based on their responses to Question 2 (a) - Section D of the BRR as per SEBI prescribed format.

Table 3: Cumulative number of companies

Score	2017-18	2016-17
81 or more	49	41
71 or more	74	68
61 or more	83	78
51 or more	86	82
41 or more	90	85
40 or less	91	87

Observations on Companies which scored “Perfect 90”:**Positives:**

- For FY 16-17, out of 87 sample companies 17 companies had scored “Perfect 90” i.e. had responded ‘Yes’ to every question under every policy. This number has increased to 21 companies in FY 17-18 which have scored “Perfect 90”. Four Companies which moved to perfect score in FY 17-18 are
 - Scores of P&G Hygiene & Healthcare Ltd, Oracle Financial Services Software Ltd, Titan Ltd. and Vedanta Ltd increased to “Perfect 90”.
 - Titan Company Ltd has not provided BR Report as per SEBI format in FY 16-17, however, in FY 17-18, the Company has provided BR Report as per SEBI format. Titan Company Ltd has disclosed that it has a policy for all 9 principles and answered in affirmative for all the questions on the policy. Hence, was assigned a score of “Perfect 90” for FY 17-18.

Observations on Companies whose scores lies within 81 to 90 range:

- From the sample in FY 16-17, 41 companies have scored between 90 and 80. Scoring 80-90 marks can be interpreted as these companies have been better in terms of formulation of policies, adoption of policies and implementation of policies. For FY 17-18, this number improved to 49 Companies which have scored between 80-90 out of the sample of 91 companies.
- Further, there was an improvement in the scores of total 8 companies which were not in 81-90 category in 16-17, however, moved to this category in 17-18.
- There was in improvement in score of 5 companies within 81-90 category.
- Titan Company Ltd has not provided BR Report as per SEBI format in FY 16-17, however, in FY 17-18, the Company has provided BR Report as per SEBI format and the score is in 81-90 category. Avenue Supermarts Ltd was not listed in FY 16-17, hence, had not published BR Report for FY 16-17. However, in FY 17-18, the Company has published its BR Report for the first time and lies within the highest range of the scores i.e. 81-90.
- Highest improvement in scores was observed in Piramal Enterprises Ltd by 22 points as it moved from 61-70 to 81-90 range.

Observation on companies whose scores lies within 71 to 80 range:**Positives:**

- Within the range improvement of score by one point was observed in the scores of Dr. Reddy Laboratories Ltd and IndusInd Bank Ltd.
- Power Grid Corporation has also improved Y-o-Y, however, still stays in the range of 71-80.

Negatives:

- Due to decrease of 10 points Bharti Airtel has moved to 71-80 range of scores from the range of 81-90. In FY 16-17 the Company has affirmatively disclosed for Q10 “*the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency*” for

all principles. However, in FY 17-18 for Principle 4,5 and 8 the disclosure of the Company was not affirmative.

Observation on companies whose scores were below 60:

Positive:

- There was increase of 9 points in score of Power Finance Corporation Ltd from FY 16-17 to FY 17-18. In FY 16-17 the Company had not formulated the policy for principle 9. However, in FY 17-18, the Company has disclosed that the Company has formulated the policy for principle 9.

Negative:

- Bosch Ltd was the least scorer in both FY 16-17 and FY 17-18.

Observation on Companies which published BR Report for the first time as per SEBI format.

Positives:

- Avenue Supermarts Ltd was not listed in FY 16-17, hence, had not published BR Report for FY 16-17. However, in FY 17-18, the Company has published its BR Report for the first time and lies within the highest range of the scores i.e. 81-90.
- Titan Company Ltd had published its BR Report for FY 16-17, however, the Company had not followed the SEBI format. In FY 17-18, the Company has still not provided the disclosures on question in tabular format, however, the Company has provided answers to each question on every principle in descriptive format.
- Eicher Motors Ltd had not followed the complete SEBI format in FY 16-17. However, in FY 17-18, the Company has provided the answers to questions in tabular format and scored within the range of 71-80.
- Further, HDFC Ltd had also not disclosed the BR Report as per SEBI format in FY 16-17. However, in FY 17-18 the Company has given BR Report in SEBI Format and lies within the range of 71-80.

Policies on the 9 Principles

Principle-wise (as per NVGs) BR Policy/policies.

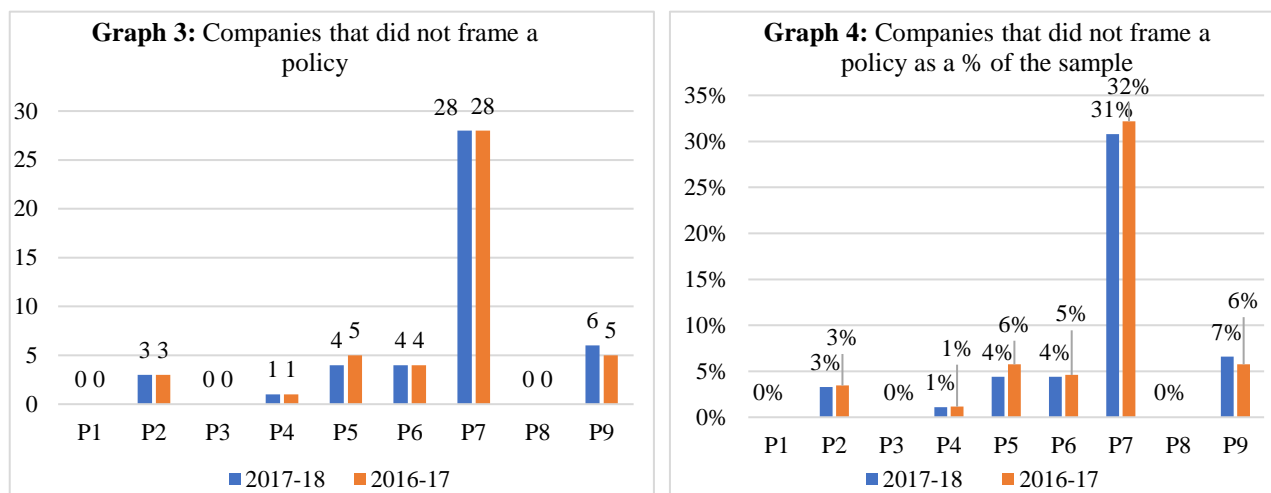
(a) Details of compliance (Reply in Y/N)

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	<i>Do you have a policy(ies) for principle</i>									

Written documentation of policies can be seen as an effective way to communicate the expectations as well as for laying down practices which are consistent with the goals of the policy. These policies become benchmark for the organisations and relevant stakeholders while engaging in any service with the organisation.

This question is the foundation for effective BR and it establishes whether the organisation is imbibing the Business Responsibility principles and setting benchmarks for the organisation in a planned and systematic manner or not. While, the content of these policies may be more material than merely framing a policy, however, without policy question on content and its importance cannot be determined. Further, the existing format of questions does not include question regarding the content of the policy, the same cannot be analysed.

The Graph 3 & 4 represents the number of Companies that did not formulate a policy on various principles from P1 to P9. The sample for FY 16-17 includes 87 companies and for FY 17-18 includes 91 companies.



It can be observed that all sample Companies for both FY 16-17 and FY 17-18 have framed a policy on **Principle 1- Ethics, Transparency and Accountability, Principle 3- Employees' Wellbeing and Principle 8- CSR.**

It can be seen from the Graph 3 & 4 that highest non adherence to framing policy is in respect of Principle 7, as maximum number of the Companies have not framed policy for P7 out of all the principles from 1 to 9.

28 Companies out of 91 in FY 17-18 and 28 companies from 87 companies in FY 16-17 have not framed policy for principle 7 on "Public Advocacy".

Some of the observations are as follows for those Companies which did not frame the policy on the principles:

- **Principle P2 "Safe and Sustainable Sourcing"** - HDFC Bank, Petronet LNG Ltd and Power Finance Corporation Ltd had not framed a policy in FY 16-17. These companies have not framed the policy in FY 17-18 as well. Power Finance Corporation Ltd has stated in its BR Report "*PFC being an NBFC, this principle has limited applicability*".
- **Principle P4 "Disadvantaged, vulnerable and marginalized stakeholders"**- Petronet LNG Ltd has not framed a policy on P4 in 2017-18. It also had not framed a policy in FY 16-17.
- **Principle P5 "Human Rights"**- Ambuja Cement, Maruti Suzuki India Ltd, Petronet LNG Ltd and Power Finance Ltd did not have a policy on principle P5 in FY 16-17. These companies still have not framed a policy in FY 17-18.

Observation: Ambuja Cement Ltd in its BR Report did not respond in 'Yes' to the question of framing a policy on Principle 5. However, the Company has neither answered 'No'. Hence, it is not clear whether the Company has framed a policy for Principle 5 or not. In absence of such clarity, SES has considered that the Company has not framed the policy for the principle 5.

While it has not responded in 'Yes' regarding framing of policy, the Company has responded in 'Yes' to the question '*Q 2- Has the policy been formulated in consultation with the relevant stakeholders*' and '*Q-3 Does the policy conform to any national /international standards*' relating to the policy for Principle 5. How has the Company has consulted the relevant stakeholders of the company for framing the policy and how is the policy is in accordance with national/international standards, if the policy is not framed.

- **Principle P6 “Protection of environment”** - ICICI Bank Ltd, ICICI Prudential Life Insurance Company Ltd and Rural Electrification Corporation Ltd have not framed a policy on P6 in FY 16-17 and 17-18.
- **Principle P7 “Public advocacy”**- Bharat Forge Ltd has stated in FY 16-17 that the Company had not framed a policy on P7. While, in FY 17-18, the Company has stated that “*The policy is embedded in the Company’s Code of Conduct, Ethics and HR policies.*”
- **Principle P9 “Customer & Consumer Survey”** - ACC Ltd, ICICI Prudential Life Insurance Company Ltd, NTPC Ltd, Petronet LNG Ltd and Steel Authority of India Ltd had not framed a policy on P9 in FY 16-17 and FY 17-18. Eicher Motors Ltd had not followed the SEBI format for BR Report in FY 16-17. However, in FY 17-18, the Company has disclosed that it has not framed the policy for P9.

Further, Power Finance Corporation Ltd had stated in FY 16-17 that policy for P9 is embedded in other various policies of the Company, while, in FY 17-18, the Company has stated that it has a policy for P9.

Approval of Policy and Signature:

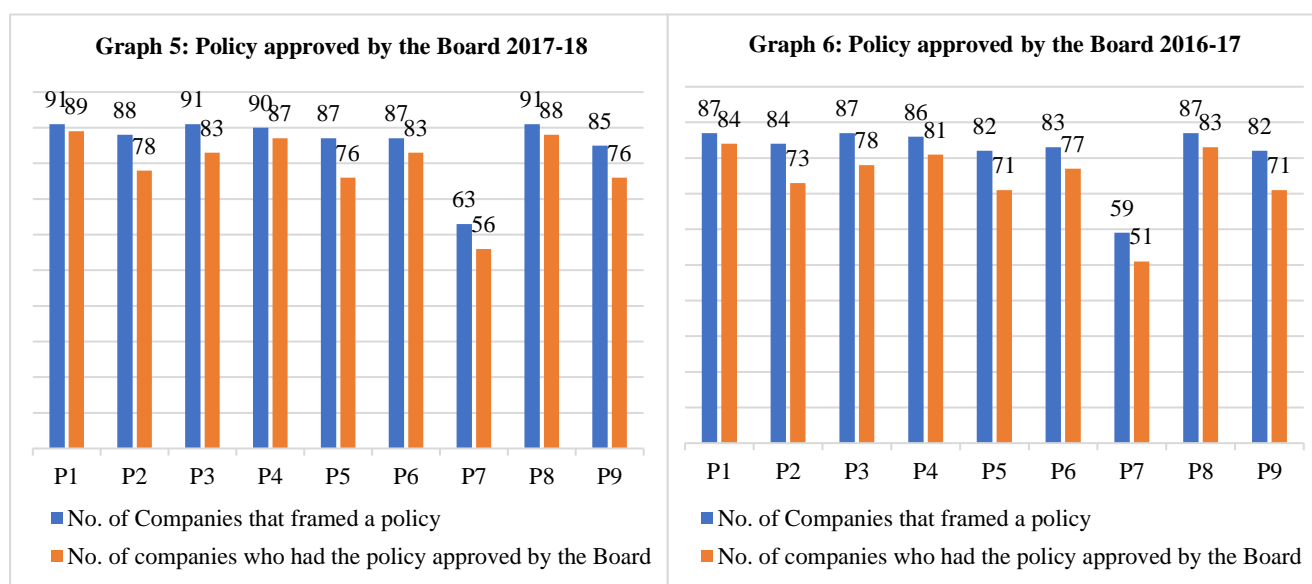
As seen in the Regulatory Requirement companies are required to respond to the following question

Principle-wise (as per NVGs) BR Policy/policies.

(a) Details of compliance (Reply in Y/N)

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
4	<i>Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?</i>									

This question requires the Company to disclose if the policy framed on P1 to P9 is approved by the Board. Graphs 5 & 6 has tabulated data. As a good governance practice, we see that Board is the highest decision-making authority in the Company. The policies developed for implementation of Business Responsibility practices should be implemented organisation wide. Therefore, logically one can say that these policies should flow as directives and governance benchmarks from the highest authority and should be adopted organisation wide as well as by all relevant internal and external stakeholders of the organisation.



From the Graph 5 & 6 it can be seen that most of the companies which have framed the policies have their policies approved by the Board.

Observations on the disclosures made by the Companies are as follows:

- **P1** – Bank of Baroda and Bosch Ltd from the sample of 91 Companies in FY 17-18 and sample of 87 companies in FY 16-17 had framed the policy on P1 but the policies were not approved by the Board.

Positive change: Further, in FY 16-17, DLF Ltd had stated “*Since all the policies are not required to be approved by the Board, the approval of the Board has been obtained where it is mandatory.*” However, in FY 17-18, the Company has answered to the question affirmatively for P1.
- **P2** - In FY 16-17, 84 companies had framed a policy on P2 and out of these, 11 Companies did not have a board approved policy. In FY 17-18 there were 88 companies which had framed a policy on P2 and out of these, 10 companies did not have a board approved policy.

Positive change:
DLF Ltd and Piramal Enterprises Ltd have shown improvement and disclosed that the policy was approved by the Board.

Negative change:
Bharti Airtel Ltd had answered affirmatively in FY 16-17 to the question, however, in FY 17-18, the Company has disclosed that the policy was not approved by the Board.
- **P3** - All sample companies for both FY 16-17 and 17-18 have framed policy for principle P3. However, all policies were not approved by the Board. Only, 83 Companies in 17-18 and 78 in FY 16-17 have approved their policy by the Board on principle P3.

Positive change: DLF Ltd and Piramal Enterprises Ltd had not approved a policy on P3 in FY 16-17, while, in FY 17-18, these Companies have approved their policy on principle P3.

Negative change:
Bharti Airtel Ltd had answered affirmatively in FY 16-17 to the question, however, in FY 17-18, the Company has disclosed that the policy was not approved by the Board.
- **P4**- 87 Companies in FY 17-18 and 81 Companies in FY 16-17 have their policy approved by the Board.

Positive change:
Adani Ports and SEZ Ltd and DLF Ltd had stated in FY 16-17 that the Company had not approved their policy on P4 in FY 16-17, while, in FY 17-18, these Companies have stated that the policy is approved by the Board.
- **P5** – In FY 16-17, 82 Companies and in FY 17-18, 87 Companies have framed a policy on principle 5. However, out of these 16 Companies in FY 16-17 and 15 Companies in FY 17-18 have not approved the policy on P5 by the Board.

Observation: Bharti Airtel Ltd had stated in FY 16-17 that the policy is approved by the Board, while in FY 17-18, the Company has stated that the policy is not approved by the Board.
- **P6** - From the sample 87 Companies out of 91 in FY 17-18 and 83 sample Companies out of 87 for FY 16-17 have framed a policy for Principle 6.

Positive: DLF Ltd and Piramal Enterprises Ltd had stated in FY 16-17 that the policy for principle 5 was not approved by the Board, while in FY 17-18, both the Companies have stated that policy on principle 5 is approved by the board.
- **P7** –8 Companies which have framed policy on P7, did not have the policy approved by the Board for FY 16-17. In FY 17-18 this figure was 7.

Positive: In FY 17-18, DLF Ltd and Piramal Enterprises Ltd has stated that the policy was approved by the Board whereas in FY 16-17 these companies had stated that policy was not approved by the Board.
- **P8** – All of the sample Companies have a policy on P8. Out of these sample Companies, 88 Companies had a policy approved by the Board in FY 17-18. 3 Companies in FY 17-18 and 4 Companies in FY 16-17 did not have a policy on P8 approved by the Board.

Positives: In FY 17-18, Sun TV Networks Ltd and DLF Ltd have stated that the policy was approved by the Board. In FY 16-17, these companies did not have a policy on P8 approved by the Board.

- **P9** – In FY 17-18, from the sample of 91 Companies, 76 Companies have policy approved by the Board on principle P9. 6 Companies had not framed a policy for P9 and 9 Companies have a policy which is not approved by the Board.

In FY 16-17, 71 Companies had a policy approved by the Board on principle 9. Five Companies had not framed a policy for P9 and 11 Companies had a policy which was not approved by the Board.

Further, in FY 17-18, 52 Companies have policies on all 9 principles which were approved by the Board.

Observations regarding the Approval Authority of the Policy:

Second part of the question requires the Companies to answer to “*If yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director*”. It was seen that 21 Companies from the sample have specifically provided response whether the policy was signed and if it was then the signing authority. Few of the companies’ responses are provided below for reference.

- ABB India Ltd has stated that “*A few of the policies have been approved by the Board and other policies which are ABB Group policies are adopted by the Company.*”
- Asian Paints Ltd and Reddy Laboratories Ltd had disclosed specifically for each policy that who has signed the policy.
- State Bank of India has also disclosed for all policies that “*Yes, the BR policy has been approved by the Board of Directors*”.
- Few more Companies have also provided that who has signed the policies, i.e. Dabur India Ltd, Siemens Ltd, Axis Bank, Bharat Electronics Ltd, BPCL, Britannia Industries Ltd, Avenue Supermarts Ltd, Emami Ltd, Hindustan Petroleum Corporation Ltd, IOCL, Oil and Natural Gas Corporation Ltd, Piramal Enterprises Ltd., Sun Pharmaceuticals Ltd, Tata Motors Ltd, Tata Power Ltd, Tech Mahindra Ltd and UPL Ltd.
- Wipro Ltd has also disclosed that who has signed the policy in a detailed manner.

Committee for implementation of Policies

Principle-wise (as per NVGs) BR Policy/policies.

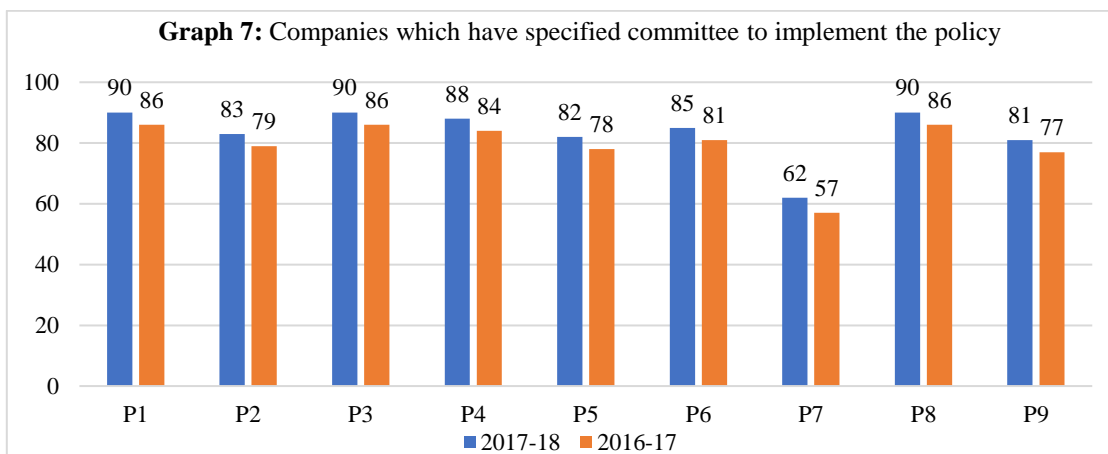
(a) Details of compliance (Reply in Y/N)

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
5	<i>Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?</i>									

Formulation of the policy and its approval are two initial steps in the direction of adoption of BR principles in practice. Once a policy is formulated, procedures and specific guide on how to carry out its implementation is required. Merely, formulating a policy and approving the same with no mechanism to implement properly within the Company and integrated with its operations is as good as not having a policy. Therefore, logically either a director or committee of the Board or someone from the top management must be commissioned to carry out the implementation of the Board goals and vision and engage with the required managers and departments of the Company to set up procedures. Spirit of the formulation of policy lies in its implementation.

Question 5 requires the Companies to disclose that whether, the Company has a specified committee to oversee the implementation of the policies formulated by the Company. Graph 7 depicts, companies

that responded that they have identified a committee/ designated authority to oversee the implementation of the policy.



It was observed that for 3 principles **P1**, **P3**, and **P8** almost all Companies in the sample that have framed a policy, had also constituted a committee to oversee the implementation of the policy.

Some observations about the Companies which have not constituted a committee or the Companies which have not disclosed clearly if they had a committee to oversee the implementation of the policy are as follows:

- **P2** – 5 companies who had formulated the policy, did not constitute a committee to oversee the implementation of the policy. These Companies include Bosch Ltd, Cummins India Ltd, Maruti Suzuki India Ltd, Motherson Sumi Systems Ltd and Steel Authority of India Ltd in FY 17-18.
- **P4**- Bosch Ltd and Motherson Sumi Systems Ltd did not formulate a committee to oversee implementation of this policy.
- **P5** - 6 companies viz. ACC Ltd, Bosch Ltd, Cummins India Ltd, Dr. Reddy Laboratories Ltd, Motherson Sumi Systems Ltd and Steel Authority of India Ltd has framed a policy for P5 but has not constituted a committee to oversee the implementation of the policy
Observation: Ambuja Cement Ltd in its BR Report did not respond in ‘Yes’ to the question of framing a policy on Principle 5. The Company has responded in ‘Yes’ to the question regarding formulation of committee to oversee the implementation of the policy.
- **P6** - Bosch Ltd and Motherson Sumi Systems Ltd, have not constituted a committee to oversee the implementation of the Company.
- **P7** –Motherson Sumi Systems Ltd had framed a policy but did not constitute a committee to oversee the implementation of the policy.
- **P9** –4 Companies viz. Ambuja Cement Ltd, Bosch Ltd, Cummins India Ltd and Motherson Sumi Systems Ltd has framed a policy for P5 but has not constituted a committee to oversee the implementation of the policy.
- Motherson Sumi Systems Ltd has framed policies on all 9 principles however, the Company has not formed any committee oversee the implementation of the policy

6. Availability of policies on Public Domain

Principle-wise (as per NVGs) BR Policy/policies.

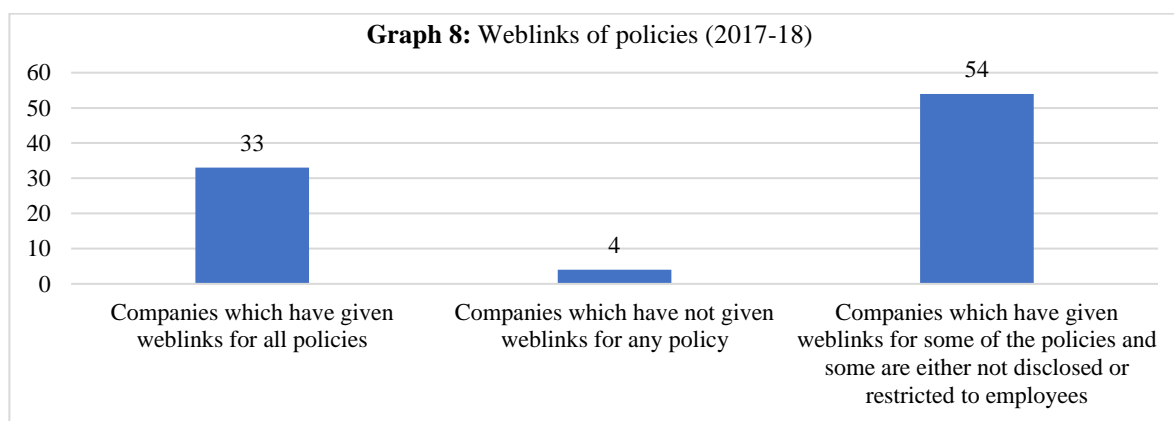
(a) Details of compliance (Reply in Y/N)

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6 Indicate the link for the policy to be viewed online?									

This question requires the Companies to disclose the weblinks of the policies formulated by the Company to achieve key objectives as stated in the policy. Since the policies relate to Business Responsibility principles imbibed by the Companies, various stakeholders are impacted by these policies. World over ESG- Environmental, Social and Governance disclosure by companies are being factored in the investment decision by shareholders, lenders, suppliers as well as employees. These non-financial parameters have been getting traction and are being recognised as another element in the valuation of the Company.

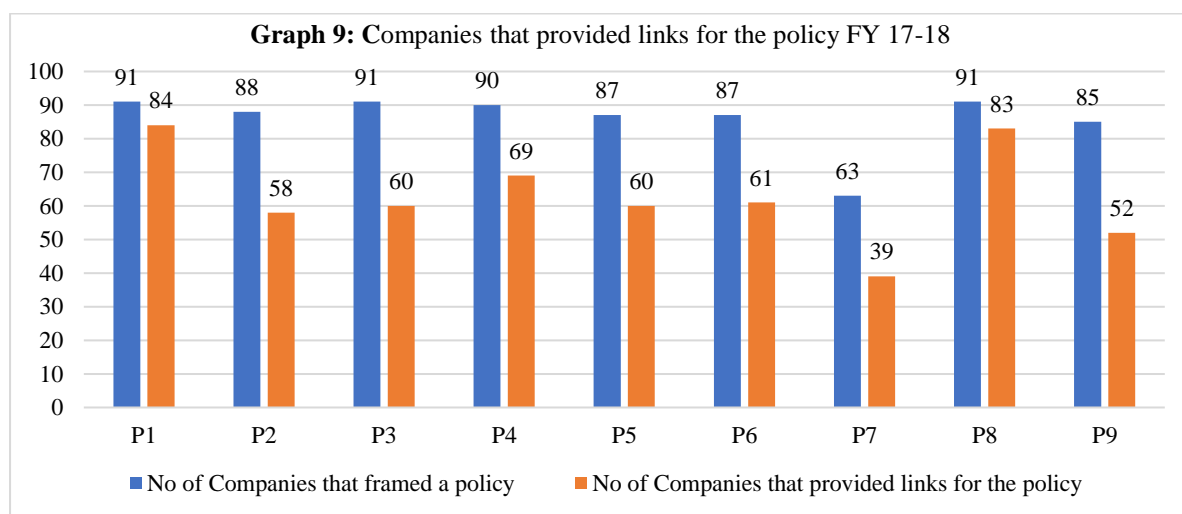
Therefore, it has become more relevant and important that companies’ goals and objectives on Business Responsibility are being communicated via their policies effectively and to all stakeholders.

Graph 8 depicts that how many Companies have provided the links for the policy to be viewed online.



As it can be observed from the Graph 8, for the FY 2017-18 from the sample companies 33 Companies have given weblinks for all the policies formulated by the Company. While, 54 Companies are among the group which have formed the policies but either the weblinks is not given or view of the policies are restricted to employees of the Company for one of more policy(ies).

There are 4 Companies from the sample which have not disclosed weblink of any policy. They disclosed that all the policies are restricted to view for the employees only. These Companies include Grasim Industries Ltd, Ultratech Cement Ltd, Punjab National Bank and Kotak Mahindra Bank.



There are few companies which have provided separate links for each policy like Asian Paints Ltd, Dr. Reddy’s Laboratories Ltd etc.

Additionally, Marico Ltd has provided links for the 3 policies combining all the 9 principles and has not mentioned that which policy is applicable to which principle.

10 Audit/ Evaluation

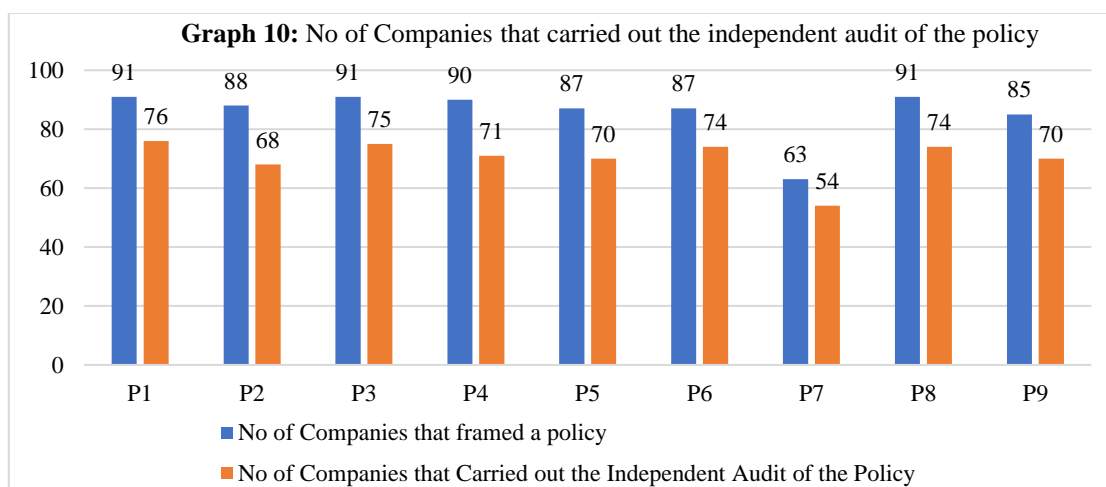
Principle-wise (as per NVGs) BR Policy/policies.

(a) Details of compliance (Reply in Y/N)

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
10	Has the company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?									

Audit evaluation acts as a key reinforcer of the validity of information and data. Independent Audit/ evaluation of functioning and adoption of policy it not only helps in determining if the key objectives of the policies are being met or not, it also provides insights with respect to steps initiated by companies in implementation of the polices and any deficiencies in the implementation process or in the procedure of implementation. Such a practice also informs the Company from time to time in case of any deviations from the policies are observed.

The Graph 10 depicts the current rate of adoption of audit/ evaluation practices in respect of its Business Responsibility policies and initiatives within the Sample companies for FY 17-18. Graph 10 provides a synopsis for 9 policies framed within the companies for which the companies have carried out audit/ evaluation.



On an average, approximately 15 companies had not carried out an audit evaluation on the working of the policy.

Further, 8 companies from the sample companies have not carried out audit evaluation on the working of any of the policies framed by the Company for FY 17-18. These 8 companies are Avenue Supermart Ltd, Emami Ltd, Indian Oil Corp Ltd, Marico Ltd, Oil and Natural Gas Corp. Ltd, Shriram Transport Fin Co. Ltd, Sun Pharmaceutical Ind Ltd and Zee Entertainment Ltd

SECTION E

Under Section E of the SEBI format of Business Responsibility Reporting, there are specific question regarding the 9 Principles of Business Responsibility. For the purpose of the Study we have analysed response on questions where the response is either quantified or objective replies such as yes and no. Since, comparison on basis of subjective response cannot be compared, the same was left out of analysis.

PRINCIPLE 1

Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

Stakeholder Complaints

P1: Question 2 “How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management?”

As per the question Companies were required to disclose data on ‘STAKEHOLDER COMPLAINTS’. In this context it became pertinent to understand who would be part of Stakeholder.

For a Company to respond to the above question, Company would need to first understand the two below mentioned points:

- Data on which stakeholder complaints is required to be disclosed as stakeholders would be anyone who has interest in the performance of the Company including but not limited to Shareholders, Employees, Suppliers, Customers, Lenders etc.
- Format for disclosure of such Complaints eg. Complaint has been recorded, complaint has been resolved, kinds of actions undertaken to resolve complaints etc.

During our analysis, it was observed there is no guidance note available with the companies on the above-mentioned points which can act as a reference for companies to disclose stakeholder’s complaints. Therefore, while gathering data on responses, it was observed that the disclosures by the sample companies were based on their individual interpretation of the requirements. Companies disclosures varied from shareholders complaints, consumer complaints or public grievances. Further, some companies also provided data on reported complaints under “Code of Conduct”, “Sexual Harassment” or “Whistle-blower” policies.

Since, the SEBI format has not laid down any particular requirement in disclosure on Stakeholder Complaints, any data on complaints reported by companies would be sufficient disclosure however not complete. Since, stakeholder is a much wider concept that shareholders disclosure under this question would be very vast. Therefore, based on the above constraints identified, the data collected could not be compared within sample companies as that would show a inaccurate scenario of the disclosure. However, in order to provide an overview on data of complaints reported by the sample companies one may refer to the Compendium under which extracts from BR Report of each Company have been depicted. **Annexure 3**

To make disclosures more meaningful SEBI must provide a set of guidelines with the format of complaints which should form part of a Company’ disclosures. A clear segregation and guidelines on the data that is required to be disclosed from regulator perspective can help companies in adhering to the format and provide reader with comparable data.

PRINCIPLE 2

Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle

Sustainable Sourcing

P-2; Question 3 *“Does the company have procedures in place for sustainable sourcing (including transportation)? (i) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.”*

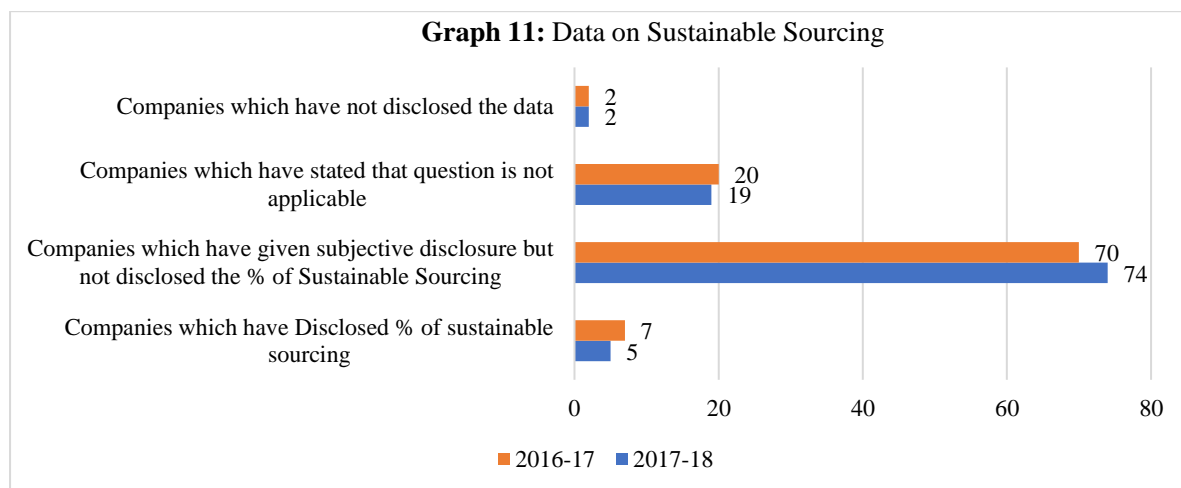
As per the NVG 2011 *“The principle recognizes that all stages of the product life cycle, right from design to final disposal of the goods and services after use, have an impact on society and the environment. Responsible businesses, therefore, should engineer value in their goods and services by keeping in mind these impacts.*

*The principle, while appreciating that **businesses are increasingly aware of the need to be internally efficient and responsible, exhorts them to extend their processes to cover the entire value chain – from sourcing of raw materials or process inputs to distribution and disposal.***”

As per SEBI Circular, objective of the principle 2 is *“Businesses should assure safety and optimal resource use over the life-cycle of the product – from design to disposal – and ensure that everyone connected with it- designers, producers, value chain members, customers and recyclers are aware of their responsibilities.”* Further it states that *“In designing the product, businesses should ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.”*

The ultimate goal of “Sustainable Sourcing” is to ensure efficient use of available resources by all the relevant stakeholder’s who are involved directly or indirectly in designing and manufacturing of products / technologies.

The response of the Company to the question aims to recognize Company’s efforts or initiatives taken towards sustainable development while sourcing their products and also requires them to quantify how much of their product’s inputs are sustainably sourced. This further acts as an assurance for all relevant stakeholders to keep balance between commercialization (Top & Bottom line i.e. sales & profits) and maintaining social, ethical, and environmental stability. However, while analysing the data gathered it was observed that the first part of the question is responded to by most companies by providing details of initiatives taken for sustainable sourcing while the second part of the question which is % of resources sustainably sourced was not provided by most companies. The reason behind non- disclosure could be as the Regulator has not provided any set guidelines to measure the % of resources sustainably sourced. Therefore, readers of the BR Reports also don’t have comparable data across peers. Graph 11 depicts responses of Sample companies which have been bundled into various categories such as subjective disclosure, no disclosure and some form of a quantified disclosure.



Observations:

- Except 2 companies from the sample companies rest of the Companies have responded with either a subjective disclosure, process or provided exact percentage of inputs in both FY 16-17 and FY 17-18.
- 19 Companies in FY 17-18 and 20 companies in FY 16-17 have stated that being a service industry the question is not applicable to them.
- 74 Companies in FY 17-18 have answered in subjective manner and not disclosed a specific % for any of the product for which the Company adopt sustainable sourcing. Although few companies which did not disclose the percentage of input that were sustainably sourced, and only disclosed the steps taken by the company to source the inputs sustainably.

Changes:

- Adani Ports & SEZ Ltd had disclosed in FY 16-17 that the question is not applicable to the Company. However, in FY 17-18, the Company has stated “*Yes, the Company is practicing the sustainable sourcing for its operations. The mechanized conveyors for coal transportation, procuring E-RTG cranes are the examples of sustainable sourcing.*”
- Oil India Ltd had disclosed the % for sustainable sourcing in FY 16-17, although in FY 17-18 the % was not disclosed, however, the Company has responded to the question in a subjective response.

Detailed Response:

- Indian oil Corporation Ltd has disclosed different % for different resources in both FY 16-17 and 17-18.

From the data collection, it has been observed that only 5 Companies in FY 16-17 and 7 companies in FY 17-18 have responded to the question regarding % of resource sustainably sourced.

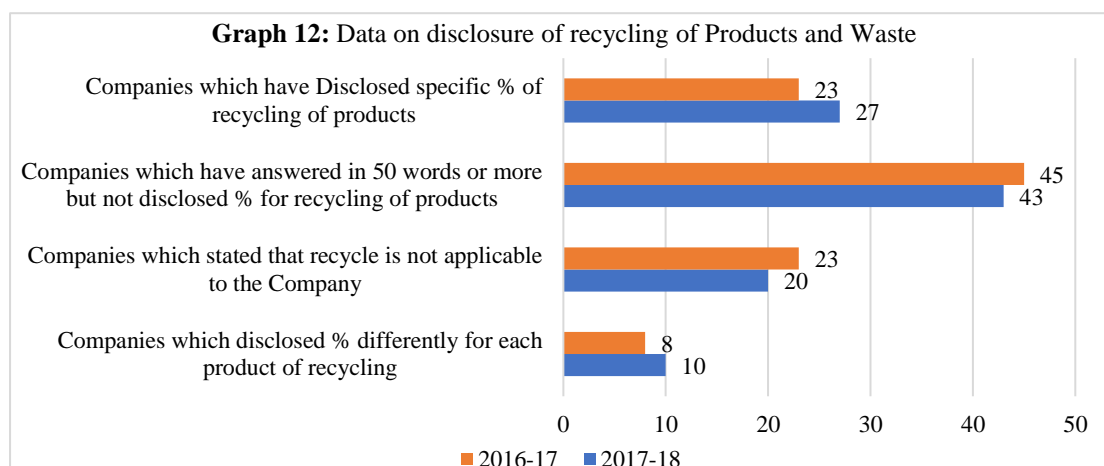
Recycling of Waste

P-2; Question 5 “*Does the Company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste? (Separately as < 5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.*”

One of the objectives of Principle 2 stated in the SEBI Circular is “*Businesses should recognize that over-consumption results in unsustainable exploitation of our planet's resources, and should therefore promote sustainable consumption, including recycling of resources*”.

Such disclosure is required so that any user of data can understand the Company's endeavours in promoting use of recycled products or use of waste produced during manufacturing by recycling the same from the Company's response to this question and evaluate improvement or slippages. This gains further importance as one of the primary goals of sustainable development is efficient and economic use of resources so that the future generations do not suffer the cost of over utilisation of resources by present generation. Hence, to reiterate it is not only important to source inputs sustainably, but it is equally important to ensure that the waste generated is reused/ recycled to its maximum potential.

The Graph 12 depicts that how many companies have disclosed the data on recycling.



As it can be observed from the Graph 12 that most of the Companies have provided a subjective response and have not disclosed the % of the products recycled and reused. Some of the Companies directly disclosed the % of the recycle products.

While, very few companies have disclosed different categories of waste produced along with % for each of the waste that was recycled or reused. For reference few of the answers are depicted in the BPG.

- Indian oil corporation Ltd and GAIL India Ltd has disclosed recycling of waste in a detailed manner.
- Petronet LNG Ltd has disclosed the answer in detail regarding the mechanism to recycle products/ waste which was adopted by the Company.
- Reliance Industries Ltd, Bharat Forge Ltd, Hero Honda Motors Ltd, Maruti Suzuki Ltd and JSW Steel Ltd are the Companies which have disclosed different % for the products which they recycled or reused.
- Kotak Mahindra Bank in FY 16-17 had not disclosed the % of the recycled products, although, it is also not applicable to the Bank. However, in FY 17-18, the Bank has stated *“The bank believes in reduce, reuse and recycle and manages its solid waste efficiently. The bank implemented paper and food waste management practices in FY 2017-18. By displaying the quantity of food wasted by employees in the canteen on a daily basis, the Bank has made an effort to bring about awareness and sensitise employees towards reducing food wastage. Used oil from DG sets is sent to a government authorised disposer/recycler for disposal. The Bank takes a proactive approach towards handling it's electronic waste (e-waste). It has tied up with the CPCB licensed authorised e-waste recyclers. The e-waste collected for FY 2017-18 amounted to 1,000 units of old non-functional laptops and desktops along with 4,000 units of IT equipment like printers, router, network switch.”*
- Some of the banks have also adopted the recycle and reuse of the products even though being a service industry it was not applicable to them. Like State Bank of India has disclosed the 94% of waste recycled.

PRINCIPLE 3

Business should promote the well-being of all employees

Diversity in Workforce

P 3; Question 1 & 3 “Please indicate the Total number of employees. Please indicate the Number of permanent women employees”

The objective of principle 3 includes “Businesses should provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation” as stated in the SEBI circular.

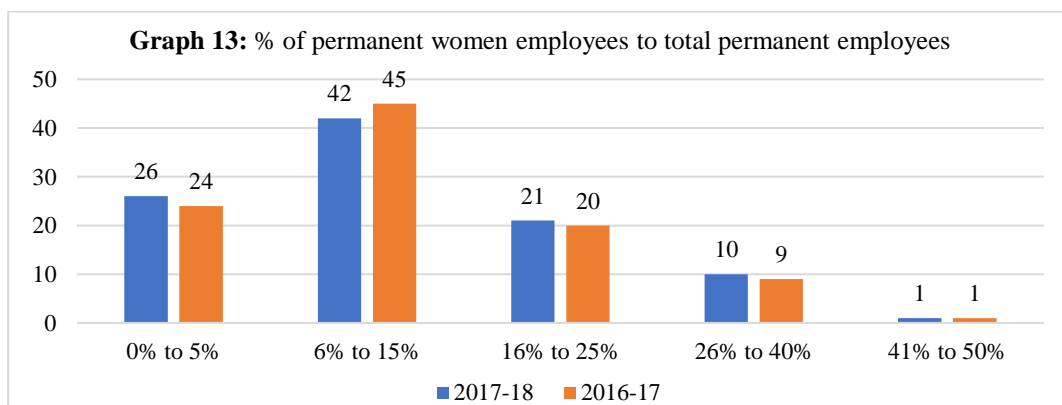
Diversity in workplace is represented by fair participation of women, representation of employees from different races, caste, religion and employees with physical disability thereby supporting the principle of non-discrimination. However, the questions in the SEBI format doesn’t require comprehensive responses from the Company which are as comprehensive as the objective of Principle 3. Companies only have to disclose data related to total number of employees, total number of contractual employees, total number of permanent women employees and permanent employees that are differently abled. Further, Companies are required to disclose if there were any cases of sexual harassment, child labor or discriminatory employment reported and pending during the last year.

The Companies are not required to give disclosure on steps taken to improve gender or procedure if any in the Company to fight bias in recruitment or employment. Therefore, in essence the questions require very narrow response and therefore investor has to make a judgement about Company’s BR initiative under Principle 3 based on these responses unless the Companies have voluntarily disclosed more information.

Out of the sample of 99 companies for FY 16-17, data on total employees was disclosed by all companies and data on total number of permanent women employees was disclosed by all the companies.

The total number of permanent employees in the top 100 listed companies increased from 26,42,072 employees in FY 16-17 to 27,73,706 employees in FY 17-18, an increase of 1,31,634. There is an increase of approx. 45,000 women employees in FY 17-18 from FY 16-17. This indicates that out of new addition in employees around 34% were women employees. This compares very favourably with overall average of women employee at 21.18%. Addition of higher % of women employees indicates that if the trend continues like this, it will be a big step towards removing gender bias in employment and improving gender equality.

The Graph 13 depicts the % of women employees in the total permanent workforce in sample companies.



Observations:

Total number of Permanent women employees as a % of total permanent employees in FY 17-18 are 21.18% of total employees in sample companies.

The median percentage of women permanent employees to permanent employees within the sample companies in FY 16-17 was 8.53% and in FY 17-18 was 8.32%.

It has been further observed that in FY 17-18 there were 10 companies which had more than 25% of women employees. In FY 17-18, there are 11 companies which have more than 25% of women employees.

Companies which have more than 25% women employee (2017-18)	
Company Name	% of permanent women employees to total permanent employees
Interglobe Aviation Ltd	43.38%
Infosys Ltd	36.12%
Tata Consultancy Serv Ltd	35.31%
Wipro Ltd	35.00%
Motherson Sumi Systems Ltd	33.59%
Oracle Fin Serv Soft Ltd.	31.31%
LIC Housing Finance Ltd	30.29%
Tech Mahindra Ltd	30.17%
Bajaj Holdings & Invs Ltd	30.00%
ICICI Bank Ltd.	28.11%
Titan Company Ltd	26.11%

Companies which have more than 25% women employee (2016-17)	
Company Name	% of permanent women employees to total permanent employees
Interglobe Aviation Ltd	43.75%
Infosys Ltd	36.06%
Tata Consultancy Serv Ltd	34.75%
Wipro Ltd	33.00%
Tech Mahindra Ltd	30.86%
Bajaj Holdings & Invs Ltd	30.00%
Oracle Fin Serv Soft Ltd.	29.76%
LIC Housing Finance Ltd	29.13%
ICICI Bank Ltd.	26.96%
Titan Company Ltd	25.10%

It has been observed that within the sample:

- Interglobe Aviation Ltd has the highest % of women employees in both years FY 16-17 and FY 17-18 among the sample companies. In FY 16-17, 6,377 were women employees in the Company while, the same increased to 7,835 in FY 17-18.
- MRF Ltd, Adani Ports & Sez Ltd and Shree Cements Ltd have less than 1% women employees to total employees in the company in FY 17-18.
- In IT industry % of women employees in the company is between 24% to 40%. Infosys Ltd., Wipro, TCS and Oracle have a higher percentage of woman employees among IT companies.

- After IT sector, Banking sector is the most gender diversified. ICICI Bank Ltd has the highest 28.11% of women employees among other banks. State Bank of India, Axis Bank and Bank of Baroda also has more than 20% of women employees.
- In public sector banks, Bank of Baroda has the highest no of women employees i.e. 22.65%.
- In housing finance sector, LIC Housing Finance Ltd has 30.29% of women employees, which is highest among this sector.

Prevention of Sexual Harassment

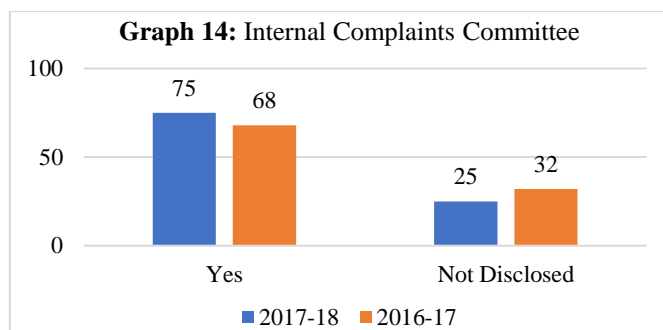
P 3; Question 7 “Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year”.

As per SEBI format of BR Report under section E - Principle 3, the companies are required to disclose details about the reported and pending cases of sexual harassment. However, as per the SEBI BRR format Companies are not required to disclose if the Company has a Sexual Harassment policy and if the Company has formed a committee to deal with cases of sexual harassment within the Company.

While collecting data, disclosure of Companies on these two data points were also collected. It was observed that most of the companies have disclosed in their annual reports that they have constituted an Internal Complaints Committee to deal with sexual harassment complaints within the Company.

As per SEBI circular on BR Reporting, objective of principle 3 state that “*Businesses should create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities*”.

Graph 14 depicts the number of companies which disclosed if it constituted an Internal Complaints Committee for FY 17-18 and FY 16-17.



It has been observed from the Graph 14 that almost 25% of the Companies from the sample have not disclosed whether they have an Internal Complaints Committee to deal with such cases or not.

Prevention, Prohibition & Redressal of Sexual Harassment of women at workplace is a critical issue and the Companies should adopt the policies and constitute an Internal Complaints Committee as per the requirement of Act, 2013 and should ideally place these disclosures in their annual report.

Companies are required under Section 22 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to incorporate the data on number of cases of sexual harassment reported and pending in a FY in the Annual Report.

Positive:

Some of the Companies like Bharti Airtel Ltd, Grasim Industries Ltd, Hindustan Zinc Ltd, Idea Cellular Ltd, LIC Housing Finance Ltd and Piramal Enterprises Ltd have disclosed that they have incorporated

an internal complaints committee as per Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. However, they had not disclosed the same in FY 16-17.

Table 4: Top 3 companies with highest number of cases reported of Sexual Harassment in the last 3 Financial Years

FY	Name of the Company	Number of cases reported (A)	No. of women employees (B)	% to total women employees (A/B)*100
2017-18	Wipro Ltd.	101	57,339	0.18%
	ICICI Bank	99	23,153	0.43%
	Infosys Ltd.	77	73,717	0.10%
2016-17	Wipro Ltd.	116	59,889	0.19%
	ICICI Bank	95	22,229	0.43%
	Infosys Ltd.	88	72,248	0.12%
2015-16	Wipro Ltd.	111	39,545	0.28%
	ICICI Bank	87	18,807	0.46%
	Infosys Ltd.	62	69,116	0.09%

From the Table 4 it can be observed that Wipro Ltd had the highest number of cases reported and ICICI Bank had the highest % of sexual harassment cases reported when compared with strength of women employees.

These figures can be attributed to the fact that IT and Banking sectors have highest number of participation of women employees and hence had high number of sexual harassment cases reported in these sectors. Highest number of pending cases as well as reported cases across three years were noticed in case of WIPRO Ltd.

Table 5: Reported & Pending cases

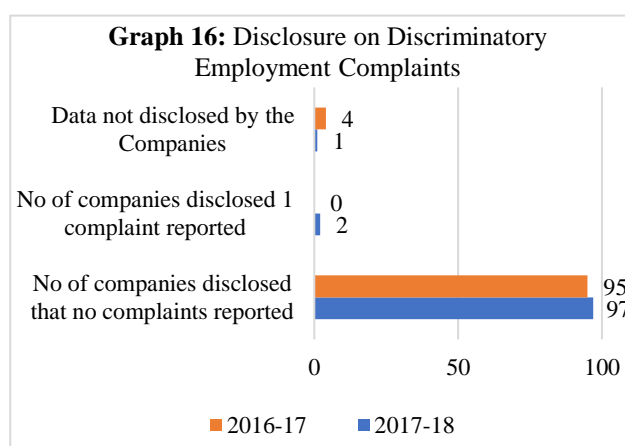
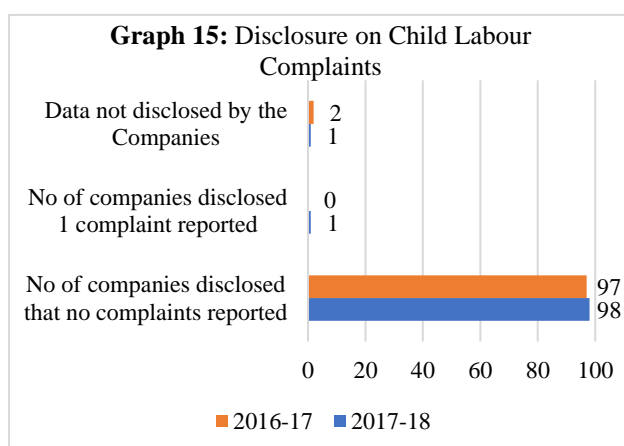
Name of the Company	Number of reported cases			Number of pending cases		
	2017-18	2016-17	2015-16	2017-18	2016-17	2015-16
Wipro Ltd	101	116	111	9	14	4
Tata Steel Limited	24	26	18	8	7	4
State Bank of India	18	21	27	7	6	4
Kotak Mahindra Bank Ltd	34	19	8	14*	7	4

*Includes 7 pending cases pertaining to FY 2016-17. In the case of balance 14 pending cases, enquiries were in progress at the close of the year of which 9 have been closed subsequently.

In steel sector, Tata Steel Ltd has the highest number of cases reported and pending of sexual harassment within the sample.

Disclosure regarding complaints of Child Labour and Discriminatory Employment

As per SEBI format of BR Report, under principle 3, Companies are required to disclose whether there are any complaints regarding Child Labour/ Forced Labour or Involuntary Labour reported or pending.



From the Graph 15, it can be seen as 2 companies in FY 16-17 and 1 company in FY 17-18 have not disclosed data for Child Labour complaints. To the question *“Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, and sexual harassment in the last financial year and pending, as on the end of the financial year.”* Godrej Consumer Ltd has responded that *“one complaint was reported in last financial year.”* in its FY 17-18 Report. However, from the response it is not clear that the complaint was relating to child labour, forced labour, involuntary labour or sexual harassment.

As it can be seen from the Graph 16 that 1 company in FY 17-18 and 4 companies in FY 16-17 have not disclosed data for discriminatory employment.

Positive:

Titan Company Ltd had not disclosed the data regarding the child labor complaints in FY 16-17, however, in FY 17-18, the Company has disclosed that no complaints are pending.

In FY 17-18, Motherson Sumi Systems and Tech Mahindra Ltd have disclosed that one complaint was received related to Discriminatory Employment which has been resolved satisfactorily. In FY 16-17, no complaints were reported regarding the Discriminatory Employment within the sample companies.

% of Permanent employees with disability- Workforce Diversity

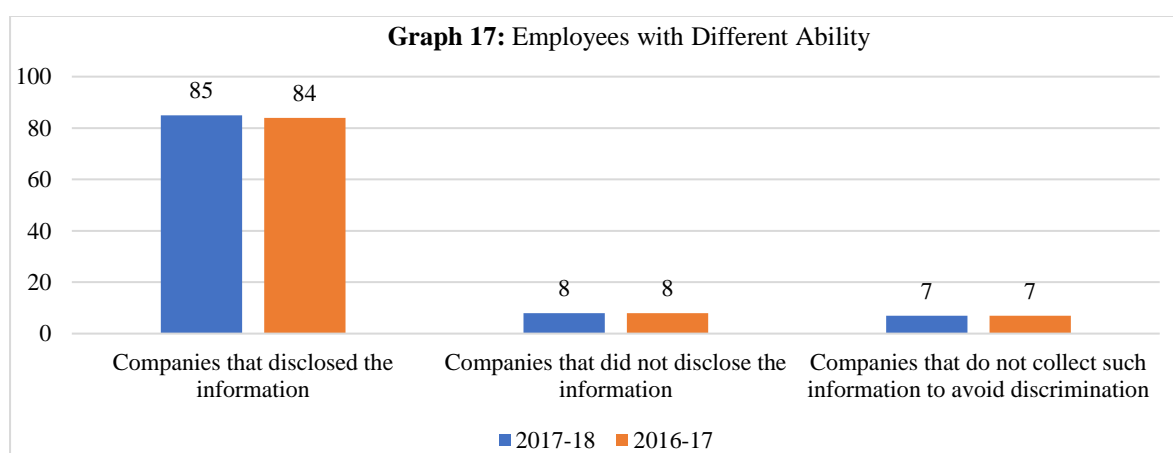
P 3; Question 4- *“Please indicate the number of permanent employees with disabilities.”*

As per Section E: Principle wise disclosure, Principle 3- Question 4, Companies are required to disclose:

“Please indicate the number of permanent employees with disabilities.”

As per SEBI format of BR Report, the Companies are required to disclose the number of permanent employees with disabilities. In FY 17-18 from the sample companies of 100 companies, 85 companies have disclosed the data on permanent employees with disability and in FY 16-17 from sample of 99 companies, 84 companies have disclosed the data on number of employees with disabilities.

The Graph 17 shows a detailed breakup of the companies which disclosed and did not disclose such information with reasons.



Some of the observations for those companies which did not disclose the information in either FY 17-18 or FY 16-17 are as follows:

- The average % of differently abled employees to the total number of permanent employees in FY 16-17 was 0.40% and in FY 17-18 was 0.60%.

- Although SBI disclosed information on the employees with disabilities in its BRR in FY 17-18, the same was not found in Sustainability Report for FY 16-17.
- Bajaj Finance Ltd had not disclosed the information related to employees with disabilities in FY 16-17, while, in FY 17-18, the Company has disclosed that the Company has 5 differently-abled employees.
- Bajaj Finserv Ltd has also disclosed information related to disabled employees in FY 17-18, while, the Company had not disclosed the information for the same in FY 16-17.
- Cipla Ltd had stated in FY 16-17 that “*To eliminate any possibilities of discrimination, Cipla does not record any information regarding employee disabilities*”. However, in FY 17-18, it disclosed information related to differently abled employees.
- Eicher Motors Ltd had disclosed in FY 16-17, the number of disabled employees, however, in FY 17-18, the Company has stated that “*The Company also makes an effort to include people with special needs as part of its workforce.*”
- Similarly, Indiabulls housing Finance Ltd had disclosed in FY 16-17, no of disabled employees, however, in FY 17-18, Company has not disclosed the same.

Some of the Companies from the sample did not disclose the data related to differently abled employees. These companies do not record such information to avoid any discriminations among the employees.

In FY 16-17, total number of differently abled employees were 10,491 in 84 companies which had disclosed the data. However, in FY 17-18, the total number of differently abled employees increased to 16,557 in sample of 85 companies which have disclosed the data. However, it clarified that in 16-17 data on disabled employees of 6 companies, viz. Bajaj Finserv Ltd., Bajaj Finance Limited, Cairn India Limited, Cipla Ltd, Avenue Supermarts Limited and State Bank of India, which have disclosed the figures in 17-18. Substantial increase in number of disabled employees is on the account of disclosure of information by State Bank of India in FY 17-18. State Bank of India has disclosed that 4,319 permanent employees are differently abled in its workforce. Therefore, there is no quantum jump in number of disabled employees.

In FY 16-17, in 24 companies percentage of differently abled employees to the total permanent employees was above average the average of 0.40%. In FY 17-18, in 25 companies percentage of differently abled employees to the total permanent employees was above the average of 0.60%.

It was observed that higher % of differently abled employees were in PSUs or PSBs. Exception was Motherson Sumi Systems Ltd which has the highest % of differently abled employees among other sample companies for both FY 16-17 and 17-18. Motherson Sumi Systems Ltd had 630 differently abled employees in FY 16-17 and 933 differently abled employees in FY 17-18.

Table 6: top 5 companies with highest % of Differently abled Employees

Company Name	% of Disabled Employees in FY 17-18
Coal India Ltd	3.90%
Power Fin Corp Ltd.	2.81%
Rural Elec Corp. Ltd.	2.65%
Bank of Baroda	2.52%
BHEL	2.43%

Coal India Ltd has the highest % of differently abled employees to the total permanent employees for both FY 16-17 and FY 17-18.

In absolute terms State Bank of India has the highest number of differently abled employees for FY 17-18.

Table 7: Number of Differently abled Employees

Company Name	Absolute no of Disabled Employee in FY 17-18
State Bank of India	4,319
Punjab National Bank	1,775
Bank of Baroda	1,402
Motherson Sumi Systems Ltd	933
BHEL	913

The maximum increase in % of disabled employees from FY 16-17 to FY 17-18 was in Punjab National Bank which increased by 1.01%. In absolute numbers also Punjab National Bank has the highest increase in number of differently abled employees i.e. 772 from previous year.

After Punjab National Bank, Motherson Sumi Systems has second highest increase in number of differently abled employees i.e. 303.

Table 8: Increase in number of differently abled Employees

Company Name	Increase in number of Disabled Employee
Punjab National Bank	772
Motherson Sumi Systems Ltd	303
Bank of Baroda	175
Tech Mahindra Ltd	133
Infosys Ltd	122

Employee Association

P 3; Question 5 & 6 “Do you have an employee association that is recognized by management. “What percentage of your permanent employees is members of this recognized employee association?”

Objective of Principle 3 as stated by SEBI in its Circular is “Businesses should respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.”

98 companies in FY 17-18 and 95 companies in FY 16-17 from the sample companies have provided response to the Question if the Company has a recognised employee association.

Of these, 70 companies have disclosed that they have a recognised employee association in FY 16-17 and FY 17-18.

Table 9: Disclosure regarding employee association

Observations:	FY 17-18	FY 16-17
Companies that have a recognised employee association	70	70
Companies that do not have a recognised employee association	28	24
Companies that have not disclosed if they have a recognised employee association ^{Note A}	2	4
Companies that have disclosed that employee association is not applicable ^{Note B}	0	1
Total sample	100	99

Note A:

2017-18	2016-17
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Indiabulls Hsg Fin Ltd	Indiabulls Hsg Fin Ltd
P&G Hygiene & Health Care	P&G Hygiene & Health Care Ltd
	Bajaj Finserv Ltd.
	Bajaj Finance Ltd

Note A: Bajaj Finserv Ltd and Bajaj Finance Ltd in FY 16-17 BRR had not responded to the question, if they have an employee association. However, in FY 17-18, they have responded and stated that they don't have any recognised employee association.

Note B: Oracle Financial Services and Software Ltd had disclosed in FY 16-17 that employee association is not applicable to the Company while, in FY 17-18, the Company has disclosed that there is no employee association.

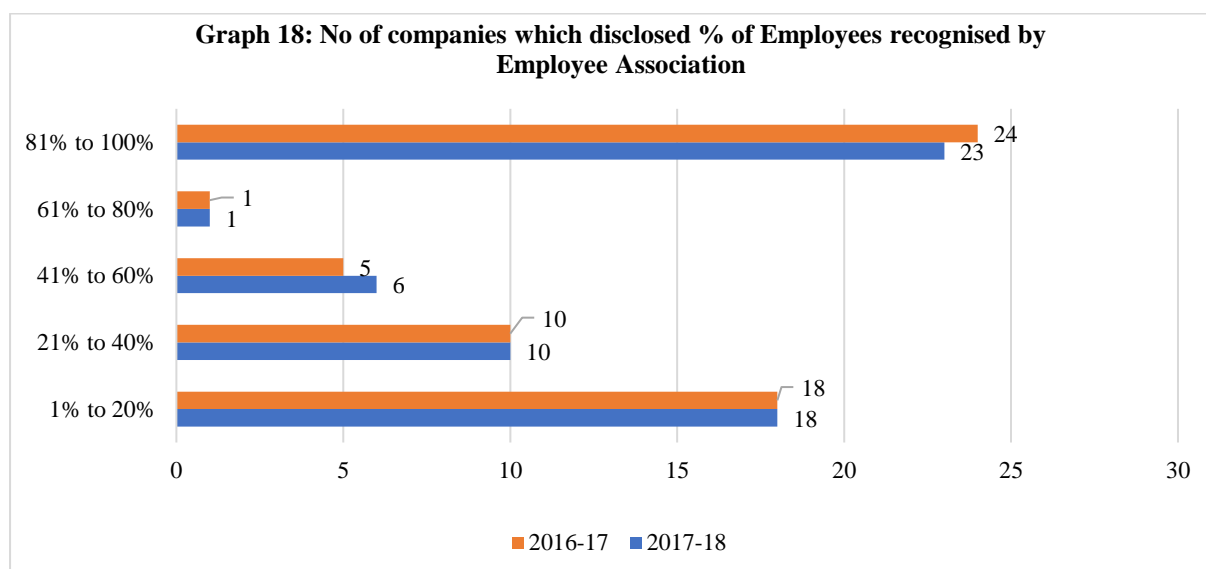
In relation to employee association, the Companies also required to disclose the percentage of permanent employees as members of the recognized association. Table 10 indicates if the Companies that have a recognised employee association, have also provided % of employees being member of association.

Table 10: Disclosure regarding % of employees that participated in the employee association.

Observations:	FY 17-18	FY 16-17
Companies have disclosed % of permanent employees that are member of the recognised employee association	59	57
Companies have not disclosed % of permanent employees that are member of the recognised employee association ^{Note A}	8	6
Companies that have disclosed differently for different employee categories	3	7
Total	70	70

Note A: Coal India Ltd and ONGC Ltd had disclosed the % of employees as member of recognised by employee association in FY 16-17, however, these companies have not disclosed the data in FY 17-18.

Further break-up of the % of employees that participate in the recognised employee association is given in **Graph 18**:



- Out of 70 companies that had stated that they have recognised employee association, 56 companies have disclosed the % of employees that are part of recognised employee association.

-
- It was further observed that some Companies have not disclosed the % of the permanent employees that are part of employee association, however, they have disclosed the absolute number of employees that are part of recognised employee association.
 - Few companies have also disclosed the data of permanent employees that are recognised by employee association differently. Like, Oil India Ltd has disclosed participation of employees as follows:
 - i) Oil India Executive Employees Association -86.67%
 - ii) Oil and Gas Employees Union - 66.78%
 - Bank of Baroda has disclosed as:
 - i) 21.07% of Officers are members of recognized employee association as per records.
 - ii) 86.98% of Business Associates & Sahayaks are members of recognized employee association as per records.
 - Dabur India Ltd has not disclosed the exact % of employees, however, the Company has disclosed that “*Less than 5% of the permanent employees are members of this recognised employee association*”.
 - Colgate Palmolive India Ltd has disclosed that the Company does not have a recognised employee association, however, it has disclosed the % of employees that are part of employee association.

From those companies who have disclosed the % of employees, most of the companies have 80 to 100% participation of employees in the recognised employee association.

PRINCIPLE 4

Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

Mapping of Stakeholders

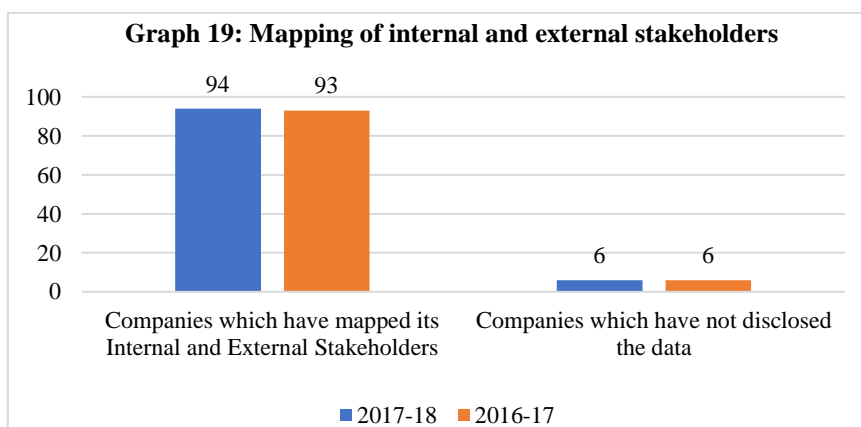
P 4; Question 1 ***“Has the company mapped its internal and external stakeholders? Yes/No”***

Objective of Principle 4 states that *“Businesses should systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them.”*

Stakeholder mapping and analysis helps companies in analysing who are the key stakeholder of the Company. Company can access their needs and interests and address them more effectively. Companies can identify areas of concerns, build more targeted plans to address areas of concerns along with identification of goals and objectives for any stakeholders either social or institutional if the Company maps its stakeholders.

It can be observed from the Graph 19 that in FY 16-17, 93 companies have disclosed that they mapped their internal and external stakeholders, while, 6 companies have not disclosed if they have mapped their stakeholders.

Whereas, in FY 17-18, 94 companies have mapped their internal and external stakeholders, and 6 companies have not disclosed whether they mapped their internal and external stakeholders.



- Bajaj Auto Ltd, Bajaj Finserv Ltd, Bajaj Finance Ltd and Bajaj Holding & Investments Ltd, Indiabulls Housing Finance Ltd and Pidilite Industries Ltd have not disclosed whether they mapped the internal and external stakeholders.
- Further, it was observed that detailed answer in terms of stakeholder mapping along with stakeholder engagement was disclosed by Torrent Pharma Ltd in its BRR for FY 17-18. Extract of the answer is mentioned in BPG.

Disadvantaged, vulnerable and marginalized stakeholders

P 4; Question 1 ***“Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.”***

From the Table 11, it can be observed that from the sample of 99 companies in FY 16-17, total 87 companies disclosed that they identified the disadvantaged, vulnerable and marginalized stakeholders.

In the sample of 100 companies for FY 17-18, total 88 companies disclosed whether they have identified the disadvantaged, vulnerable and marginalized stakeholders.

Table 11: Identification of disadvantaged, marginalised and vulnerable stakeholder

	2017-18	2016-17
Companies that have identified	91	86
Companies that did not identify ^{Note A}	6	8
Companies that did not disclose if they have identified ^{Note B}	3	5
Total sample	100	99

Note A

2017-18	2016-17
ABB Ltd	ABB Ltd
Bajaj Auto Ltd	Bajaj Auto Ltd
Bajaj Finserv Ltd	Bajaj Finserv Ltd
Bajaj Finance Ltd	Bajaj Finance Ltd
Indiabulls Hsg Fin Ltd	Indiabulls Hsg Fin Ltd
Steel Authority of India	Steel Authority of India
	HDFC Ltd
	DLF Limited

Note B

2017-18	2016-17
Hindustan Unilever Ltd.	Hindustan Unilever Ltd.
Pidilite Industries Ltd	Pidilite Industries Ltd
Bajaj Holdings & Investments Ltd	Bajaj Holdings & Investments Ltd
	HDFC Bank Ltd
	Titan Company Ltd

Observations on the disclosure by the sample companies:

Note A:

DLF Ltd and HDFC Ltd did not identify the vulnerable and marginalized stakeholders in FY 16-17, however, in FY 17-18, they stated that they have identified the same.

Note B:

- HDFC Bank had not disclosed in FY 16-17 but has disclosed in FY 17-18 that the Company has identified disadvantaged, vulnerable and marginalized shareholders.
- Titan Company Ltd had also not disclosed in FY 16-17 whether it has identified or not the disadvantaged, vulnerable and marginalized shareholders. However, in FY 17-18, the Company has disclosed that it has identified disadvantaged, vulnerable and marginalized shareholders.

PRINCIPLE 6

Business should respect, protect, and make efforts to restore the environment

Identifying Environmental Risk.**P 6; Question 3** “Does the company identify and assess potential environmental risks? Y/N”

Company has a diversified role towards the society, which is not limited to its shareholders for generation of profit or towards its employees but includes its participation in protecting and conservation of the environment. Companies have an important role to protect its environment and sustainable use of resources.

SEBI circular states that “Businesses should develop Environment Management Systems (EMS) and contingency plans and processes that help them in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to their operations or that of a member of its value chain.”

Companies should identify and understand the impact of their business on the environment and should also identify the risks the Company would face due to climate change. Globally, Companies are also identifying the environment related risks and adopting more environment friendly practices and identifying risks and formulating strategies to mitigate those risks.

<i>Table 12: Identification of Environmental Risk</i>	2017-18	2016-17
Companies that identified risks	87	85
Companies that have not identified risks ^A	2	2
Companies that did not disclose if risks were identified ^B	5	6
Companies that stated that question is not applicable ^C	6	6
Total sample	100	99

A

2017-18	2016-17
Zee Entertainment Pvt Ltd	Zee Entertainment Pvt Ltd
Sun TV Network Ltd	Sun TV Network Ltd

B

2017-18	2016-17
Asian Paints Limited	Asian Paints Limited
Bajaj Auto Ltd	Bajaj Auto Ltd
Cadila Healthcare Limited	Cadila Healthcare Ltd
Indiabulls Housing Fin Ltd	Indiabulls Housing Fin Ltd
Shriram Transport Fin Co.	Shriram Transport Fin Co.
	Housing Development Finance Corporation*

*Discussed below

C

2017-18	2016-17
Bajaj Finserv Ltd.	Bajaj Finserv Ltd.
Bajaj Finance Limited	Bajaj Finance Limited
Icici Pru Life Ins Co Ltd	Icici Pru Life Ins Co Ltd
Power Fin Corp Ltd.	Power Fin Corp Ltd.
Rural Elec Corp. Ltd.	Rural Elec Corp. Ltd.
Bajaj Holdings & Invs Ltd	Bajaj Holdings & Invs Ltd

In response to the question of identification of environmental risks by the Company, from the Table 12, it can be observed that 87 companies in FY 17-18 and 85 companies in FY 16-17 have disclosed that they have identified the environment risks. Only 2 companies were in the sample companies which have not identified the risk. Few companies have disclosed that being a service industry and not being a manufacturing company, the question is not applicable to them.

The observations on those who did not disclose the answers are as below:

- *HDFC Ltd had not disclosed the answer to the question in FY 16-17, however, in FY 17-18, the Company has disclosed that “*HDFC recognizes the risks arising from climate change such as extreme weather conditions and its impact on housing and therefore the ability to borrowers to service the loans.*”

Clean Development projects

P 6; Question 4 “*Does the company have any project related to Clean Development Mechanism?*”

SEBI circular on Principle 6 further states that “*Businesses should continuously seek to improve their environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.*”

Table 13: Clean Development projects

Does company have a project related to Clean Development	2017-18	2016-17
Companies that have a clean development project	40	38
Companies that do not have a clean development project	37	34
Companies that did not disclose if they have a Clean Development project	6	9
Companies that stated the question is Not Applicable	17	18
Total Sample	100	99

From the data collected of the sample companies, from the Table 13 it was observed that 40 companies in FY 17-18 have disclosed they have clean development project. Some service industry companies like banks or other service industries have stated that the question was not applicable to them.

Positive change:

- Titan Company Ltd had not disclosed the information related to Clean Development Mechanism in FY 16-17. While, in FY 17-18, the Company has disclosed that it has a project related to Clean Development Mechanism.
- Godrej Consumer Products Ltd had stated in FY 16-17 that it does not have any clean development mechanism, however, in FY 17-18, the Company has stated that “*We are working on our integrated watershed management programme to be registered under Verified Carbon Standard (VCS). The project is currently under the validation phase. We expect the project to be registered with VCS by July 2018. The project will mitigate 684,000 tonnes of CO₂e over the period of 20 years, which is equivalent to 34,000 tonnes of CO₂e per annum.*”
- MRF Ltd did not have a project related to clean development in FY 16-17, however, in FY 17-18, the Company has answered affirmatively to the question.

Observations:

- Dr. Reddy Laboratories Ltd and Oil India Ltd have disclosed that they had a project on Clean Development Mechanism in FY16-17. However, they have stated in the report for FY 17-18 that they do not have a project related to clean development mechanism.

- Marico Ltd had stated in FY 16-17 question is “Not Applicable”, however, in FY 17-18, the Company has stated that it does not have any project related to clean development.

Emission and waste generation

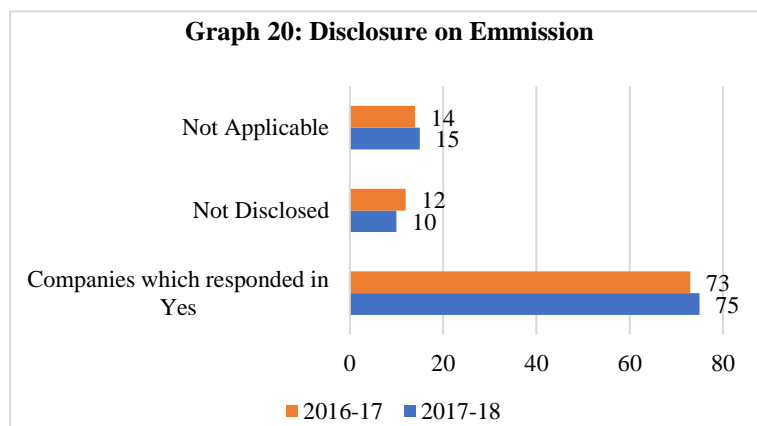
P 6; Question 6 “Are the Emissions / Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?”

SEBI format of BR Report states that “Businesses should report their environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.”

It has been observed that most of the companies from the sample companies have responded to the question that all emissions generated by the Company are within range. Few Companies have not disclosed the data regarding this question.

While few companies being from the service industry, have stated that the question was not applicable to them.

Graph 20 depicts responses of the companies whether the emission was within permissible range.



As it can be seen from the Graph 20 that 10 companies in FY 17-18 and 12 companies in FY 16-17 have not disclosed the data regarding the question.

From the companies which have disclosed the data to the question, no company has stated that the emission was more than permissible limit.

Observation:

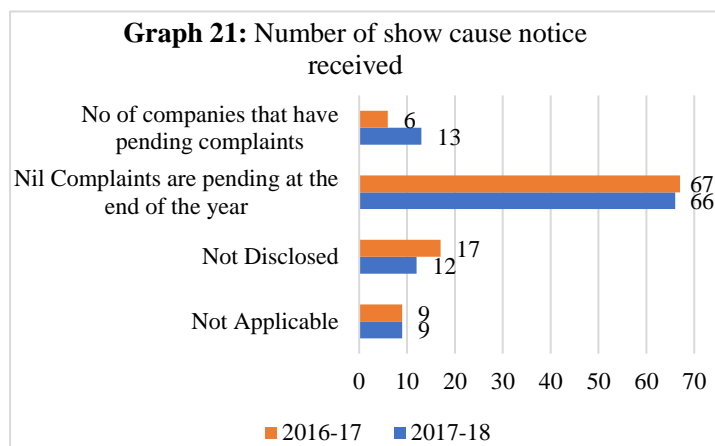
Oil India Ltd had disclosed in FY 16-17 that “The emissions/waste generated by the company were with the permissible limit given by CPCB/SPCB”, while in FY 17-18, the Company has not responded to the question.

Positive:

HDFC Ltd and Cipla Ltd had not disclosed the data about the emission in FY 16-17, while in FY 17-18, these companies have responded to the question affirmatively. HDFC Ltd has stated that “the corporate complies with requisite environmental regulations in respect of its premises and operations” and Cipla Ltd has stated that “air emissions and waste generation levels were well within the permitted limits”

Most of the Companies have stated in the data sample have stated that there were “Nil” cases pending at the end. Few companies have also reported that no cases were received during the year. Some companies have stated that being the service industry the question was not applicable to them.

Graph 21 depicts responses of the companies about the no of show cause notices received from CPCB/SPCB



From the Graph 21, it can be observed that in FY 16-17, 17 companies have not disclosed the data regarding the show cause notice pending, while, in FY 17-18, 12 companies have not disclosed the data.

67 companies in FY 16-17 have stated that there were no cases pending at end of the year. While, in FY 17-18, 66 companies have stated that no cases were pending at the end of the year.

Observation:

- Five companies viz. HDFC Ltd, JSW Steel Ltd, United Spirits Ltd, Oil India Ltd and Titan Company Ltd had not disclosed about the information regarding the question, however, these companies have disclosed the same in FY 17-18.
- BHEL had stated in FY 16-17 that no show cause notice was received, while in FY 17-18, the Company has stated that *“One show cause notice from Directorate of Industrial Safety & Health, Govt. of Tamil Nadu has been received by Trichy manufacturing unit during 2017-18 which is pending for resolution as on March 31, 2018. No show cause / legal notice received from Central Pollution Control Board (CPCB) / State Pollution Control Board (SPCB) are pending as on March 31, 2018.”*
- HPCL Ltd, Bharti Infratel Ltd, Tata Consultancy Services Ltd had stated in FY 16-17 that no show cause notice were received or pending, however, in FY 17-18, these companies have pending show cause notices from CPCB.

Companies which disclosed about the pending complaints, few of them are as follows:

- JSW Steel Ltd has stated that *“One site of the Company received a notice from the Central Pollution Control Board (CPCB) for non-installation of a continuous emission monitoring system. The site was already in the process of procuring the system; it obtained a stay order from the High Court and completed the installation of the monitoring system for the requisite number of stacks. The CPCB was requested to revoke the order. The formal decision is awaited.”*
- Ambuja Cements Ltd has stated that *“There are 6 (six) cases that are pending in different Courts, involving environment related issues as on end of the Financial Year”.*
- NTPC Ltd has not disclosed the number of complaints received, however, the Company has stated that *“All the complaints / notices are addressed timely.”*
- Colgate Palmolive India Ltd had disclosed that no notice was pending at the end of the financial year FY 16-17, however, in FY 17-18, the Company has stated that *“company had received three show cause notices in the regular course from the State Pollution Control Board and the same have been resolved satisfactorily in the Financial Year 2017-18. There were no pending show cause notices from CPCB / SPCB at the end of the Financial Year 2017-18.”*
- Hero Honda Motors Ltd has not stated about the show cause notice, however, it has stated as follows:
 - *“Direction for installation of online stack/air emission monitoring system connected to CPCB server before 31.03.2018, was received vide notification dated 20.03.2018 at Dharuhera Plant. Status: HMCL is exploring available technologies and assessing suppliers.”*

- *Direction from Uttarakhand State Pollution Board for connection to CETP. The Direction has been issued in relation to a NGT order dated 23.01.2018.
Status: Appeal filed before the NGT to set aside the directions”*

PRINCIPLE 8

Businesses should support inclusive growth and equitable development

Corporate Social Responsibility

Section 135 (1) of the Companies Act, 2013 states as:

Every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during any financial year shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director.

Following Data was collected to analyse the CSR activities of the Company. This was categorised into data related to CSR committee, CSR activities carried by whom and CSR expenditure.

- If the Company has constituted a CSR committee?
- How many directors are members of CSR committee? Of these, how many are independent directors?
- Does the Committee have an Independent Chairman?
- How frequent a CSR committee conducts its meetings?

Further, data was also collected on the following:

- Has the company fully spent the prescribed amount on its CSR activities?
- If the Company has failed to spend the full prescribed amount on its CSR activities, whether the Company has disclosed any reason(s) for not being able to spend the full prescribed amount?
- Sector wise spending by the Company
- Who carried out the CSR activities?
- Has the Company conducted any impact assessment of CSR activities? If yes, then if the impact assessment was done by an Independent agency?

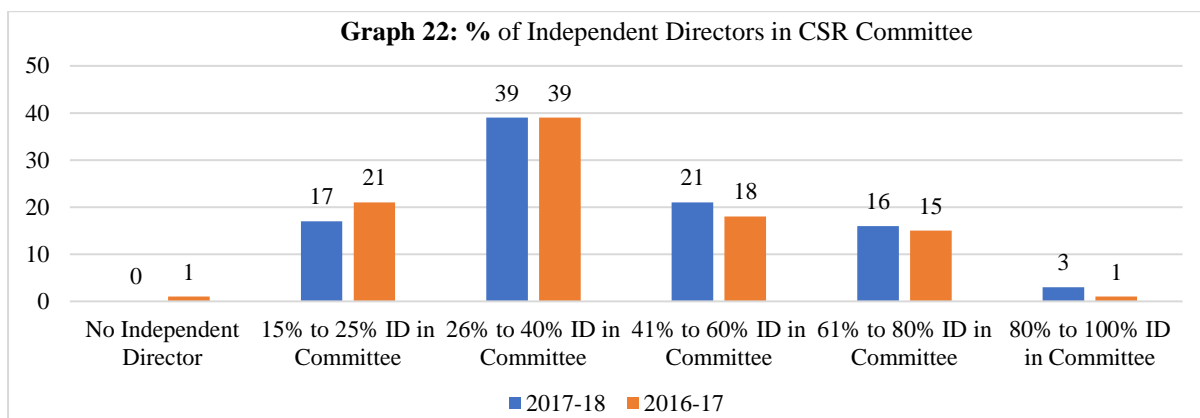
In FY 16-17, 99 companies and in FY 17-18, 100 companies are in the sample companies. Out of these, 4 are Public Sector Banks. Public Sector Banks are not companies as per Definition of the 'Company' under Companies Act, 2013, and PSB are not registered under the Companies Act, 2013, therefore, for Public Sector Banks it is not mandatory to spend 2% of their average net profit for preceding 3 financial years on their CSR activities. Hence, we have excluded these banks from the CSR analysis.

CSR Committee

A CSR Committee is constituted to monitor and report the utilization of funds for CSR activities. Corporate Social Responsibility Committee was an integral part of all the companies in the sample i.e. 95 companies for FY 16-17 (total 99 companies less excluding 4 PSBs) and 96 companies for FY 17-18 (total 100 companies less excluding 4 PSB).

It has been observed from the analysis of the composition of CSR committee that on an average in both FYs CSR committee has 4 members. It has been further observed that all companies have approximately 2 independent directors as members of the committee. In FY 16-17, Oil India Ltd did not have any Independent Director as member, however, in FY 17-18, the Company has an independent director. In FY 17-18, no CSR committee has been found which does not have an independent director as member.

Graph 22 depicts the number of independent directors in CSR committee in sample companies:

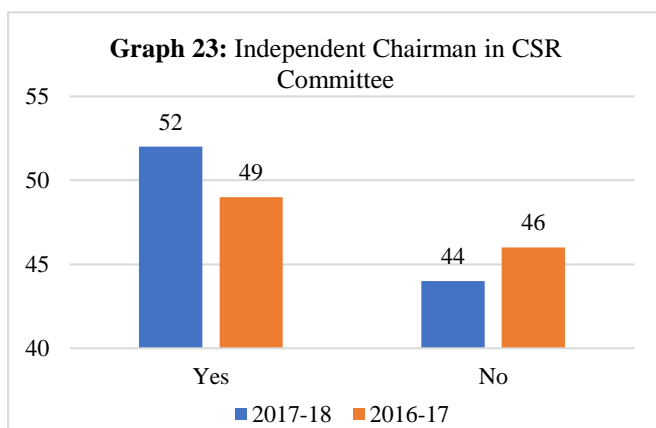


The Companies Act 2013, requires that CSR committee should have at least one independent director. It is observed in the sample companies that most companies fell in the category of 25%-60% independent directors as members of CSR committee.

Observation:

- Only Wipro Ltd. had a CSR committee which is fully comprised of Independent Directors in both FY 16-17 and FY 17-18.
- Cummins India Ltd, Oil and Natural Gas Corp. Ltd have a CSR Committee fully comprised of independent directors in FY 17-18. Further, Only Oil India Ltd did not have any Independent Director as member of the CSR committee in 2016-17. Same has been observed by the secretarial auditor of the Company in their report for FY 16-17. However, in FY 17-18, Oil India Ltd has 2 Independent Directors as members of CSR committee.

Graph 23 depicts the information regarding Independent Chairman in CSR Committee



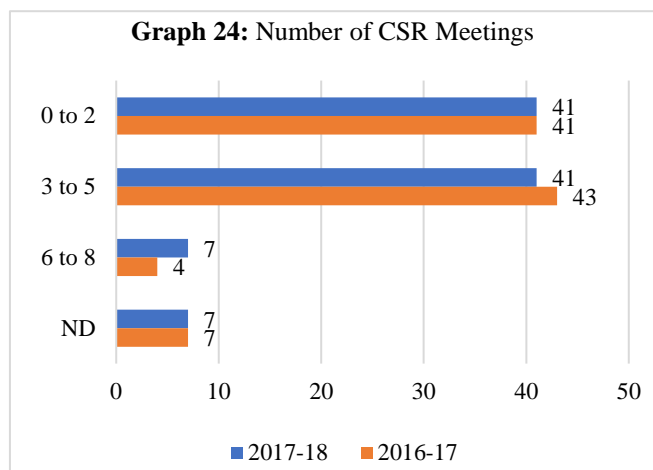
Although, the Companies Act does not require that Chairman of the CSR committee should be an Independent Director. However, it has been observed that from the sample, 52 companies for FY 2017-18 and 49 Companies for FY 16-17 companies have Independent Director as the Chairman of the CSR committee.

Positives:

Few Companies did not have a Independent Chairman of the CSR committee in FY 16-

17, however, in FY 17-18 these companies have an Independent chairman. These companies include HDFC Bank Ltd, NTPC Ltd, Oil India Ltd and Tata Steel Ltd.

Although, as per law it is not required to disclose the number of meetings of the CSR committee. However, it has been observed that most companies from the sample had disclosed the information.



The Graph 24 depicts the number of meetings of CSR committee of the Sample Companies in FY 17-18 and FY 16-17.

Most CSR committee of the sample companies have met between 3 to 5 times during the year.

Expenditure on CSR Initiatives

As per Section 135 of the Companies Act 2013, every Company, private Ltd or public Ltd, which has a net worth of ₹ 500 crore or a turnover of ₹ 1,000 crore or net profit of ₹ 5 crore, has to spend at least 2% of its average net profit on Corporate Social Responsibility, where average net profit should be calculated as per section 198 for the immediately preceding three financial years.

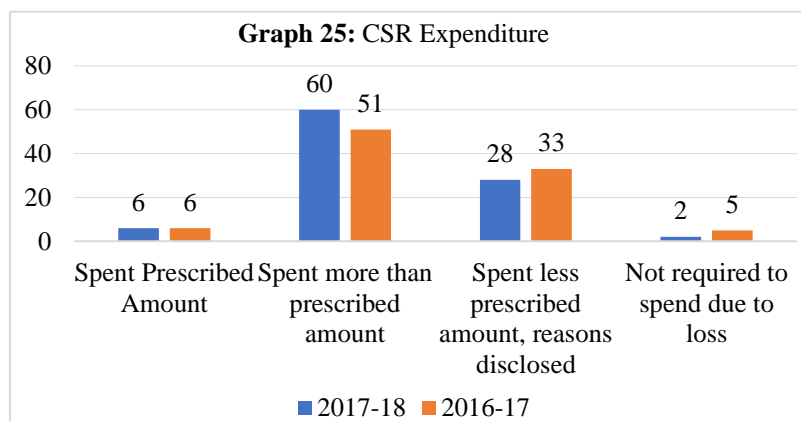
As required as per SEBI BR Report under section B, the Companies are required to disclose:

- average net profit for immediately preceding three financial years
- their total spending on CSR as a % of Profit After Tax
- list of activities in which expenditure has been incurred

Further, the Companies also required to disclose detailed sector wise expenditure in form of an annexure to be included in Board’s Report as required u/s 135 of Companies Act, 2013.

As per the Graph 25 for last 2 financial years i.e. 2017-18 and 2016-17, most of the Companies have complied with the requirement of spending 2% of their average net profit for immediately preceding three financial years on CSR activities.

Graph 25 depicts whether the sample companies had spent the prescribed amount on CSR activities



It can be illustrated from the Graph 25 “CSR Expenditure” that number of companies which have spent more than 2% on CSR activities have increased Y-o-Y. In FY 16-17, 51 companies had spent more than the prescribed amount on their CSR activities, while in FY 17-18, the number increased to 60 companies which have spent

more than the prescribed amount on its CSR activities.

If the Company fail to spend prescribed amount on their CSR activities, the Company is required to disclose the reason(s), if any. All companies from the sample have disclosed the reasons and the same are also disclosed in the BRR extract for the sample companies forming part of the Annexure 3 to this report.

Sectors of Expenditure on CSR

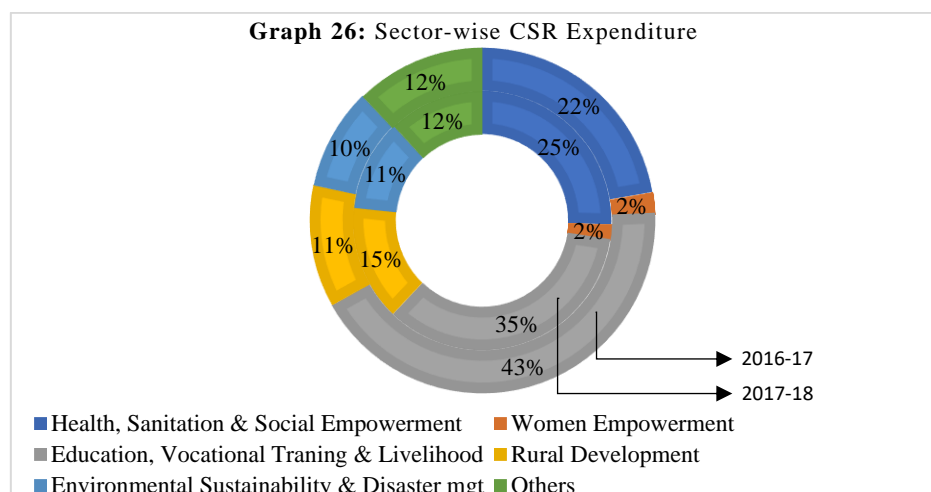
The companies require to spend on their CSR activities and are required to disclose the sector wise expenditure in an Annexure on CSR activities along with their Annual Report. Annexure also contains the details of the project under which sector it is covered and the amount spent on the project. Some companies have also provided projected and cumulative spent on its CSR activities. SES has found that most of the companies are spending majorly on 5 sectors as follows:

- Health, Sanitation & Social Empowerment
- Women Empowerment
- Education, Vocational Training & Livelihood
- Rural Development
- Environmental Sustainability & Disaster management

Other Expenditures which do not form a part of above categories are considered under “other” category.

In FY 17-18, sample companies have spent ₹ 7,484 crores collectively on its CSR activities, while, in FY 16-17, the companies have spent ₹ 7,812 crores. Graph 26 depicts the break up of total expenditure by sample companies.

Graph 26 depicts the sector wise break up of CSR expenditure by sample companies



As it can be seen from the Graph 26 that, the companies spent maximum on Education, Vocational Training and Livelihood followed by health, sanitation and social empowerment projects/ initiatives. Women empowerment is a sector in which the least expenditure has been incurred. For both FY 16-17 and 17-18, the sector wise expenditure was almost same.

Table 14 depicts Top 5 Companies which have spent the most in absolute terms.

Table 14: Top 5 spenders on CSR initiatives and their sectoral expenditure

	Average Net Profit of previous 3 FYs (in ₹crores)	Prescribed CSR expenditure (in ₹crores)	CSR Spend (in ₹crores)	Percentage of CSR spend to the prescribed CSR expenditure	Health, Sanitation & Social Empowerment	Women Empowerment	Education, Vocational Training & Livelihood	Rural Development	Environmental Sustainability & Disaster management	Others
Top 5 Spenders in FY 17-18 (As per absolute expenditure)										
Reliance Industries Ltd	35,154	703	745	105%	19.85%	-	55.57%	24.27%	0.19%	0.12%

ONGC Ltd	2,435	487	503	103%	56.53%	1.46%	19.51%	1.66%	3.40%	17.44%
TCS Ltd	24,868	497	400	80%	32.75%	-	21.50%	-	0.25%	45.50%
HDFC Bank Ltd	7,984	159	374	234%	12.49%	3.07%	15.14%	-	0.32%	16.04%
Indian Oil Corp Ltd	16,397	327	331	100%	3.53%	-	14.88%	-	24.10%	57.49%
Top 5 Spenders in FY 16-17 (As per absolute expenditure)										
Reliance Industries Ltd	31,021	620	659	106%	40.84%	-	38.10%	14.28%	2.04%	4.73%
ONGC Ltd	26,783	536	526	98%	17.50%	2.15%	40.08%	0.11%	23.69%	16.48%
TCS Ltd	22,275	446	380	85%	22.55%	0.07%	23.20%	-	0.14%	54.04%
HDFC Bank Ltd	15,200	304	305	100%	7.71%	-	8.47%	41.61%	0.33%	41.88%
Infosys Ltd	14,371	287	289	101%	16.51%	-	23.38%	12.82%	28.99%	18.30%

From the Table 14 it can be observed that Reliance Industries Ltd, ONGC and TCS are consistently spending highest on CSR initiatives in last 3 FYs in absolute terms. It can further be noted that Reliance Industries has consistently spent more than the prescribed amount on CSR initiatives. However, despite being in the top 5 spenders on CSR initiatives, ONGC and TCS have spent less than the prescribed amount on CSR initiatives for FY 16-17. In FY 17-18, ONGC has spent more than the prescribed amount on its CSR activities

It can be observed from the Table 14 that ONGC has been consistent with spending on Women Empowerment for last 3 FYs. In FY 17-18, HDFC Bank Ltd has spent approx. 3.07% on women empowerment, no other companies in the top 5 have spent more than 1% of the amount on Women Empowerment initiatives in FY 17-18.

It has been further observed that the companies have spent more on Education, Vocational Training and Livelihood and Health and Sanitation and Social Empowerment sectors.

Table 15: Top 5 Companies in decreasing order for 16-17 and 17-18 who have spent the most as compared to the prescribed CSR expenditure

	Average Net Profit of previous 3 FYs (in ₹crores)	Prescribed CSR expenditure (in ₹crores)	CSR Spend (in ₹crores)	Percentage of CSR spend to the prescribed CSR expenditure
Top 5 Spenders in FY 17-18				
Vedanta Limited	471	9.42	45.00	477.71%
UPL Limited	296	5.94	20.36	342.76%
Coal India Ltd	393	7.88	24.31	308.50%
Tata Steel Limited	4,280	85.62	231.62	270.52%
United Spirits Limited	211	4.23	10.46	247.28%
Top 5 Spenders in FY 16-17				
Coal India Ltd	681	13.65	128.06	938.17%
UPL Limited	244	4.89	23.79	486.50%
Piramal Enterprises Ltd	458	9.17	32.82	357.91%
Ambuja Cements Ltd	1,489	29.78	59.37	199.36%
NHPC Ltd	2,211	44.23	75.82	171.42%

Coal India Ltd is in top 5 companies for last 3 FYs in spending more than the prescribed amount in relative terms. NHPC Ltd had spent highest more than prescribed amount for FY 15-16 and FY 16-17. UPL Ltd has been in top 5 for last 2 FYs.

Table 16: Lowest 5 Companies in increasing order for FY 15-16, 16-17 and 17-18 who have spent the least as compared to the average net profit for the past 3 FYs

	Average Net Profit of previous 3 FYs (in ₹crores)	Prescribed CSR expenditure (in ₹crores)	CSR Spend (in ₹crores)	Percentage of CSR spend to the prescribed CSR expenditure	Percentage of CSR spend to the Avg Net Profit
5 Least Spenders in FY 17-18					
Indiabulls Hsg Fin Ltd	2,384	47.68	1.08	2.27%	0.05%
Motherson Sumi Systems Lt	887	17.75	0.85	4.77%	0.10%
Bharti Airtel Limited	10,731	214.62	27.80	12.95%	0.26%
LIC Housing Finance Ltd	2,539	50.79	6.78	13.35%	0.27%
MRF Ltd	2,151	43.04	9.50	22.05%	0.44%
5 Least Spenders in FY 16-17					
Motherson Sumi Systems Lt	769	15.40	1.40	9.04%	0.18%
Indiabulls Hsg Fin Ltd	1,837	36.75	5.88	16.00%	0.32%
MRF Ltd	1,961	39.24	7.73	19.70%	0.39%
Petronet Lng Limited	1,080	21.60	4.38	20.28%	0.41%
Hindustan Zinc Limited	8,767	175.35	49.40	28.17%	0.56%

From the Table 16 it can be seen that Indiabulls Housing Finance Ltd, Motherson Sumi Systems Ltd and MRF Ltd have consistently spent less than prescribed amount on CSR activities. In fact these companies are in the lowest 5 companies which spent less than 2% of net profit of past 3 years on CSR expenditure.

Mode of Undertaking CSR

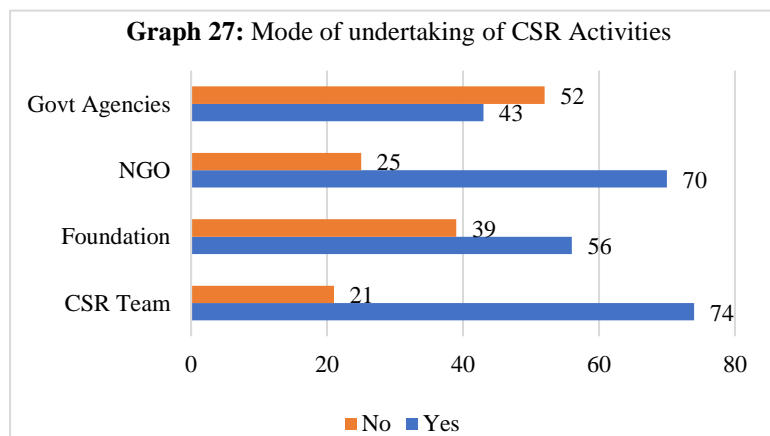
Companies carry out CSR activities through various internal or external agencies. Internal agencies like its own in-house teams or via Company's/Group's Foundation. While, some companies also undertake CSR Initiatives via external organisations such as NGO's or Government structures.

As per SEBI format of BR Report under Section E Principle 8 the Companies are required to disclose:

P 8; Question 2 “Are the programmes / projects undertaken through in-house team / own foundation / external NGO / Govt. structure / any other organization?”

From the Data collected for sample companies regarding the mode of undertaking CSR, it was observed that the Companies mostly carries out its CSR initiatives through more than one mode. The Graph 27 depicts the most used mode of carrying on CSR initiatives:

Graph 27 depicts modes of undertaking of CSR by sample companies



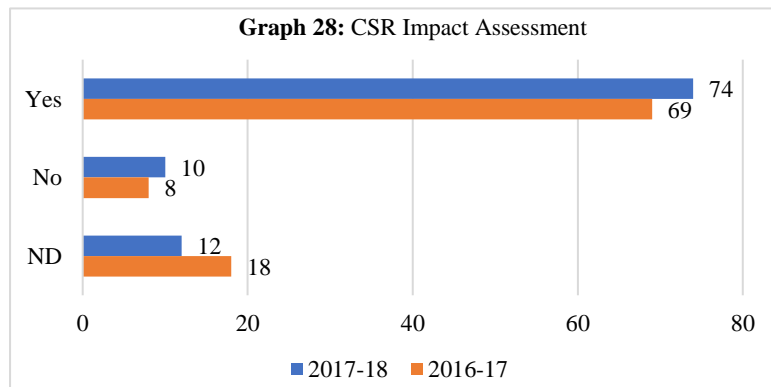
It can be observed from the Graph 27 that most companies prefer to carry out CSR initiatives either by the in-house team/ directly or through an external NGO. Further, it has also been observed that most companies have own trusts/ foundations to carry out CSR initiatives.

Impact Assessment Of CSR

P 8; Question 2: “Have you done any impact assessment of your initiative?”

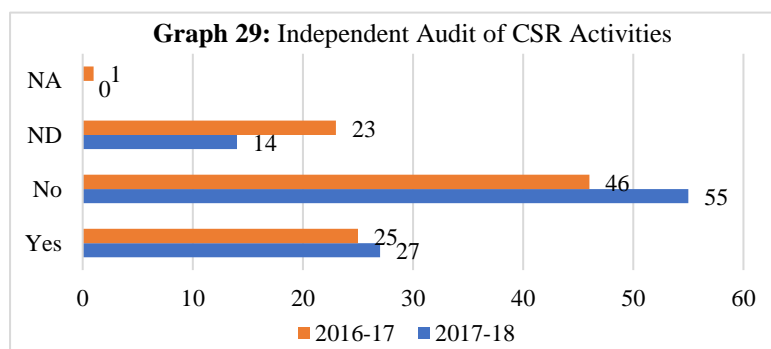
As per SEBI format of BR Report, under the Section E-Principle 8 the Companies must disclose, that whether the Companies have conducted an impact assessment of their CSR initiatives or not. The Companies have disclosed about impact assessment in subjective manner. The data collected was categorised in 3 categories, if Company carried out impact assessment, did not carry out impact assessment and company has not disclosed (ND).

Graph 28 depicts whether the sample companies had carried out impact assessment of CSR activities



74 companies in FY 17-18 and 69 companies in FY 16-17 carried out impact assessment. Some Companies have carried impact assessment with external agency while some of the Companies have in house teams who carries out impact assessment internally.

Graph 29 depicts if the sample companies had carried out independent audit of CSR activities



It was observed that companies have disclosed regarding auditing their CSR activities. It has been observed by the study that companies are conducting audit of its CSR activities either externally or internally. From the Graph 29, it can be observed that 27 companies have done third party audit for its

CSR activities in FY 17-18, while, in FY 16-17, 25 companies had conducted third party audit for its CSR activities.

PRINCIPLE 9

Businesses should engage with and provide value to their customers and consumers in a responsible manner

Consumer Complaints

P 8; Question 1: ***“What percentage of customer complaints/consumer cases are pending as on the end of financial year?”***

As per SEBI format the companies are required to disclose the data regarding the % of customer complaints or consumer cases which are pending at the end of financial year. Many companies have disclosed data either on customer complaints or consumer cases or both.

Since the data collected for the sample companies fall under different categories, hence, the data cannot be grouped for comparison analysis because varied categories data will lead to an inaccurate interpretation.

Therefore, the data of complaints under the question is disclosed in the extract of each Company in the Annexure 3.

Mahindra & Mahindra Ltd has disclosed complaints division wise. This was considered a good disclosure. The reference of the disclosure in the BPG to this Report

Consumer Survey

P 8; Question 1: ***“Did your company carry out any consumer survey/ consumer satisfaction trends?”***

The Companies are required to disclose under section this section, that whether they carried out any consumer survey/customer satisfaction trends.

Companies conduct consumer surveys to obtain feed-back from customers regarding their products and services. Some companies have online portals to interact with customers and to receive feedback

Table 17: Consumer Satisfaction Survey

Observations:	2017-18	2016-17
Companies that carried out a survey/ customer satisfaction trend	83	79
Companies that did not carry out a survey	8	7
Companies that did not disclose the information	7	11
Companies which stated that customer survey was not applicable to them	2	2
Total	100	99

- From the Table 17, it can be observed that almost 80% Companies from the sample have carried out customer satisfaction survey for FY 2016-17 and FY 2017-18.
- 8 Companies in FY 17-18 and 7 Companies in FY 16-17 did not carry out the survey.
- Bajaj Finserv Ltd and Bajaj Holdings & Investment Ltd have disclosed that consumer survey is not applicable to them.
- Dr Reddy’s Laboratories Ltd had states in FY 16-17 that *“Our primary research team regularly conducts consumer surveys in all therapy areas.”* While, in FY 17-18, the Company has stated that no survey has been carried out.

Positives:

- Cummins India Ltd, HDFC Bank Ltd and Titan Company Ltd had not disclosed if they had carried out a survey in FY 16-17, however in FY 17-18, they have disclosed that they carried out the Consumer survey.

COMPARISON OF DISCLOSURES UNDER GLOBAL REPORTING INITIATIVE – GRI STANDARD WITH BRR

GRI is an Independent international organisation that helps companies and other organizations provide information to their stakeholders in a manner that they are able to communicate their impact on critical sustainability issues which includes climate change, human rights, governance and social well-being. In October 2016, GRI has launched the most recent guidelines on Sustainability Reporting i.e. GRI Standard. Companies are going forward required to follow the most recent updated standards while adopting sustainability reports as per GRI.

Based on the GRI guidelines, sustainability reports are more readily comprehensible, hence, it provides the holistic view about the Company to its stakeholders. Although, the Companies which are publishing their BR Reports as per SEBI format are not required to publish sustainability reports. However, 50 companies in FY 16-17 and FY 17-18 have published their sustainability reports and approx. 40 companies have followed the GRI format in their Sustainability Reports.

In tandem with the global initiatives towards the Sustainability Reporting, Ministry of Corporate Affairs (MCA) in India also had taken steps towards the non financial reporting by the companies in India. In view of the above, MCA had introduced the ‘National Voluntary Guidelines (NVG) on Social, Environmental and Economic Responsibilities of Business.’ These guidelines consist of 9 principles related to Environment, Social and Governance factors. Along with these principles, format of the Business Responsibility Report has also been provided.

Format for the BR Report prescribes certain parameters for the companies to prepare BR Report in accordance with NVG principles.

Subsequent to the guidelines issued by MCA, SEBI has issued a circular mandating Top 100 companies based on their market capitalization to prepare and publish BRR. Thereafter, by an amendment to its circular, SEBI has extended this regulation to top 500 companies.

This study is conducted to compare the disclosure as required under the general disclosure requirement of GRI Standard and BR format as prescribed by SEBI. In the comparison we have also covered the requirements of disclosures under the Companies Act, 2013 and SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 (LODR).

As stated by GRI “GRI 102: General Disclosures is used to report contextual information about an organization and its sustainability reporting practices. This includes information about an organization’s profile, strategy, ethics and integrity, governance, stakeholder engagement practices, and reporting process.” GRI standards also include numerous topic-specific Standards. These are used to report information on an organization’s impacts related to economic, environmental, and social topics (e.g., Indirect Economic Impacts, Water, or Employment). However, the present comparison was only restricted to disclosure under GRI 102.

It has been found that general disclosures under GRI Standards are far more comprehensive and wider as compared to SEBI BRR format, in terms of the disclosures related to financial and non-financial information about the Company.

Comparative table for the above has been provided in Annexure -1.

From 99 questions under the general disclosures in GRI Standard, 20 questions are fully covered either under the BRR or under the disclosure of Companies Act and SEBI LODR. 51 questions are covered partially in BRR or elsewhere in Annual Report. While, 28 questions are not covered. From this it can

be concluded that the disclosures required under the BRR are not as vast and intensive as compared to GRI Standard.

GRI Standard include:

- **Requirements:** *These are mandatory instructions. In the text, requirements are presented in bold font and indicated with the word 'shall'. Requirements are to be read in the context of recommendations and guidance; however, an organization is not required to comply with recommendations or guidance in order to claim that a report has been prepared in accordance with the Standards.*
- **Recommendations:** *These are cases where a particular course of action is encouraged, but not required. In the text, the word 'should' indicates a recommendation.*
- **Guidance:** *These sections include background information, explanations and examples to help organizations better understand the requirements.*

Companies which are publishing their reports in accordance to GRI guidelines have disclosed the impacts of the practices and operations of the organization on society, environment and the economy.

Similar to GRI, SEBI BRR format also has 9 principles of Business Responsibility, which are required to be answered by the companies both objectively and subjectively. However, the format provided by SEBI does not convey the response of the Company as objectively and as comprehensively as the disclosure requirement in GRI Reporting.

Most of the companies from the sample companies have published their sustainability report in accordance with GRI Standard guidelines. Many companies which operate globally also have practice to publish sustainability reports. This indicates that companies are more progressive towards adopting the global standards which require much more comprehensive disclosures and the companies are following more descriptive format voluntarily. In view of this, regulators in India should also mandate more intensive disclosures related to non-financial reporting. It would help to assess the Company's ability to sustain for a longer period.

In short, BRR framework is a good step towards the publishing of the Sustainability Reporting, however, in terms of the disclosures it is far away from the global standards and practice. It needs to evolve so that disclosure of companies on adoption of robust risk mitigation policies and practices is communicated to stakeholders more effectively. The disclosure are not only relevant to stakeholder but they should be an introspection for the Company and highlight the strong and weak areas where Company can adopt better sustainable practices. Hence, it can be summarized that regulators in India must introduce comprehensive guidelines as compared to present available NVG guidelines, so that Indian companies also fall in line of globally accepted disclosures requirements.

BRR-Best Practice Guide (BPG)

Laws are meant to be followed in true spirit and in right direction. If not followed with the true intent, then the purpose is defeated. Though, intent of an entity cannot be controlled and channelled to the right path, however, sometimes lack of understanding of the basic purpose of law may be a hindrance to follow the law with true intent. In such situation the regulator should provide guidance in way that communicate the intent behind the creation of law for the entities to follow in the most effective manner. However, it is not necessary that only the regulatory bodies should provide guidance, even practitioners, research organisations can also provide reference of the right practices. This study is one of such attempts to drag the attention towards the best practice disclosures among the sample companies.

MCA had introduced the “National Voluntary Guidelines (NVG)” with the primary purpose of putting together information about the company’s business and initiatives taken towards Environment, Social and Governance responsibility.

Data was collected for top 100 listed companies as per market capitalisation as on 31st March 2017. In terms of the format of Business Responsibility Reports provided by SEBI, responses of companies are not purely in objective form, and the format also gives scopes of detailed, elaborate answers by entities. It is observed that the question which gives freedom to respond in words or subjective responses, increases the possibility of variation in answers in different dimensions, industries etc. Anything in excess is bad even if it is excessively understated or excessively exaggerated. However, depending on the different companies and their businesses, parameters we also understand that Regulatory cannot set response requirement or format of questions for each industry separately. It has been observed that all companies have their own way to represent the facts and information to its stakeholders.

While preparing this guide we have gathered the best responses given by the companies to each question in the BR report format. Purpose of this was to bring out the best disclosure practice, however, not to indicate the lack of disclosures of the companies. Our objective is to provide an easy guide to any reader to identify best disclosure examples which were more informative yet short and precise or in presentable manner.

We paid attention to the answers which had better representation of information and which was brief but comprehensive. We collected some extracts for each questions and have provided the same hereinafter:

We have prepared this guide as per the SEBI template for BR Report.

Section A

Section A requires ‘GENERAL INFORMATION OF THE COMPANY’

1. Corporate Identity Number (CIN) of the Company
2. Name of the Company
3. Registered address
4. Website
5. E-mail id
6. Financial Year reported
7. Sector(s) that the Company is engaged in (industrial activity code-wise)
8. List three key products/services that the Company manufactures/provides (as in balance sheet)
9. Total number of locations where business activity is undertaken by the Company

(a) Number of International Locations (Provide details of major 5)

(b) Number of National Locations

10. Markets served by the Company – Local/State/National/International

Comments: Generic information is required to be provided by the Company in this section. This cannot be compared as the information vary from company to company. However, it was observed that few companies have disclosed a much more detailed information than other about the Company and its business. Following is an Extract from BR Report of Emami Ltd and Hindustan Petroleum Corporation Ltd

Extract of disclosure from **Emami Ltd**

7.	Sector(s) that the Company is engaged in (industrial activity code-wise)	<p>Emami is a Fast-Moving Consumer Goods (FMCG) company and operates in niche consumer and healthcare product categories like Cooling Oils, Balms, Antiseptic cream, Fairness creams for men and ayurvedic Hair and Scalp Care Oils. The Principles products of the Company with industrial Activity code are:</p> <table border="1" data-bbox="699 730 1487 992"> <thead> <tr> <th>Sl.</th> <th>Product</th> <th>Industrial Activity Code</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Navratna Oil</td> <td>30049011</td> </tr> <tr> <td>2.</td> <td>Zandu and Menthos Plus Balm</td> <td>30049011</td> </tr> <tr> <td>3.</td> <td>Boroplus Antiseptic Balm</td> <td>30049011</td> </tr> <tr> <td>4.</td> <td>Fair and Handsome Cream</td> <td>30049910</td> </tr> <tr> <td>5.</td> <td>Kesh King Oil</td> <td>30049011</td> </tr> </tbody> </table>	Sl.	Product	Industrial Activity Code	1.	Navratna Oil	30049011	2.	Zandu and Menthos Plus Balm	30049011	3.	Boroplus Antiseptic Balm	30049011	4.	Fair and Handsome Cream	30049910	5.	Kesh King Oil	30049011
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8.	List three key products/services that the Company manufactures/provides (as in balance sheet)	<p>(i) Navratna Oil (ii) Zandu and Menthos Plus Balm (iii) Boroplus Antiseptic Balm (iv) Fair and Handsome Cream (v) Kesh King Ayurvedic Hair & Scalp Medicinal Oil</p>																		
9.	Total number of locations where business activity is undertaken by the Company	<p>i. Number of International Locations (Details of major 5) – Emami operates through 9 overseas subsidiaries and has presence in 60+ countries with a manufacturing unit in Bangladesh as well. Major geographies where Emami operates in are: a. South Asia Association for Regional Cooperation (SAARC) b. Middle East, North Africa and Pakistan (MENAP), c. South East Asia and Australia (SEAA) d. CIS and Eastern Europe (CISEE) e. Africa ii. Number of National Locations Emami carries out its operations through its Head Office in Kolkata, 4 regional offices, 8 manufacturing units, and 27 depots across India.</p>																		
10.	Markets served by the Company	Indian Market, export and operations in international geographic as above.																		

Source: Emami Ltd Annual Report 2017-18 Business Responsibility Report Page No. 162

Extract of disclosure from **Hindustan petroleum Corporation Ltd**

7.	Sector(s) that the Company is engaged in (industrial activity code-wise)	<p>As per National Industrial Classification, Ministry of Statistics & Programme Implementation, the Company is engaged in activities described below:</p> <table border="1" data-bbox="518 1899 1487 2040"> <thead> <tr> <th>Group</th> <th>Class</th> <th>Sub-class</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>192</td> <td>1920</td> <td>19201</td> <td>Production of liquid and gaseous fuels, illuminating oils, lubricating oils or greases or other products</td> </tr> </tbody> </table>	Group	Class	Sub-class	Description	192	1920	19201	Production of liquid and gaseous fuels, illuminating oils, lubricating oils or greases or other products
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					from crude petroleum or bituminous minerals																																																								
			19203		Bottling of LPG/CNG																																																								
			19209		Manufacture of other petroleum n.e.c. (includes manufacture of petroleum jelly, micro-crystalline petroleum wax, slack wax, ozokerite, lignite wax, petroleum coke, petroleum bitumen and other residues of petroleum oils or of oils obtained from bituminous minerals)																																																								
		352	3520	35202	Distribution and sale of gaseous fuels through mains																																																								
		061	0610	06102	On shore extraction of crude petroleum																																																								
		351	3510	35105	Electric power generation using solar energy																																																								
				35106	Electric power generation using other non-conventional sources																																																								
		493	4930	49300	Transport via pipeline [Crude, LPG and Petroleum Products]																																																								
		466	4661	46610	Wholesale of solid, liquid and gaseous fuels and related products																																																								
		473	4730	47300	Retail sale of automotive fuel in specialized stores [includes the activity of petrol filling stations]																																																								
		477	4773	47736	Retail sale of household fuel oil, bottled gas, coal and fuel wood																																																								
		721	7210	72100	Research and experimental development on natural sciences and engineering																																																								
8.	List three key products/services that the Company manufactures/provides (as in balance sheet)	a. High Speed Diesel (HSD) b. Liquefied Petroleum Gas (LPG) c. Motor Spirit (MS)																																																											
9.	Total number of locations where business activity is undertaken by the Company	a. Number of International Locations: NIL b. Number of National Locations: We have 2 major refineries at Mumbai and Visakhapatnam. We have a strong country-wide network of infrastructure as below: <table border="1" data-bbox="518 1478 1484 2038"> <thead> <tr> <th>Sr. No.</th> <th>Description</th> <th>Units</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Retail Outlets</td> <td>Nos</td> <td>15062</td> </tr> <tr> <td>2</td> <td>LPG Distributorships</td> <td>Nos</td> <td>4849</td> </tr> <tr> <td>3</td> <td>SKO/ LDO Dealerships</td> <td>Nos</td> <td>1638</td> </tr> <tr> <td>4</td> <td>Auto LPG Dispensing Stations (ALDS)</td> <td>Nos</td> <td>218</td> </tr> <tr> <td>5</td> <td>CNG Outlets</td> <td>Nos</td> <td>239</td> </tr> <tr> <td>6</td> <td>Aviation Fuel Stations</td> <td>Nos</td> <td>41</td> </tr> <tr> <td>7</td> <td>Terminals & TOPs</td> <td>Nos</td> <td>41</td> </tr> <tr> <td>8</td> <td>Inland Relay Depots</td> <td>Nos</td> <td>41</td> </tr> <tr> <td>9</td> <td>LPG Bottling Plants</td> <td>Nos</td> <td>48</td> </tr> <tr> <td>10</td> <td>Lube Blending Plants</td> <td>Nos</td> <td>6</td> </tr> <tr> <td>11</td> <td>Exclusive Lube Depots (COLD/COD)</td> <td>Nos</td> <td>27</td> </tr> <tr> <td>12</td> <td>Lube Distributors</td> <td>Nos</td> <td>266</td> </tr> <tr> <td>13</td> <td>Clearing and Forwarding Agents (CFA)</td> <td>Nos</td> <td>116</td> </tr> </tbody> </table>				Sr. No.	Description	Units	Value	1	Retail Outlets	Nos	15062	2	LPG Distributorships	Nos	4849	3	SKO/ LDO Dealerships	Nos	1638	4	Auto LPG Dispensing Stations (ALDS)	Nos	218	5	CNG Outlets	Nos	239	6	Aviation Fuel Stations	Nos	41	7	Terminals & TOPs	Nos	41	8	Inland Relay Depots	Nos	41	9	LPG Bottling Plants	Nos	48	10	Lube Blending Plants	Nos	6	11	Exclusive Lube Depots (COLD/COD)	Nos	27	12	Lube Distributors	Nos	266	13	Clearing and Forwarding Agents (CFA)	Nos	116
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		14	LPG Import Facility Locations	Nos	2
		15	Lube Oil/ATF Pipelines Capacity	MMTPA	2.1
		16	Designed Multi Product Pipeline Capacity		
		16.a	Main Lines (POL)	MMTPA	22.99
		16.b	Branch Lines (POL)	MMTPA	11.07
		16.c	Main Line (LPG)	MMTPA	1.94
<p>c. Markets served by the Company – local/state/national/international: We serve national as well as international markets. We do international trade (Lubricants & other petroleum products) with Nepal, Bhutan, Myanmar, Sri Lanka, Singapore, Middle East and African markets.</p>					

Source: Hindustan petroleum Corporation Ltd Annual Report 2017-18 Business Responsibility Report Page No. 96

Section B

Section B is about Financial Details of the Company

1. Paid up Capital (INR):
2. Total Turnover (INR):
3. Total profit after taxes (INR):
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):
5. List of activities in which expenditure in 4 above has been incurred: -

Comments: Under this section of the BR format, the Company is required to disclose the financial details of the Company and the sectors of CSR expenditure. It was observed that Bank of Baroda, GAIL (India) Ltd, Ambuja Cement and Tata Power Ltd have disclosed the CSR expense in a structured manner. These companies have disclosed sectors as well as amount spent on different sectors under this section.

Following is an Extract from BR Report of **Ambuja Cement Ltd-** In FY 16-17 and FY 17-18, Ambuja Cements Ltd has provided the concise and specific disclosure as disclosed below:

List of activities on which expenditure in 4 above has been incurred: -			
All CSR activities conducted by the Company are in alignment with those identified under Schedule VII of Companies Act, 2013 and are listed as follows:			
Sr. No.	CSR Project or activity identified under Schedule VII of Companies Act, 2013	Sector in which the Project is covered	Expenditure incurred during the period (Amount ₹ In Crore)
1	Eradicating extreme hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water	Drinking Water, Agro based Livelihood, Animal Husbandry, Health, Sanitation	15.59
2	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;	Education, Ambuja Manovikas Kendra, Ambuja Vidya Niketan, Skill and Entrepreneurship Development Institute (SEDI), Non Formal Education, Village Knowledge Centre	19.81

3	Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically background groups;	Women, Female Feticide, Self Help Group, Federation	1.60
4	Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;	Non-Conventional, Biogas, Solar, Plantation, Water Resources, Watershed	6.06
5	Rural development projects.	Rural Infrastructure Project	9.20
	Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts.	Protection of national heritage, art and culture.	5.00
	Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.	Contribution to Prime Minister's National Relief Fund.	0.15
		Total	57.41
	Overheads	Overheads	1.38
			58.79

Source: Annual Report 2017 Ambuja Cements Ltd. Pg. No. 143

Following is an Extract from BR Report of **Tata Power Ltd**- Sector wise CSR expenditure as shown below:

List of activities in which expenditure in the above has been incurred:	
<i>Based on the Need Assessment undertaken in 2016, in FY17 the Company revised its CSR interventions to include 7 focus areas for community development initiatives across its locations. While Financial Inclusivity was based on mobilizing resources under various Government schemes to ensure entitlements of marginalized community in particular without any resource requirement, rest focus areas had budget allocation. Besides this, Affirmative Action is a cross cutting theme with focus on dalit and tribal communities.</i>	
Focus Areas	% spent
Education (Focus on Gender Balance upto Secondary)- VIDYA	12.31
Health and Sanitation-AROGYA	6.27
Livelihood-SAMRIDDHI & Employability-DAKSH	45.09
Renewable Energy- AKSHAY	0.75
Social Capital and Institution Building- SANRACHNA	8.48
Water (Irrigation and Drinking)- SWAJAL	0.89
Affirmative Action and Others	26.21
<i>Source: Tata Power Company Ltd Annual Report 2017-18 Business Responsibility Report pg no 113</i>	

Section C

Section C: other details

1. Does the Company have any Subsidiary Company/ Companies?

2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)

3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

Comments: This section requires the companies to disclose information about the participating entities of the Company and percentage of their participation in the BR initiative of the Company. The Companies are required to disclose from the sample companies have provided the information whether they have any subsidiary, whether these subsidiary or other entity that the company does the business with participate in the BR initiative of the Company. In the last part of the question Companies are required to provide the % of the entity(ies) which participate in the BR initiatives of the Company. It was observed that the Companies have followed the different disclosure practice. Few companies have disclosed exact percentage of other entities that participated, while few companies have disclosed more than 60%, less than 30%, 30%-60% entities participated. As there was variation in disclosure of data comparison across all 100 listed entities was difficult.

Many companies have provided the detailed information about the entities and their participation in the BR initiative of the Company. Bharat Electronics Ltd, Mahindra and Mahindra Ltd have provided the descriptive answer, while Dabur India Ltd has bifurcated the entities and initiative of the Company in reader friendly manner.

Following is an Extract from BR Report of **Dabur India Limited**–

Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]		
Dabur actively engages with its business associates through its BR initiatives.		
Entity	Initiative	% of entity
Suppliers (small farmers)	We directly engage with local & small producers for procuring inputs for our supply of rare herbs and medicinal plants through our greenhouse projects. (Details in response to question 4 in Section E, Principle 2)	< 30%
Distributors	We actively engage with our distributors to build their capacity through workshops and training sessions.	<30%
B2B customers	We organise customized education programmes for our B2B customers like beauty parlors, doctors etc.	<30%
Suppliers and distributors	The Direct Touch policy (Whistle Blower & Protection Policy) applies to business associates (suppliers, stockists and dealers) as well. This provides a platform to business associates for reporting unethical business practices without fear of reprisal.	>60%

Source: Business Responsibility Report 2016-17 Dabur India Ltd. Pg. No. 4

Following is an Extract from BR Report of **Mahindra & Mahindra Ltd**

3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

The company has long lasting relationships with its suppliers. A majority of supplier base has been already covered by conducting awareness sessions on 'sustainability'. From F14 a special drive for awareness of suppliers has been started and your Company have covered 573 suppliers till F17. A road map for covering

additional 375 suppliers from F17 in the next 3 years has been put in place and actions are already underway to cover suppliers from Mahindra Trucks and Business Division, Mahindra Two Wheelers Limited, Swaraj Division (SD) and Construction Equipment Division. In F17, 145 suppliers were covered by conducting two online training sessions. In continuation, in F18 additional 200 suppliers participated in training & awareness programs on sustainability. Further in F17, your Company supported Institute for Sustainable Communities to launch EHS+ Center at Symbiosis Institute of International Business, Pune. This Center is poised to provide training to Small & Medium Scale Enterprises in the field of Energy and Environment Health & Safety. A detailed curriculum was jointly prepared and training was imparted. In F18, 26 courses were developed and trainings were imparted to 779 participants, thus total 44 courses were developed and 1,694 participants were trained during the two years for Indian industries.

For enhancing skills at the Supplier end, focused activities drive in the following areas was undertaken and organization work structure for the same has been put in place in the Purchasing group for last few years. The areas covered are supplier business capability building (93 suppliers), Mahindra supplier evaluation standard (121 suppliers), Supply Risk Mitigation & Management (241 suppliers).

About 375 Suppliers have actively participated in Annual Supplier meets in F18.

In F16 "Msetu" an IT platform was launched through which technology has been leveraged to interact with Supplier Partners. 100% Suppliers are live on this interactive platform.

The % of entities covered is now more than 60% for Suppliers in above initiatives.

As regards SD, training & awareness of 122 Suppliers (55%) have already been done till F18.

For another 30 Suppliers, training & awareness has been planned in F19.

Similarly, 258 Dealers out of 295 have taken part in sustainability drive via Mahindra Dealers' Excellency Programme. This amounts to 87% of the total Dealers.

Source: Mahindra & Mahindra Ltd Annual Report 2017-18 Business Responsibility Report Page No. 168

Section D

Section D: BR Information

1. Details of Director/Directors responsible for BR

a) Details of the Director/Director responsible for implementation of the BR policy/policies

- DIN Number
- Name
- Designation

S. No.	Particulars	Details
1	DIN Number (If applicable)	
2	Name	
3	Designation	
4	Telephone Number	
5	E-mail Id	

b) Details of the BR head.

Comments: Purpose of this section is to disclose the details about the authorized person who is responsible for the BR policies and initiatives taken by the Company. It does not require any comparison.

2. Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N)

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1 Do you have a policy(ies) for principle									

2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online									
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Comments: The above table comprises of 9 principles of BRR and 10 questions corresponding to each principle. The companies are required to mention Y/N in each cell for every question to every principle. However, some companies have provided the extensive and more informative answers.

Question 6 requires the companies to provide weblinks for the policies. It was observed that some companies have not provided the links for each policy formulated. While, few companies have given one links for all policies. There were few companies from the sample that provided separate links for each separate policy. SES is of the opinion this is the best practice to provide separate links for different policies.

It was observed that Bharat Electronics Ltd, Bharat Forge Ltd, Tata Motors Ltd., Reliance Industries Ltd., GAIL (India) Ltd., Shree Cements, Siemens Limited, Dr. Reddy's Laboratories Limited have provided more elaborated answers to these questions irrespective of the requirement to respond only in Y/N.

For question 4 in the above table which requires the policies of the Company to be approved by the Board/MD/CEO of the Company, Asian Paints Ltd, Dabur India Ltd & Dr. Reddy's Laboratories Limited have provided more concise information regarding the signing authority of the policy.

Rural Electrification Corporation Ltd has also provided the detailed answers to the questions in a tabular format. It has followed the SEBI format by providing all the sections of the template and have provided detailed responses for each question.

Wipro has not provided the tabular format of principles. Hence, it has not followed the same format of BR Report as prescribed by SEBI, however, it has provided detailed answers. Since the responses provided by these companies are quiet detailed links for the same has been provided for reference:

- 1. Oil and Natural Gas Limited** has provided user friendly and elaborated answers for each principle and their corresponding questions. The Company has provided detailed answers in place where answers can be provided in Yes/No. BR Report of ONGC can be referred in Annual Report 2017-18 page no 128 ([Weblink](#))
- 2. Container corporation of India** has also provided the answers for each principle and their corresponding questions in a tabular format separately for each principle along with the performance criteria. Though, at

individual levels the answers provided are not completely quantified as required, however, the presentation given is appreciable because it provides complete information to the user separately for each question. Refer Concor’s BRR in the Annual Report 2017-18 Page No 97 ([Weblink](#)).

3. **Wipro Limited** has provided detailed answers to every question instead of just providing Y/N in the respective table. Business Responsibility Report can be found in Annual Report Page No 309 ([Weblink](#))
4. **Rural Electrification Corporation Ltd** has provided all the answers to every principle in a tabular format. BR Report of the Company can be found in Annual Report Page no 106 ([Weblink](#))

As stated above, Asian Paints Ltd, Dabur India Ltd and Dr Reddy Laboratories Ltd have been found more descriptive and explanatory in terms of the disclosure of signing authority of the policies.

We have attached the snippet of disclosure of question 4 of Asian Paints Ltd and Dabur India Ltd and that can be taken as a reference for the better disclosure practice:

Reference 1- Dabur India Ltd

Sr. No.	Question(s)	P1	P2	P3	P4	P5	P6	P7	P8	P9
4.	Has the policy being approved by the Board? If yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Yes, Board of Director	Yes, CEO	Yes, CEO	Yes, CEO	Yes, CEO	Yes, CEO	NA	Yes, Board of Directors	Yes, CEO

Reference 2- Asian Paints Ltd

Sr. No.	Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
4.	Has the policy been approved by the Board? If yes, has it been signed by MD/owner/ CEO/appropriate Board Director?	Y (It is signed by the Vice President - Human Resources Function)	Y (It is signed by the Managing Director)	Y (It is signed by the Vice President Human Resources Function)	Y (It is signed by the Managing Director)	Y (It is signed by the Vice President - Human Resources Function)	Y (It is signed by the Managing Director)	NA	Y (It is signed by the Managing Director)	Y (It is signed by the Managing Director)
		As a process all the policies are noted by the Board. The Board authorises Senior Officials of the Company to authenticate the policies and make necessary changes whenever required.								
6	Indicate the link of the policy to be viewed online?	https://www.asianpaints.com/marine/investors/policies-programs.html	https://www.asianpaints.com/footer-links/ehspolicy.html	https://www.asianpaints.com/content/dam/secondary-navigation/investors/policies-code-of-conduct-for-employees.pdf	https://www.asianpaints.com/content/dam/secondary-navigation/about-citizenship/CSR%20Policy.pdf	https://www.asianpaints.com/content/dam/secondary-navigation/investors/code-of-conduct/asia-paints-codeof-conduct.pdf	https://www.asianpaints.com/footer-links/ehspolicy.html	NA	https://www.asianpaints.com/content/dam/secondary-navigation/about-citizenship/CSR%20Policy.Pdf	https://www.asianpaints.com/footer-links/customer-policy.html

	yes, specify? (50 words)	national and international standard s. This applies to all the directors and employees across the group.	the 10 principles of the UN Global Compact 1. We take into account industry best practices and global benchmarks in defining our policies.	that, we continuously benchmark our policies with competition in different markets and review them as needed. Industry best practices and global benchmarks in defining our policies.	s of the UN Global Compact . We take into account industry best practices and global benchmarks in defining our policies.
4	Has the policy been approved by the board? If yes, has it been signed by MD/owner/CEO/appropriate board director?	Yes, it has been approved by the board and/or appropriately authorized.	Statutory policies are placed before the board for international policies by COO. The management council (MC) and relevant stakeholders are consulted.	Policies in India are approved by CHRO and international policies by COO. The other policies are approved by CEO/MD.	Statutory policies are placed before the board for consideration and approval . All other policies are approved by CEO/MD.

5	Does the company have a specified committee of the board/director/official to oversee the implementation of the policy?	Yes	The responsibility for the implementation of policies and their review with the primary function head.	All policy changes are discussed in HR leadership team meeting. The MC and relevant stakeholders are consulted before taking it for approval.	The responsibility for the implementation of policies and their review primarily lies with the respective business/function head.	NA	Yes	NA	Yes	The responsibility for the implementation of policies and their review primarily lies with the respective business/function head.
6	Indicate the link for the policy to be viewed online?	www.dreddys.com/investors/governance/code-of-business-conduct-and-ethics-cobe.aspx	www.dreddys.com/media/123467/share_policy.pdf	NA	www.dreddys.com/media/123467/share_policy.pdf	www.dreddys.com/investors/governance/code-of-business-conduct-and-ethics-cobe.aspx	www.dreddys.com/media/123467/share_policy.pdf	NA	www.dreddys.com/media/125014/csr-policy.html	www.dreddys.com/media/123467/share_policy.pdf
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes	Employees are required to sign an undertaking, at least annually, stating that they have read	Yes, all policies have been communicated to stakeholders.	Employees are required to sign an undertaking, at least annually, stating that they have read the Code of Business Ethics (COBE) and	Yes.	Yes	NA	Yes	Employees are required to sign an undertaking, at least annually, stating that they have read the Code of Business Ethics (COBE) and

<p>the Code of Business Ethics (COBE) and comply with the principles of the code. New employees are required to sign a similar undertaking at the time of joining. Additionally, all our policies with respect to the nine principles are available on the company's website.</p>	<p>comply with the principles of the code. New employees are required to sign a similar undertaking at the time of joining. Additionally, all our policies with respect to the nine principles are available on the company's website.</p>	<p>comply with the principles of the code. New employees are required to sign a similar undertaking at the time of joining. Additionally, all our policies with respect to the nine principles are available on the company's website.</p>
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8	Does the company have in-house structure to implement the policy/policies?	Yes	Yes	Yes, we have an intranet where all policies are published along with FAQs. Apart from that we have employee communications sent out on any changes in policies.	Yes	Yes.	Yes	NA	Yes	Yes
9	Does the company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?	Yes	We also have a dedicated ombudsman policy to address all concerns related to company level policies.	Policy grievances are handled by the respective business HR partners. We also have a common email-ID, wherein employees can drop an email with their feedback.	We also	Yes.	Yes	NA	NA	We also have a dedicated ombudsman policy to address all concerns related to company level policies.

10	Has the company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	Yes	We comply with the nine principles broadly through the following policies: Code of Business Conduct and Ethics (COBE), SHE policy and principles, quality policy, purchase policy and HR policies. These policies are regularly reviewed by various internal and external agencies,	All policies are audited by the internal team. We also have external auditors who review HR policies/processes.	We comply with the nine principles broadly through the following policies: Code of Business Conduct and Ethics (COBE), SHE policy and principles, quality policy, purchase policy and HR policies. These policies are regularly reviewed by various internal and external agencies, including regulatory agencies. We also proactively follow public advocacy through various forums.	Yes	Yes	NA	No	We comply with the nine principles broadly through the following policies: Code of Business Conduct and Ethics (COBE), SHE policy and principles, quality policy, purchase policy and HR policies. These policies are regularly reviewed by various internal and external agencies, including regulatory agencies. We also proactively follow public advocacy through various forums.
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Source: Annual Reports 2016-17 Dr Reddy's Laboratories Ltd. Pg. No. 25

3. Governance related to BR

1. Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

Comments: The question requires the companies to disclose the frequency of the assessment of BR initiative taken by the Company. And, also to disclose the assessor of the BR initiative. The question has provided an option of “3 months, 3-6 months, Annually, More than 1 year”. Companies are required to disclose the frequency of assessment. However, companies have disclosed the responses to this question in various formats like regularly, periodically, ongoing basis, at review meetings etc. It has been observed that the disclosure related to this information has been varied within sample companies.

Few companies have responded by providing details of CSR activities and the frequency of CSR Committee meetings. From their responses it is not clear if CSR committee is the committee assessing BR initiatives.

SES has found that MRF Ltd and Tata Power Ltd have disclosed the frequency of assessment of BR in a detailed manner which includes the review at different levels by different authorities.

MRF Ltd has disclosed the review process step by step. The responses provided by MRF is presented below for reference:

MRF Ltd

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO meet to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year:

The Board of Directors of the Company, annually reviews the various initiatives forming part of the BR performance of the Company. The CSR Committee reviews the implementation of the projects/programmes/activities once in about 6 months. The Chairman & Managing Director and the Vice Chairman & Managing Director deliberate on issues relating to the BR when the respective functional review is done (1-6 months).

Source: MRF Ltd Annual Report 2017-18 Business Responsibility Report Pg.No 54

Tata Power Company Ltd

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company (within 3 months, 3-6 months, Annually, More than 1 year).

Tata Power's Sustainability performance has been a Board level agenda and the same is monitored by the Board CSR Committee and Sustainability Advisory Council (SAC). The CSR committee recommends the activities to be undertaken by the Company as specified in Schedule VII to the Act or prescribed by the rules. SAC comprises the Company's senior management, two independent Board members, and external national and international members of civil society who are experts in the fields of environmental protection, biodiversity conservation, climate change and community relations. The SAC's role is to challenge the organisation's strategies on sustainability issues and also guide. The Company to formulate improved approaches. The frequency of CSR Committee and SAC meetings is quarterly, and the management enacts on the inputs provided by them.

Source: Tata Power Company Ltd Annual Report 2017-18 Business Responsibility Report Pg.No 114

GAIL India Ltd

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

In FY 17-18 total 2 meetings were held by Sustainable Development Committee, further GAIL has various related sub committees of Board which meets from time to time to review aspects related to Business Responsibility.

S. No.	Committees of the Board	Number of Meetings Held in FY 2017-18
1	Corporate Social Responsibility Committee	3
2	Audit Committee	13
3	HR Committee	4
4	Stakeholders Relationship Committee	1
5	Stakeholders' Grievance Redressal Committee	3
6	Business Development & Marketing Committee	10
7	Finance Committee	2
8	Nomination and Remuneration Committee	4

Source: GAIL (India) Ltd Annual Report 2017-18 Business Responsibility Report Pg no. 86

Section E**Section E: Principle-wise performance**

Comments: Section E deals with the principle-wise performance

Principle 1

1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs /Others?

Comments: Responses in Section E are mostly subjective disclosure. Comparison based on subjective disclosure would create a subjective bias hence such comparison was not undertaken for the study. However, some of the Companies have provided detailed responses and a few of those responses are provided as reference.

Powergrid Corporation Ltd, United Spirits Ltd and Rural Electrification Corporation Ltd provided detailed responses. Below are some of the responses for reference:

Powergrid Corporation Ltd

1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes / No. Does it extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others ?

Yes. POWERGRID is committed to observe transparency and consistency in all its operations. POWERGRID follows a no. of policies/ rules to strengthen ethical conduct at all levels including the following:

- a) **Code of Business Ethics & Conduct:** POWERGRID has laid down two separate Code of Business Ethics & Conduct – one for Board Members and another for Senior Management Personnel (including

those deputed in Subsidiaries/ Joint Ventures) in alignment with Company's Vision & Mission and aims at enhancing ethical and transparent process in managing the affairs of the Company.

- b) **POWERGRID Conduct and Discipline Appeal rules (POWERGRID CDA Rules)**: POWERGRID CDA Rules define the desirable and non-desirable acts and conduct for the employees and extend all employees working with it (including those deputed in Subsidiaries/ Joint Ventures). The aspects of Bribery and Corruption are also covered under CDA rules. There is laid procedure for actions in the case of non-compliance with the defined terms as well as for any misconduct.
- c) **Whistle Blower and Fraud Prevention Policy**: Whistle Blower and Fraud Prevention Policy provides a system for disclosures made by employees or complaint of any fraud employees of POWERGRID (all full time, part time or employees appointed on adhoc/ temporary/ contract basis) as well as representative of vendors, suppliers, contractors, service providers or any outside agency (ies) doing any type of business of POWERGRID.

Since, POWERGRID is a designated public authority, the provisions of the Right to Information Act, 2005 are applicable on us. The Chief Public Information Officers (CPIO) at the Corporate and regional level ensure smooth access to information in timely manner. Several initiatives have been taken/are being taken by POWERGRID to strengthen Integrity, transparency and fairness in its business practices which includes the following:

- (i) Well defined "Delegation of Powers" is in place delineating the powers of the top executives and below for carrying out work in systematic manner.
- (ii) POWERGRID has implemented "Works & Procurement Policy and Procedure (WPPP) for Pre-award stages" (as amended from time to time) with a view to making the policies and procedures more systematic, transparent and easy to administer uniformly throughout its business operations with major thrust on expeditious and decentralized decision making coupled with accountability and responsibility.
- (iii) "Integrity Pact Program" has been implemented which is considered as a useful tool in ensuring transparency in the procurement process. Contract above Rs. 100 crore and monitored by a panel of "Independent External Monitor (IEMs)"
- (iv) Manuals and Procedures are in place for Construction, Operation & Maintenance.
- (v) E-procurement mechanism for most of the project procurements has been implemented.
- (vi) E-reseves auction mechanism is in place.
- (vii) The Projects "RUPANTAR", the Enterprise Resource Planning (ERP) initiative of our Company has been implemented and majority of the key processes related to business are running on ERP.
- (viii) Detail of Award is posted on the website on real time basis.
- (ix) POWERGRID focuses on Preventive, Pro-active as well as Punitive Vigilance. Aiming at better transparency and to inculcate good governance within the organization, POWERGRID has taken a number of initiatives. For details, section on 'Commitment to Transparency & Vigilance Function' under Directors Report may be referred.

Source: Power Grid Corporation Ltd Annual Report 2017-18 Business Responsibility Report Page no. 76

United Spirits Ltd

1. Does the policy relating to ethics, bribery and corruption cover only the Company? Yes / No. Does it extend to the Group /Joint Ventures / Suppliers / Contractors / NGOs / Others?

The Code of Business Conduct & Ethics (CoBCE) is the key policy governing the compliance and ethics framework of the Company. All the employees are required to undergo mandatory training within 30 days of joining the employment and a yearly refresher training, along with a compliance certification program, for evaluation of the knowledge and understanding of CoBCE on an annual basis. In addition, face to face and functional trainings are also provided by the members of the compliance and ethics function on a regular basis.

In addition to CoBCE, the compliance program is also anchored by policies and procedures, prescribed as per the global standards, covering areas such as anti-bribery & corruption, including guidelines on gifting & entertainment, anti-money laundering and prevention of sexual harassment at workplace in addition to the Employee Alcohol Policy, as a part of its commitment to responsible drinking.

During the year revised CoBCE has been rolled out to subsidiaries of the Company also, namely, Pioneer Distilleries Limited, Sovereign Distilleries Limited, Tern Distilleries Private Limited, Royal Challenge Sports Private Limited and Four Seasons Wines Limited, through adoption of the policy by the respective Boards and provision of training to the employees of the respective subsidiaries. They have also been covered under the process of annual compliance certification.

The Company has a whistle blower / vigil mechanism known as SpeakUp, operated by a third party agency. Employees are encouraged to raise their compliance concerns through this mechanism, apart from other internal reporting channels viz. Line Manager or representatives of HR, Legal, Compliance & Ethics function, etc. Confidentiality and anonymity is guaranteed to all reporters. Company has a structured Breach Management Standard in place, for timely and conclusive resolution of issues raised through the whistle blower mechanism. Access is also provided to the Chairman of the Audit Committee in appropriate and exceptional cases.

Source: United Spirits Ltd Annual Report 2017-18 Business Responsibility Report Page no. 87

Rural Electrification Corporation Ltd

1. Does the policy relating to ethics, bribery and corruption cover only the Company? Does it extend to the Group/ Joint Ventures Suppliers/ Contractors/NGOs/ Others?

REC is a leading Public Financial Institution having a remarkable presence in the financing of all segments of Indian Power Sector viz. generation, transmission, distribution, renewable energy, etc. The Company believes in adopting the best Corporate Governance practices and has a strong legacy of fair, transparent and ethical governance practices.

Further, the policy relating to ethics, bribery and corruption covers the employees of the Company as well as shareholders, consultants, vendors, lenders, borrowers, contractors, outside agencies doing business with REC, employees of such agencies, and/or any other parties which has business relationship with REC. Further, the following policies/procedures have been put in place to establish a culture of fairness, ethics and transparency in the organization:-

1. The Company has established a 'Vigil Mechanism' for Directors and employees to report their genuine concerns or grievances about unethical behavior, actual or suspected fraud or violation of Company's Code of Conduct or Ethics Policy. As an integral part of such Vigil Mechanism, the Whistle Blower Policy of REC has been formulated with a view to empower the Directors and employees of REC and its subsidiary companies, to detect and report any improper activity within the Company.
2. There is a "Policy for Prevention of Fraud" which set forth obligation on part of every employee of the Company for prevention, detection and reporting of any act of fraud, bribery or corruption.
3. In compliance of guidelines on Fair Practices Code of Reserve Bank of India (RBI), REC has also developed the Fair Practices Code (FPC) for its lending operations which intends to provide assurance to all the borrowers regarding the Company's commitment to fair dealing and transparency in its business transactions.
4. The Company also has a 'Policy on Materiality of Related Party Transactions and Dealing with Related Party Transactions' which prescribe adequate procedures and disclosures to be made before entering into transactions with such parties.
5. REC has framed Conduct, Discipline and Appeal (CDA) Rules which define code of conduct for employees and the acts of bribery, corruption, etc. are included therein as misconducts on the part of employees. Central Vigilance Commission's (CVC) guidelines/instructions, etc. are also followed in this regard. The above policies,

rules, guidelines/instructions, etc. are also applicable to the subsidiary companies of REC. Further, other stakeholders are also required to conform to principles of fairness, ethics and transparency in their dealings with REC.

6. REC has also adopted a “Code of Business Conduct & Ethics for Board Member and Senior Management” which captures the behavioral and ethical standards.

Source: Rural Electrification Corporation Ltd Annual Report 2017-18 Business Responsibility Report Page no. 108

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

Comments: This question requires the Company to disclose the information related to stakeholder complaints received and resolved in a FY. It has been observed that disclosure related to stakeholder complaints has been varied from company to company. Hence, the data could be grouped for the analysis. As the stakeholders are of various category and they differ on the basis of their complaints. It is advisable that the companies should provide data on stakeholders with category of stakeholders. This can provide better responses for readers of the report.

Companies like Indian Oil Corp. Ltd., NHPC Ltd. have provided the same. A few of responses are provided below for reference:

Indian Oil Corporation Limited

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

Stakeholder	No. of complaints received	No. of Complaints resolved	% Resolved	Remarks
Related to services, tenders and through Public Grievance Redressal	7693*	7693	100%	*Complaints received through Public Grievance portal, Government of India.
shareholders' Complain	3474	3474	100%	These are investor complaints forwarded by MCA / SEBI / Stock Exchanges as well as those directly raised with the company
Related to consumers/ Customers	373588	371549	99.45%	Retail Sales: Out of 16,861 complaints, 16,700 complaints (99.05%) were resolved. LPG: Out of 3,56,429 Feedback/ complaints, 3,54,551 complaints (99.47%) were resolved. Lubes: All 18 complaints have been resolved. Institutional Business: All 227 complaints have been resolved. Cryogenics: All 53 complaints have been resolved
Related to Integrity Pact (IP)	13	13	100%	All complaints received under IP were tabled before the panel of IEMs for joint deliberation and recommendation. Compliance to IEM recommendations were complied by the concerned Functional Groups / Departments and apprised to IEMs subsequently

Source: Indian Oil Corporation Ltd 2017-18 Business Responsibility Report Page No. 123

NHPC Limited**Principle 1**

How many stakeholder complaints have been received in the past Financial Year and what percentage was satisfactorily resolved by the management?

We have received some stakeholder complaints during 2017-18 with regard to violation of the Corporate Governance norms and Code of Business Conduct and Ethics. The numbers of shareholders complaints available are as follows:

Description	Opening balance as on April 1, 2017	Received during the year 2017-18	Resolved during the year 2017-18	Pending as on March 31, 2018
Non-receipt of refund orders	0	15	15	0
Non-receipt of dividend warrants	0	3462	3462	0
SEBI Complaints	1	21	22	0
Stock exchange complaints	0	9	9	0
Consumer forum/ Court cases	3	0	1	2
Advocate Notices	0	0	0	0
Total	4	3507	3509	2

The Company has observed no complaints under its Whistle Blower Policy in 2017-18.

The Company have observed 6 (six) cases of misrepresentation categorised under guidelines for Banning Business dealing with bidders in respect of Contractor/ Supplier during FY 2017-18, details of which are as under:

- i) M/s Wideprint System & Solutions has been banned for three years w.e.f. April 25, 2017 for business dealing with NHPC Corporate Office.
- ii) M/s Mithila Malleables Pvt. Ltd., Vill. Harbanspurs Sirhind (Punjab) has been banned for five years w.e.f. June 29, 2017 for business dealing with NHPC Ltd.
- iii) M/s Cee Dee Vacuum Equipment Pvt. Ltd., Pune has been banned w.e.f. July 31, 2017 for business dealing with Corporate Office. The ban has been extended upto April 15, 2018.
- iv) M/s Printrade Issues India Pvt. Ltd., Mumbai has been banned for three years w.e.f. November 17, 2017 for business dealing with NHPC Corporate Office.
- v) M/s Elettromeccanica India Private Limited, New Delhi has been banned for three years w.e.f. September 25, 2017 for business dealing with NHPC Corporate Office.
- vi) M/s Agro Auto Grind Engineers (P) Ltd., Ghaziabad was suspended for Business dealing with NHPC Ltd. on December 19, 2017 for 6 months and later on banned for three years w.e.f. April 3, 2018 for business dealings across NHPC Limited.

The numbers of Bondholder's complaints available are as follows:

Description	Opening balance as on April 1, 2017	Received during the year 2017-18	Resolved during the year 2017-18	Pending as on March 31, 2018
Non-receipt of refund orders	0	0	0	0
Non-receipt of TDS Certificate	0	1	1	0
Non-receipt of Electronic Credit	0	0	0	0
Non-receipt of Interest Warrants	0	38	38	0
Non-receipt of Bonds/ Securities	0	19	19	0
Total	0	58	58	0

Source: NHPC Ltd Annual Report 2017-18 Business Responsibility Report Pg.No.75

Tata Power Company Ltd

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management?

Stakeholder	Received in FY 17-18	Satisfactorily resolved by the management (%)
Employees	43	98
Vendor	6	100
Company	0	0
Investor	26	96
Society	8	100

Source: Tata Power Company Ltd Annual Report 2017-18 Business Responsibility Report pg no. 115

Principle 2

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

- i.
- ii.
- iii.

Comments: The question requires the companies to provide information regarding 3 products of the Company which have been designed with environmental concerns, risks and/or opportunities. All companies have disclosed the information regarding this question.

As it says, "List up to 3 of your products or services whose design has incorporated -

1. social or environmental concerns,
2. risks and/or
3. opportunities."

Some of the companies have provided an elaborate response regarding service or products along with responding to how the product or service take into account environmental concerns risks and opportunities. Few responses are provided below for reference:

Oil & Natural Gas Corporation Ltd

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

a. 10 MW Solar PV Plant at Hazira Gas Processing Complex, Surat, Gujarat:

Giving a big boost to the ambitious proposition of Government of India to significantly increase the share of renewable energy of the total energy production, a solar PV Power Plant of 10 MW capacity has been planned to be installed within Hazira Plant. Apart from its beneficial impact on environment, it will also help the company to meet its 'Renewable Purchase Obligation' requirement through solar power. The plant is estimated to reduce CO2 emission by 11,689 tonnes due to absence of fossil fuel in power generation. The techno-commercial feasibility report was prepared by one of the company's prestigious institutes, 'Institute of Engineering and Ocean Technology'. The plant has started partial power production in FY'18 and is expected to be fully operational in FY'19.

b. Rain water harvesting:

Rain Water Harvesting (RWH) projects are implemented/being implemented at different work centres of ONGC under the umbrella of Sustainable Water Management. The harvested water is being used for beneficial use like gardening, toilet flushing, etc. and also for recharging of ground water aquifers.

Details of existing rain water harvesting projects:

Sl. No.	Name of project
1.	29 ground water recharge wells at various locations of Ahmedabad Asset
2	Rain water from roof-top and surface run off harvesting at Green Building, Mumbai
3	Percolation well for bore well recharge at Residential complex, Ankleshwar Asset
4	Rain water harvesting system as integral part of C2- C3 plant, Dahej, Gujarat
5	Rain water harvesting at Rajahmundry Asset base complex, Rajahmundry
6	16 infiltration well in IPSHEM, Goa
7	2 ground water recharge wells at IRS, Ahmedabad
8	6 ground water recharge wells at KDMIPE, Dehradun
9	1 ground water recharge well at base complex, RFB, Jodhpur
10	10 RWH system at K.V. School, NOBH and officers' club at Agartala, Tripura Asset
11	RWH system, PPCL building, Uran Plant, Uran, Maharashtra
12	Bhavale Hill RWH system, Thane, Maharashtra
13	RWH system at SPIC campus, ONGC Panvel, Maharashtra
14	RWH systems at various locations at Western Onshore Basin, Vadodara

c. Sea Water Desalination:

With fresh water scarcity looming large across the world and especially in India, desalination of sea water has become one of the most important tools to address the increasing demand of fresh water. Uran process plant at Uran, Maharashtra is one of the most important plants of the Company, responsible to process the crude coming from Mumbai High and to produce value added products. Presently, Uran needs approx. 17000 m³ freshwater per day for its normal operations. The water is supplied by MIDC which is sole supplier in this region. Due to rapid growth in and around Uran, the Company may face disruption of fresh water as MIDC has limited known sources of water. To avoid any future disruption, it has been proposed to set up 20MLD capacity desalination plant. The feasibility study has been carried out by MECON and the project received in principle approval from the executive committee for its implementation. It has been decided that a 10 MLD desalination plant, upgradable to 20 MLD capacities in future, will be set up at Uran, Maharashtra. Contract for PMC has been awarded.

Source: Oil & Natural Gas Corporation Ltd Annual Report 2017-18 Business Responsibility Report pag no. 133

ACC ltd

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

1. Blended cements: The Company manufactures Blended cements viz. Portland Pozzolana Cement (PPC) and Portland Slag Cement (PSC) which are environmentally better than the conventional OPC. Industrial wastes such as flyash and slag, which are otherwise not environmental friendly are suitably used in the manufacture of PPC and PSC which result in partial replacement of virgin limestone and reduction of associated CO₂ emissions.

2. Co-processing services: The Company provides waste management solutions, under the brand name of 'Geocycle', to waste generating industries and organizations in the country through co-processing of wastes in cement kilns. This not only ensures a safe and environmentally sustainable solution for the disposal of hazardous and non-hazardous wastes but it also results in creating environmental and social benefits such as resource conservation, reduction of GHG emissions, local employment, etc.

3. Green Building Centers: "Green Building Centers" is the Company's initiative to facilitate low-cost housing development in India, by promoting sustainable materials, building techniques and locally trained workforce. The production of green building materials is carried out in a modern production environment with main emphasis on Quality and Service. The Green Building Centers have positively impacted the climate, water and nature as well as the communities at large. The impact on the environment can be easily measured by reduction in CO₂ emission, fertile top soil conservation and utilization of waste materials.

Source: ACC Ltd Annual Report 2017-18 Business Responsibility Report pag no. 129

GAIL (India) Ltd

1 List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

a) Natural Gas & LPG Transmission

b) Liquid Hydrocarbon

c) Petrochemicals (HDPE & LLDPE)

Note- The following procedures are followed for adopting any new products/process/services -

Detailed Engineering, Detailed Feasibility study including cost estimation & investment approval for new Gas Processing and Petrochemical plants, Renewable Energy projects, trunk pipelines and Last Mile Connectivity to various customers enroute these trunk pipelines

All above projects are developed and executed taking into consideration environmental and social concerns, risks & opportunities by incorporating the following activities:

- EMP (Environmental Management Plan)
- EIA (Environment Impact Assessment)
- SIA (Social Impact Assessment)
- RRA (Rapid Risk Assessment)
- CCOE clearance (Chief Controller of Explosives)
- HAZOP (Hazard & Operability study)
- Market study
- Coastal Regulatory Zone Clearance
- Construction Management Plan (CMP)
- Adopting State of Art Technology for Construction Projects requiring minimal resources and minimising wastages

Source: GAIL (India) Ltd Annual Report 2017-18 Business Responsibility Report pag no. 87

Power Grid Coporation of India ltd:

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

- Installation of Gas Insulated Switchyard (GIS) instead of Air Insulated Switchyard (AIS) in the Vicinity of habitation/ town areas which has substantially reduced land requirement (approx. 1/4th as compared to AIS) and hence, the social risks associated with securing of land.
- Emphasis on securing land for substation through “Wiling Buyer Willing seller” basis on market/negotiated rate to ensure social equity and to avoid public resistance/court intervention.
- Establishment of high capacity “Green Energy Corridors” dedicated for transmission of renewable energy including solar parks across the country not only reduced the dependency on thermal generation but also provided boost to renewable generation by providing reliable grid connectivity.
- Provision of “Rain Water Harvesting” facility has been made mandatory part of all substations design.

All the Transmission lines and substations are designed and implemented consistently complying with the Statutory laws and conforming to the National & International Standards.

Source: Power Grid Corporation of India Ltd Annual Report 2017-18 Business Responsibility Report pag no. 77

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):

- Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?
- Reduction during usage by consumers (energy, water) has been achieved since the previous year?

Comments: This question requires the company to disclose about the reduction in use of resources during sourcing/ production/ distribution achieved since the previous year. Further, it also enquires about the reduction in use of resources during usage by consumers (energy, water) has been achieved since the previous year of resources like energy, water and raw material etc.

ACC Ltd., United Spirits Ltd, Ambuja Cements Ltd have provided detailed quantifiable data in this regard. Few responses are provided below for reference:

ACC Ltd

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc) per unit of product (optional):

i. Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain

Consumption per unit of production	Current Year (January – December 2017)	Previous Year (January – December 2016)
Electrical Energy (kWh/ Tonne of Cement)	84.33	88.66
Thermal Energy (K Cal / kg of Clinker)	742	748
CO2 Emissions (kg CO2 / Tonne of Cement)	525	545

ii. Reduction during usage by consumers (energy, water) has been achieved since the previous year?

The Company’s products do not have any broad based impact on energy during usage phase. However, as the cement manufacturing process is energy intensive, the Company takes several measures to reduce thermal and electrical energy consumption during manufacturing stage.

Source: ACC Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 129

Ambuja Cement Ltd

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):

i) Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?

The Company continuously strives its best to reduce the power/LDO Coal and other fuels consumed per unit of cement produced. The details are as under:

Consumption per unit of Production	Industry Norms	Current Year (Jan to Dec 2017)	Previous Year (Jan to Dec 2016)
Electricity (KWH/T of Cement)	100	77.65	77.366
LDO (Ltr/T of Clinker)	N.A.	0.15	0.15
Coal and other Fuels (K.Cal/Kg of Clinker)	800	759	753

ii) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

The details of the reduction during usage by consumers (energy, water) achieved since the previous year are not available with the Company.

Source: Ambuja Cement Ltd Annual Report 2017 Business Responsibility Report Pg. No. 146

GAIL (India) Ltd

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):

i. Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?

a) **Natural Gas & LPG Transmission:** In the entire value chain, the company has the responsibility of transmission of Natural Gas (NG) & LPG from source to customers through pipeline and Compressor/Pumping stations by following industry best practices, safety standards with integrated management. GAIL's system of transmission of NG and LPG is supported by SCADA system with central control system for overall monitoring.

b) **Liquid Hydrocarbon:** GAIL's LPG plants converts the Natural Gas to its value added products i.e. Liquid Hydrocarbons. The plants are designed by adopting state of the art technology with best industry standards, practices and norms such as OISD. The state of the art control system is adopted in all LPG plants. LPG is sold in bulk to LPG retailing companies (OMCs) and other liquid hydrocarbon products are sold to industrial customers for their consumption.

c) **Petrochemicals (HDPE & LLDPE):** In GAIL's petrochemical plant, ethane-propane (C2/C3) is recovered from natural gas in the Gas Processing Unit and is cracked in the Gas Cracker Unit to produce ethylene and propylene. Ethylene is converted to final products - HDPE (High Density Polyethylene) and LLDPE (Linear Low-Density Polyethylene) in the four polymer units. This procedure has resulted in the optimization of energy, raw material, water etc. for the desired level of production.

ii. Reduction during usage by consumers (energy, water) has been achieved since the previous year?

In FY 17-18, the gas sold or supplied to its customers by GAIL increased to 85MMSCMD from previous year's 81MMSCMD. Some new customers have also switched from liquid & other fuels to Natural Gas. As Natural Gas is the most benign fossil fuel, this has led to reduction of GHG Emissions at customer end.

Source: GAIL India ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 87

3. Does the company have procedures in place for sustainable sourcing (including transportation)?

i. If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

Comments: This question requires the companies to disclose information about the sustainable sourcing practices adopted by the Company and also to disclose the percentage of the inputs sourced sustainably. 93 companies from the sample companies have disclosed that they have the procedure for sustainable sourcing. More than 90 companies have also disclosed the data about the recycling of the products.

It has been observed, GAIL India Ltd, Indian Oil Corporation Limited, Godrej Consumer Products Ltd and NTPC Ltd have provided the same in percentage with respect to different resources.

Few responses are provided below for reference:

GAIL (India) Ltd

3. Does the company have procedures in place for sustainable sourcing (including transportation)?

GAIL has introduced an e-tendering system which is based on the principle of competitiveness. The procurement practices are executed in a manner that is transparent, fair, competitive and cost effective. This process is a green initiative of the organization, as it also contributes towards reduction of paper use.

Additionally, GAIL undertakes interaction with prospective bidders through Pre-tender & Pre-bid meetings for every tender with the objective improving the tender conditions in sustainable manner.

Our IT team continuously works with various departments to provide solutions to the internal and external customers, and automated several processes through IT enabled services across the entire organization.

Further, we host our tenders on our website which are available in public domain and whosoever is interested can participate in those tenders without having to physically visit the tender issuing site.

In order to procure energy efficient and sustainable products, GAIL has introduced the following provisions:

- a) Loading criteria in tenders for procurements of compressors / turbines / generators. The loading criteria are based on the fuel/ electricity consumption for specified period (say 10/15 years) of the equipment. The prices works out considering the loading criteria are added in the quoted prices while evaluating the bid. This helps company in procuring fuel/ electricity efficient equipment.
- b) Star rating electrical equipment.
- c) Green building concept in all new building projects.
- d) AUT / Automatic Welding wherever feasible
- e) Usage of Solar Power source to meet energy requirements of Pipeline Stations
- f) Using energy efficient machines

As decided by Sustainable Development Steering Committee (SDSC) action is under progress for minimum 3 star rating in the specification while procuring electrical items and air conditioners more than 10 years old to be replaced after doing a cost benefit analysis.

Further, GAIL has installed capacity of 118 MW (approx.) wind energy and 10MW of solar energy generating projects.

In order to ensure sustainability in the supply chain, GAIL has implemented Public Procurement Policy for Micro and Small Enterprises (MSEs), DMEP policy and initiated Make in India campaign in GAIL to develop local vendors thereby enhancing the socio-economic development.

i. If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

Yes, GAIL has implemented Public Procurement Policy for Micro and Small Enterprises (MSEs). The policy targets 20% of procurement from MSEs with a sub target of 4% from MSEs owned by the Scheduled Caste or the Scheduled Tribe entrepreneurs for the Goods and Services rendered by such organizations. In addition, GAIL implements all policies of the Government which contributes to sustainable sourcing. All the bidders are required to confirm acceptance to our General Conditions of Contracts wherein they confirm abiding to all provisions relating to impact on (a) society, (b) environment, (c) labor practice (d) human rights aspects.

Source: GAIL (India) Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 88

Indian Oil Corporation of India Ltd

3. Does the company have procedures in place for sustainable sourcing (including transportation)?

(i) If yes, what percentage of your inputs was sourced sustainably? Also provide details thereof in about 50 words or so.

IndianOil's business interests extend across the entire hydrocarbon value chain – from exploration & production, refining, pipeline transportation to marketing of petroleum and petrochemical products. In its business pursuit, crude oil is the major raw material which accounts for over 90% of total material consumption in terms of value.

IndianOil has well diversified basket for crude oil sourcing involving long term contracts for its overseas procurement besides partnering with domestic upstream oil & gas companies for indigenous procurement. During the year, Corporation improved its share of indigenous procurement (17.88%, in terms of value vs. 16.96% during the previous year) leading to reduced dependence on imports. The corporation also strengthened its position as an upstream player by building a portfolio of oil & gas assets, with participating interest in 9 domestic and 10 international blocks which would ensure uninterrupted crude supply in the long term.

IndianOil's vast network of pipelines or the "Underground Highways", as they are referred to within the organisation, are the most energy-efficient and environment-friendly mode of transportation. The 13,391 km long pipeline network, as on 31.03.2018, is productively used for supply of crude to Refineries and delivery of petroleum products to marketing terminals.

- During the year, IndianOil transported 73.068 MMT of crude oil through a combination of time charter & voyage charter based on the parcel size, prevailing market price, logistics involved including co-loading of different parcels for optimisation of freight cost.
- Approximately 83% of imported crude oil was transported through very large crude carriers.
- Achieved 98% utilization of time charter vessel through proper planning in deployment of vessels.

Source: Indian Oil Corporation of India Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 124

Godrej Consumer Products Ltd

3. Does the Company have procedures in place for sustainable sourcing (including transportation) and what percentage of inputs are sourced sustainably?

In India, our demand-driven supply chain has led to mutually beneficial relationships with our suppliers and dealers. We have extended this to include partnerships with key modern trade players. We have always laid emphasis on procuring raw materials responsibly. As a best practice, our procurement team looks at not only the initial cost but also the life cycle cost. Among the available alternatives, we prefer the material with the lowest life cycle cost for procurement.

We work closely with suppliers and manufacturing teams to explore and implement Recycle and Reuse programmes that are beneficial to the environment and create value addition for stakeholders. We aim at making our value chain environmentally friendly and responsible. We are committed to comply with the requirements of local environment laws and regulations in the countries and regions where we operate and source any material, product, or services.

We developed a Sustainable Procurement Policy and released it in 2016. After releasing the policy, we conducted a baseline assessment of the top 116 vendors in the first phase. Basis responses composite scores were calculated for all suppliers, and the suppliers were classified into red, yellow and green levels. The minimum threshold for vendors has been fixed at the yellow level, and targets have been provided to all the suppliers to improve their compliance to the yellow level within 1 year.

You can view the detailed policy at www.godrejcp.com/codes-andpolicies.aspx.

We have over 600 suppliers on board and approximately 50 per cent of them are local suppliers. We source nearly 50 per cent of our materials locally from our local suppliers. We have started numerous initiatives for sourcing materials locally to help us reduce carbon emissions and our overall carbon footprint. Owing to our conscious local sourcing efforts, we have identified nine more local suppliers during 2017-18 and have started sourcing material from them. This initiative has substantially reduced the transport distance and hence transport related GHG emissions by 250 tCO₂e per annum.

Source: Godrej Consumer Products Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 07

NTPC Ltd

3. Does the company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof,

The Following procedures are in place for the sustainable sourcing of coal by NTPC for its different power station:

- i) Coal Linkage: Coal linkage for a new project is accorded by Standing Linkage Committee-Long Team (SLC-LT) under the aegis of Ministry of Coal, GOI. Accordingly, NTPC applies for coal linkage to SLC(LT) for its new projects on the direction of SLC-LT, Coal companies issue Letter of Assurance (LoA) to the Buyer valid for 24 months. On receipt of LOA, NTPC completes all the formalities enabling for signing of FSA.
- ii) Fuel Supply Agreement (FSA): FSA is signed between the Buyer and Coal Companies for a period of 20 years with a provision of review after every 5 years. Based on the terms & conditions of FSA, coal companies supply coal to the power stations.
- iii) Bilateral MOUs: Short-term coal procurements are done as per requirement through Bilateral MoUs with coal companies for the quantity, price & period mutually agreed by buyer & Coal Company.
- iv) E-Auctions: Coal is also procured for critical stations by participating in E-Auctions conducted by Coal companies as approved by NTPC Board.
- v) Import: NTPC imports coal with the approval of NTPC Board. NTPC procures the coal on short-term basis and in multipackages to enable cost benefit to NTPC.

During 2017-18, NTPC sourced about 168.95 Million Metric Tons of domestic coal and no imported coal.

Source: NTPC Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 164

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?

If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

Comments: This is a question about the processes adopted by the Company to procure goods and services from local and small producers. Few companies viz. GAIL India Ltd, Indian Oil Corporation Ltd, Godrej Consumer Products Ltd have provided elaborate disclosures. Few responses are mentioned below:

GAIL (India) Ltd

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?

Yes, GAIL has implemented “Public Procurement Policy” for Micro and Small Enterprises (MSEs). As per the policy, benefits like waiver from tender fee and EMD, Purchase Preference are provided to MSEs. The policy targets 20% of procurement from MSEs with a sub target of 4% of procurement from MSEs owned by the Scheduled Caste or the Scheduled Tribe entrepreneurs for the Goods and Services rendered by such organizations. These industries are generally local & small producers from the surrounding communities near the place of work.

Additionally, Policy for providing Preference to Domestically Manufactured Electronic Products (DMEP), Purchase Preference Local Content (PP-LC) and Domestically Manufactured Iron & Steel Products (DMI&SP) has been implemented in GAIL to boost domestically manufactured products.

If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

GAIL has implemented Public Procurement Policy for Micro and Small Enterprises (MSEs). As per the policy, benefits like waiver from tender fee and EMD, Purchase Preference etc. are provided to MSEs. The policy helps in reducing the transaction cost of the suppliers or vendors involved in the tendering process. Further, GAIL has already introduced e-procurement to reduce paper work and speed up the tendering process. This also helps the local and small vendors to quote in large numbers with ease and reduces their tendering cost involved in submission of bulky bid documents. In all tenders’-tender or pre-bid meeting is conducted to ensure wider participation and to educate vendors on the tendering process.

GAIL also hosts the Procurement Plan for the Financial Year on its Tendering website, which inter alia contains the list of items where MSEs are participating/ expected to participate. Further, GAIL is in talks with various vendors to get itself registered on their TReDS platform. This will enable discounting of the bills thereby ensuring Working Capital of the vendors/contractors.

GAIL also interacts with the small and local vendors at various forums like vendors meet or MSEs meet or Industry Conclave etc. and takes initiatives to make small and local vendors aware of its requirements. GAIL has also started a unique initiative of vendor coaching wherein the bidders are given training on the process of participation in GAIL’s tender. Further, all the relevant terms and conditions (both pre-award and post award) are informed to the bidders.

Source: GAIL (India) Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 88

Indian Oil Corporation of India Ltd

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

Conforming to the Public Procurement Policy for Micro and Small Enterprises Order, 2012, Public Sector Enterprises are required to procure a minimum of 20% of total annual value of goods or services from MSEs. Indian Oil has put in various efforts to procure items specified for procurement from MSEs and has provided necessary provisions in all the tenders stating the eligibility of MSEs to participate in the tenders. To encourage the procurement from MSEs, the Corporation has exempted MSEs from paying tender fees / earnest money

deposit. A total of 24.09% (excluding crude oil & gas) procurement was done through MSE's during the year 2017-18 as against the target of 20%. Vendor development programmes 54 numbers were conducted during the financial year by the Corporation to develop MSEs. Indian Oil has also been promoting MSEs through various other activities. Some of the initiatives taken by Indian Oil are as follows:

- Indian Oil is putting up stalls at Regional MSE Meets/Exhibitions to display the products procured by Indian Oil which can be developed by local and small vendors. Skill Development centres have also been set up by a few units to improve skills and employability of local youth.
- Purchase preference is given to MSE vendors who are in the ambit of L1+15% and willing to match the L1 Price.
- In case MSE owned by SC/ST becomes eligible for purchase preference, irrespective of its ranking among the MSEs, the entire 20% quantity/service is being awarded to them.
- Waiver of EMD is granted to all MSE vendors irrespective of the category of Registration i.e. Goods or Services.
- Vendors Meets being organized at all Regions to have direct interaction with vendors.

Source: Indian Oil Corporation of India Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 124

Godrej Consumer Products Ltd

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

Yes. 50 per cent of our vendors are local suppliers, and they contribute nearly 50 per cent of all our materials sourced. These vendors are given priority payments as well as technology and quality system upgradation support. While developing a small-scale or local vendor, our category manager first visits the vendor's location to understand the capacity and processes at the vendors end. We then send across a baseline questionnaire (different for different categories) to the concerned vendor, this is done to get a better understanding of the vendor's facilities and processes.

The questionnaire is evaluated, and we then make a request to audit the vendor. At the audit, we evaluate them as low-, moderate-, or high-risk vendors. Our moderate- and high- risk vendors are given 6 months' time to improve their facility and scheduled for a reaudit. The vendors are also requested to provide a corrective and action report on our findings of the audit.

These measures help us ensure the sustainability of our local suppliers and work on building their capability. In addition, as part of our community development initiative, we regularly source gift products in bulk from non-profit organisations and self-help groups (SHGs) for our events. Some of our team members have also volunteered their time and skills to help build the capability of these non-profit organisations, as part of Brighter Giving, our structured volunteering programme.

Source: Godrej Consumer Products Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 08

5. Does the company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.4

Comments: This question focuses on the 3R' of the sustainability reporting which includes Reduce, Reuse and Recycle. It requires the companies to disclose whether the Company has adopted any mechanism to recycle the products and waste. If the Company has a process to recycle the waste, then the Company must

disclose the percentage of the recycling of products and waste. If the company deals in more than one product then the Company must specify percentage of the recycling for each product. However, it has been observed that most of the companies have not provided data separately for each product. While some of the Companies have disclosed separately for each product. 9 companies have provided percentage of recycling separately for each product.

Responses from Bharat Forge Ltd, Hero Honda Motors Limited, Hindustan Zinc, Indian Oil Corporation Ltd reports have been provided below:

Bharat Forge Ltd

5. Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of product and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

As part of its endeavor of contributing towards reducing carbon footprint and ensuring sustainability across all operations, the Company focuses on various initiatives like:

- Company is sending 100% forging flash to steel mills for recycling.
- 100% re-use of treated industrial effluent for processing.
- 30 to 40% waste heat is recovered using regenerative burners resulting in reducing the fuel combustion.
- 50% of recycled water from sewage treatment plant is used for maintenance of greenery in the Plant.
- Implementation of rain water harvesting.
- 100% of hazardous waste sent to authorized party.
- Recycling of packing boxes.
- Deployment of 3R strategy in operational area. Kaizens are taken by several departments to reduce waste.
- Waste generated monitoring & reduction started.

Source: Bharat Forge Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 86

Indian Oil Corporation Ltd

5. Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products

Indian Oil undertakes various measures to minimize the waste generation in its operation and to improve its resource efficiency, ensuring optimal use of resources. The Corporation aims to reuse/recycle the waste including waste water generated at the site by adapting various technology measures. Slop oil generated from process units and sludge processing modules in refineries is reprocessed in Crude Distillation Units, Visbreakers and Delayed Cokers. Waste water generated from refineries is treated in Effluent Treatment Plants and Sewage Treatment Plants. The treated water is reused as makeup water in Cooling Towers, Fire Water Headers and Horticulture. During 2017-18, the refineries have recycled around 89% of waste water generated. Spent catalyst from RFCC units is sent for co-processing in cement industries, while other spent catalysts are sent to authorised recyclers for recovery of noble and other precious metals. The oil sludge is disposed through bioremediation process.

To treat the organic waste generated, Organic Waste Convertors (OWCs) and Biogas Plants have been installed at the locations. The biogas generated is used for cooking purpose. During the year 2017-18, the Corporation has treated 338 tonnes of organic wastes through Biogas Plants/OWCs installed across its locations. Indian Oil has also taken waste paper recycling initiative and partnered with third party recyclers who would collect the waste paper and provide new paper stationeries against the same. During the year 2017-18, Indian Oil recycled around 130 tonnes of waste paper through third party recyclers. Buy-back Policies are in place for disposal of waste materials wherever feasible.

During the year, about 89% of treated effluent water was reused/ recycled within the refineries. At all marketing locations, Oil Water Separators have been provided to separate oil and water. Oil is reclaimed and recycled and water samples are monitored ensuring the compliance of effluent standards before discharging outside the installations.

All polymer products produced by Indian Oil are 100% recyclable. Information pertaining to the “recyclable” nature of the products is mentioned on the packaging as per the ASTM International Resin Identification Coding System. For indication purpose, a recycling symbol is associated with the product produced. For example, recycling symbol “2” is associated with HDPE. Recycling symbol “5” is used for PP per IS 14534: 1998 standard on packaging bag. It indicates that even packaging woven sack is recyclable too.

Source: Indian Oil Corporation Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 125

Hero Honda Motors Ltd

5. Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

Yes, the Company has a mechanism for recycling its waste. HMCL recycles 90% of trade effluents which are re-used in the process using Zero Liquid Discharge (ZLD) platform. All the treated domestic effluents are either converted to soft water, used in cooling towers or in green belt maintenance. About 59% of the paint sludge is co-processed/ recycled and balance 41% is incinerated and waste heat from incinerator is recovered and used for process water heating.

Source: Hero Honda Motors Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 125

Hindustan Zinc Ltd

5. Does the company have mechanism to recycle products and waste? If yes, what is the percentage of recycling waste and products?

Our production process is based on principles of optimal use of the material and natural resources. Our primary activities are in the extraction, processing and smelting of various minerals as well as power generation using well-established processes and technologies. Our focus on best available technology helps us to produce these products using efficient energy consumption and maximum mineral recovery. We have in place a Resource Use and Waste Management Technical Standard and the supporting guidance notes which augment us to mitigate the environmental impacts of our products and process. We have been constantly enhancing technical capabilities for better recoveries of main products and by-products. We have commenced construction of a Fumer plant in our existing leaching circuit of Hydrometallurgical process. This will eliminate generation of hazardous waste and help us to eliminate the use of land for storing this waste. We have also commissioned Paste Fill Plants, at Sindesar Khurd Mine and Rampura Agucha mine as an environmentally sustainable global practice.

Central R&D Laboratory (CRDL) of Hindustan Zinc has worked with wastes generated from Pyro-smelting, Hydro-smelting and Captive Power Plant respectively and established a suitable raw mix design to cast paver blocks using these waste materials. During the year, a Waste to Wealth committee was constituted to spearhead generation of wealth from waste. The primary objective is reduction of waste generation, conversion of residue material into saleable product and reduction of waste to SLFs. The business continued to improve its performance in conservation and recycling. During the reporting year, the water recycling rate was 35% (FY 2017: 33%) and 42% of the waste generated during the year recycled. (FY 2017: 39%) We are actively engaged with Regulatory authorities’ stream lining approvals for utilizing Jarosite/ Jarofix / Slag in Road Construction and in manufacturing of Cement.

Source: Hindustan Zinc Ltd Annual Report 2017-18 Business Responsibility Report Pg.No. 116

Principle 3

1. Please indicate the Total number of employees.
2. Please indicate the Total number of employees hired on temporary/contractual/casual basis.
3. Please indicate the Number of permanent women employees.
4. Please indicate the Number of permanent employees with disabilities.
5. Do you have an employee association that is recognized by management.
6. What percentage of your permanent employees is members of this recognized employee association?
7. Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.

S. No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1.	Child labour/ forced labour/involuntary labour		
2.	Sexual harassment		
3.	Discriminatory employment		

8. What percentage of your under-mentioned employees were given safety & skill up-gradation training in the last year?

- Permanent Employees
- Permanent Women Employees
- Casual/Temporary/Contractual Employees
- Employees with Disabilities

Comments: These questions are objective hence responses are also objective and are not varied from Company to company. A comparison of number of female employees in the Company is provided in the findings of the study.

Further, Question Number 7 and 8 require companies to provide details of complaints filed and pending at the end of the year. However, for sake of clarity a few companies have provided pending complaints from the previous year if any and further provided if any complaints were filed during the year and pending at end of the year. It provides a better picture to the reader to understand the time period for which complaints are pending.

NTPC has provided the previous year pending complaints as follows:

3.7 Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.				
The status is:				
S. No.	Category	No. of previous year pending complaints	No. of complaints filed during the F.Y. 2017-18	No. of complaints pending as on 31.03.2018
1	Child labour/ forced labour/ involuntary labour	Nil	Nil	Nil
2	Sexual harassment	Nil	Nil	Nil
3	Discriminatory employment	Nil	Nil	Nil

As on date, the above complaint on sexual harassment is closed. No such complaint is pending, as on now.

Source: NTPC Ltd Annual Report 2017-18 NTPC Ltd. Pg. No. 165

8th question of the principle enquires about the percentage of employees who were given safety & skill up-gradation training in the previous financial year by the company. It has been observed that the companies have different category of employees and the company does not provide percentage of the training given to employees category wise. Very few companies have provided the data related to training given to employees under different categories. Godrej Consumer Products Ltd, Gail India Ltd and UPL Ltd have provided information of the training of employees division wise. Few responses have been provided for reference below:

As provided by **GAIL (India) Ltd:**

8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?

A	Permanent Employees	Total: 95.31%
B	Permanent Women Employees	Total: 94.23%
C	Casual/Temporary/Contractual Employees	Total: 100% - safety awareness
D	Employees with Disabilities	Total: 99%

Note - 95.38 % Male Permanent Employees were given safety& skill upgradation training\ in the last year

All the employees posted at sites and projects are given mandatory Safety Awareness training. Apart from the scheduled trainings, employees are also provided trainings related to Safety & Skill up gradation in respective functional areas and behavioural aspects through knowledge sharing programs, online quizzes and competitive events organized on various occasions like Safety Week, National Safety Day etc.

Source: GAIL (India) Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 89

Godrej Consumer Products Ltd

8. What safety & skill up-gradation training was provided in the last year?

Category	Safety				Skill Upgradation			
	North Cluster	North East Cluster	South Cluster	Central West Cluster	North Cluster	North East Cluster	South Cluster	Central West Cluster
Permanent Male Employees	95%	100%	98%	96%	97%	95%	95%	96%
Permanent Female Employ	100%	100%	100%	93%	98%	95%	100%	86%
Employees with disabilities	100%	NA	100%	100%	99%	88%	NA	93%
Casual/Temporary/Contractual employees	100%	100%	100%	100%	100%	85%	55%	100%

Source: Godrej Consumer Products Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 011

UPL Ltd

8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?

UPL takes safety of its employees very seriously and has taken up programmes to train our workforce on how to main occupation health and safety.

Safety – 14 PSM elements are the basis for Safety Processes. Trainings are provided accordingly to the workforce. Our internal team has developed few rituals on safety which is followed with full respect.

- Daily Safety Talk: Daily briefing on safety before start of the shift.
- Monthly we cover a particular safety theme by the unit safety representative.

The Company also invests in trainings to upgrade the skills of our employees based on requirements and demand. A Calendar based training program is published for both behaviour and functional development of the employees. Based on the availability and nominations the employees are provided with the trainings and certifications. No employee in manufacturing functions can take charge of respective activities unless they have undergone Level 0, 1 & 2 training minimum duration for which is 23 days. This training basically is intended for safety and functional expertise including safety in operating related functions.

Company has several other training programmes which essentially addresses the areas of safety on various activities like construction safety, Chemical safety, emergency response, Process Safety Management, electrical safety etc. UPL does not differentiate between company employees or contractual employees.

What are the average hours of raining on:	Total Employees		Employees at Management level		Employees at Non-Management level		Temporary Employees		Contractual Employees		Permanent Employees with Disabilities	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
a) Safety	1263	47	103	3	1160	44	2843	243			23	
b) Skill Upgradation	934	4	46	2	888	2						
c) Others	623	6	87	2	536	4						

Source: UPL Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 144

Principle 4

1. Has the company mapped its internal and external stakeholders? Yes/No.

This question requires the companies to disclose about their stakeholders and if the company has a process to connect with every stakeholder of the Company. It was observed that some companies have provided elaborate responses and identified various categories and sub-categories of shareholders and in structured way regarding their stakeholders and their medium of engagement. Response of Torrent pharma ltd has been provided below for reference:

Torrent Pharmaceutical Ltd

Our key stakeholders include our Suppliers and Customers including Stockiest and Distributors, Healthcare professionals, Employees, Investors & Shareholders, Local communities and Government & Regulatory authorities. Stakeholder's engagement helps in better understanding of the perspectives on key issues and builds a strong relationship with them. Many of the engagements take place during the routine course of business, in day to day interactions with the stakeholders. In addition, we also have formal engagements with the stakeholders in the following manner.

Stakeholders	Medium of Engagement
Suppliers and Customers including Stockiest and Distributors	Regular business meetings, Personal and electronic interactions etc.
Healthcare professionals	Sales representative meetings, Interactions during conferences etc.
Employees	Intranet, Meetings, trainings, various Company-wide celebrations and events.
Investors & Shareholders	Investor's meets, Roadshows, Quarterly results, Annual Reports, Annual General Meetings, Press releases etc.

Local communities	Conducting medical camps, setting up / running / supporting hospitals, schools, particularly in the areas where Torrent head quarters is situated and at locations in and around its operations
Government & Regulatory authorities	Compliance of various statutory laws and regulations applicable to the Company

Source: Torrent Pharmaceutical Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 81

2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.

The question requires the company to make disclosures if the Company has identified the disadvantaged, vulnerable and marginalized shareholders. More than 90% of the companies from the sample companies have disclosed that they have identified their disadvantaged, vulnerable and marginalized shareholders. Response of Alkem laboratories has been provided below for reference:

Alkem Laboratories Limited

The Company undertakes engagement with stakeholders by identifying and classifying them and thereafter designing its CSR programmes to serve the target disadvantaged, vulnerable and marginalised stakeholders. The Company identifies those stakeholders who are less fortunate than others and who require more support.

Stakeholder	Areas of concern addressed
Women	Provided stitching training to ladies at Baddi and Mandva and organised free breast cancer detection camps at Mumbai
Patients	Sponsored spine surgery for underprivileged patients in Mumbai and free health checkup for dementia patients in Hyderabad and Mumbai.
Children	Sponsored Cochlear implants for deaf children and provided hearing device to them and provided healthcare facilities to premature babies belonging to underprivileged families in Mumbai.
Villagers/ Communities	Provided facilities for quality drinking water and Construction of public toilets, bathrooms and sanitation facilities in Sikkim, Raigad and Mandva; provided healthcare facilities in Primary Healthcare Centres at Baddi and Sikkim. Installed solar LED street lights at Mandva.
Students	Sponsored construction of classrooms for Bhakti Vedanta at ISKCON (Kharghar, Maharashtra). Renovated Government schools, provided infrastructure and also facilitated good quality drinking water and clean bathrooms in Baddi, Sikkim, Mandva and Daman. Supporting education for students in rural areas of Assam and Punjab. Construction of water tank at Government Industrial Training Institute, Sikkim.
NGO's	Sponsored through NGO's various health camps and awareness programs and treatment of diseases in different parts of the country
Government	Provided manpower for housekeeping services at Government. Hospital, Daman. Created infrastructure for Government Hospital at Sikkim

Source: Alkem Laboratories Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 95

3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

Answer to this question requires the companies to disclose about the initiative taken by the companies for disadvantaged, vulnerable and marginalized stakeholders. Response of Power Grid Corporation of India Ltd has been disclosed for reference below

Power Grid Corporation of India Ltd

3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

POWERGRID has taken following initiatives to engage with the disadvantaged, vulnerable and marginalized stakeholders:

- **Internal Stakeholders (Employees- Persons with Disabilities (PWD)/SC/ST/Women – POWERGRID** ensures diversity at workplace through efforts to recruit, develop and retain the most talented people from the pool of SC/ST/OBC/Ex-servicemen/Persons with Disabilities (PWD) candidates, in accordance with GOI directives on reservation matters. The Special initiatives taken include –
A time bound mechanism for the redressal of grievances is in place as under:
 - a) A Reservation Cell has been constituted at the corporate, as well as regional level to comply with GOI directives on reservation matters for SC/ST/OBC/Ex-servicemen/Persons with Disabilities (PWD). This cell is under control of nominated liaison officer(s). The Liaison Officer(s) are available on a pre-fixed day and time for interaction once in week. Wide publicity regarding availability of the liaison officer is ensured amongst SC/ST employees. Regular meetings with SC/ST/OBC employees Association are conducted. ‘Awareness Programme’ are organized to acquaint the SC/ST/OBC Employee’s Association are conducted. ‘Awareness Programme’ are organized to acquaint SC/ST/OBC/PWD employees about the relaxations and concessions available to them under Government directives.
 - b) Internal Complaints Committees (ICCs) under Sexual Harassment of Women in Workplace (Prevention, Prohibition, Redressal) Act, 2013 exist in company to redress complaints received regarding sexual harassment.
Women Employees are extended certain relaxation like posting in soft locations, etc. Widow women headed families /SC / ST / physically handicap who have suffered loss of land / loss of structure / loss of livelihood (wage or occupation) are considered for additional need based benefits.
- **External Stakeholders {Projects Affected Persons / Families (PAPs / PAFs) – Widow women headed families, SC/ST/ Physically Handicap} – The Special initiatives taken include –**
 - a) Rehabilitation and Resettlement (R&R) measures : Vulnerable groups like widow women headed families SC/ST/Physically handicap who have suffered loss of land/ loss of structure/ loss of livelihood (wage or occupation) are considered for additional need based benefits.
 - b) CSR Initiatives : Corporate Social Responsibility (CSR) activities of POWERGRID are focused towards initiatives that promote inclusive growth and address the basic needs of the under privileged and weaker sections of the society. The organization addresses the issues of Community Development with thrust on Health, Education, Sanitation, Skill Development, Infrastructure creation for Rural Development, environmental sustainability, etc. primarily around its areas of operations. A large number of women, girls, SC/ST/Minority, poor & marginalized section of the population were benefited as a result of POWERGRID’s CSR initiatives. Various CSR initiatives such as improvement in facilities at public healthcare/ educational institutions, Scholarship/financial assistance to the deprived students, etc. had been undertaken for improving the quality of life of the less privileged population. Besides, a large number of projects involving infrastructure development in rural areas like installation of solar street lights, creating sanitation and drinking water facilities, construction/ renovation of roads, Classroom, community centres, toilets in school furniture etc. have been undertaken to make the basic facilities and services available to the community. In addition, the Company continues to undertake several CSR Skill Development initiatives by imparting livelihood oriented skill development training through the reputed institution like NSDC, Indo-German Institute for Advanced Technology (IGIAT), Vizag, Indo German Tool Room (IDTR), Indore for imparting high-end skill training to youth to enable them for meaningful and decent employment.

Source: Power Grid Corporation of India Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 79

Principle 5

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?

Comments: The companies are required to disclose if it has a policy on human rights and also the scope of the applicability of the policy. Companies must disclose if the policy covers only the company or also the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others. Response of the Power Grid Corporation of India Ltd is provided for reference:

Power Grid Corporation of India Ltd

1. Does the Policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others?

Human Rights issues are incorporated under related policies & practices of POWERGRID which extend to the employees including those deputed in Subsidiaries/ Joint Ventures and relative aspects pertaining to Vendors/ Suppliers/ Contractors through contract condition. Further, The Conduct and Discipline Appeal rules (“CDA Rules”) of POWERGRID also define the desirable and non-desirable acts and conduct for the employees (including those deputed in Subsidiaries/ Joint Ventures). There is a laid procedure for actions in case of no-compliance with the defined terms as well as any inappropriate or unwelcome sexually-determined behaviour. To promote fair and equitable employment relationship, a scheme for Grievance Redressal of employees is also in place which ensures a time bound mechanism for the redressal of grievances. As per requirement under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder, Internal Complaints Committees (ICCs) are in place to redress complaints received regarding sexual harassment.

POWERGRID also got certified to Social Accountability standard SA-8000 for its human resource and labour management policies and practices. Vendors/ Suppliers/ Contractors are required to comply with the provisions of the labour laws/ Human rights etc. through stipulations in the conditions of contract. As per the Contract agreement, contractors are prohibited from subjecting their workers to any child, forced or compulsory labour. All Contractors are required to comply with various compensation and regulatory acts. All Suppliers to POWERGRID have to confirm to General Conditions of Contract and SA 8000 clauses. POWERGRID takes declaration regarding Social Accountability from the bidder/contractors for compliance of all requirements of Social Accountability Standards i.e., SA 8000 (latest Standard available at www.sa-intl.org), this declaration forms part of Contract Documents. Provision of penalties for no-adherence of the same also included in the contract conditions.

POWERGRID promotes awareness of the importance of respecting Human Rights within its value chain and discourage instance of abuse. Besides conducting technical and behavioral trainings, the training on Human Rights issues to sensitize people towards women, the differently-abled and the socially weaker sections of the society have also been imparted.

Source: Power Grid Corporation of India Ltd Annual Report 2017-18 Business responsibility Report Pg. No. 80

2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

As the ambit of stakeholder complaints is much wider than just shareholder complaints the responses across the sample companies was varied. A few responses have been depicted below for reference:

Indian Oil Corporation Ltd

2. How many stakeholder complaints were received in the past financial year and what percent was satisfactorily resolved by the Management?

Stakeholder	No. of complaints received	No. of Complaints resolved	% Resolved	Remarks
Related to services, tenders and through Public Grievance Redressal	7693*	7693	100%	*Complaints received through Public Grievance portal, Government of India.
Shareholders` Complain	3474	3474	100%	These are investor complaints forwarded by MCA / SEBI / Stock Exchanges as well as those directly raised with the company
Related to consumers/ Customers	373588	371549	99.45%	Retail Sales: Out of 16,861 complaints, 16,700 complaints (99.05%) were resolved. LPG: Out of 3,56,429 Feedback/complaints, 3,54,551 complaints (99.47%) were resolved. Lubes: All 18 complaints have been resolved. Institutional Business: All 227 complaints have been resolved. Cryogenics: All 53 complaints have been resolved
Related to Integrity Pact (IP)	13	13	100%	All complaints received under IP were tabled before the panel of IEMs for joint deliberation and recommendation. Compliance to IEM recommendations were complied by the concerned Functional Groups / Departments and apprised to IEMs subsequently

Source: Indian Oil Corporation Ltd Annual Report 2017-18 Business Responsibility Report Pg No. 123

Principle 6

4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?

The Companies are required to disclose about the projects related to Clean Development Mechanism. Response provided by ONGC was detailed and elaborate. It has been provided below for reference:

Oil & Natural Gas Corporation Ltd**4. Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so.**

The Company commenced its CDM journey in 2006. Currently ONGC has 15 registered CDM projects with UNFCCC that yield Certified Emissions Reductions (CER) approx. 2.1 million yearly. The registered CDM projects are as under:

Sl. No.	Project	CER/annum
1.	1 Waste heat recovery from Process Gas Compressors (PGCs), Mumbai High South (offshore platform)	5320
2.	Up-gradation of Gas Turbine 1 (GT 1) and Gas Turbine 2 (GT 2) at co-generation plant of Hazira Gas Processing Complex (HGPC)	7802
3.	Flare gas recovery project at Uran plant	97740
4.	Flare gas recovery project at Hazira Gas Processing Complex (HGPC), Hazira plant	8793
5.	Amine Circulation Pumps Energy Efficiency at Hazira Plant	4043
6.	51 MW wind power project of ONGC at Surajbari	85762
7.	Energy Efficient Green Building at Mumbai	544
8.	Energy Efficient Green Building at Dehra Dun	735
9.	Gas Flaring Reduction at Neelam & Heera Asset	65811
10.	OTPC Natural gas based combined cycle power plant in Tripura, India	1612506
11.	Energy Efficient Green Building at Kolkata	1881
12.	Energy Efficient Green Building at Delhi	5944
13.	Gas flare reduction at GGS Charali Assam	15172
14.	Replacement of MOL pumps at Neelam and Heera	10539
15.	102 MW Wind Power project at Jaisalmer, Rajasthan	180177
	Total	2102769

Source: Oil & Natural Gas Corporation Ltd Annual Report 2017-18 Business responsibility Report Pg. No.

Principle 8

- 1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.**
- 2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?**
- 3. Have you done any impact assessment of your initiative?**
- 4. What is your company's direct contribution to community development projects Amount in INR and the details of the projects undertaken.**
- 5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.**

Comments: The principle is regarding companies contribution towards social initiatives. All companies from the sample have provided information about the CSR activities carried out by the companies. 84 companies have responded to the question related to impact assessment of CSR initiatives. Some companies have not disclosed whether they have conducted impact assessment or not. In answer to question 4 of the principle, the companies are required to disclose the information about their contribution towards the community development projects and sector wise CSR expenditure. In view of the SES Petronet LNG Ltd and NHPC Ltd have provided more elaborate information.

Q3. Have you done any impact assessment of your initiative?

It has been provided below for reference:

Godrej Consumers Products Ltd

3. Have you done any impact assessment of your initiative?

We regularly evaluate all our programmes. In FY 2016-17, we are organised a semi-longitudinal study of the employability programme. The aim of the study was to cover beneficiaries trained across India to understand the changes and impact created by the training programme by following a set of trainees for a period of 2 years. This longitudinal study was designed to understand the trajectories, decisions, and changes over time in a trainee's life, rather than the situation at only one point in time. The study adopted a mixed-methods approach:

-- Quantitative study: To adopt a cost-effective model, a short, telephonic survey was designed by the impact assessment partner and administered by a rural BPO to the trainees.

-- Qualitative study: This was done via face-to-face interviews to understand the nuances and narratives with a select number of beneficiaries who could be tracked over the next two years.

Impact assessment of beauty and hair care programme:

Till date, our programme has trained nearly 160,000 women. Despite social constrains of domestic responsibilities and mobility issues, these women have not only stepped up and completed the training but almost 60 per cent of them now have increased income levels.

Through our partnerships, we have been able to place over 50 per cent of our trainees in parlour chains and local establishments. Nearly 40 per cent of our trainees have setup their own salons or provide door-to-door or specialised services. Few trainees have built their confidence and managed to find jobs by themselves and work full-time. Women are now able to articulate their rights and some are better equipped to negotiate their rights at home and in the community.

EMBED:

EMBED is an intensive community awareness and behaviour change communication programme to combat malaria in regions with a high API. Under the EMBED programme, we collaborate with NGOs and governments in an effort to reduce morbidity and mortality due to malaria.

The approach towards the project is as follows:

- Implement community need based behaviour change communication interventions at the village and household levels to spread awareness and encourage appropriate health-care-seeking behaviour for the prevention and control of mosquito-borne diseases
- Strengthen links with public and private health services in prioritised blocks to improve access to preventive, diagnostic, and curative services
- Evaluate the data to support scalability and replicability of the project in other geographies

Impact:

- The programme currently addresses 45 per cent of the malaria burden in Madhya Pradesh across 9 districts, 3000 villages, 7,00,000 households, and 35,00,000 people.
- In phase I, 209 ASHA workers, 77 Rural Health Care Providers, 655 Ojhas, and 156 community volunteers have been trained on correct diagnosis treatment and/ or referral of malaria cases.
- Based on government data, from 2015 to 2017, in the districts covered in phase I, there has been a 70-86 per cent decrease in the API of intervention villages compared to 40-50 per cent decrease in the API of the non-intervention villages.

Source: Godrej Consumer Products Ltd Annual Reports 2018 Business Responsibility Report pg no. 22

Q4. What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken?

A few responses have been provided below for reference:

Petronet LNG Ltd

Note: Petronet LNG Ltd. has provided the sector wise expenditure, while has not disclosed the steps taken by the company for community development initiative, which is required by the question. However, NHPC has disclosed it in elaborated way. Both snippets have been provided below for the reference. Gail India Ltd has also provided in concise format.

What is the Company's direct contribution to community development projects - Amount in INR and details of the projects undertaken?

INR 8.55 crores was spent during the financial year 2017- 18. This represents 0.41 % of profit after tax spends on CSR activities during the previous financial year. Details of some key projects undertaken during the year are as following:

No.	Focus Areas	Expenditure (₹Crore)
1	Healthcare and Sanitation	0.23
2	Education and Empowerment	0.26
3	Rural Development Projects	0.07
4	Promoting Rural Sports	0.03
5	Art and Culture	5.00
6	Towards Petronet LNG Foundation#	2.00
	# A wholly owned subsidiary of Petronet LNG Limited	7.59

*Note: The total amount spent on Administrative Overheads is ₹ 0.96 Crores as per clause 6 of PLL CSR policy. Thus, total amount spent on CSR for the FY 2017-2018 is ₹ 8.55 Crores.

Source: Petronet LNG Ltd Annual Report 2016 Business Responsibility Report Pg.No. 72

NHPC Ltd

What is your company's direct contribution to community development projects - Amount in INR and the details of the projects undertaken?

Total contribution to community development Projects during FY 2017-18 were ` 3854.71 Lakhs. The Details are as under:

Project	Amount (INR Lakhs) for 2017-18
i. Education & Skill development	590.39
ii. Healthcare, drinking water & sanitation	2170.10
iii. Rural Development	373.25
iv. Environment & Sustainability	151.30
v. Women Empowerment/ Senior Citizen	0.97
vi. CSR Capacity Building, Sports, Art & Culture and Other Initiatives	568.70
Total expenditure	3854.71

The details of various Projects undertaken during the year are as under:

1. Education & skill development

- Skill Development and Vocational Training Programs confirming to NSQF (National Skill Qualification Framework).
- Construction of Vivekanand Kendra Vidyalaya at Kolaptukar, Dollungmukh (Arunachal Pradesh)
- Improvement/ up-gradation of ITIs /Schools in different part of country.
- Construction & up-gradation of school buildings and labs and providing infrastructure in schools.
- Provided scholarship to students for higher education.

2. Healthcare

- Deployment of Mobile Medical Units in Assam equipped with medical facilities, qualified doctors and medical attendants for providing basic health services in villages.
- Organizing a large number of medical camps, Cataract surgery camps and Vaccination Programmes in surrounding areas of Projects/Power Stations and distributed free medicines to economically weaker families/ individuals.
- Providing aids and assistive devices to differently abled persons.
- Providing assistance for improvement of overall health conditions of the communities through up-gradation of Govt. Hospitals, Maternity Centers.
- Providing Ambulances, Medical equipment and other infrastructure facilities to Govt. Hospitals.
- Safe Drinking Water facilities with bore well, filtration in public areas, community centers etc.
- Community drinking water facility with RO Plant.
- Basic Amenities/ Sanitation facilities in Market/ Public places.
- Construction/ Installation of toilets in schools/Public places.
- Construction/ Installation of Water Supply Lines and Sanitation in villages.
- Water Supply System for Schools.

- l) Installation of Garbage bins, Adoption and Beautification of public places, Solid waste management of the locality, providing utility van for cleaning debris etc.

3. Rural Development

- a) Rural Development to augment basic infrastructure facilities like area electrification, Community Centre, Water Supply Lines, Drains, Roads/ Paths, Irrigation canals etc.
- b) Construction activities of RCC Culverts/ Wooden Bridges, Cremation sheds, Rain shelters, Bus Stops etc.
- c) Electrification of Hamlets in Alchi village (Leh)
- d) Development of Agriculture/ Apiculture, poly green houses for villagers, Organic cultivation.
- e) Construction of cold storage for keeping and securing the agri products.
- f) Other infrastructure and community development as per local needs.

4. Environment & Sustainability

- a) Development of Bio-Diversity Park.
- b) Installation of Solar Street Lights. Providing LED Lights to conserve energy.
- c) Installation of Food processing units for preservation of local fruits.
- d) Restoration of canals for irrigation purpose.

5. Women Empowerment/ Senior Citizen

- a) Various skill development programs for empowerment of women and their livelihood enhancement.

6. Sports, Art & Culture / Other Initiatives

- b) Impact assessment studies
- c) Training to promote Rural Sports.
- d) Promotion of local Art & Culture.
- e) Construction of National Museum for Sardar Patel and the Indian Freedom Movement

Source: NHPC Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 79

GAIL (India) Ltd

A community initiative pertains to projects undertaken to address a 'community' challenge or need. People sharing similar geography or socio-political conditions share parallel problems. Schemes facilitating a community initiative are therefore, utilitarian in nature.

GAIL has taken up several CSR projects for implementation to develop communities primarily around GAIL installations and Pipelines.

For instance, GAIL has been providing healthcare facilities through operation of Mobile Medical Units (presently 31 MMUs), spread out in nine states, covering an estimated 20,000 beneficiaries per MMU, making proactive efforts to address the primary and preventive healthcare. More than 14.5 lakhs people have been benefited from 2014- 15 to 2017-18 under this initiative. TB Free Pata (In Auraiya District of UP) Project is notable in that it has targeted to improve community health by screening more than 25000 families, covering population more than a lakh, and ensuring early diagnosis and treatment of Tuberculosis among the target population. This is also in alignment with the program launched by Honorable PM on 13th March 2018, for making India TB Free by 2025.

The details of CSR expenditure incurred on activities under identified focus areas, is as under:

- a) UNNATI - Rural Development Initiative: INR 970.62 lakhs

- b) AROGYA (Total) - Nutrition, Health and Drinking Water and Sanitation initiatives, including Swachh Bharat: INR 2,712.88 lakhs
- c) GAIL KAUSHAL - Skill Development and Livelihood Generation Initiatives: INR 770.56 lakhs
- d) UJJAWAL - Education centric initiatives: INR 810.78
- e) SASHAKT - Women Empowerment: INR 75.65 lakhs
- f) Capacity Building- Need/Impact, Overheads, Documentation and other Miscellaneous activities as per Operating Guidelines to GAIL CSR Policy: INR 60.83
- g) Others- Training to promote of Rural sports, Nationally recognized sports, Paralympic Sports and Olympics Sports: INR 3,763.34

Source: GAIL (India) Ltd Annual Reports 2018 Business Responsibility Report pg no. 93

Principle 9

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.

Comments: The question is not very clear in the terms of requirement of disclosures as it provides an option to the companies to disclose either number of customer complaints or consumer cases or both. Further, it was observed that companies disclosed data on pending complaints at the end of financial year which does not reveal the true picture as one does not know how many customer complaints were reported. We observe that the information should also provide data on pending complaints for the previous year along with complaints received in the current year and those that are resolved during the year. Further, if the Company operates within different industries then data on consumer complaints should be segregated based on different industries.

Responses provided by *Indian Oil Corporation Limited and Mahindra and Mahindra Limited* are provided below for reference for Question 1 –

Mahindra & Mahindra Ltd

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.

Customer complaints are treated very seriously in the organization. We hear our customers through various mediums such as emails to customercare@mahindra.com, With You Hamesha 24X7 Call Centre toll free no, websites, tweet handle, telephone, letter, fax etc. The status of pending complaints/cases as on 31st March, 2018 is as follows:

2017-18	Automotive Division	Farm Division (Including Swaraj)	Total
Percentage of Consumer Cases Pending against M&M as on 31st March 2018 of cumulative cases pending or filed since 1 st April 2009	38.32%	33.19%	37.24%

AD – Customer complaints

Receiving Period	Total Complaints Registered in this period	Open	Close	Open %	Close%
F18	73,586	142	73,444	0.19%	99.81%
F12-F18	3,88,302	142	3,88,160	0.04%	99.96%

FD – Customer complaints

Receiving Period	Total Complaints Registered in this period	Open	Close	Open %	Closed %
F18	19,514	115	19,399	0.59%	99.41%
F11-F18	1,11,478	115	1,11,363	0.10%	99.90%

SD – Customer complaints

Receiving Period	Total Complaints Registered in this period	Open	Close	Open %	Closed %
F18	725	5	720	1%	99%
F11-F18	1,546	5	1541	0.3%	99.7%

Source: Mahindra & Mahindra Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 180

Indian Oil Corporation Ltd

1. What percentage of customer complaints/ consumer cases is pending as on the end of financial year.					
S. No.	Business Group	No. of complaints Received	No. of complaints resolved	No. of pending Complaints	% pending
1.	Petrochemicals	151	151	0	0.00%
2.	LPG	352422	350544	1878	0.53%
3.	Retail sales	16055	15894	161	1.00%
4.	Institutional Business	76	76	0	0.00%
5.	Lubes	18	18	0	0.00%
6.	Cryogenics	53	53	0	0.00%

Source: *Indian Oil Corporation Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 133*

Titan Company Ltd

1. What percentage of the customer complaints / consumer cases are pending as on end of the financial year Given below for 2017-18?			
Customer Complaint (Products and Services)	Number of Complaints		
	Received	Resolved	Pending
Watch Division: % of warranty complaints on sales	2.36%	2.36%	0
TEAL – PECSA	15	15	0
TEAL – MBA	297	287	0
Eyewear Division- % of warranty complaints on sales	34091	34091	0
Jewellery Division - % of warranty complaints on sales	2819	2766	53

Source: *Titan Company Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 115*

2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)

Comments: It was observed that response of the company on the above question varied from company to company. In the study, responses across the 100 companies have not been compared since the data could not be categorised. In SES' opinion, the response given by *Indian Oil Corporation Limited, Gail India Ltd and United Spirits Ltd* is detailed and represents comprehensively regarding company's display of product information on the product label, over and above what is mandated as per the local laws.

A few responses have been depicted below for reference:

GAIL (India) Ltd

2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)
In case of Polymers the logo of GAIL, Product name, lot Number, mfg. date, plant address mark of grade name and batch number are mentioned on the bags. GAIL's polymer products are being packed in 25 kg woven bags at Pata Plant.

Further, the detailed specification, product application etc. are available on printed product brochure and on GAIL's web site having link: http://www.gailonline.com/final_site/BV-Petrochemicals.html

Liquid Hydrocarbon products are marketed by GAIL in bulk only and sold on ex-works basis by loading in road tankers and/or railway wagons deployed by customers. Technical / safety related information on the product being carried is displayed on the truck tanker / rail wagon itself as per local laws and is ensured by the customer/ transporter concerned. As the liquid hydrocarbons are transported in bulk quantity, separate labels are not provided for displaying product specific information.

When LHC is transported through road tankers, for the "inflammable Products", it is clearly written on the tankers, which are nominated by the customers. Additionally, the product name, safety signage, hazardous chemicals signage, emergency contact no, transporter's name and contact no are also displayed on the tankers.

Further, Company tries to voluntarily engage Customers through various forums such as meets, one to one interaction, and telephonic conversation to provide product information, over and above mandatory requirements.

GAIL has a specific centre, "GAIL Polymer Technology Centre" (GPTC) for addressing customer's concerns regarding polymer product quality. The GPTC also provides quality certificate on case basis.

Source: GAIL (India) Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 93

Indian Oil Corporation Ltd

2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information).

Yes. All commercial products of IndianOil follow Bureau of Indian Standards (BIS) guidelines for product information and labelling, details of which are given below:

LPG: LPG Cylinders, Pressure Regulators & Valves conform to BIS Standards, which are displayed on the equipments. The Distributors are also under instruction to sell LPG Rubber Hose and Hot Plates conforming to BIS Standards.

Bitumen: Bitumen is mostly sold in bulk and only approx 10% of product is sold in packed form in barrels. It is ensured that product specifications are made available to the consumer and highest quality control & safety procedures are followed whilst marketing these products.

Lubricants: All product labels, besides complying with Legal Metrology requirements, also display the product information for the benefit of Aviation Fuel: The product is sold in bulk and the product specification test report of all the batches is provided.

Petrochemicals: For all our petrochemical products, the Certification of Analysis depicting all quality parameters is attached with each consignment. All Polymer products of IndianOil are 100% recyclable and a "recyclable" symbol is printed on package of products as per ASTM (American Society for Testing & Material) International Resin Identifications Coding Systems. customers regarding the technical specification and recommended use of the product being marketed.

Source: Indian Oil Corporation Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 133

United Spirits Ltd

2. Does the Company display product information on the product label, over and above what is mandated as per local laws?

Yes/ No/N.A./Remarks (additional information)

Yes. Generally we have front and back label for few brands and few have a single label.

Back Label – We print following mandatory details

- 1) Branding
- 2) MRP
- 3) Manufacturing unit address
- 4) Reg. office address
- 5) FSSAI License number
- 6) Customer care phone number and Mail ID.
- 7) Ingredients
- 8) Quantity and strength declarations
- 9) Batch number and date of manufacturing
- 10) Bar code
- 11) Excise mandates as per state excise regulation.
- 12) Country of Origin.

Front Label – We include:

- 1) Branding
- 2) Brand Claim / Brand Story
- 3) Brand Assets

Source: *United Spirits Ltd Annual Report 2017-18 Business Responsibility Report pg no. 94*

3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

Comments: This question enquires whether any case(s) has been filed by any stakeholder against the company related to unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. This question is important as it enables the shareholders to understand about the governance of the company in relation to trade practices or advertising.

In SES opinion, Hindustan Petroleum Corporation Ltd and Ambuja Cements Ltd have provided detailed responses with respect to this question. Responses have been depicted below for reference:

Hindustan Petroleum Corporation Ltd

3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

The Company has not received any complaints on unfair trade practices and Irresponsible advertising. The following cases/appeals are pending:

Complaints	No. of Cases filed in the last five years	No. of cases pending as on end of Financial year 2017-18.
Unfair Trade Practice	0	0
Irresponsible Advertising	0	0
Anti-competitive behaviour	7	6

Source: *Hindustan Petroleum Corporation Ltd Annual Report 2017-18 Business Responsibility Report. Pg.No. 106*

Ambuja Cements Ltd

3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

The details of the complaints filed are as under:-

Sr. No	Particulars	Remarks / Status
1.	The Competition Commission of India passed an Order dated 31st August, 2016, imposing penalty on certain cement manufacturers including the Company, concerning alleged contravention of the provisions of the Competition Act, 2002. The penalty imposed on the Company is ` 1163.91 Crore.	The Company has filed appeal against the Order of Competition Commission of India before the Competition Appellate Tribunal. The Tribunal, vide Order dated 21 st November, 2016 has stayed the operation of the Commission's Order, subject to deposit of 10% penalty in the form of Fixed Deposit of six month's duration. However, it was also ordered that if the Appeal is dismissed, then the balance amount of penalty shall have to be deposited with interest @ 12% per annum from the date of CCI's Order i.e. 31st August 2016. The arguments have been heard by the NCLAT and the final order is reserved.
2.	State of Haryana has filed a complaint alleging cartelization in the tender for supply of cement by some cement companies including Ambuja Cements Ltd.	CCI vide Order dated 19th January 2017 has held cement companies including Ambuja Cements Ltd. guilty of violating provisions of the Competition Act and imposed penalty to the tune of 0.3% of the average turnover of last three financial years. Accordingly, the penalty on Ambuja works out to `29.84 Crores. The company has appealed against CCI's order and the same has been stayed. Final hearings are being held.

Source: Ambuja Cements Ltd Annual Report 2017-18 Business Responsibility Report. Pg.No. 154

4. Did your company carry out any consumer survey/ consumer satisfaction trends?

Comments: The companies are required to disclose about the customer satisfaction survey/ customer satisfaction trends, if any. It appears that it is an objective questions which requires an answer in yes/no format. Such response would not serve the purpose as one cannot differentiate between the responses of the companies with respect to their policy regarding customer interaction. The Company should disclose more elaborate response regarding frequency of conducting survey, types of survey conducted, measures taken to increase customer satisfaction etc.

A few responses have been depicted below for reference:

Hindustan Petroleum Corporation Ltd

4. Did your company carry out any consumer survey/consumer satisfaction trends?

Yes. Everything at HPCL begins with understanding the customers' expectations. We consistently provide products and services, which meet or exceed our customer expectations and satisfy customers by anticipating their requirements.

LPG:

HPCL Field Officers and senior officers have conducted consumer survey to address the concerns regarding awareness, customer service & safety of the first time LPG users hailing from lower socio-economic strata at the premises of Pradhan Mantri Ujjwala Yojana (PMUY) LPG consumers. The sample size consisted of more than 10,000 customers spread across vast geography of 342 districts in 18 states.

LUBRICANTS:

Undertook Lubes Brand Positioning Survey in three cities; Mumbai, Pune and Ahmedabad covering around 200 channel partners and consumers. HP Lubes are perceived to have extremely good quality with affordable pricing; customers consider HP brand to be "Value for Money".

Source: Hindustan Petroleum Corporation Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 106

Tata Power Company Ltd**4. Did your Company carry out any consumer survey/ consumer satisfaction trends?**

Customer Satisfaction Surveys are key indicator parameters to measure customer satisfaction and dissatisfaction levels. These surveys are conducted annually across all segments i.e. commercial, industrial and residential consumers and are face to face interaction with 5-point rating scale. The findings of the report guide us to understand the key improvement areas which are shared with the concerned departments and accordingly, the necessary action is taken based on the key findings. Overall Customer Satisfaction Assessment total (CSAT) score in percentage for FY18 is given below:

Customer	Satisfaction (%)
Residential	83
Industrial	78
Commercial	80

Source: Tata Power Company Ltd Annual Report 2017-18 Business Responsibility Report Pg. No. 120

Piramal Enterprises Ltd**4. Did your Company carry out any consumer survey/consumer satisfaction trends?**

Yes.

Pharmaceutical Division

Customer Centricity is the evolution from being "Product centric" to "Customer centric". At PEL, it is a function that focuses on the customer and what it takes to move beyond the reactive and into the proactive mode of operation by looking at ways to improve processes, communication and project management. Thus we are not only able to better understand and predict customer needs, but are also able to implement and leverage solutions that allow for automated and prompt insights about entire customer segments. We believe that we exist because our customer has a need for product or services to service end customers (patients). We have instilled a robust feedback mechanism using NPS (Net Promoter Score) metrics. This helps us gauge customer loyalty and the first of its kind in CRAMS business. We also measure CES (Customer Effort Score). This is the indicator of how much effort did the customer have to put to get his/her work done. Again, more positive CES score means that we have made it easy for our customers to get the services.

We have also implemented mechanism to generate Customer Experience (CX) Insights via voice of customer (VOC) which was designed & rolled out as a centralised automated customer satisfaction survey

using AQSCI (Assurance, Quality, Service, Value, Innovation and People) model for all businesses on Qualtrics platform in line with the customer needs. Platform to improve CSI (such as Customer Satisfaction Index Score & reporting gaps, area ownership, action planning, etc.) designed and implemented.

Customer involvement throughout the Customer Satisfaction process is a key differentiator, we validate our survey responses with the customer, develop a plan of action and close the feedback loop, involving customer at every stage. We have made significant strides in our journey towards a customer centric culture with an emphasis on execution and scientific excellence while building an organization with a broad portfolio of services that appeal to our global customers. With our growth, investments and strong financials, our customers have now begun to view PEL as the 'Partner-of-Choice' for their external needs, from Discovery through Commercialisation. Our Internal partner satisfaction survey is meant for internal functions i.e. for internal stakeholders or cross-functional customers. A comprehensive site wise analysis is done under the survey.

To address customer issues on call, the call quality is assessed in terms of technical issues understanding of the customer grievance, usage of correct language, listening to the grievance attentively as well as joining calls on time. Customer centricity workshops are conducted for customer facing teams to enhance their capabilities in running an efficient grievance cell.

Consumer Products Division (CPD)

At PEL, CPD consumer feedback and satisfaction is an important metrics to gauge our performance as a consumer centric company. Consumer surveys are conducted in the form of a feedback mechanism for our services and are utilised to determine the satisfaction levels based on the C-Sat metrics. Consumer care focuses on giving timely resolutions to all the stakeholders and the consumers within the TAT.

Source: Piramal Enterprises Ltd Annual Report 2017-18 Business Responsibility Report pg no. 185

Some of the questions are subjective in nature and hence response across those questions could not be compared within the sample. The questions are as mentioned below:

Principle 4

3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

Principle 6

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.

2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.

5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.

Principle 7

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:

- a.
- b.
- c.
- d.

2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

SES has observed that following companies have provided Business Responsibility Reports with brief yet comprehensive disclosures. These can be referred as the best practice disclosures.

1. Indian Oil Corporation Ltd (Page No. 118 of the Annual Report 2017-18)
2. Dr Reddy's (Page – 23 of the Annual Report 2017-18)
3. GAIL (Page – 82 of the Annual Report 2017-18)
4. Ambuja Cements (Page – 142 of the Annual Report 2017)
5. Mahindra & Mahindra Limited (Page – 167 of the Annual Report 2017-18)
6. Bharat Forge Ltd (Page – 81 of the Annual Report 2017-18)
7. Tata Motors Ltd (Page – 173 of the Annual Report 2017-18)
8. Tata Power Company Ltd (Page – 111 of the Annual Report 2017-18)
9. Wipro Ltd. (Page – 309 of the Annual Report 2017-18)
10. Powergrid Corporation Ltd (Page – 73 of the Annual Report 2017-18)

ANNEXURE 1

Comparison of GRI Standard General Disclosures vis a vis disclosure requirement under Business Responsibility Report

GRI Standard		GRI - G4	Coverage	Contents covered in		Contents not covered
No	Content	Previous Standard No		BRR - SEBI	Other Sections of Annual Report	
GRI 102-1	Name of the organization	G4-3	Covered in BRR	Section A-2 Name of the Company	Form MGT-9 annexed to the Board's Report	
GRI 102-2	Activities, brands, products, and services	G4-4	Covered in BRR	Section A-8 List three key products/ services that the Company manufactures/ provides	SEBI (LODR) Regulation 2015-Schedule V (B. Management Discussion and Analysis: 1. c) Segment-wise or product-wise performance	Primary brands are covered in MD&A however while discussing the product wise performance companies often discuss the product lines.
GRI 102-3	Location of the headquarters	G4-5	Covered in BRR	Section A-3 Registered address	MGT-9 annexed to the Board's Report	
GRI 102-4	Number of countries where the organization operates, and the names of countries where it has significant operations and/or that are relevant to the topics covered in the report.	G4-6	Covered in BRR	Section A-9 Total number of locations where business activity is undertaken by the Company (a) Number of International Locations (Provide details of Major 5) (b) Number of National Locations		
GRI 102-5	Nature of ownership and legal form.	G4-7	Covered elsewhere	Not covered in BRR	Form MGT 9I. REGISTRATION AND OTHER DETAILS: iv. Category / Sub-Category of the Company	
GRI 102-6	Markets served, including: i. geographic locations where products and services are offered; ii. sectors served; iii. types of customers and beneficiaries	G4-8	Partially covered in BRR	Partially covered in Section A 10 Markets served by the Company – Local/ State/ National/ International		BRR covers only the markets (countries) in which the Company serves but does not give geographic breakdown, sectors served, types of customer and beneficiaries
GRI 102-7	Scale of the organization, including: i. total number of employees;	G4-9	Covered in BRR	Section E Principle 3 (1) Please indicate the Total number of employees.	Rules to Section 197(12) requires number of permanent employees on the rolls of Company	

	ii. total number of operations*;		Covered elsewhere		Company disclose areas of operations in the Director's Report. Further Companies also disclose Segment Wise performance under Management Discussion and Analysis	Note* From the GRI Standard Guidelines and from implementation manual the definition of operations was unclear. Operations has been interpreted as segments in which company operates.
	iii. net sales (for private sector organizations) or net revenues (for public sector organizations);		Covered in BRR	Section B-2 Total Turnover (INR)		
	iv. total capitalization (for private sector organizations) broken down in terms of debt and equity;		Covered in BRR and elsewhere	Section B-1 Paid up Capital (INR)	Debt is disclosed under the heading 'Borrowings' in the Financial Statements.	
	v. quantity of products or services provided.		not covered	Not covered in BRR	Not covered elsewhere	Quantity of products not covered
GRI 102-8	a) Total number of employees by employment contract (permanent and temporary), by gender	G4-10	partially covered in BRR	Section E Principle 3 (1) Please indicate the Total number of employees. Section E Principle 3 (2) Please indicate the Total number of employees hired on temporary/contractual/ casual basis. Section E Principle 3 (3) Please indicate the Number of permanent women employees		BRR covers total number of permanent employees. GRI Standard requires disclosing the total number of employees by gender and by region, while P3-2 does not require this breakdown.
	b) Total number of employees by employment contract (permanent and temporary), by region.		not covered	Not covered in BRR		
	C) Total number of employees by employment type (full-time and part-time), by gender.		Partially covered in BRR	Section E Principle 3 (1) Please indicate the Total number of employees. Section E Principle 3 (2) Please indicate the Total number of employees hired on temporary/contractual/ casual basis.		

				Section E Principle 3 (3) Please indicate the Number of permanent women employees		
	d) Whether a significant portion of the organization's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work performed by workers who are not employees		not covered	Not covered in BRR		
	e) Any significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b, and 102-8-c (such as seasonal variations in the tourism or agricultural industries).		not covered	Not covered in BRR		
	f) An explanation of how the data have been compiled, including any assumptions made		not covered	Not covered in BRR		
GRI 102-9	A description of the organization's supply chain, including its main elements as they relate to the organization's activities, primary brands, products, and services.	G4-12	not covered	Not covered in BRR		
GRI 102-10	Significant changes to the organization's size, structure, ownership, or supply chain, including:	G4-13	covered elsewhere partially	Not covered in BRR	As per Section 134 of the Companies Act, 2013 and Rule 4 of the Companies (Share Capital and Debentures) Rules, 2014 details of Ownership structure are covered in the section of Board's report and MGT 9	

	i. Changes in the location of, or changes in, operations, including facility openings, closings, and expansions		covered elsewhere partially	Not covered in BRR	As per Regulation 51 of SEBI (Listing Obligation and Disclosure Requirement Regulation) 2015 The Company is required to promptly inform the Exchanges of information such as any changes in the general character or nature of business / activities, disruption of operation due to natural calamity, and commencement of commercial production / commercial operations	
	ii. Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations)		Covered elsewhere		covered in MGT 9, change in share capital	
	iii. Changes in the location of suppliers, the structure of the supply chain, or relationships with suppliers, including selection and termination		Not covered	Not covered in BRR		
GRI 102-11	Whether and how the organization applies the Precautionary Principle or approach	G4-14	Not covered	Not covered in BRR		
GRI 102-12	A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes, or which it endorses.	G4-15	Not covered	Not covered in BRR		
GRI 102-13	A list of the main memberships of industry or other associations, and national or international advocacy organizations	G4-16	partially covered in BRR	Principle 7-1 Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with	BRR Covers list of trade and chamber association Company is associated with but does not cover national and international advocacy organisations. Further, it does not cover position on the	

					body, funding details and how they view the membership.	
GRI 102-14	A statement from the most senior decision-maker of the organization (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy for addressing sustainability	G4-1	covered elsewhere partially	Not covered in BRR	Not a legal requirement. But the Companies often discuss this under corporate overview section.	However, there is no legal requirement of a direct statement from CEO/ Chairman as required by GRI Standard
GRI 102-15	A description of key impacts, risks, and opportunities.	G4-2	covered elsewhere partially	Not covered in BRR	Covered Partially under SEBI (LODR) Regulation 2015- Schedule V (B Management Discussion and Analysis: 1 (b) Opportunities and Threats & e) Risks and concerns)	Under MD&A only risk and opportunities regarding the Company are covered, however key impacts are not covered. The coverage and details required under GRI Standard are much more extensive as compared to SEBI BRR
GRI 102-16	A description of the organization's values, principles, standards, and norms of behavior	G4-56	covered elsewhere partially		SEBI (LODR) Regulation, 2015, Regulation 46. Website (2) The listed entity shall disseminate the following information on its website (d) code of conduct of board of directors and senior management personnel;	code of conduct for directors and employees is usually disclosed. It's not mandatory to disclose values, principles, norm of behaviour or code of ethics.
GRI 102-17	A description of internal and external mechanisms for: i. seeking advice about ethical and lawful behavior, and organizational integrity	G4-57, 58	not covered	Not covered in BRR		
	ii. reporting concerns about unethical or unlawful behavior, and organizational integrity.		covered elsewhere partially		Partially covered under Whistle Blower Policy, Insider Trading Policy and Code of Conduct. These policies are supposed to be disclosed by all listed companies.	unethical behaviour can be reported by whistle blower mechanism, insider trading policy and few provisions of code of conduct

GRI 102-18	The reporting organization shall report the following information: a. Governance structure of the organization, including committees of the highest governance body.	G4-34	covered elsewhere partially	Not covered in BRR	SEBI (LODR) Regulation 2015 Schedule V: Annual Report The annual report shall contain the following additional disclosures C. Corporate Governance Report: (2) Board of Directors (a) composition and category of directors (3) Audit Committee (4) Nomination & Remuneration Committee (6) Stakeholders' grievance committee	CG Report covers disclosure on composition of Board and Committees. However, it does not cover disclosure on committees responsible for decision-making on economic, environmental and social impacts as required under GRI Standard guidelines
	b. Committees responsible for decision-making on economic, environmental, and social topics.		covered elsewhere partially	Not covered in BRR		
GRI 102-19	Process for delegating authority for economic, environmental, and social topics from the highest governance body to senior executives and other employees	G4-35	not covered	Not covered in BRR		
GRI 102-20	Whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental, and social topics and Whether post holders report directly to the highest governance body	G4-36	partially covered in BRR	Section D (1) Details of Director/Directors responsible for BR (a) Details of the Director/Director responsible for implementation of the BR policy/policies		BRR covers disclosure on Directors responsible for BR but does not mandate disclosure whether post holders report directly to the highest governance body as required under GRI Standard
GRI 102-21	Processes for consultation between stakeholders and the highest governance body on economic, environmental, and social topics. If consultation is delegated, describe to whom it is delegated and how the resulting feedback is	G4-37	not covered	Not covered in BRR		

	provided to the highest governance body					
GRI 102-22	Report the composition of the highest governance body and its committees by:	G4-38	covered elsewhere partially		SEBI (LODR) Regulation 2015 Schedule V: Annual Report	Details of Board and committees
	- Executive or non-executive				The annual report shall contain the following additional disclosures	Directors and membership, executive and non-executive, tenure, gender is covered. However, details of Membership of Underrepresented social groups, competences relating to economic, environmental and social impacts, stakeholder representation is not covered.
	-Independence				C. Corporate Governance Report	
	-Tenure on the governance body					
	-Number of each individual's other significant positions and commitments, and the nature of the commitments					
	-Gender					
	-Membership of under-represented social groups					
	-Competences relating to economic, environmental and social impacts					
	-Stakeholder representation					
GRI 102-23	a. Whether the chair of the highest governance body is also an executive officer in the organization. b. If the chair is also an executive officer, describe his or her function within the organization's management	G4-39	covered elsewhere partially		SEBI (LODR) Regulation 2015 Schedule V: Annual Report The annual report shall contain the following additional disclosures C. Corporate Governance Report: (2) Board of Directors (a) composition and category of directors	Details if chairman is executive or non-executive director is covered in CG report. However, details about his or her function within the organization's management and the reason

	and the reasons for this arrangement					or this arrangement is not covered.
GRI 102-24	a. Nomination and selection processes for the highest governance body and its committees	G4-40	Covered elsewhere	Not covered in BRR	The shareholders of the Company on recommendation of the NRC, elect the Board Members by voting. Further, the Board appoints members for various committees of the Board such as Audit Committee, NRC, Stakeholder Relationship Committee, CSR committee etc.	
	b. Criteria used for nominating and selecting highest governance body members, including whether and how				Companies Act has not laid down any specific criteria such as minimum educational requirement for appointing a director.	
	i. stakeholders (including shareholders) are involved				However, Companies Act, 2013 has laid down certain criteria for membership of Audit Committee.	
	ii. diversity is considered				Companies Act further mandates for each committee a minimum Independence criteria. So each committee has to appoint certain number of Independent Directors as members.	
	iii. independence is considered				Further, Companies Act,2013 mandates that at least 1 woman director must be on Board of a listed Company.	
	iv. expertise and experience relating to economic, environmental, and social topics are considered					
GRI 102-25	Report Processes for the highest governance body to ensure conflicts of interest are avoided and managed	G4-41	covered elsewhere partially	Not covered in BRR	Disclosure on Related party transactions and Shareholding of promoter/ controlling shareholder is disclosed.	Process to ensure conflict of interest are avoided and managed is not covered. No disclosure on cross board membership and cross

	Report whether conflicts of interest are disclosed to stakeholders, including, as a minimum: - Cross-board membership - Cross-shareholding with suppliers and other stakeholders - Existence of controlling shareholder - Related party disclosures					shareholding with suppliers and other stakeholders.
GRI 102-26	Highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental, and social topics	G4-42	not covered	Not covered in BRR		
GRI 102-27	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental, and social topics	G4-43	not covered	Not covered in BRR		
GRI 102-28	Processes for evaluating the highest governance body's performance with respect to governance of economic, environmental, and social topics Whether such evaluation is independent or not, and its frequency Whether such evaluation is a self-assessment	G4-44	Covered elsewhere partially		Companies Act, 2013 Section 134: Financial statement, Board's report, etc (p) in case of a listed company and every other public company having such paid-up share capital as may be prescribed, a statement indicating the manner in which formal annual evaluation has been made by the Board of its own performance and that of its	Board evaluation disclosure forms part of board's report, however it is not w.r.t. gov, eco, env and social topics. Further, report of actions taken is also not disclosed therein.

	Actions taken in response to evaluation of the highest governance body's performance with respect to governance of economic, environmental, and social topics, including, as a minimum, changes in membership and organizational practice				committees and individual directors;	
GRI 102-29	Highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities – including its role in the implementation of due diligence processes	G4-45	Not covered	Not covered in BRR		
	Whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental, and social topics and their impacts, risks, and opportunities					
GRI 102-30	Highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental, and social topics	G4-46	Partially covered elsewhere		SEBI (LODR) Regulation 2015 Schedule V: Annual Report The annual report shall contain the following additional disclosures B. Management Discussion and Analysis 1. This section shall include discussion on the following matters within the limits set by the listed entity's competitive position: e) Risks and concerns	Management Discussion and Analysis which is disclosed in Annual Report as part of Board's Report covers discussion on Risks and Concerns of the organisation. However, the regulation does not mandate to disclose the highest governance body's role in reviewing the effectiveness of the organization's risk management processes.

GRI 102-31	Frequency of the highest governance body’s review of economic, environmental, and social topics and their impacts, risks, and opportunities	G4-47	Partially covered elsewhere		SEBI (LODR) Regulation 2015 Schedule V: Annual Report The annual report shall contain the following additional disclosures B. Management Discussion and Analysis 1. This section shall include discussion on the following matters within the limits set by the listed entity’s competitive position: e) Risks and concerns	The regulation mandates the Company should disclose risks and concerns discussion as part of MD& A. However, the frequency at which board reviews risk and opportunities is not required to be disclosed.
GRI 102-32	The highest committee or position that formally reviews and approves the organization’s sustainability report and ensures that all material topics are covered	G4-48	Covered	Section D (1) (a) Details of the Director/Director responsible for implementation of the BR policy/policies (b) Details of the BR head		
GRI 102-33	Process for communicating critical concerns to the highest governance body	G4-49	Not covered	Not covered in BRR		
GRI 102-34	a. Total number and nature of critical concerns that were communicated to the highest governance body	G4-50	Not covered	Not covered in BRR		
	b. Mechanism(s) used to address and resolve critical concerns					
GRI 102-35	Remuneration policies for the highest governance body and senior executives for the following types of remuneration	G4-51	Covered elsewhere partially		Covered under SEBI (LODR) Regulation 2015, Schedule V: Annual Report, C. Corporate Governance Report (5) Remuneration of Director	How performance criteria in the remuneration policy relate to the highest governance body’s and senior executives’ economic, environmental and social objectives is not covered
	i. Fixed pay and variable pay, including performance-based pay, equity-based pay,					

	<p>bonuses, and deferred or vested shares</p> <p>ii. Sign-on bonuses or recruitment incentive payments</p> <p>iii. Termination payments</p> <p>iv. Clawbacks</p> <p>v. Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees</p> <p>How performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topics.</p>					
GRI 102-36	<p>The reporting organization shall report the following information:</p> <p>a. Process for determining remuneration.</p> <p>b. Whether remuneration consultants are involved in determining remuneration and whether they are independent of management.</p> <p>c. Any other relationships that the remuneration consultants have with the organization.</p>	G4-52	covered elsewhere partially		Covered under SEBI (LODR) Regulation 2015, Schedule V: Annual Report, C. Corporate Governance Report (5) Remuneration of Director	Process for determining remuneration forms part of CG report, however, if consultants are involved and if they are independent are not part of the disclosure.

GRI 102-37	<p>The reporting organization shall report the following information: a. How stakeholders' views are sought and taken into account regarding remuneration. b. If applicable, the results of votes on remuneration policies and proposals.</p>	G4-53	covered elsewhere partially	Not covered in BRR	<p>The shareholders vote on the appointment of Executive Director(s). Companies are required to disclose details of proposed remuneration in the Resolution for appointment of Executive Director(s). Also the shareholders approve any change in remuneration of Executive Director Therefore, Shareholders approve the remuneration of Executive Directors. Further, shareholders also approve commission to be paid to Non-Executive Director(s). The voting results are disclosed on the Company's website as well informed to the concerned Stock Exchange (s).</p>	<p>Votes are taken on the proposed remuneration. However, Companies Act does not provide for voting on remuneration policy of the Company. Therefore, shareholders views are not sought on Remuneration Policy.</p>
GRI 102-38	<p>Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.</p>	G4-54	covered elsewhere partially		covered partially in form MGT 9	<p>Ratio of executive director's remuneration to median remuneration of all employees is covered. But ratio of compensation of highest paid individual in each country to median remuneration of employees is not covered.</p>
GRI 102-39	<p>Ratio of the percentage increase in annual total compensation for the organization's highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the</p>	G4-55	covered elsewhere partially		covered partially in form MGT 9	<p>MGT 9 discloses increase in compensation of executive directors and increase in total employee compensation. It does not include highest paid individual in each country and also does not include increase in median compensation of employees.</p>

	highest-paid individual) in the same country					
GRI 102-40	A list of stakeholder groups engaged by the organization.	G4-24	partially covered in BRR	Section E Principle-4-1 Has the company mapped its internal and external stakeholders	Companies interact with investors by conducting Analyst Meets	The principle does not cover list of stakeholders, it covers just in yes or no if the Company has mapped internal and external stakeholders.
GRI 102-41	Percentage of total employees covered by collective bargaining agreements	G4-11	not covered	Not covered in BRR		
GRI 102-42	The basis for identifying and selecting stakeholders with whom to engage	G4-25	not covered	Not covered in BRR		
GRI 102-43	The organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process	G4-26	Partially covered in BRR	Section E Principle 4 (3) Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.		BRR covers only initiatives taken by the Company to engage with disadvantaged, vulnerable and marginalized stakeholder unlike GRI which covers all stakeholders.
GRI 102-44	Key topics and concerns that have been raised through stakeholder engagement, including: i. how the organization has responded to those key topics and concerns, including through its reporting; ii. the stakeholder groups that raised each of the key topics and concerns.	G4-27	Partially coverage in BRR	Section E Principle 1 (2) How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so The GRI Standards do not require disclosing the total number of stakeholder complaints and the percentage that were satisfactorily resolved.		

GRI 102-45	a. A list of all entities included in the organization's consolidated financial statements or equivalent documents. b. Whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report	G4-17	Covered in BRR	Section C (1) Does the Company have any Subsidiary Company/ Companies? (2) the Subsidiary Company/Companies participate in the BR Initiatives of the parent company?		The GRI Standards do not require disclosing the number of subsidiary companies that participate in the BR Initiatives of the parent company.
GRI 102-46	The reporting organization shall report the following information: a. An explanation of the process for defining the report content and the topic Boundaries. b. An explanation of how the organization has implemented the Reporting Principles for defining report content.	G4-18	not covered	Not covered in BRR		
GRI 102-47	A list of the material topics identified in the process for defining report content	G4-19	not covered	Not covered in BRR		
GRI 102-48	The effect of any restatements of information given in previous reports, and the reasons for such restatements	G4-22	covered elsewhere partially	Not covered in BRR	Companies Act, 2013 has a provision for re-opening of accounts and voluntary revision of Financial Statement.	The Section only covers revision of Financial Statement and not any other information provided in the Annual Report.
GRI 102-49	Significant changes from previous reporting periods in the list of material topics and topic Boundaries.	G4-23	not covered	Not covered in BRR		
GRI 102-50	Reporting period for the information provided	G4-28	Covered in BRR	Section A (6) Financial year reported		
GRI 102-51	If applicable, the date of the most recent previous report.	G4-29	not covered	Not covered in BRR		

GRI 102-52	Reporting cycle	G4-30	Covered	Section D (3) (a) Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, more than 1 year (b) Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?		
GRI 102-53	The contact point for questions regarding the report or its contents	G4-31	partially covered in BRR	Section A (5) E-mail id		GRI Standard, requires disclosing the contact point for questions regarding the report or its content, while A5 requires an email address of the company.
GRI 102-54	The claim made by the organization, if it has prepared a report in accordance with the GRI Standards, either: i. 'This report has been prepared in accordance with the GRI Standards: Core option'; ii. 'This report has been prepared in accordance with the GRI Standards: Comprehensive option'.	G4-32 a	not covered	Not covered in BRR		BRR does not provide for use of in accordance option. Also, BRR does not mandate that report be externally assured
GRI 102-55	a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report. b. For each disclosure, the content index shall include:	G4-32 b	not covered	Not covered in BRR		

	<ul style="list-style-type: none"> i. the number of the disclosure (for disclosures covered by the GRI Standards); ii. the page number(s) or URL(s) where the information can be found, either within the report or in other published materials; iii. if applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made. 					
GRI 102-56	<p>The reporting organization shall report the following information:</p> <ul style="list-style-type: none"> a. A description of the organization’s policy and current practice with regard to seeking external assurance for the report. b. If the report has been externally assured: <ul style="list-style-type: none"> i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process; ii. The relationship between the organization and the assurance provider; 	G4-32 c	not covered	Not covered in BRR		

	iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organization's sustainability report.					
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ANNEXURE - 2

SEBI SUGGESTED FORMAT FOR BUSINESS RESPONSIBILITY REPORT

Section A 'GENERAL INFORMATION OF THE COMPANY'

1. Corporate Identity Number (CIN) of the Company
2. Name of the Company
3. Registered address
4. Website
5. E-mail id
6. Financial Year reported
7. Sector(s) that the Company is engaged in (industrial activity code-wise)
8. List three key products/services that the Company manufactures/provides (as in balance sheet)
9. Total number of locations where business activity is undertaken by the Company
 - (a) Number of International Locations (Provide details of major 5)
 - (b) Number of National Locations
10. Markets served by the Company – Local/State/National/International

Section B: Financial Details of the Company

1. Paid up Capital (INR):
2. Total Turnover (INR):
3. Total profit after taxes (INR):
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):
5. List of activities in which expenditure in 4 above has been incurred: -

Section C: Other Details

1. Does the Company have any Subsidiary Company/ Companies?
2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)
3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

Section D: BR Information

1. Details of Director/Directors responsible for BR
 - a) Details of the Director/Director responsible for implementation of the BR policy/policies
 - DIN Number
 - Name

- Designation

S. No.	Particulars	Details
1	DIN Number (If applicable)	
2	Name	
3	Designation	
4	Telephone Number	
5	E-mail Id	

b) Details of the BR head.

Comments: This Section enquires about the Directors responsible for the BR policies and the BR head which does not necessitate any Comparison. Therefore, no specific proforma is provided for this.

2. Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N)

(a) Details of compliance (Reply in Y/N)

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy(ies) for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online									
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

(b) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The company has not understood the Principles									

2	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3	The company does not have financial or manpower resources available for the task									
4	It is planned to be done within next 6 months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)									

3. Governance related to BR

a) Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

b) Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1

1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

Principle 2

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):

(a) Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?

(b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

3. Does the company have procedures in place for sustainable sourcing (including transportation)?

(a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?

(a) If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

5. Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

Principle 3

1. Please indicate the Total number of employees.

2. Please indicate the Total number of employees hired on temporary/contractual/casual basis.

3. Please indicate the Number of permanent women employees.

4. Please indicate the Number of permanent employees with disabilities
5. Do you have an employee association that is recognized by management.
6. What percentage of your permanent employees is members of this recognized employee association?
7. Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.

S. No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
	Child labour/ forced labour/involuntary labour		
	Sexual harassment		
	Discriminatory employment		

8. What percentage of your under-mentioned employees were given safety & skill up-gradation training in the last year?

- Permanent Employees
- Permanent Women Employees
- Casual/Temporary/Contractual Employees
- Employees with Disabilities

Principle 4

1. Has the company mapped its internal and external stakeholders? Yes/No.
2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.
3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

Principle 5

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?
2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

Principle 6

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.
2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.
3. Does the company identify and assess potential environmental risks? Y/N
4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?
5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.
6. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?

7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.

Principle 7

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:
 - a.
 - b.
 - c.
 - d.

2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

Principle 8

1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.
2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?
3. Have you done any impact assessment of your initiative?
4. What is your company's direct contribution to community development projects Amount in INR and the details of the projects undertaken.
5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.

Principle 9

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.
2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)

ANNEXURE 3

EXTRACT OF BUSINESS RESPONSIBILITY REPORT OF COMPANIES

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ABB India Ltd (2017)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines for FY 2017. **The Sustainability Report has been independently assured by DNV GL.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	A few of the policies have been approved by the Board and other policies which are ABB Group policies are adopted by the Company.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The Company is having a committee for CSR, Prevention of Sexual Harassment of Women at the Workplace. For the other policies, the Company is having adequate internal control on its implementation.								
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6	Link 7	Link 8	Link 9
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* The Company has disclosed the policies links in the BR Report. However, links of the Policies disclosed below:

Link 1. Environment, Health and Safety Policy – http://new.abb.com/docs/librariesprovider19/default-document-library/hse-policy-poster_24-x-32-in_v5.pdf?sfvrsn=2

Link 2. Corporate Social Responsibility Policy – <http://new.abb.com/indian-subcontinent/investors/corporate-governance/india-corporate-social-responsibility>

Link 3. Sexual Harassment of Women at the Workplace Policy - <https://new.abb.com/docs/librariesprovider19/default-document-library/policy-on-sexual-harassment-of-women-at-workplace.pdf?sfvrsn=2>

Link 4. Anti Corruption Policy – <https://new.abb.com/about/integrity>

Link 5. Whistle Blower Protection Policy - <https://new.abb.com/about/integrity/reporting-channels/whistleblower-protection-policy>

Link 6. ABB Group Social Policy - <https://new.abb.com/sustainability/society/social-policy>

Link 7. ABB Group Human Rights Policy - <https://new.abb.com/sustainability/human-rights-policy-and-statement>

Link 8. ABB's Code of Conduct - <http://www.abb.co.in/cawp/abbzh252/45f145dc6fc01cac12579b500315ed3.aspx>

Link 9. ABB Supplier Code of Conduct - <https://new.abb.com/about/supplying/code-of-conduct>

Sustainability Report FY 2017: <https://new.abb.com/docs/default-source/sustainability/abb-group-sustainability-report-2017.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company does not have any subsidiaries. The Company has stated that more than 60% of other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the Board meets every 3 to 6 months to review the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that Code of Business Conduct (along with an Anti-Bribery and Corruption Directive) cover not only by the company, it extends to the Group / Joint Ventures, Suppliers, Contractors, NGOs and Others.
- The Company has stated that the Company received 208 investor grievances complaints, all of them have been satisfactorily resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“All of the Company’s vendors mandatorily go through a stringent evaluation and qualification criteria before they are registered within the Company. The qualification procedures include all aspects of sustainability performance.”*
- The Company has stated that *“The Company has stringent waste management practices for internally generated wastes; covered in the Company’s HSE Policy.”* And also disclosed that the Company recycled more than 10% of products and waste.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Principle 3 of the BR Report that, the Company has a recognised employee association. Further, the Company has disclosed that approximately 17.87% of permanent employees are members of recognized employee associations.
- Approx. 5.83% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017		2016		2015	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 100% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has not identified the disadvantaged, vulnerable and marginalized stakeholders.
- Further, the Company has not taken any special initiatives to engage with the disadvantaged, vulnerable and marginalized stakeholders.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“No. It is not applicable to all – Group, Joint ventures, Suppliers, Contractors, NGOs and others.”*

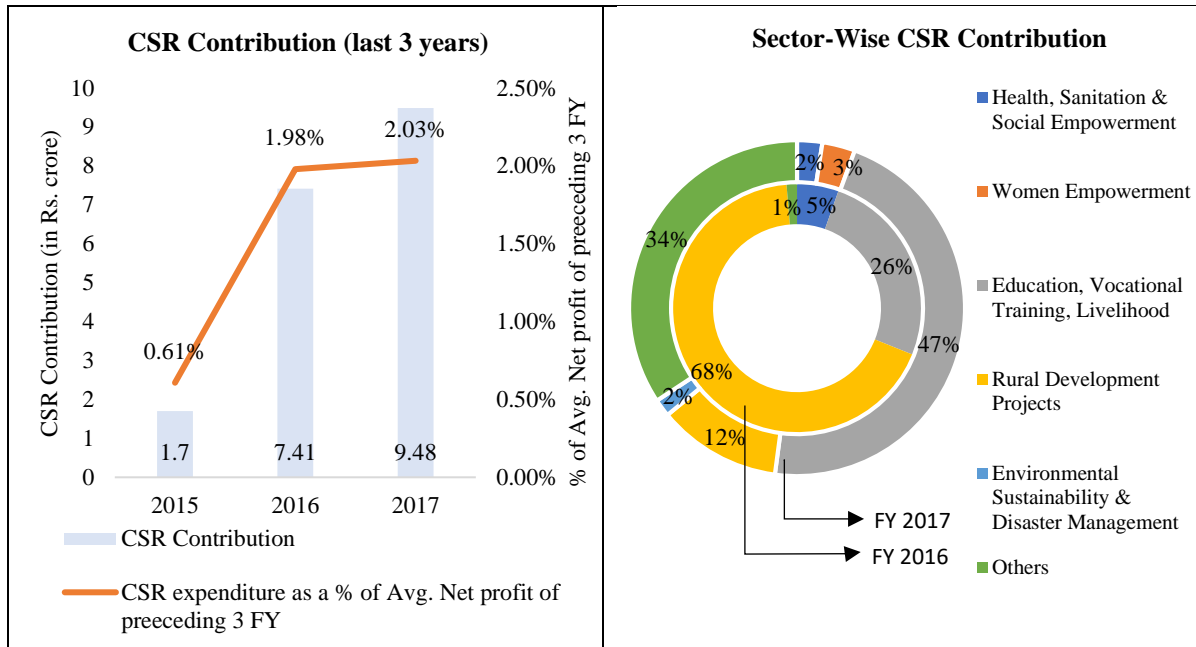
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated *“No. It is not applicable to all – Group, Joint ventures, Suppliers, Contractors, NGOs and others.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one Independent. The Chairman of the committee is Independent Director. The Company mainly undertakes CSR Activities through registered trust, in house team as well as through partnerships with verified external NGO partners / implementing agencies.



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

- 0.80% of customer complaints/consumer cases are pending as on the end of financial year.
- A Customer Satisfaction Survey is carried out by the Company during the year.

Substantial change from FY 2016

There are no substantial changes identified from previous year report.

ACC Ltd (2017)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines. **The Sustainability Report has been independently assured by TUV India Private Ltd.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle		Note 1			Note 2				
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).		Note 3		Note 4		Note 5		Note 4	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1			Link 2		Link 3		Link 4	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?		Note 6							
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 7								

Note 1: The policy is embedded in the Company's quality & environment policies which interalia, relate to safe & sustainable products

Note 2: The policy is embedded in the Company's Code of Business Conduct, HR Policies & other various HR practices

Note 3: Bureau of Indian Standards (BIS)

Note 4: This policy conforms to the provisions of the Companies Act, 2013. In addition, the Policy is also in conformity with the Sustainability Development Goals (SDGs). All our projects are mapped to concerned SDGs and its related targets

Note 5: This policy conforms to the MoEF guidelines of Corporate Environment Responsibility under EIA Notification, 2006

Note 6: The Company has a redressal mechanism to address product related complaints i.e. customer complaint portal

Note 7: The implementation of the policy is subject to an Independent Audit by the Statutory Auditors and also has an oversight mechanism from the parent Company

Link 1 - Building on Integrity Our Code of Business Conduct-- <http://www.acclimited.com/sh/CCFS.pdf>

Link 2 - Corporate Social Responsibility Policy- <http://www.acclimited.com/sh/CMCN.pdf>

Link 3 - Corporate Environment Policy- <http://www.acclimited.com/sh/EN.pdf>

Sustainability Report FY 2017: <http://www.acclimited.com/assets/new/pdf/2017-ACC-SD-Report-25-Jul-2018.pdf>

Concerns:

The Company responded to questions under Section D-2 in either Y, N or (-). However, the Company has not differentiated between the Questions against which the answer is N or (-).

Reasons disclosed by the Company for not formulating policies adhering to principle 7 and 9 is as follows:

P7: The Company has a track record of pioneering achievements, long experience and leadership position which has benefitted the cement industry at large in initiating dialogue with the Government. However, no need for a formal policy has been felt.

P9: The Company has a systematic process for assessing customer needs and fulfilling them with innovative products and services. It also has customer complaint redressal system.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that 1 out of 5 Subsidiaries participate in the BR initiatives of the parent Company. The remaining 4 are inoperative.

Company has stated that *“In partnership with an NGO, a CSR initiative “ACC ki Laadli” under the VidyaUtkarsh project is a flagship education initiative. The Project receives contributions from ACC Cement Dealers in the form of “Lakshya points” secured by them in appreciation of their achievements of business targets from ACC. The points are then redeemed as financial inputs into this project.”* However, the Company has further disclosed that less than 30% of the other entity/ entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that it meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Company has a Code of Business Conduct (along with Anti-Bribery and Corruption Directive) and a vigil mechanism named Ethical View Reporting Policy that have been approved by the Board of Directors. These are applicable to all Board Members and employees of the Company and all its subsidiaries, and an annual affirmation is taken from the designated employees”*.
- *“The Anti-Bribery and Corruption Directive and the Ethical View Reporting Policy also extend to the Company’s business partners viz. vendors/service providers/customers. The Code is available on the Company’s website at this web address <http://www.acclimited.com/sh/CCFS.pdf>”*
- The Company received 64 complaints under the Ethical View Reporting Policy, out of which 51 were resolved and the balance 13 complaints are under various stages of investigation and completion.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“Yes, the Company has all its manufacturing plants close to limestone mines which helps minimize transportation of the primary raw material”* and *“The Company encourages procurement through vendors who adopt sustainable practices.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“ACC has the facility of consuming used cement bags as Alternate Fuel in some of the manufacturing units. The location of cement plants are far away from markets, a very low percentage of used bags get recycled at the Plants. About 85% of cement manufactured by the Company comprises of blended cement which is produced using slag and fly ash which are wastes from other industrial processes.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Committee to address concerns of sexual harassment.
- Company has a recognised employee association. Further, the Company has disclosed that approximately 45% of permanent employees are members of recognized employee associations.
- Approx. 3.75% of the permanent employees are women.
- **Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report**

Category	2017		2016		2015	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	1	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 61% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders through materiality matrix as a part of its stakeholder engagement strategy development process.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders with the help of Participatory Rural Appraisal to base village micro plans and secondary socio-demographic data of the community.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Company has stated that *“all CSR interventions of the Company are intended to target the disadvantaged, vulnerable and marginalized stakeholders.”* The Company has education projects which largely focused on government schools situated in remote rural pockets of

India. The Company continues to run two Anti-Retroviral Therapy (ART) centres to support people affected by HIV/ AIDS through medical treatment and counselling. The Company has enhanced access to healthcare for the community through health camps and mobile health clinics. The Company also jointly works with the local district administration for promoting national campaigns on Open Defecation Free, Skilling and Water Conservation measures. The Company continues to engage with the vulnerable and marginalized stakeholders for their sustainable livelihood. Skill training was provided to 3745 youth, Low External Sustainable Agriculture projects for farmers, institutionalizing women SHG registered federations and achieving four open defecation free villages are some of the accomplishments during 2017.”

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that “all aspects of human rights are included and covered in the Code of Business Conduct as well as in various human resource practices / policies.” However, the Company has not stated that the Code of Business Conduct is applicable to which entities.

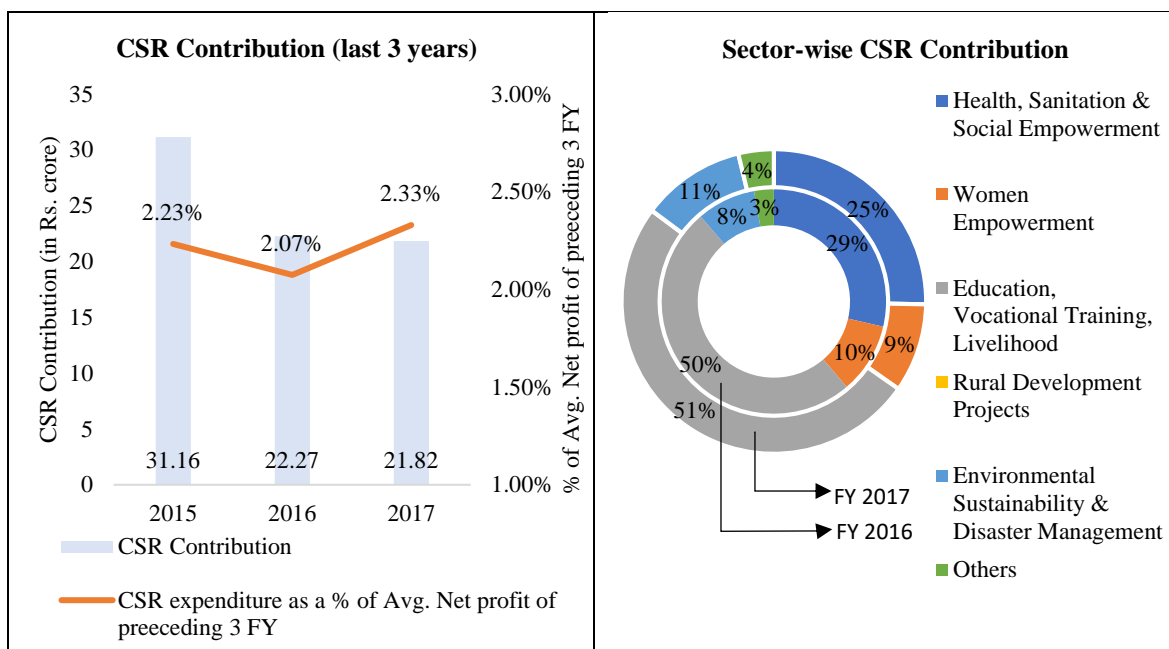
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “its Corporate Environment Policy covers the Company and its subsidiaries.”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emissions/waste generated by the Company were all within the permissible limits given by CPCB/SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house CSR Department, Company’s trust - ACC Ayushman Trust and through engagement with other corporates, Academic, and Government Institutions. The Company conducts impact assessment of its CSR initiatives. A third-party Social Audit of 100% CSR expenses was done for the fourth consecutive year.



* Graph “Sector-Wise CSR Contribution - Others” includes Training to promote rural sports and protection of national heritage, art and culture.

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

- A total of 954 complaints were received from customers (end-consumers) in 2017, out of which none (amounting to <4%) was pending as of December 31, 2017.
- A Customer Satisfaction Survey is carried out by the Company every year.

Substantial change from FY 2016

There are no substantial changes identified from previous year report.

Adani Ports & Special Economic Zone Ltd (2017 - 18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI Standards for FY 17-18 ([Weblink](#)). **The Sustainability Report has been independently assured by British Standards Institution for FY 17-18.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies reflect the intent of the United Nations Global Compact, GRI guidelines and international standards such as ISO 14001, OHSAS 18001 and NVG Guidelines issued by Ministry of Corporate Affairs, Government of India.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link https://www.adaniports.com/sustainability/policies								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been communicated to key internal stakeholders. The communication is an ongoing process to cover all internal and external stakeholders.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Sustainability Report FY 2017-18: https://www.adaniports.com/docs/APSEZ_Sustainability_Report_FY_2017-18

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that the Company has 28 subsidiary companies (including step-down subsidiaries) as on 31st March, 2018. The Company has further stated that Business Responsibility initiatives of that parent company are applicable to the subsidiary companies to the extent that they are material relation to

the business activities of the subsidiaries. No other entity / entities participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that The Company's Business Responsibility performance is assessed annually.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“it has adopted Code of Conduct for its Directors and Senior Management and all employees of Adani Group Companies. It does not extend to other entities. Senior management and the Directors of the Company have to adhere to the Code of Conduct, constituted with an objective to promote ethics and transparency in the conduct of its operations. Policies including whistle blower are applicable to each employee working with the organization.”*
- Stakeholder's Relationship Committee received 13 complaints related to shareholders like non-receipt of Annual Report, non-receipt of declared dividend, revalidation of dividend warrant or refund order etc. All complaints were satisfactorily resolved. Please refer page 81 of Annual Report of the Company.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that *“Yes, the Company is practicing the sustainable sourcing for its operations. The mechanized conveyors for coal transportation, procuring E-RTG cranes are the examples of sustainable sourcing”.*
- The Company has further stated regarding recycling of products and waste that *“the Company complies with all applicable regulatory requirements pertaining to waste disposal as prescribed by the regulatory agencies. The Company is providing cargo handling logistic services which generates non-hazardous and hazardous wastes. The Company is disposing its waste in environmental friendly manner through CPCB / SPCB registered CHWIF/ TSDF or authorised recyclers. During the FY 2017-18, the Company has disposed total 5,617.30 MT waste (hazardous – 278.85 MT and non-hazardous – 5,338.50 MT) following 5R principles under the ZERO WASTE initiative. 80.04% recycled, 16.58% reprocessed, 2.55% recovered, 0.66% reused and 0.17% incinerated. No waste was disposed at landfill site.”*

Principle 3: Businesses should promote the well-being of all employees

- As per the requirement of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and rules made thereunder, your Company has constituted Internal Complaints Committee which is responsible for redressal of complaints related to sexual harassment.
- The Company does not have an employee association recognized by the Management.
- Approx. 0.74% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Although, the Company has not disclosed the percentage of the permanent employees were given safety and skill upgradation training in the last year, however, the Company has stated that “*The Company’s training programs extend to all permanent and contractual employees, which are rolled out as per the annual training calendar and individual employee training needs, covering a significant percentage of employees. All contractual employees are given mandatory safety training on induction as well as on the job skills related training through the contractors and the Company*”.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that the Company has mapped its stakeholders and has a systematic stakeholder engagement process.
- The Company has identified disadvantaged, vulnerable & marginalized stakeholders. APSEZ through Adani Foundation works for the development of the said stakeholder group.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that “*The Company as a business entity firmly believes and endorses notions of sustainable community development especially for the vulnerable and marginalized sections. Across its business locations, it strives to create an environment of coexistence where there is an equitable sharing of resources followed by sustained growth and development. The Company has been promoting CSR activities in its operational areas through the Adani Foundation. With conscious efforts, the Company has been strategically supporting a number of initiatives run by the Foundation under the areas of education, community health, sustainable livelihood development and rural infrastructure development.*”

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The company has instituted and implemented a Group level policy on human rights which covers all direct employees, consultants (including fixed term appointees), associates, trainees, suppliers, vendors etc. in all companies/businesses of the Group.

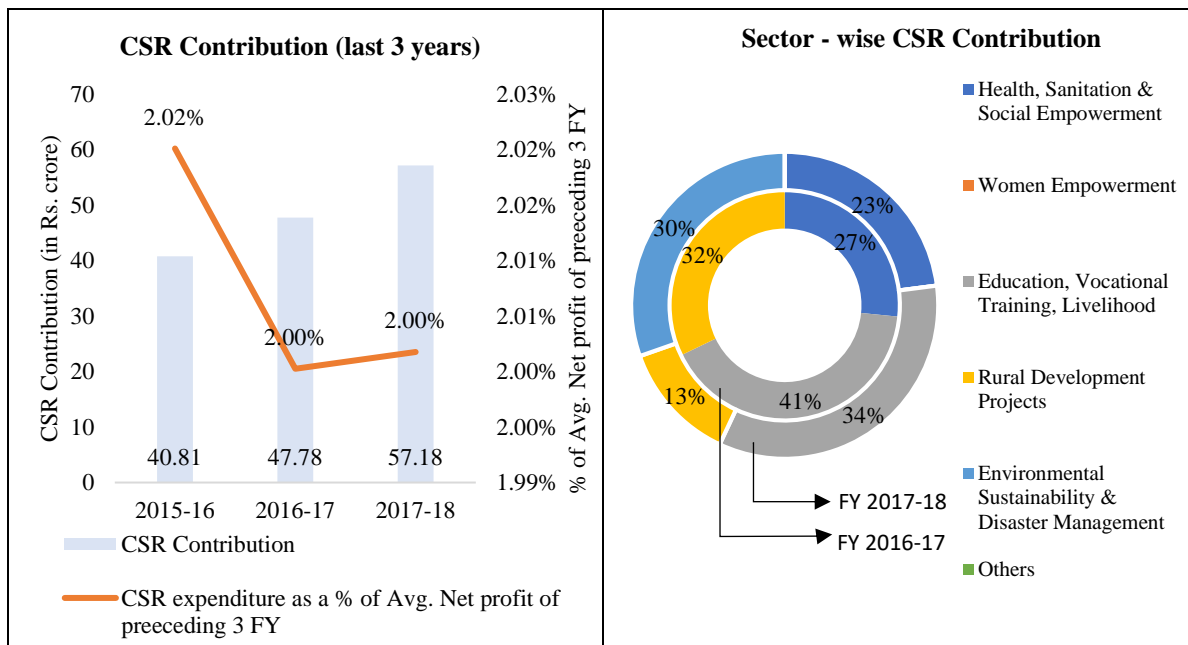
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “*the Company has adopted an Occupational Health, Safety and Environment Policy as these aspects are integral to the Company’s business values. The Policy covers only the Company.*”

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through Adani Foundation which partners with several NGOs and governmental organisations. The Company conducts impact assessment of its CSR initiatives.



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

- o The Company stated that no Customer complaints / consumer cases are pending as of end of financial year 2017-2018.
- o The Company has mentioned that the Company actively seeks function-wise feedback from various stakeholders.

Substantial changes from FY 16-17

Principle wise BR Policy/ Policies

For FY 16-17 the Company had stated that for P5, P7, P8, P9-Q 10 i.e. the Company did not carry out independent audit/ evaluation, however in FY 17-18 report the Company has stated that it carried out audit/ evaluation.

For FY 16-17 the Company had stated that for P4 -Q 4 i.e. the policy been not approved by the Board, however in FY 17-18 report the Company has stated that the policy been approved by the Board.

FY 17-18

	Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									

FY 16-17

	Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									

Alkem Laboratories Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies have been developed on the lines of the 'National Voluntary Guidelines on Social, Environment and Economic responsibilities of businesses' established by the Ministry of Corporate Affairs, Government of India in 2011.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	All the policies are available for employees to view on the Company's intranet. For external stakeholders, wishing to view the policies, a request can be emailed to the Compliance Officers.								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that currently only one subsidiary of the Company viz, Indchemie Health Specialties Private Limited participates in BR Initiative through its own CSR activities. Other entities do not take part in the Company's BR initiatives.

Governance Related to BRR

The Company has stated that Board meets once in a quarter and review important aspects of BR.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the Company has in place *“Code of Ethics for Employees” and “Code of Business Conduct and Ethics for Directors and Senior Management” to promote highest standard of ethical conduct in all of its business activities. The Company has further stated that it also has separate Code of Ethics for its Suppliers, Vendors and other Stakeholders.”*
- The Company has stated that *“our Whistle Blower Policy enables and encourages employees and volunteers of the company to report any report any action or suspected action taken within the Company that is illegal, fraudulent or in violation of any adopted policy of the Company”.*
- The Company has stated that no complaint was received under Whistle Blower Policy or directly from stakeholders during the financial year 2017-18.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company has in place standard operating procedures related to green procurement through which the Company endeavors to strengthen its procurement processes of energy, water, raw materials, packaging material, and finished goods”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company has extreme care to ensure that waste generated is sent through proper channels for incineration as these are mostly bio-medical and hazardous waste and requires appropriate disposal mechanisms. The Company has place, proper systems to re-cycle the waste water generated in the manufacturing facilities. The Company has also initiated “Zero discharge” project and set-up sewage treatment plants”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 3.44% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	1	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has disclosed the % for Safety and Skill upgradation training for Category Wise as reproduced in the table below.

Category	Skill upgradation training	Safety training
Permanent Employees	68%	20%
Permanent Women Employees	24%	23%
Casual/ Temporary/ Contractual Employees	6%	43%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has identified and mapped the internal and external stakeholders.
- The Company undertakes engagement with stakeholders by identifying and classifying them and thereafter designing its CSR programmes to serve the target disadvantaged, vulnerable, marginalised stakeholders. The Company has also identified those stakeholders who are less fortunate than others and who require more support.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company focuses serving disadvantaged, vulnerable and marginalised stakeholders in core areas near to its manufacturing facilities and R&D centres through various CSR initiatives.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company's Human Rights policy covers all its employees across all grades and locations. The Code of Ethics for Suppliers, Vendors and other Stakeholders contains covenants on human rights aspect that are applicable to our Suppliers, Vendors and Contractors.

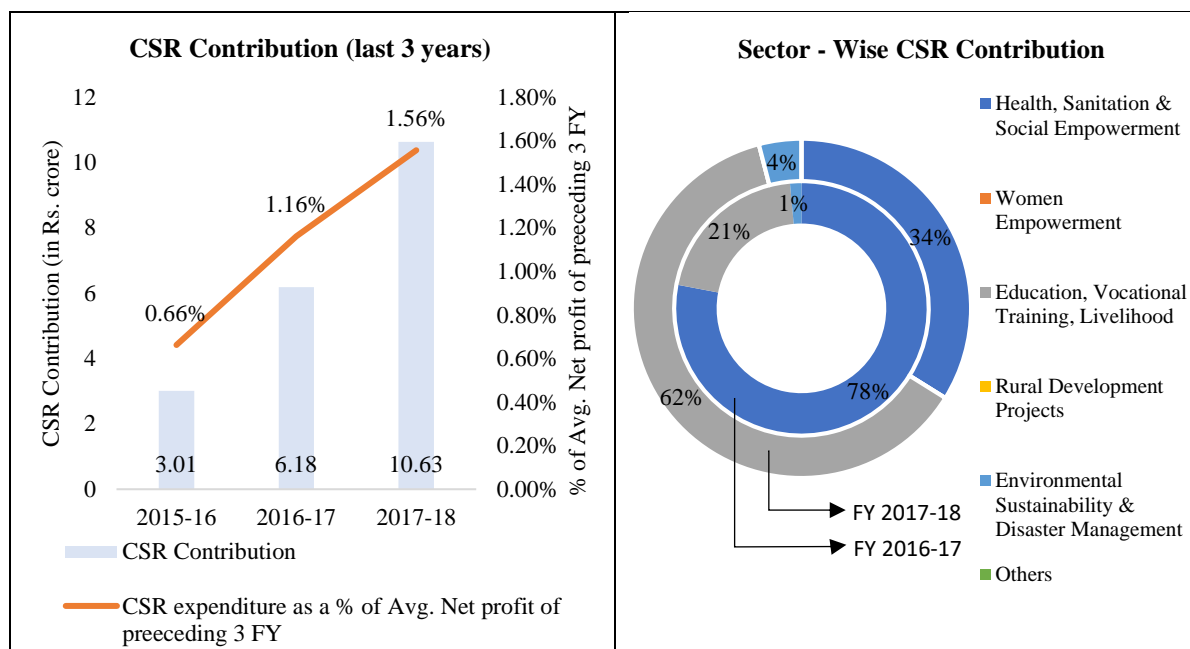
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** NGOs/Others? The Company's policy applies to all the offices and manufacturing locations across India and as well as overseas. The Code of Ethics for Suppliers, Vendors and other Stakeholders contains covenants on environmental aspects that are applicable to our Suppliers, Vendors and Contractors.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which one Independent Director. The chairman of the Committee is Independent Director. The Company mainly undertakes CSR Activities through its in-house and also collaborates with external NGOs. The Company conducts impact assessment of its CSR initiatives. The Company monitoring the impact internally or through respective NGOs.



The Company has failed to spend the full prescribed amount on its CSR activities for FY 2017-18 and has state the reason as follows:

“Your Company considers social responsibility as an integral part of its business activities and endeavours to utilise allocable CSR budget for the benefit of society. Our CSR initiatives are concentrated on well-being of our communities by focusing on healthcare and sanitation, education, environmental concerns, rural development, women empowerment and vocational training. During the financial year 2017-18, the Company had substantially increased its CSR expenditure but could not materialise its long term CSR initiatives on account of inability to find the required infrastructure. In this regard, the Company has acquired a non-profit organisation named Alkem Foundation for supplementing its efforts in implementation of its CSR objectives in a structured manner and in helping the community from the long term point of view. The Company believes that its short term and mid-term initiatives have progressed well and endeavours to accelerate its CSR expenditure in the coming years for achieving its long term objectives as well.”

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

- Although, the Company has not disclosed the no of complaints received during the year, however, the Company has disclosed that 2 consumer cases were pending as at the end of the financial year.
- The Company do not conduct any consumer survey. The Company has stated that *“The Company’s products are prescribed and recommended to the patients (consumers) by medical professionals. As the consumer exercises little to no power in choosing the drugs especially from the speciality category, we do not conduct any consumer survey.”*

Substantial change from FY 16-17:

Change	FY 2017-2018	FY 2016-17
Section D, point 2, Question 10	Externally Audited	The policies are currently evaluated internally and would be subjected to external audits as applicable.
Section D, point 2b,3	The Board of Directors review the BR performance of the Company on an annual basis.	The Board of Directors review the BR performance of the Company once in a quarter

Ambuja Cements Ltd (2017)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines. ([weblink](#)) The Company has prepared the

Annual Report for FY 2017 as per IIRC Integrated Reporting format. **The Sustainability Report has been independently assured by TUV India Private Ltd.**

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6		Link 2	Link 7
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1 - Building on Integrity Our Code of Business Conduct (Provided link1 is not working)

<https://www.ambujacement.com/Upload/PDF/Ethical-View>

Link 2– Sustainability Policy

<http://www.ambujacement.com/Upload/PDF/Sustainability.pdf>

Link 3 - Corporate Social Responsibility Policy

<http://www.ambujacement.com/Upload/PDF/CSR-Policy.pdf>

Link 4: <http://www.ambujacement.com/Upload/PDF/Environmental-Policy.pdf>

Link 5: <http://www.ambujacement.com/Sustainability/Stakeholder-engagement>

Link 6: <http://www.ambujacement.com/Upload/PDF/CSR-Policy.pdf>

Link 7: <http://www.ambujacement.com/Upload/PDF/code-of-conduct-and-business-ethics-wef-01-01-2017.pdf>

Sustainability Report for FY 2017: <http://www.ambujacement.com/Upload/PDF/ambuja-cement-sustainable-development-report-2017.pdf>

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company has not followed the P7 policy. And stated that *“Need for a written policy was not felt. Suitable decision for a written policy will be taken at appropriate time.”*

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 6 Subsidiaries as on 31st December 2017. The Company has further stated that *“the subsidiary companies do not participate in the BR initiatives of the parent Company”*. ACC Ltd has its own BR initiatives. The business activities of the remaining subsidiary companies are not material in relation to the business activities of the Company.

Governance Related to BRR

The M.D. & CEO assesses the BR performance of the Company on a Quarterly basis which is then appraised to the Board at its quarterly meetings as a part of larger presentation on sustainability. The CSR and Sustainability Committee is also appraised about the BR performance bi-annually at its meetings.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The policies relating to ethics, bribery and corruption as well as the Whistle blower Policy covers the Directors, Employees, Vendors and Customers of the Company. These policies are more or less aligned with the policies of the parent company. The Group /Joint Venture companies have their own policies which are also aligned with the policies of the parent company.
- The Company received a total of 30 complaints during the year 2017. Out of these 30 complaints, 7 complaints were pre-assessed by the EVC Committee but did not warrant further investigation. 19 complaints were investigated and concluded whereas 4 complaints are still under investigation.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, however, has stated that *“all inputs, except where the Company does not have any control, are sourced sustainably. The Company has a procedure in place for sustainable sourcing of energy, water including transportation. Almost all the inputs are sourced on a sustainable basis”*.
- The Company has stated that *“We have fly ash and bottom ash generated as waste from our captive power plants which is used in our cement production. The entire fly ash generated [100%] is utilised to produce Portland Pozzolana Cement. (PPC). Waste water generated from our plant and colony is recycled and reused in dust suppression, gardening, horticulture, etc”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association (trade unions affiliated to either of INTUC / AITUC / BMS).

Further, the Company has disclosed that approximately 30% of permanent employees are members of recognized employee associations

- Approx. 2.46% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017		2016		2015	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 100% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The company has further identified the disadvantaged, vulnerable and marginalised stakeholders, namely the communities around its manufacturing sites and its workers/contractual workers and truck drivers. Disabled children and youth emerged as a separate group and hence are catered through education and skill development program. Women in the communities are reached out to through the Women Empowerment Program.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** A comprehensive stakeholder engagement program operates to facilitate several initiatives for engagement of different stakeholders. The Company has further stated that “‘*We Care*’ developed for promoting a serious safety culture in Ambuja”.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company does not have any policy on Human Rights for the time being. However, the company refers to the guidelines provided by the parent company LafargeHolcim and uses it as a tool for assessment of Human Rights impacts at its plants.

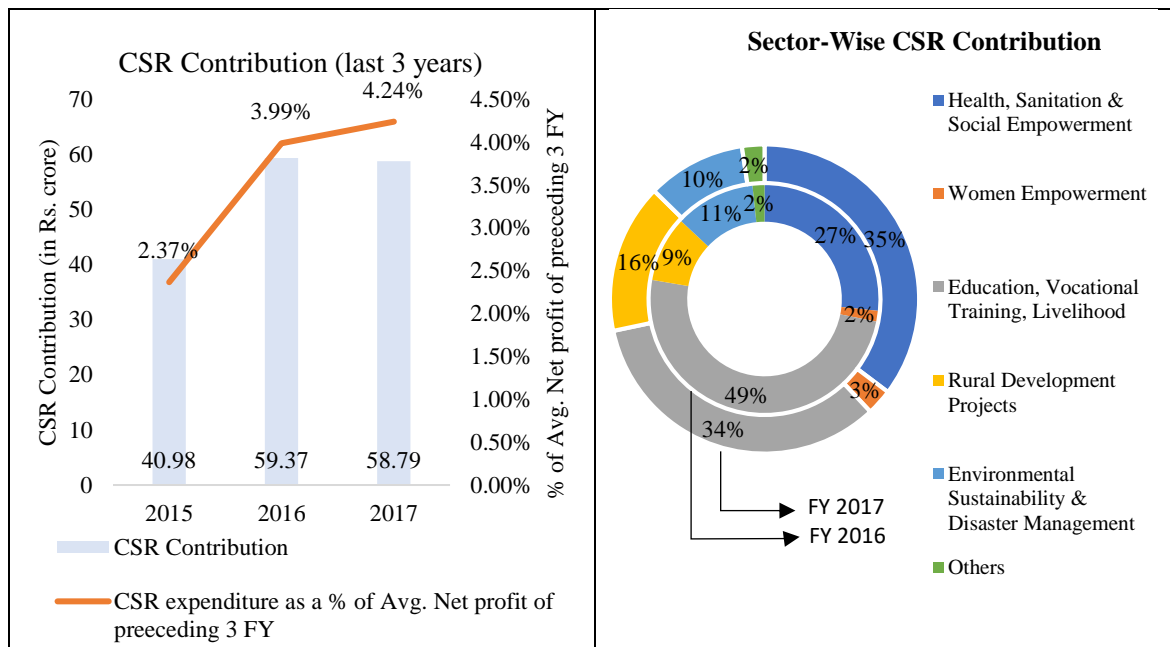
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company states “*that The Corporate Environment Policy is applicable to only Ambuja Cements Limited*”.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its Company’s trust - ACF Ambuja Cement Foundation. The Company conducts impact assessment of its CSR initiatives by internal expert consultants and organizations. Ambuja Cement Foundation (ACF) is a CSR arm of Ambuja Cements Ltd monitors the projects.



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

- A total of 689 complaints were received from customers (end-consumers) in 2017 all of them have been resolved.
- As regards consumer cases, 19 consumer cases were pending before different Forums/Commissions/Courts at the beginning of the year. During the year 1 consumer case was filed and 7 cases were disposed off leaving a balance of 13 pending cases as on end of the financial year 2017.
- A Customer Satisfaction Survey is carried out by the Company every year. The surveys are carried out as per the global standards like Nielsen’s Brand Equity Index (BEI), Net Promoter Score (NPS) & other research agencies on periodical basis.

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Asian Paints Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report, however, the Company has not disclosed which format it followed in sustainability report. ([Weblink](#)) **The Sustainability Report has been independently verified by DNV GL.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	Note 1							Note 1	
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note 2							Note 2	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director? Note 3	1	2	1	2	1	2		2	2
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Note 4							Note 4	
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6		Link 7	Link 8
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 5							Note 5	

Link 1 - Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

<https://www.asianpaints.com/more/investors/policies-programs.html>

Link 2 - Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

<https://www.asianpaints.com/footer-links/ehs-policy.html>

Link 3 - Businesses should promote the well-being of all employees.

<https://www.asianpaints.com/content/dam/asianpaints/website/secondary-navigation/investors/policies-programs/code-of-conduct-for-employees.pdf>

Link 4 - Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

<https://www.asianpaints.com/content/dam/asianpaints/website/secondary-navigation/about-us/corporate-citizenship/CSR%20Policy.pdf>

<https://www.asianpaints.com/footer-links/customer-policy.html>

Link 5 - Businesses should respect and promote human rights

<https://www.asianpaints.com/content/dam/asianpaints/website/secondary-navigation/investors/policies-programs/code-of-conduct-for-employees.pdf>

Link 6 - Businesses should respect, protect, and make efforts to restore the environment

<https://www.asianpaints.com/footer-links/ehs-policy.html>

Link 7 - Businesses should support inclusive growth and equitable development

<https://www.asianpaints.com/content/dam/asianpaints/website/secondary-navigation/about-us/corporate-citizenship/CSR%20Policy.pdf>

Link 8 - Businesses should engage with and provide value to their customers and consumers in a responsible manner

<https://www.asianpaints.com/footer-links/customer-policy.html>

Sustainability Report for FY 2017-18: <https://www.asianpaints.com/content/dam/asianpaints/website/secondary-navigation/sustainable/microsite/pdf/asian-paint-sr-2018.pdf>

Note 1: While there may not be formal consultation with all stakeholders, the relevant policies have evolved over a period of time by taking inputs from concerned internal stakeholders.

Note 2: The spirit and content of the code of conduct and all the applicable laws and standards are captured in the policies articulated by the Company. The policies are based on and are in compliance with the applicable regulatory requirements and international standards. Please refer the detailed report for more information.

Note 3: As a process all the policies are noted by the Board. The Board authorises Senior Officials of the Company to authenticate the policies and make necessary changes whenever required.

1: It is signed by the Vice President – Human Resources Function

2: It is signed by the Managing Director

Note 4: The implementation and adherence to the Code of Conduct for Employees is overseen by the Human Resource and Internal Audit Function respectively. The CSR Policy is administered by the CSR committee in line with the requirements of the Companies Act, 2013 and Rules framed thereunder. The EHS Policy is Policy overseen by the Supply Chain, Manufacturing and the Research & Technology Function. The Company has a separate Customer Centricity Function which looks at all customer related issues.

Note 5: While the Company has not carried out independent audit of the policies, the internal Audit Function periodically looks at the implementation of the policies.

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company does not have a separate policy on “policy advocacy”. For advocacy on policies related to the Paint Industry, the Company works through industry associations such as Indian Paints Association, Confederation of Indian Industries, etc. There are specified officials in the Company who are authorised for communicating with industrial bodies and managing government affairs in accordance with communication policy of the Company.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that “the Company as on 31st March, 2018 has 6 (Six) direct subsidiaries and 19 (Nineteen) indirect subsidiaries. The Company has further disclosed that the Company encourages its subsidiaries to adopt its policies and practices.

Governance Related to BRR

The Company has stated that other supporting functions/groups meets periodically to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has an exhaustive Code of Conduct which is based upon the principles of Fairness, Ethics and Corporate Governance. The Company expects all the employees to act in accordance with

the highest standards of personal and professional integrity, honesty and ethical conduct which includes handling of actual or apparent conflicts of interest between personal and professional relationships, free from fraud and deception. The Code is applicable to employees of the Company and its subsidiaries and is to be affirmed on an annual basis.

- There is an Ethics Committee duly constituted under the Whistle Blower Policy and comprises of Managing Director & CEO, Company Secretary and the Head of Human Resources function as its members. The Committee deals with complaints from any employee or business associate.
- The Company has in place mechanisms for receiving and dealing with complaints from stakeholders and is responsive to any complaints received from stakeholders. During the year, your Company received 34 investor complaints from shareholders which have been resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company is a pioneer of world class technologies and products that are truly eco-friendly and recognised on a global scale. Product stewardship has always been the priority of the Company while ensuring customer satisfaction and delight. The premium end products are free from heavy metals, Carcinogen, Mutagen and Reproductive toxins (CMR), reduced Volatile Organic Content and made compliant to toughest International Green Standard GS11. The Company has further stated that During building expansion more than 84% material sourced from within 500 Km radius, provision of electric charging points for car have been done.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“the Company has done 100% reuse of treated water.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 31% of permanent employees are members of recognized employee associations.
- Approx. 5.85% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	4	Nil	4	Nil	4	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 90.03% of the permanent employees and 100% of permanent women employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of it, Company engages with its stakeholders on an ongoing basis for a constructive consultation process.
- The Company has always ensured value creation, safety, skill upgradation, enhanced living standards and better experience for its partners including employees, contract workers and suppliers, through its good governance and employee friendly policies and practices. Engagement mechanisms whereby each stakeholder group provides timely feedback and response through formal and informal channels are in place.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Asian Paints offers vocational training programs to painters and contractors across a variety of skills including designer finishes, water proofing, wood finishes and wallpaper installation in order to improve lives of unskilled individuals. In the financial year 2017-18, Colour Academics have conducted more than 104,000 trainings where more than 65,000 participants have come for more multiple training modules.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“Company is compliant to national regulations pertaining to human rights. Several workshops explaining the principles enshrined in the Code of Conduct of your Company were organized for its employees. The Code of Conduct of your Company also applies to the employees of the subsidiary companies.”*

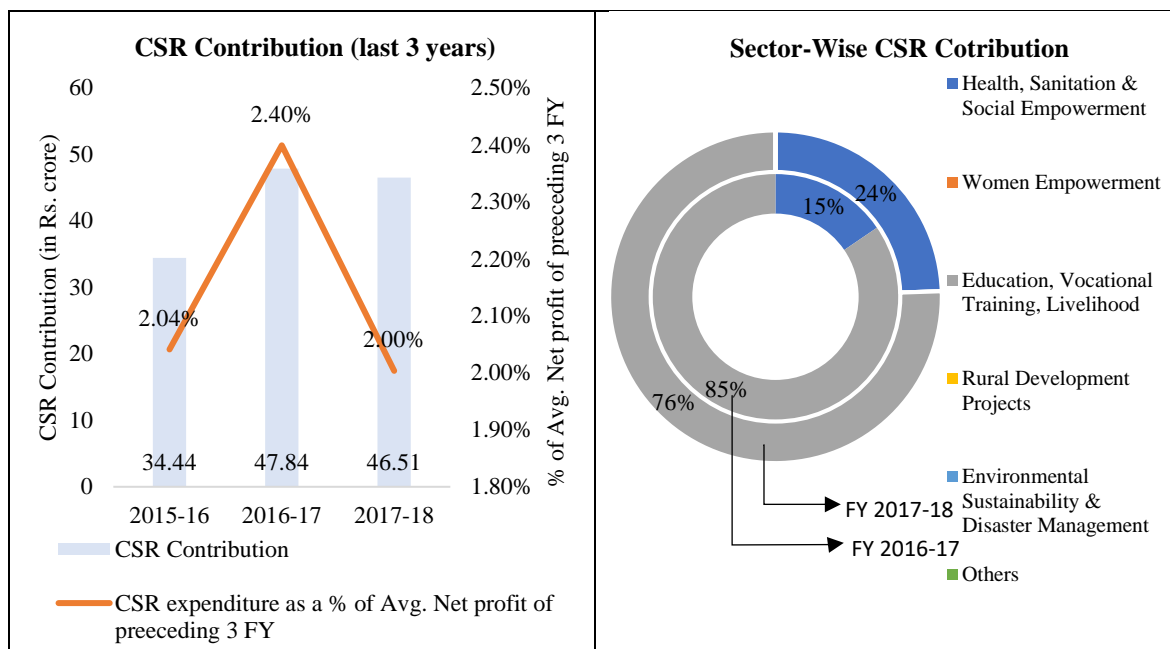
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the policies applicable to all its business places. For the subsidiaries, the policy is applicable in line with the local requirements prevailing in the country of operation. The Company has not disclosed if the policy on Principle 6 covers Group/Joint Ventures/Suppliers/Contractors/NGOs/others.
- **Are the Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?** The Company has not disclosed whether the emissions, Waste generated by the Company were within the limits as prescribed by CPCB or SPCB. However, the Company has stated that, *“The Company’s manufacturing facilities are ISO 14001 certified. Deviations from laid down policies and procedures are tracked and reviewed by effective procedures of Corrective Action and Preventive Action (CAPA).”*

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 2 are Independent members. While Chairman of the Company is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house team and external NGO.



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

- o The Company has not disclosed the no of complaints, which were received from customers (end-consumers) in FY2017-18, however, the Company has stated that 31st March, 2018, 1 Customer Compliant was pending further 41 consumers related legal cases were pending as at the end of the financial year.
- o A Customer Satisfaction Survey is carried out by the Company every year.

SUBSTANTIAL CHANGES FROM FY 16-17

o **Reporting framework**

The Company had published a Sustainability report for FY 15-16 which was prepared as per GRI G4 Guidelines. However, the Sustainability Report for FY 16-17 and FY 17-18 is not published as per GRI Guidelines.

o **Principle wise policy**

The Company had disclosed in FY 15-16 BR report that the Company did not have a policy for Principle 7 on Public Advocacy. The Company had further stated that it planned to have a policy in next 1 year. However, in FY 17-18 the Company has stated that “The Company does not have a separate policy on “public advocacy”. For advocacy on policies related to the Paint Industry, the Company works through industry associations such as Indian Paints Association, Confederation of Indian Industries, etc. There are specified officials in the Company who are authorised for

communicating with industrial bodies and managing government affairs in accordance with Communication Policy of the Company.”

In FY 17-18, in principle 2, the Company has stated that the Company reused 100% of treated water. Further, the Company has stated that *“During building expansion more than 84% material' sourced from within 500 Km radius, provision of electric charging points for car have been done.”*

Aurobindo Pharma Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9		
1	Do you have a policy/ policies for principle		Note 2					P7		P9		
2	Has the policy been formulated in consultation with the relevant stakeholders?											
3	Does the policy conform to any national / international standards? If yes, specify (50 words).						Note 1					
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?											
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?											
6	Indicate the link for the policy to be viewed online	Link 1		Employees Self Service in IHRMS Link 1 , Link 2			Link 2				Link 3	Note 3
7	Has the policy been formally communicated to all relevant internal and external stakeholders?		Note 2									
8	Does the Company have an in-house structure to implement the policy / policies?											
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?				Systems in place							
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?										The CSR assessment is done internally	

Note 1- Policy is in line with ISO 14001 international standards

Note 2- The company continuously focusses on the optimal utilization of resources from its product design to disposal

Note 3- The company in its operations ensures the customer value

*Link 1- <https://www.aurobindo.com/wp-content/uploads/2018/10/Whistle-Blower-Policy.pdf>
<https://www.aurobindo.com/investors/corporate-governance/code-of-conduct/>*

Link 2- <https://www.aurobindo.com/wp-content/uploads/2018/10/Updated-EHS-Policy.pdf>

Link 3- <https://www.aurobindo.com/wp-content/uploads/2018/10/Aurobindo-CSR-Policy.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that the Company has 56 subsidiary companies located in India and other countries as on 31st March, 2018. The parent company undertakes majority of the BR initiatives, through its 'Not for Profit' foundation called Aurobindo Pharma Foundation. Entities like suppliers, distributors did not participate in the Company's BR initiatives for the reporting period.

Governance Related to BRR

The Company has stated that it meets annually to assess the Business Responsibility performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“the Company is committed to build a strong ethical organization. The Company's Code of Conduct affirms its commitment to the highest standards of integrity and ethics. The Code of Conduct guides all supervisory, executive and managerial employees of the Company including the Board members. The policy is communicated to the employees across all the locations.”*
- The Company received has received and resolved 31 complaints from investors. All the complaints were resolved to the satisfaction of the shareholders and there were no pending complaints at the year end.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of sustainable sourcing, however, the Company has disclosed that, *“the Company has laid down a standard operating procedure for the selection of its vendors and approving the same for sourcing of material. There is a system in place for evaluating the EHS resources and compliance of key suppliers and vendors for key raw material intermediates and API sourcing.”*
- The Company has stated that *“it has a mechanism to recycle or dispose materials including waste in a responsible manner. The Company has the process of recovering solvents where the volume of solvent usage is maximum and wherever possible to recycle. Spent Catalysts are sent back to vendor for regeneration and reuse. All organic wastes generated from API Units (solids and liquids) and all the wastes generated from Formulations Units (with very few exceptions) are disposed to Cement Units for use as auxiliary fuel called 'co-processing' of wastes. For the financial year under discussion, approximately 60% of the waste is recycled through co-processing.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Company has constituted an internal complaints committee in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules there under. The Company has a policy on prevention & prohibition of sexual harassment at workplace. The policy provides for protection against sexual harassment of women at workplace and for the prevention and redressal of such complaints.

- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has stated that *“the majority of the office bearers/active members of the Association have left the organization, no activity has been observed during last financial year. Harmonious industrial relations were maintained across all the manufacturing locations.”*
- Approx. 4.50% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has stated that *“all the employees are given mandatory safety training at the time of joining the organization. Further there are continuous skill-based trainings imparted to over 90% of our employees.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company believes in greater engagement with its stakeholders and being sensitive towards their needs and expectations. This is one of the corporate values that focusses on being responsive to stakeholders’ needs, proactive and transparent.

The Company has a Whistle-blower Policy that provides support to employees, channel partners and vendors to report significant deviations from key management policies and report any non-compliance and wrong practices. The Company also has an Investor Grievance Cell where the investors can raise their concerns and are resolved appropriately.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“The policy covers the employees of the organization.”*

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

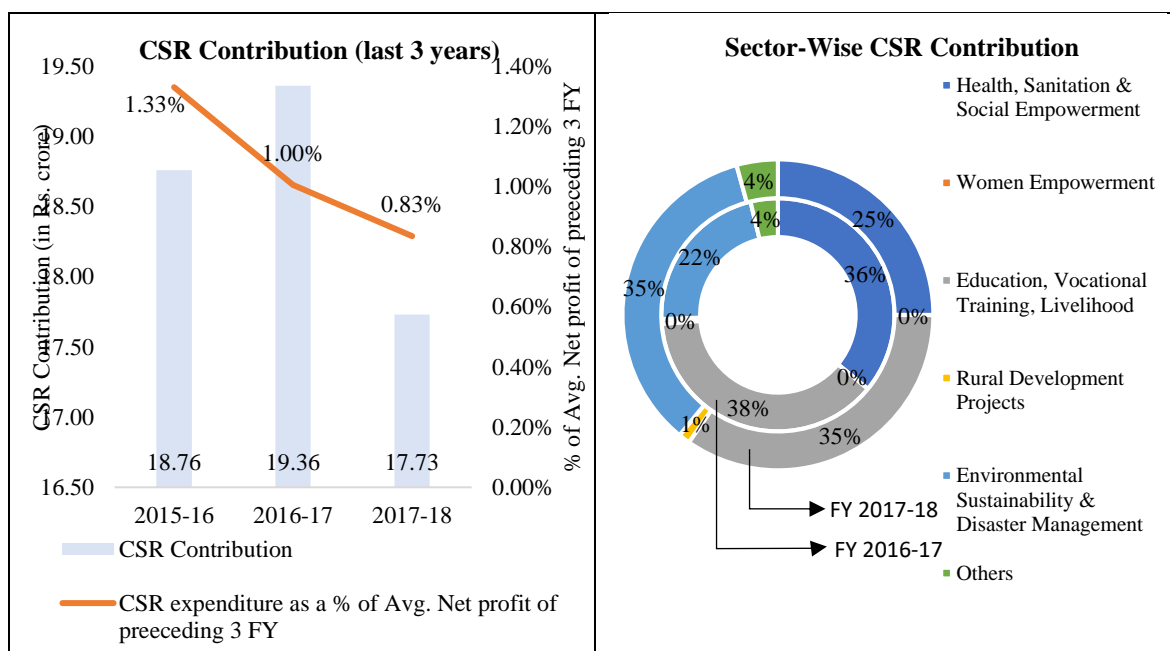
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“it has a well-defined environment, health and safety (EHS) policy that caters to the employees, group, JVs and the contractors working at our sites. The Company is committed to operate all its units in an environmentally friendly manner while protecting health and safety of its employees.”*

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has disclosed that the emissions/waste generated by the Company are within the permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through Aurobindo Pharma Foundation. The Company conduct impact assessment internally.



The Company has failed to spent the full prescribed amount on its CSR activities for FY 2017-18 and has state the reason as follows:

“The Company could not spend entire two percent of average net profits of the last three financial years. Out of the sanctioned amounts some of the works are ongoing and once the works are completed the committed amounts will be released. The Company is making efforts to identify the projects for spending the unspent and carried forward CSR funds. All unspent CSR funds of previous year (s) are carried forward for spending on CSR activities.”

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

- Aurobindo has a well-defined mechanism to handle the customer complaints. As on 31st March, 2018 less than 1% of the complaints were pending beyond the acceptable timelines as per the Standard Operating Procedures (SOP).
- The Company not disclosed about a Customer Satisfaction Survey.

Avenue Supermarts Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	All the policies have been developed in consultation with the Management of the Company								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies are in-line with the principles of National Voluntary Guidelines (NVG).								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	All the policies have been approved by the Board and have been signed by the Managing Director & CEO.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The Company has appointed a Business Responsibility Head to oversee the implementation of the policies								
6	Indicate the link for the policy to be viewed online	Link1								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies are uploaded on our websites for communicating it to the internal and external stakeholders.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Stakeholders can report grievances related to policies and provide suggestion on the email id: suggestion@dmartindia.com								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1:

https://www.dmartindia.com/files/investor_relationship/business_responsibility_policy_manual/Business%20Responsibility%20Policy%20Manual02_08_2018_04_12_54.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that the Company has 4 subsidiary companies. Out of these 4 subsidiaries, one (Align Retail Trades Private Limited) subsidiary of ASL, participates in relevant BR initiatives of the Company. No other entity / entities participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the Business Responsibility performance will be reviewed annually.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the Company has incorporated a policy on Ethics, Transparency & Accountability which is applicable to its Employees, Directors, Business Partners, Business Associates and other relevant stakeholders to conduct business ethically and transparently. The company has a separate code of conduct for Board Members and Senior Management. The intent of this code is to focus on areas of ethical risk, provide guidance to recognize and deal with ethical issues, provide mechanisms to report unethical conduct and help foster a culture of honesty and accountability.
- The Company received 363 complaints under the Ethical View Reporting Policy during the FY 2017-18, out of which 95.37% were resolved, Majority of complaints are related to IPO queries from Investors / Shareholders.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the % of sustainable sourcing, however, the Company has stated that *“ASL is aiming to reduce its fuel consumption in transportation by operating through common distribution centres in vicinity of our store locations, wherever feasible. This minimizes the distance to transport goods to our stores, thus reducing fuel consumption.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, however, the Company has stated that *“Owing to the nature of our business we generate very limited amount of waste. However, the Company has installed sewage treatment plants at stores wherever possible to reduce load on the municipal bodies.”*

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed whether it has constituted an Internal Complaints Committee, it has adopted a policy on prevention, prohibition and redressal of sexual harassment at workplace in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company does not have an employee association recognized by the Management.
- Approx. 22.15% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17	
	Reported	Pending	Reported	Pending
Sexual Harassment	11	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil

- The Company has given Safety & skill up-gradation training in the last year as follows:

No.	Category	% of Persons trained on Safety Aspects	% of Persons trained for skill upgradation
1	Permanent Employees	74	87
2	Permanent women employees	74	65
3	Permanent employees with disabilities	73	27
4	Casual/ Temporary/ Contractual Employees	75	90

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped all its key internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that “*it wants to make a real difference to the underprivileged by strengthening schools, impacting education and inspiring lives through its CSR initiatives, which includes;*
 - *Providing basic infrastructure for education,*
 - *Computer education and learning,*
 - *Balwadis for developing pre – school foundation in association with MCGM,*
 - *Availability of playground & sports fixtures and sports material,*
 - *Mid – day meals for children,*
 - *Pedagogy and activity based learnings,*
 - *Quality staff for teaching.*

The Company has impacted more than 75,000 students through its holistic school interventions.”

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that “*it has framed a policy on human rights, which is a guidance document for its Employees, Business Partners/ Associates and other relevant stakeholders.*”

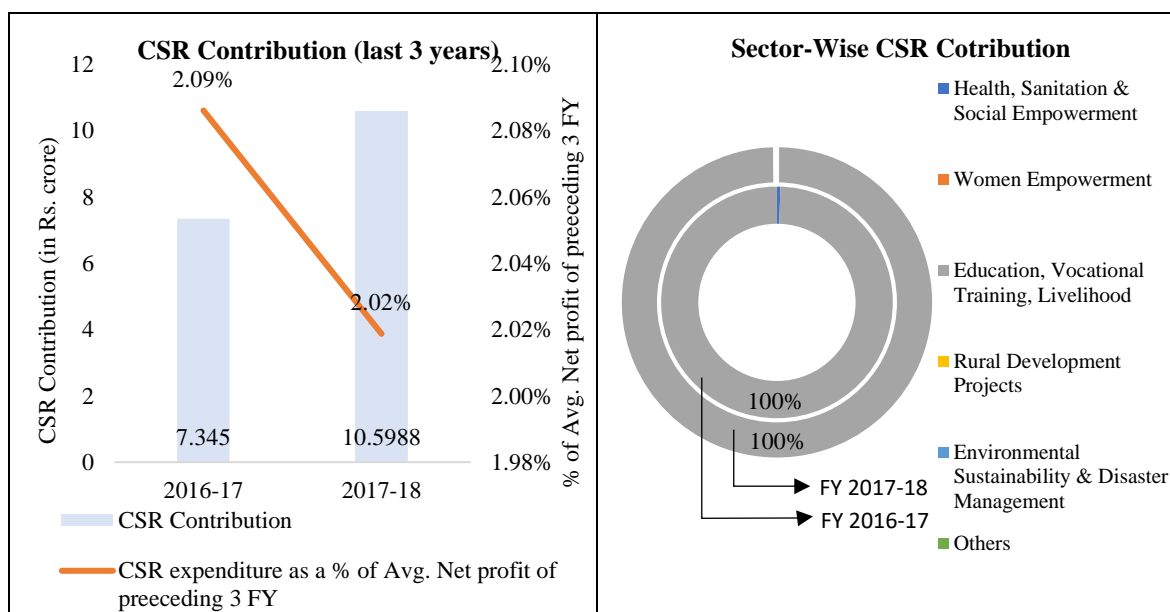
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “*its Environment Policy which is a guidance document for its Employees, Business Partners/ Associates and other relevant stakeholders to encourage them to adopt more environment friendly and safe business practices.*”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not Applicable to the Company.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, and also collaborate with Expert Partners and NGOs for some of our initiatives. The Company dedicated in-house team monitors the number of beneficiaries impacted by the Company’s CSR initiatives and the same is presented to the CSR Committee periodically.



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

- A total of 15 ongoing consumer complaints were received as on 31st March, 2018.
- A Customer Satisfaction Survey is carried out by the Company. The Company has stated that “*Our store personnel interact with customers frequently to understand their experience and take their feedback on our services. This helps us to improve our service quality and enhance customer satisfaction. We also encourage our customers to share their valuable feedback with us and have made available several channels which they can use to reach us. Some of those are: Customer Care Desk at each store Feedback / Complaints Register at stores etc.*”

Substantial change from FY 2016-17

The Company has published BR Report for FY 17-18 for the first time after its listing on 21st March, 2017 on Stock Exchanges.

Axis Bank Ltd.

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines and for the first-time alignment with the Integrated Reporting guidelines. ([weblink](#)) **The Sustainability Report published for the year 2017-18 has been independently assured by DNV-GL.**

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note 1							Note 1	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Note 2							Note 2	
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Note 3							Note 3	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Note 4							Note 4	
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 5							Note 5	

Note 1 - The policies are developed and aligned to applicable compliance requirements, RBI norms and guidelines, requirements of listing agreement with stock exchanges, or the Bank's internal requirements and best practices.

Note 2 - The policies are approved by the Board of Directors or Committee of the Board of Directors or senior management of the Bank

Note 3 - The following policies are available on the Bank's website www.axisbank.com and the remaining policies being internal documents are only available to the employees through the Bank's intranet.

1. Code of Bank's Commitment to Customers: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
2. Code of Bank's Commitment to Medium and Small Enterprises (MSE): <https://www.axisbank.com/webforms/code-of-commitment.aspx>
3. Customer Compensation Policy of the Bank: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
4. Banker's Fair Practice Code: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
5. Grievance Redressal Policy
6. Code of Conduct and Conflict of Interest Norms in respect of Board of Directors
7. Code of Conduct & Ethics for Senior Management
8. Policy on Corporate Social Responsibility
9. Citizen's Charter – A Charter for Customer Service: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
10. Customer Rights Policy: <https://www.axisbank.com/webforms/code-of-commitment.aspx>

11. Code of Conduct for Direct Selling Agents: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
12. Policy on Related Party Transactions
13. Comprehensive Deposit Policy: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
14. Policy on Collection of Dues and Repossession of Securities: <https://www.axisbank.com/webforms/code-of-commitment.aspx>
15. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)
16. Policy for lending to Micro Small & Medium Enterprises (MSMEs): <https://www.axisbank.com/webforms/code-of-commitment.aspx>
17. Privacy Policy

Note 4 - Yes. Policies have been communicated to all key internal stakeholders of the Bank. The communication on policies covering all internal and external stakeholders is an on-going process.

Note 5 - The Head of Departments are responsible for effective implementation of the policies. The Compliance Department monitors the adherence to implementation of policies mandated by RBI.

Sustainability Report of FY 2017-18 : https://www.axisbank.com/docs/default-source/default-document-library/axis-bank-sr-2018-final-report_v1-0.pdf?sfvrsn=e115b455_2

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Bank along with its subsidiaries works closely with collective trade and industry associations, while there is no specific policy outlined for this principle.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Bank has 11 subsidiaries as on 31st March, 2018 and all subsidiaries participate in the BR initiatives. The Bank has also stated that none of the other entities like (e.g. suppliers, distributors) participate in BR initiatives.

Governance Related to BRR

The performance on aspects of BR is reviewed by the Bank's Management Committee, headed by its MD & CEO on periodical basis, and at least once a year, is put up to the Board. The Bank's sustainability performance is also reviewed internally by ED – Corporate Centre, along with Head – Corporate Affairs, periodically.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank has stated that “*The Bank has put in place a Code of Conduct and Ethics which is applicable to all its employees. The Code covers aspects related, but not limited, to ethics, accountability, conflict of interest, bribery and corruption. The Bank has adopted Indian Banks' Association's 'Model Code of Conduct for Direct Selling Agents' and is applicable to all persons involved in marketing and distribution of any loan or other financial product of the Bank. Similar to the Bank, all subsidiaries have set their individual Codes of Conduct for their employees. The Bank has separate Codes and Policies for its vendors that cover key aspects related to ethics, bribery, corruption, and sustainable best practices.*”.
- The Bank received 1043(included 1028 complaints for non-receipt of dividend) all complaint resolved during the year. Further the Bank received 4,10,608 complaints (including 42,184 pending complaints from FY 2016-17) from Customers out of which 3,83,508 were resolved. In addition to this the Bank received 1,391 Consumer cases (including 1,391 pending cases from FY 2016-17) out of which 701 cases were pending.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Bank has stated that “*Considering the nature of banking products which is service-oriented and not material resource-intensive, sustainable sourcing for the Bank’s products is not a material issue for it. However, as a responsible corporate citizen, the Bank endeavours to reduce the environmental impact of its operations. As paper is one of the key materials that the Bank uses, it has made conscious efforts to procure wheat-straw based paper which is environment friendly compared to conventional wood-based paper. During the year, the Bank procured 543 tonnes of wheat-straw based paper, which is 46% of the total office paper procurement.*”
- The Bank has also stated that “*Towards grid electricity consumption, the Bank has in place 5.05 MW of in-house solar power capacity that reduces its dependence on grid electricity, which, in India, remains primarily thermal energy based.*”
- The Bank has stated that “*The nature of banking products is service oriented and not material resource intensive, and hence recycling of products is not applicable for the Bank’s products. The Bank has a recycling program under ‘Green Banking’ initiative to recycle dry waste collected in offices and branches into note pads, note books and envelopes. Since its inception in August 2011, the program resulted in recycling of 314 tonnes of dry waste into 42510 items viz. notebooks, notepads, envelopes and bookmarks.*”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bank has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Bank has disclosed under Section E of the BR Report under Principle 3 that, the Bank does not have an employee union. Although, the Bank has stated that “*The Bank respects the right of ‘Freedom of Association’. The Bank ensures that all employee grievances are received and addressed through various channels such as H-Response (virtual helpdesk to handle employee queries) or the whistle-blower portal.*”
- Approx. 22.52% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	47	3	32	6	32	4
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Bank has disclosed that 45,269 permanent male and 13,475 permanent female employees were given skill upgradation training.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has identified its stakeholders through formal and informal channels of communication.
- The Bank engages with vulnerable and marginalised sections of society through its products & services, as well as community engagement initiatives.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Through the Rural and Inclusive banking initiatives and specialized products, the Bank focuses on expanding financial literacy and banking for the Bottom of the Pyramid (BOP) to further the national agenda of financial inclusion. As on 31 March 2018, the Bank had a network of 3,703 branches/banking outlets as compared to 3,304 last year. Around 47% of the Bank's branches are in rural and semi-urban areas and 78% of the Bank's rural branches are in unbanked locations.

In FY 2017-18, ABF initiated work with 3,50,316 rural households. During the reporting period, ABF achieved its stated mission of creating 1 million livelihoods well before the stated target completion date of 31 December 2017, of which 63% are women. The Foundation has now committed itself to supporting 2 million households by 2025. The details of special initiatives disclosed in BR Report.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank has stated that *“The Bank has put in place a Policy on Human Rights applicable to all employees to reaffirm its commitment to human rights. In addition, the Bank ensures its contracts and agreements with external stakeholders such as vendors and CSR partners include pertinent clauses on human rights. The Bank has in place a ‘Supplier Code of Conduct’ which includes pertinent clauses on human rights, among other requirements.”*

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

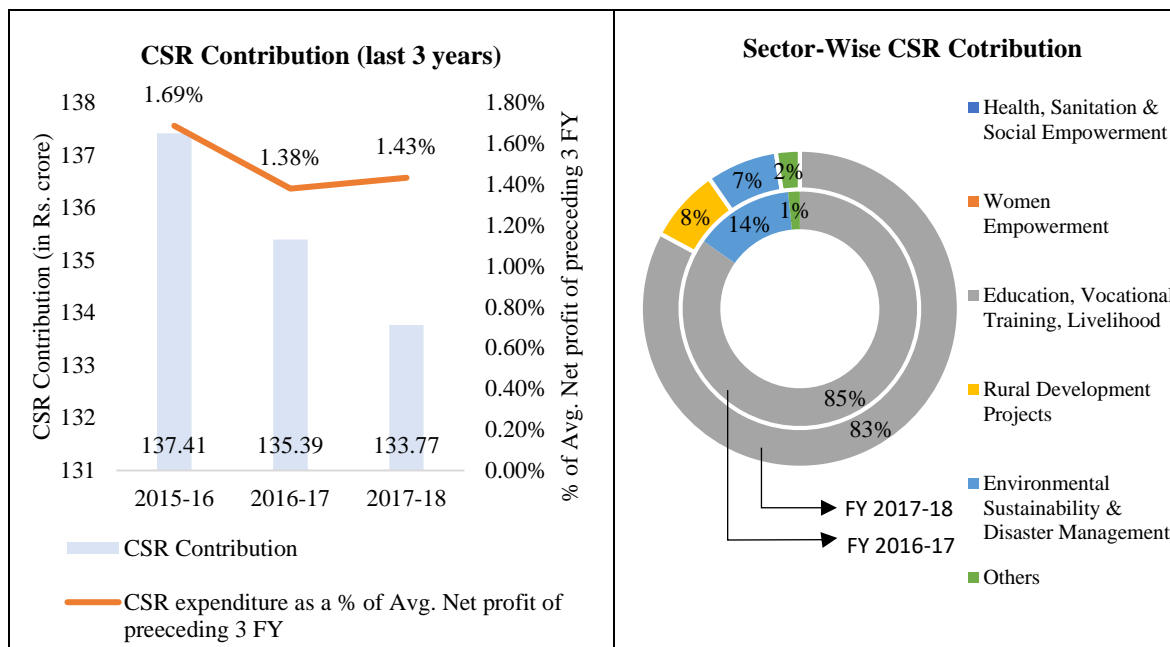
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that *“The Bank ensures that its contracts and agreements with key external stakeholders including vendors and CSR implementation partners include pertinent clauses on environment. The Bank has in place a ‘Sustainable Lending Policy & Procedures’ to include environment and social risk considerations into its corporate lending decisions. The Bank’s CSR focus, as designed in its CSR Policy, also includes environmental sustainability, wherein the Bank, directly or through its implementation partners, works on various positive impact initiatives.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Bank's CSR committee consists of 3 members out of which 1 Independent member including the Chairman. The Bank mainly undertakes CSR Activities through directly or through Axis Bank

Foundation or through any other Trust or agencies and entities as it deems suitable. The Bank conducts impact assessment of its program by engaging reputed independent agencies / institutions.



The Company has failed to spend the full prescribed amount on its CSR activities for FY 2017-18 and has state the reason as follows:

“The Bank also identified new opportunities during the year and made incremental investments in the programs relating to poverty alleviation, rural development through promoting financial literacy and enabling financial inclusion, environmental sustainability, education and skill development. The Bank continued to bolster its financial literacy and inclusion activities to mainstream the unbanked and the under-banked people, especially in rural India while helping customers to gradually transition to a digital way of undertaking transactions.

During the year 2017-18, the Bank improved its CSR spend ratio to 1.43% of its average net profits of the last three financial years, as against 1.38% last year, with contribution of `133.77 crore on various CSR activities. The Bank was not able to spend the entire prescribed CSR amount of 2% of its average net profits of the last three financials years as few of the planned CSR activities had less than estimated utilization of funds.

The proposed spend for an open access solar plant, as part of our environmental sustainability initiatives, could not be completed during the year on account of pending clearances. We expect contributions towards this initiative to commence in FY 2018-19 as soon as the necessary clearances are obtained.

The Bank remains committed to continually explore new opportunities which align to its CSR philosophy and create maximum impact and incrementally invest in CSR activities to spend the prescribed CSR amount in the subsequent years.”

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

- o A total 4,10,608 complaints (including 42,184 pending complaints from FY 2016-17) received from Customers out of which 3,83,508 were resolved. In addition to this the Bank received 1,391

Consumer cases (including 1,391 pending cases from FY 2016-17) out of which 701 cases were pending.

- The Bank conducts its annual Customer Satisfaction Survey (CSAT) to assess the perception and expectations of customers on various aspects of its products, services and brand.

Substantial change from FY 16-17

	FY 2016-17	FY 2017-18
Section C, Q. 2	The Bank has disclosed that 6 out of 9 Subsidiaries participate in the BR initiatives of the parent Bank.	The Bank has 11 subsidiaries as on 31 st March, 2018 and all subsidiaries participate in the BR initiatives.
Section D (Q.3)	The Bank has stated that BR performance reviewed by the Bank's Management Committee, headed by its MD & CEO on periodical basis, and at least once a year put up to the Board.	The performance on aspects of BR is reviewed by the Bank's Management Committee, headed by its MD & CEO on periodical basis, and at least once a year, is put up to the Board. The Bank's sustainability performance is also reviewed internally by ED – Corporate Centre, along with Head – Corporate Affairs, periodically.

Bajaj Auto Ltd (2017-18)

The Company has disclosed the Business Responsibility Report for FY 17-18 however, the report format is not as prescribed by SEBI guidelines.

Principle wise BR Policy/ Policies

The Company has not disclosed the answer to Section D: Question 2 in the tabular format as prescribed in SEBI guidelines of BRR.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that none of the Subsidiaries and entities participate in the BR initiatives of the parent Company.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has disclosed that *“A separate COC specifically applicable to the Company’s Directors and Senior Management is also in place which states that ‘Directors and Senior Managers shall observe the highest standards of ethical conduct and integrity and shall work to the best of their ability and judgment’. All Directors and Senior Management personnel have affirmed compliance with the COC. A declaration to this effect, signed by the Managing Director, is given in the Annual Report.”*
- The Company is also signatory to the Model Code of Conduct developed by Confederation of Indian Industry (CII). In addition to this, BAL is an industry partner of the World Economic Forum’s initiative, ‘Partnership Against Corruption Initiative’ (PACI), and has a policy of a zero-tolerance towards bribery.
- The Company has disclosed that no complaints were received under ‘Grievance Redressal Policy’ and ‘Whistle Blower Policy’.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The ‘Green Purchasing Policy’ of BAL contains requirements related to water, energy and natural resource conservation that need to be met by the entire supply chain. In line with this Policy, all key vendors are being certified for ISO 14001 and OHSAS 18001 management systems.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“In a preliminary study of BAL products, it was observed that their recyclability and recoverability rates were 87% and 94% respectively.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has stated that it has a recognised employee association at each of the four plants. and approximately 47.98% of employees of the same.
- Approx. 4.43% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not provided the exact percentage of permanent employees who were given safety and skill upgradation training in the last year. However, the Company has disclosed that *“In the year 2017-18, more than 6,000 employees were trained through 306 training programmes, spanning 10,306 man-days. Over and above this, employees were given training through TPM pillars, which included Safety, Health and Environment related training spanning 2,752 man-days.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has not disclosed if it has mapped its internal and external stakeholders.
- The Company has not disclosed that identified the disadvantaged, vulnerable and marginalized stakeholders however, the company has disclosed that *“During the year 2017-18, BAL recruited 1,799 new employees of which 168 (9.34%) belong to scheduled castes and scheduled tribes.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** To formalise its commitment, it launched the ‘Code of Conduct for Affirmative Action’ in 2006, which ensures that preference is given to people from socially disadvantaged sections of the society, provided merit and other business considerations are equal.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** BAL strives to uphold the human rights of all its internal and external stakeholders and ensures compliance with all applicable laws.

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

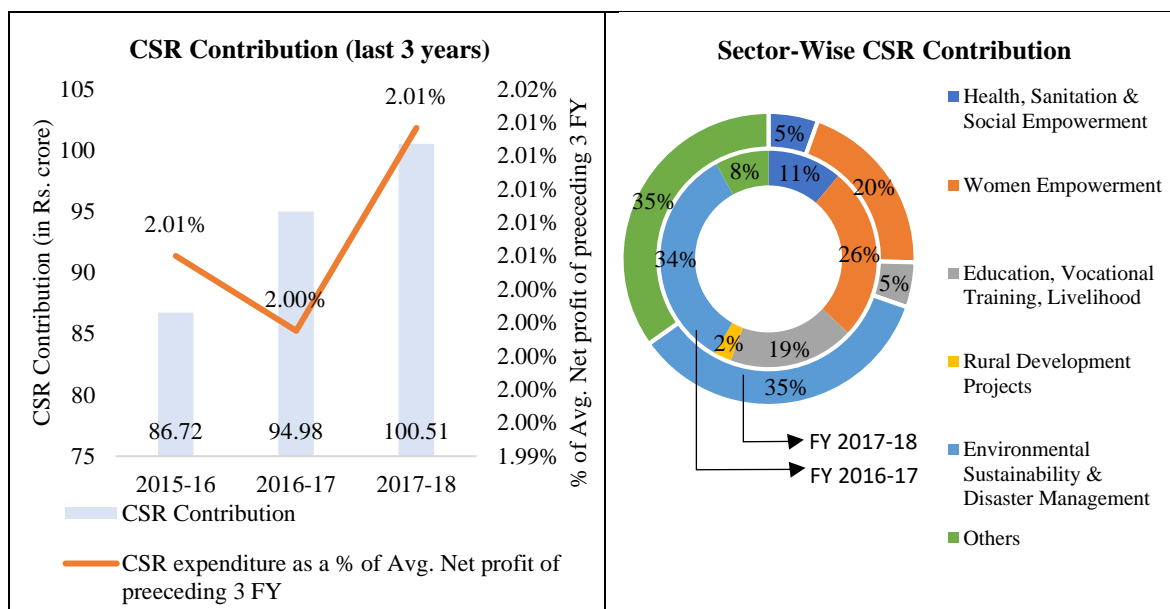
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company not disclosed whether the policy extends to the group/ Joint Ventures/ Contractors/ NGOs/ Others.

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that all plants operate as per the ‘Consent-to-Operate’ provided by the respective State Pollution Control Board (SPCB) and are within permissible limits with regards to the emissions and waste generated

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which one Independent member. Chairman of the committee is Promote Executive Director. The Company mainly undertakes CSR Activities through its in-house team (Bajaj Group).



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

- The Company stated that During the year 2017-18, 118 cases filed at the consumer forum, while 381 cases are pending as on 31st March 2018.
- Yes, the Company conducts regular surveys with the dealers, brokers, retailers and roadside mechanics.

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Bajaj Finance Ltd (2017-18)

The Company has not disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has 3 subsidiary companies and none of them participate in the BR Initiatives of the parent Company.

Governance Related to BRR

The business responsibility performance of the Company is assessed annually by Board of Directors.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that it considers ethics, transparency and accountability to be its most important operational priorities, and it is ingrained into its practices across the organisation. The processes and systems designed are meant to practice these core values of ethics, transparency and accountability. Its revised 'Code of Conduct' (CoC) in FY2018 to systematically strengthen its core values amongst its business practices and employees. The Code of Conduct is communicated to its employees through various mediums to enable understanding, adherence and implementation. The code of conduct is applicable only to the Company and not extend to its group/suppliers.
- The Company stated that no stakeholder complaint linked to Code of Conduct adherence was received in the reporting year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that, being financial service company, it neither has a sizable consumption of any raw material nor produces any physical goods. Its activities are limited to providing financial solutions to serve the needs of the people of this country.
- The Company has not disclosed the percentage of recycling of products/ waste if any.

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment, as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, BFL employees are not part of any employee association.
- Approx. 3.79% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Although, the Company has not disclosed the percentage of the permanent employees were given safety and skill upgradation training in the last year, however, the Company has stated that *“The Learning and Development (L&D) classroom focuses on leadership competency development based on the ‘Our Way’ philosophy. BFL trained approximately 11,000 people in FY2018, which included a total of over 40,000 days of offline training and approximately 428,000 learning hours, covering more than 80% of the workforce.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has not disclosed whether it mapped with internal and external stakeholders.
- The Company stated that *“its practices affirmative action and ensures there is no discrimination of any type against socially disadvantaged sections in the work place.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company, through its unique EMI financing for consumer electronics, two-and-three wheelers financing, unsecured personal and business loans, and rural lending vertical, enables the economically weaker sections of society to meet their livelihood needs.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“its dedicated to upholding the human rights of all its internal and external stakeholders and ensures compliance with all applicable laws pertaining to human rights. The Company did not receive any complaint relating to violation of human rights in FY2018.”*

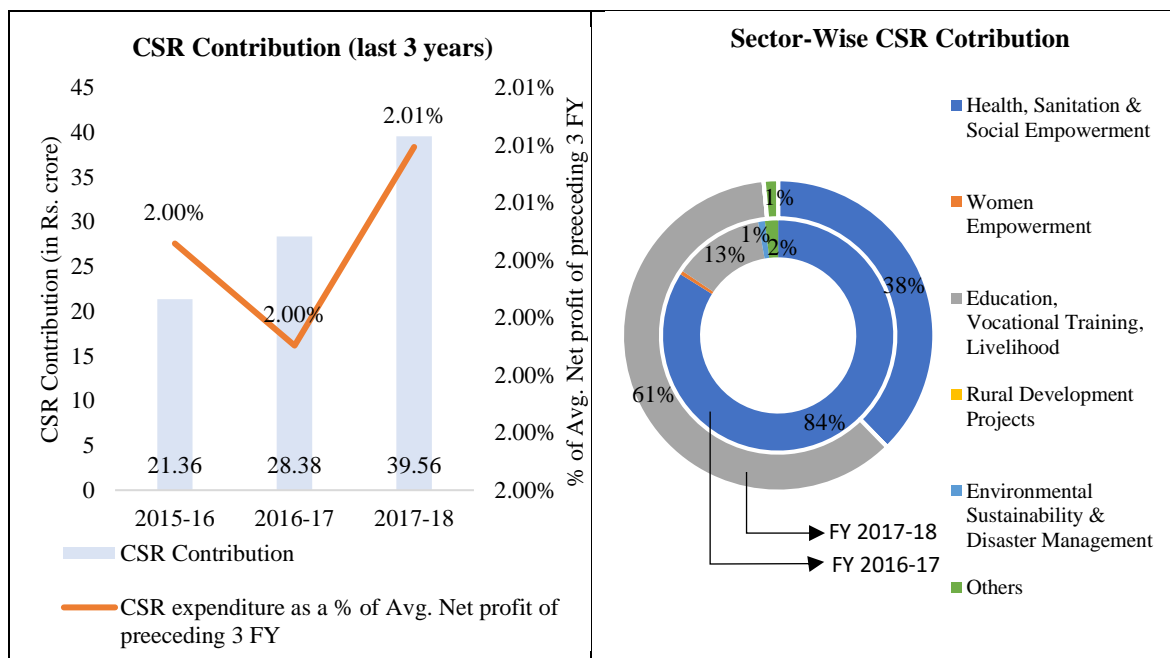
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not disclosed.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that *“Code of Conduct includes respecting the environment, eliminating waste and conserving resources as working norms. As a financial services company, BFL does not have a natural resources intensive business, and its environmental impact is largely limited to the operations of its office.”*

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The CSR projects were implemented directly or through NGOs and other welfare agencies.



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

- o The Company has stated that, a total of 12,425 complaints were received during the FY-2018 of which 225 complaints (1.81% complaints) were pending for resolution as at the end of financial year. There were 960 consumer cases pending as on 31st March 2018.
- o Consumer survey is conducted through an independent third party and its outcome is given due importance in the Company’s future planning process.

Bajaj Finserv Ltd.

The Company has not disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has not disclosed principle wise BR policies table as prescribed in SEBI guidelines.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 6 Subsidiaries and none of the Subsidiaries or other entity (Suppliers, distributors) participate in the BR initiative of the Parent Company.

Governance Related to BRR

The Company has stated that the Business responsibility performance of the Company is assessed annually by the board of Directors.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“As the holding company of the financial services businesses under the Bajaj Group, the values of ethics, transparency and accountability are ingrained into its daily operations. BFS regularly engages with the management teams of its subsidiaries to reinforce the Group values.”*
- No stakeholders’ complaints linked to the Code of Conduct adherence were received in the reporting year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although the Company has not disclosed percentage however the Company has stated that, *“BFS also has direct investment in 138 windmills with an aggregate installed capacity of 65.2 MW. This enables the Company to promote green energy production and sustainable growth, thereby mitigating the ill-effects associated with usage of fossil fuels and contributing towards the fight against climate change.”*

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed whether it has constituted an Internal Complaints Committee as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to address concerns of sexual harassment.
- The Company did not have any recognised employee association.
- Approx. 16% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed whether it provided any skill training or safety training to the permanent employees during the year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that, *“As an equal opportunity employer, BFS ensures that remuneration practices of the Company are based on merit, without regard to the person’s ethnic background or gender. These are updated on a periodic basis, in line with the market benchmarks. The Company practices affirmative action and ensures there is no discrimination of any type against socially disadvantaged sections in the work place.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that it ensures strict compliance with all applicable laws of the land that pertain to human rights and is dedicated to safeguarding the human rights of all its employees. The Company did not receive any complaint relating to violation of human rights in 2017-18.

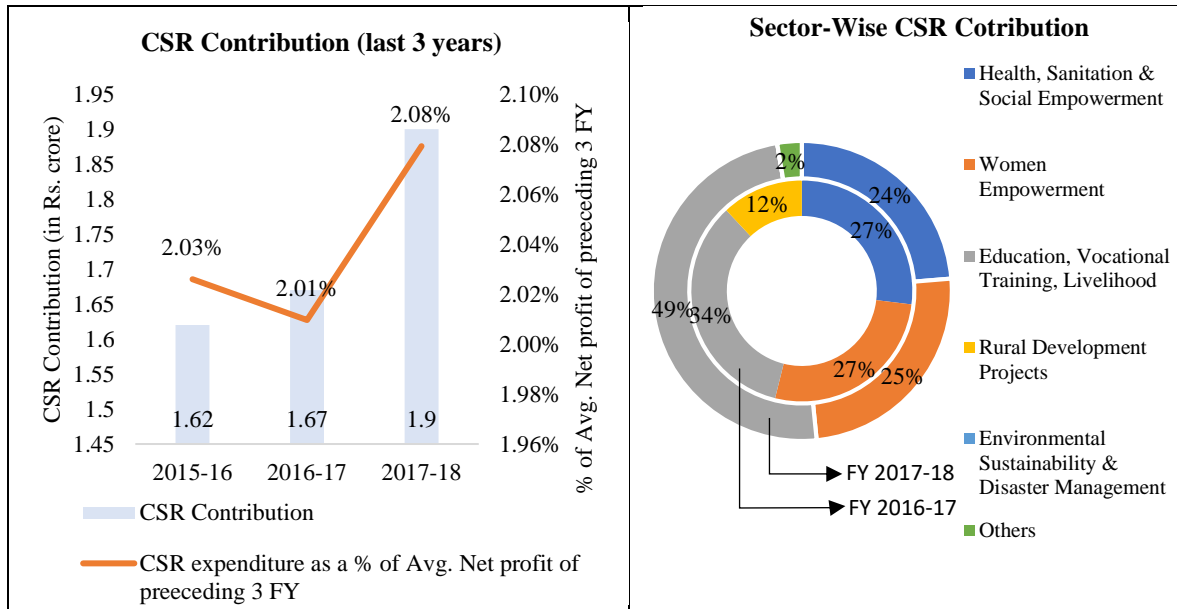
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that it has no direct business operations and a small number of employees and therefore does not have any significant direct environmental impact.
- Further, the wind energy produced by the Company considerably exceeds its electricity consumption. Thus, the Company makes a positive contribution towards sustainability and environment conservation.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is Independent member. Chairman of the committee is not an Independent member. The Company mainly undertakes CSR Activities directly or through NGO’s and other welfare agencies. The Company has stated in CSR policy that external agency conducts impact assessment of its CSR initiatives, however, not disclosed same in the Business Responsibility Report.



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

- The Company has stated that, “As a holding company, BFS does not have any direct customers or consumers under the scope of this BRR.”

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Bajaj Holdings & Investments Ltd (2017-18)

The Company has disclosed the Business Responsibility Report for FY 2017-18 in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

The Company has not disclosed the answer to Section D: Question 2 in the tabular format as prescribed in SEBI guidelines of BRR.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has Only one Subsidiary. The Company has disclosed that none of the subsidiary or other entities participates in BR initiatives of the Company.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“the Company has a Code of Conduct for its Directors and Senior Management. The Company has also stated that the Company’s Whistle Blower Policy provides a mechanism for individuals to report violations of the Code of Conduct, ethics policy, suspected or actual fraud, unethical behaviour, etc. without the fear of victimisation.”*
- The Company has disclosed in BR report that *“no stakeholder complaints with respect to the Company’s Code of Conduct and Whistle Blower Policy were received in the reporting year”*. However, the Company has stated in Annual Report 2017-18 Pg 54 that the Company received 5 investors complaints and all complaints were resolved during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that *“BHIL is a holding and investment company and is not involved in any manufacturing activity or services under the purview of BRR.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or not. However, the Company has disclosed that the Company has adopted a ‘Policy on Prevention of Sexual Harassment at workplace’ which ensures a safe work environment for its female employees.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 30% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Not Disclosed	
Discriminatory employment	Nil	Nil	Nil	Nil		

- The Company has not disclosed the % of the permanent employees were given safety and skill upgradation. However, the Company has stated that “*BHIL invests in the growth and development of all its employees through relevant trainings and engages with them on a regular basis.*”

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has not disclosed whether it has mapped its internal and external stakeholders or not.
- The Company has not disclosed about the disadvantaged, vulnerable and marginalized stakeholders. The Company has stated that “*The Company ensures there is no discrimination of any type against socially disadvantaged sections in the work place.*”
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has not disclosed about the special initiatives, if any.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has not disclosed that whether the human rights policy extends to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others or not. However, the Company has stated that “*BHIL ensures strict compliance with all applicable laws of the land pertaining to human rights and is dedicated to safeguarding the human rights of all its employees.*”

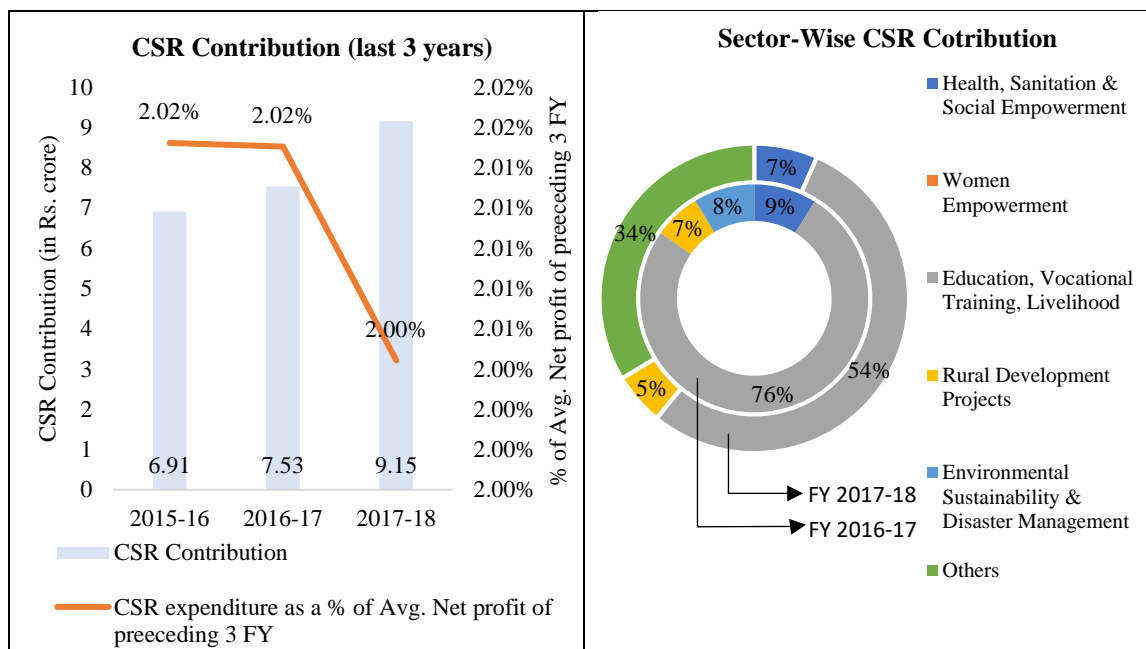
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not disclosed that whether the policy extends to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others or not. However, the Company has stated that “*BHIL is dedicated to manage its business in a manner that preserves the natural environment. As a holding company with no direct business operations and a small number of employees, BHIL does not have any significant direct environmental impact.*”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed that whether Emissions/ Waste generated by the Company are within the permissible limits given by CPCB/SPCB or not.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one Independent member. Chairman of the committee is Non-Executive Director. The Company mainly undertakes CSR Activities through its in-house team, NGOs, and other welfare agencies.



* “Others” section in above Graph “Sector-Wise CSR Contribution” represents consolidated contributions (Eradicating hunger, Poverty and Malnutrition, Education, Environmental Sustainability) in either of the related sectors listed above.

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

- The Company has stated that “Being a holding and investment company, BHIL does not have any direct customers or consumers under the scope of this BRR.”

Bank of Baroda (2017-18)

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle	*	^							
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3**	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online									#
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* Under Principle 1, the Bank follows primarily the CVC guidelines as contained in the Vigilance Manual issued by the Central Vigilance Commission. Link: <http://cvc.nic.in/man04.pdf> not working. However, SES has Found <http://cvc.nic.in/?q=guidelines/banking-sector-insurance-companies>

**S. No. 3: All the policies being followed by the Bank are in conformity with the guidelines issued by various regulators and statutory bodies such as Reserve Bank of India, Ministry of Finance, SEBI, Constitution of India, legal Acts etc. Hence, they confirm to national standards.

^ Various activities under Principle 2 are governed by the Bank's Domestic Loan Policy which is meant for internal use only and, therefore, cannot be viewed online.

Link : <https://www.bankofbaroda.com/writereaddata/images/pdf/grp-2017-approved-by-board-eng.pdf>

Reasons disclosed by the Bank for not formulating policies adhering to principle 7 is as follows:

P7: While there is no written policy for Principle 7, the Bank being one of the larger banks in the country is associated with policymakers and regulators for the advancement of public good, especially in the areas of governance and administration, economic, especially banking sector reforms, inclusive development policies etc.

Participation of Bank, Subsidiaries and other entities in BR Initiatives:

The Bank has four Domestic and eight Foreign Subsidiaries. The Bank has disclosed that none of the subsidiaries and entities participate in the BR initiatives of the company.

Governance Related to BRR

The Bank has stated that it meets annually to assess the BR performance of the Bank.

Extracts from Principle wise performance of the Bank

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- Policy relating to ethics, bribery and Corruption which covers the Bank only. The Bank has stated that the policy does not extend to the Group/Joint Ventures/Suppliers /Contractors/ NGOs/Others.
- The Bank received 10,56,041 complaints out of which 10,42,803 were resolved satisfactorily. The Bank has also disclosed that “*Out of the total complaints received (10,56,041), as per RBI guidelines, complaints resolved on the date of the receipt (D) and on the next day (D+1) i.e. (90,498) need not be included for reporting purpose. Therefore, total complaints received during FY 2017-18 comes to 9,65,543.*”

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Bank has stated that sustainable sourcing and recycling of waste is not applicable to the Bank.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bank has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Bank has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Bank has disclosed that approximately 21.07% of Officers and 86.98% of Business Associates & Sahayaks are members of recognized employee association as per records.
- Approx. 22.65% of the permanent employees are women.

Number of Complaints received: As disclosed by the Bank in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	8	Nil	5	Nil	6	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Bank has given safety and skill upgradation training to 63.72% of permanent employees in last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its internal and external stakeholders.
- The Bank has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Bank to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Bank has taken various special initiatives to engage and extend benefits to the disadvantaged, vulnerable and marginalized stakeholders such as SC/ST Employees, Persons with Disabilities, Community Service Activities.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Bank on human rights cover only the Bank or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank's various policies protecting the Human Rights, directly or indirectly, cover only the operations of the Bank and do not extend to its subsidiaries etc.

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

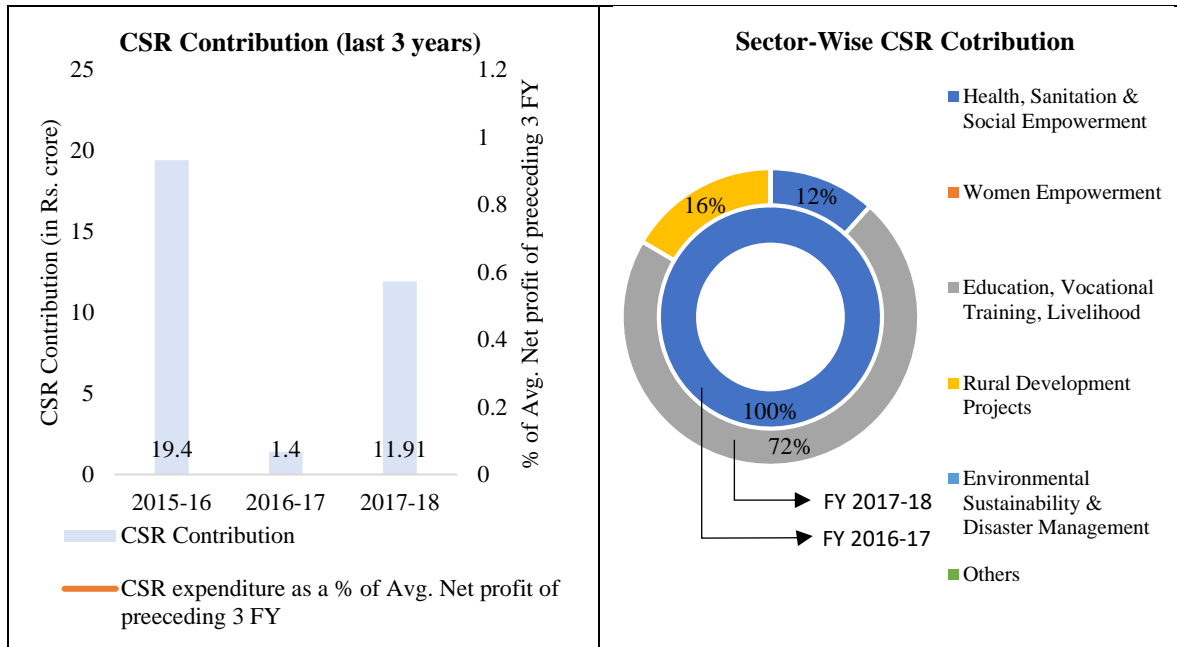
- **Does the policy pertaining to Principle 6 cover only the Bank or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Guidelines cover Bank of Baroda only.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Bank does not have a CSR committee. Although, the Bank has stated that Steering Committee of the Board oversees all activities under the Bank's Corporate Social Responsibility Policy and institutes a transparent monitoring mechanism for implementation of CSR projects or programs or activities undertaken by the Bank and social impact of the same.

Bank of Baroda is a public-sector bank. Public-Sector Bank is not a Company as per the Definition of 'Company' as stated in Companies Act, 2013, and it is not registered as a Company under the Companies Act, 2013. Therefore, it is not mandatory for the Bank to spend 2% of its net average profit of last 3 financial year on CSR expenditure. However, the Bank has voluntarily spent on CSR initiatives.



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

- A total of 10,56,041 complaints were received from customers (end-consumers) in 2018, out of which 13,540 (around 1.28%) was pending as on March 31, 2018.
- A Customer Satisfaction Survey is carried out by the Bank every year.

Bharat Electronics Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per Government of India, Department of Public Enterprises (DPE).

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	Policy formulated after extensive internal consultation, covering all functional areas								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Policy conforms to SEBI guidelines on “BR Reports” for listed entities and the Ministry of Corporate Affairs ‘National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business’								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Policy approved by the management and issued as Office Order for compliance by employees at all level across the Company.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Yes, Director (Human Resources)								
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Communicated to all internal stakeholders.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Yes. Periodical review of the working of CSR Policy, Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace, Whistle Blower policy, Code of Conduct is being carried out by the Company.								

Link- <http://www.bel-india.in/Documentviews.aspx?fileName=Business-Responsibility-Policy.pdf> under “Investors Tab” of the Company’s website.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that none of the subsidiaries and other entities participate in BR Initiatives. The Company has further stated that majority (more than 60%) of the vendors conform to key principles of Business Responsibility.

Governance Related to BRR

Though, the Company has not disclosed the frequency of the meeting. The Company has stated that Company formulated its BR Reports policy in January 2013. BR performance is reviewed in subsequent years after watching the implementation in the initial years.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the policy covers the Company. The Company has adopted Integrity Pact with all vendors/suppliers/contractors/service providers.
- The Company received 8,757 complaints out of which 8,152 were resolved and the balance 605 complaints pending

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“Environmental Policy of the Company addresses conservation of natural resources. It is being followed across the Company from design, manufacturing to disposal of the product and infrastructure developmental activities, including sourcing of transport. Substantial efforts have been made in sourcing energy efficient equipment’s, also in identifying and replacing energy inefficient equipment’s to enhance energy conservation. All the newly constructed buildings designed to be energy efficient in compliance to Green Rating for Integrated Habitat Assessment (GRIHA) criteria. More and more renewable energy systems are being implemented”*.
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company does not recycle its products, since most of the products are used in strategic / national security applications. Products are not returned to the Company once it is handed over to the customers. Waste water generated during the manufacturing is treated and totally (100%) recycled water is being used for production purposes.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 92.99% of permanent employees are members of recognized employee associations
- Approx.21.13% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	2	1	2	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Safety & skill up-gradation training in the last year:

No.	Category	% of Persons trained on Safety Aspects	% of Persons trained for skill upgradation
1	Permanent Employees	22.47	50.78
2	Permanent Women Employees	24.35	67.13

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Company has identified the following SC/ST Employees, Employees with disabilities and women employees.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders** Special Initiatives for SC/ST employees and their children, for Women employees, for Employees with disabilities. The Company has elaborated on the initiatives in more detail in the BR Report.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that Human Rights have been built into all the policies, systems and processes used in BEL. Human rights are a fundamental precept of all the Company policies, interactions and business ventures (Group / Joint) with suppliers / contractors / NGOs and others. The regard for Human Rights is thus an inalienable facet of all business processes in BEL and covers the entire spectrum of BEL's business activities.

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

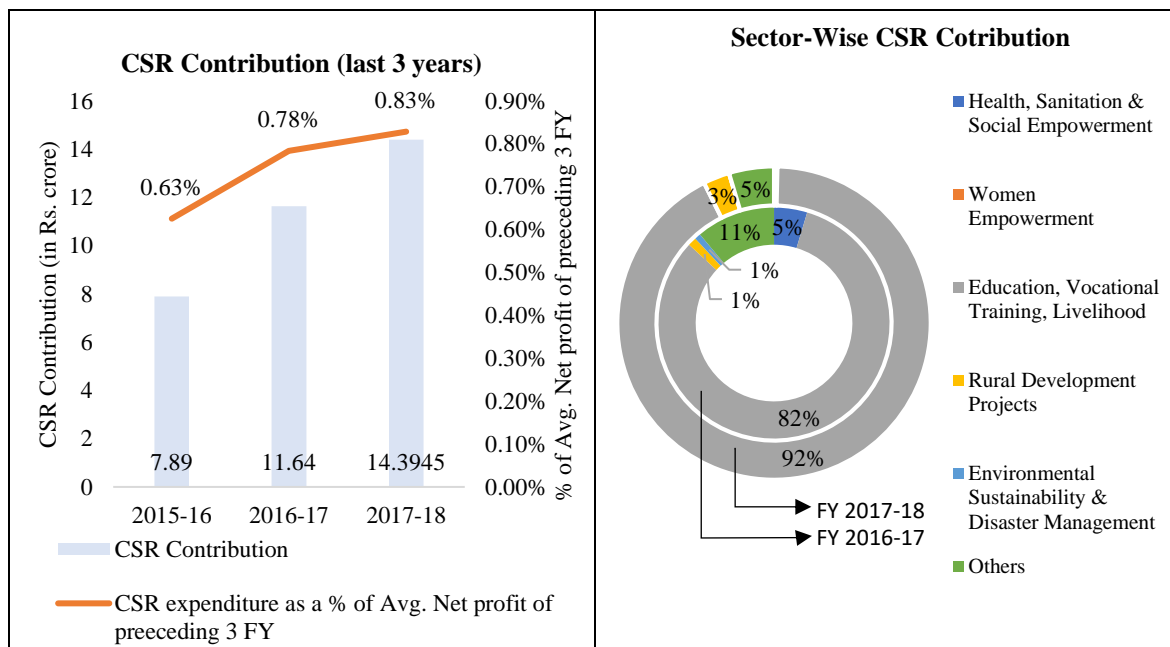
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that Policy covers the Company. The company promotes customer awareness in environmental management to minimize impact on environment during usage of the Company's Products. The Company also persuades and encourages its business partners / vendors / contractors to move towards environmental friendly processes, right from design to disposal.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes. This is being closely monitored and reported.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 6 members out of which 2 are Independent members. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house team. The Company conducts impact assessment of its CSR initiatives. The Company has stated that they adopted 3 Gram Panchayats of Yadgir Districts of Karnataka state for implementing various programmes / projects under its CSR initiatives. 'Institute

of Social & Economic change (ISEC) carried out survey on behalf of BEL and impact assessment also carried out by same institution.



Reasons disclosed by the Company for not spending the full prescribed amount on CSR initiatives is as follows:

“In order to have a long term social impact through CSR, the Company has taken up several initiatives with project duration of more than one year with milestone based payments spread across more than one fiscal year. This is also in line with DPE guidelines on CSR which mandates CPSE’s to carry out CSR programs on a project mode across more than one financial year. Such expenditure pertaining to earlier years incurred during 2017-18 amounts to ₹ 1,020.23 lakhs.”

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

- A total of 605 complaints pending as on 31st March, 2018. This amounts to 7% percent of total complaints registered.
- A Customer Satisfaction Survey is carried out by the Company every year. An independent Customer Satisfaction Survey (CSS) was done through an external agency, viz. M/s BPMBC Marketing Research (India) Pvt Ltd, Pune, to capture the Customers’ Perceptions on Quality of BEL’s Products and Services. Twenty products from 19 Units / SBUs were included in 2017-18 Customer Satisfaction Survey. Results for the same is awaited. Customer Satisfaction Index for the previous year 2016-17 was 83.8% (average).

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Bharat Forge Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle					Note 1				
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Yes, the policies are in line with international standards such as ISO 9001:2015, IATF 16949:2016, ISO 14001:2015, ISO 27001, and meet National regulatory requirements such as the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Also, guidelines as per NVGs on social, environment and economic responsibility of business have been considered for formulation of some policies.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	These policies are administered and supervised by the management of the Company through a robust internal governance structure.								
6	Indicate the link for the policy to be viewed online	Note 2		Note 2			Note 2		Note 2	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The Policies on Quality, Safety and Health and Environment are subject to internal and external audits as part of certification process and ongoing periodic assessments. Other policies are periodically evaluated for their efficacy through Internal Audit mechanism.								

Note 1 - The policy is embedded in the Company's Code of Conduct, Ethics and HR Policies

Note 2 - The Company has stated that "Policies on HR, ISO, CSR, Insider Trading, Related Party etc. are available on links such as: <http://bflapp.bharatforge.com/hronline/Pages/CodeofConduct.aspx>
<http://portal.bharatforge.com/default.aspx>
<http://www.bharatforge.com/investors/policies.html>

Although, the Company has provided the links for the policies to be viewed online, however, these links are not working. Some of the policies like CSR, Insider Trading, Related Party are available on http://bharatforge.com/investors/corporate-governance/policies?utm_medium=301&utm_source=direct&utm_campaign=/investors/policies.html. However, all the policies could not be located.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 21 direct and indirect subsidiaries as on March 31,2018. The Company has further stated that “*given the current size and scale of operations of the company, the subsidiaries as of now are not engaged in BR initiatives of the company. Also, the other entities with which the company does business are not directly included in the BR initiatives of the company.*”

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company states that “*Code of conduct of BFL provides guidelines and policies on ethics, bribery and corruption. This Code is applicable to all BFL Employees including Executive Directors within all sectors, regions, areas and functions. The reference to ‘Employee’ shall mean and include:*
 - (a) *Employees,*
 - (b) *Consultants/Advisors, Retainers, Agents, Representatives etc. to the extent applicable.”*
- During the year under review, the Company has not received any complaints in connection with ethics, bribery or corruption.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company states that the Company’s supplier selection, assessment and evaluation process includes elements of sustainability.
- As part of its endeavour of contributing towards reducing carbon footprint and ensuring sustainability across all operations, the Company focuses on various initiatives like:
 - sending 100% forging flash to steel mills,
 - 100% use of treated industrial effluent for processing
 - 30 to 40% waste heat is recovered using regenerative burners
 - resulting in reducing the fuel combustion.
 - 50% of recycled water from sewage treatment plant is used for maintenance of greenery in the Plant.
 - Implementation of rain water harvesting.
 - 100% of hazardous waste sent to authorized party.
 - Recycling of packing boxes.
 - Deployment of 3R strategy in operational area. Kaizens are taken by several departments to reduce waste.
 - Waste generated monitoring & reduction started.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 39.76% of permanent employees are members of recognized employee association.
- Approx. 1.08% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has stated that it has given safety and skill upgradation training in the last year as illustrated in the table below:

i)	Permanent Employees	85.61%
ii)	Permanent Women Employees	60%
iii)	Casual/Temporary/Contractual Employees	98.75%
iv)	Employees with Disabilities	3 Nos.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that *“the principal stakeholders of the Company are its employees, shareholders, suppliers, customers, vendors, partners, government and regulatory authorities, trade union, associates, etc. These stakeholders are mapped in a structured manner through systematic communication platforms which helps us to understand the customer needs and the improvement opportunities for the Company in all prospects.”*
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders through need assessment in the nearby communities and the villages.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“the Company has always made special efforts for the people and communities residing in the nearby vicinity of the plant locations to enable them improve their way of living. The Company is involved in diverse activities to create a positive social impact by helping the disadvantaged, vulnerable and marginalized communities. The Company’s varied activity primarily focuses on health, education, sanitation and environment protection. The Company closely works with various NGOs, trusts, charitable societies, etc. to meet its aim of contributing towards the society at large for promotion and development of rural areas, deprived people and communities.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company states that “it does not have a stand-alone policy for human rights, however, the Company’s internal policies on Code of Conduct, Ethics and CSR recognizes all the key aspects of human rights which lays down the acceptable behaviour of the employees and provides for stringent disciplinary actions in case of violation of these policies.”

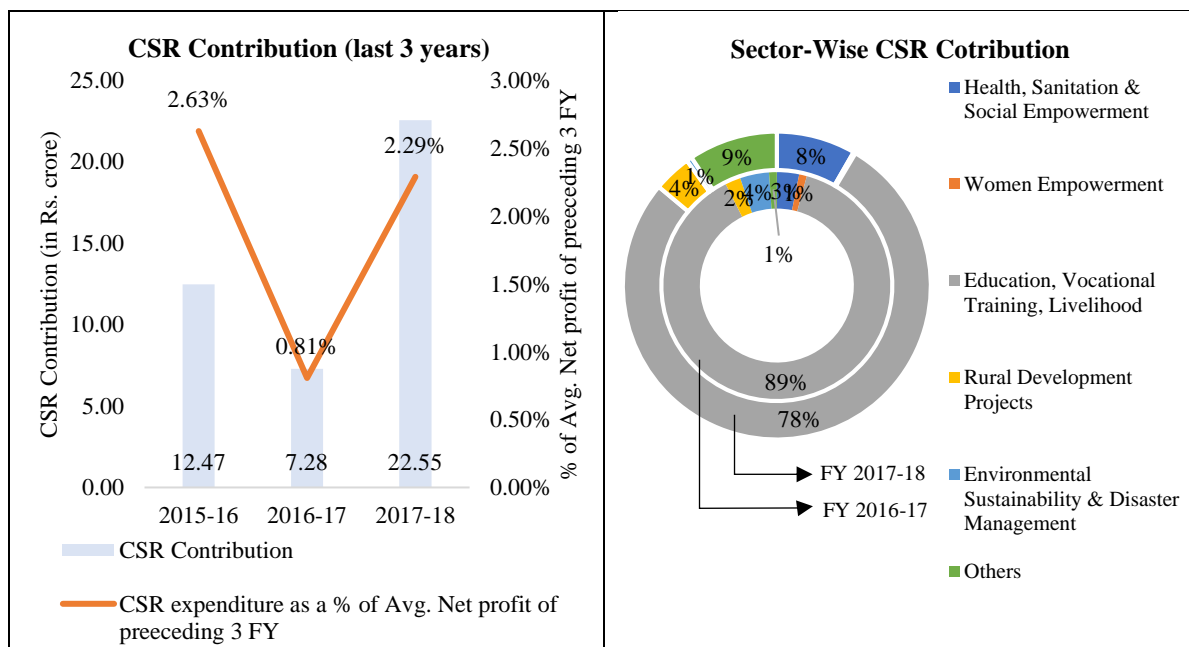
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “its Environment Policy extends to its all interested parties which includes company employees, group companies, joint ventures, suppliers, Contractors, NGOs, and others.”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, All Emissions/Waste generated are monitored daily/Monthly/Quarterly and ensured for within the permissible limit as per MPCB Consent norms.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is Independent director, who is the Chairman of the Committee. The Company mainly undertakes CSR Activities through its in-house team, Company’s trust - Akutai Kalyani Trust, Pune external NGO and government authorities. The Company conducts impact assessment of its CSR initiatives.



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

- A total of 55 complaints were received from customers (end-consumers) in 2017, out of which for 9, customer complaints actions are implemented, and effectiveness is under monitoring.
- A Customer Satisfaction Survey is carried out by the Company every year. The Company obtains the customer feedback directly or referring to customer portal on monthly basis and compile the “Voice of Customer Report” to identify areas of concern reported.

Substantial change from FY 16-17

- For the year ended 15-16 the company did not have any policy on principle 5 **Businesses should respect and promote human rights and had stated in its BRR 2016-17 that “it is planned to be done within the next year”** and in BRR 16-17 the company states that although, there is no separate policy for human rights, however, for principle 5 the policy is embedded in the Company’s Code of Conduct, Ethics and HR policies.

Bharat Petroleum Corporation Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines. ([weblink](#)) **The Sustainability Report has been independently assured by KPMG India.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Various policies at BPCL conform to different applicable statutes/ guidelines/ rules etc. issued by GOI and updated from time to time. Industry practices, national/ international standards are kept in view while formulating polices.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Different policies are approved by the Board/ Competent Authorities as per delegation of power								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1	Link2	*	Link2	*	Link2	Link2	Link3	Link4
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* Company's Internal web (Intra link)

Link 1 - Ethics, transparency & accountability https://www.bharatpetroleum.com/images/files/CodeOfConduct_BPCL.pdf

Link 2 – HSE Policy <https://www.bharatpetroleum.com/sustainability/health,-safety,-security-&-environment/security-policy.aspx>

Link 3 – CSR Policy <https://www.bharatpetroleum.com/social-responsibility/corporate-social-responsibility/policy.aspx>

Link 4 – Citizen's Charter https://www.bharatpetroleum.com/PDF/Citizen_Charter.pdf

Sustainability Report 2017-18: <https://www.bharatpetroleum.com/images/files/Sustainability%20Report%202017-2018.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 11 subsidiaries and none of the Subsidiaries or other entities (Suppliers, distributors) participate in the BR initiative of the Parent Company.

Governance Related to BRR

The Company has stated that Sustainable Development Committee meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company states that the policy formulated by Company on ethics, prevention of corruption and bribery covers its entire operations. The group companies and joint ventures are separate legal entities having their own policies and are not covered under Company's policy.
- During the FY 2017-18, 26 investor complaints have been received through SEBI, BSE, NSE, ROC and NSDL (SEBI-10, BSE-NSE- 8, ROC-1 and NSDL-2) and has received 8 complaints before the panel of independent external monitors for joint deliberation and recommendations which all were resolved satisfactorily. Further 4,22,621 customer complaints have been received out of which 4,22,290 complaints were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that some initiatives are taken by Central procurement team for reduction in emission. The has diversified its Global Crude Oil supply from various sources and efforts are made for optimisation of the crude basket and minimisation of inventories, at the same time ensuring uninterrupted supplies of crude oil to refineries. BPCL has employed Very Large Cargo Carriers (VLCCs) for crude oil transportation to save fuel.
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that it has been constantly exploring the possibility of recycling waste material generated from its operations.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a 21 Registered employee association. Further, the Company has disclosed that approximately 93% of permanent employees are members of recognized employee associations.
- Approx. 9.23% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	1	3	0	1	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil

Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil
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- The Company has disclosed regrading percentage of permanent employees that were given safety & skill up-gradation training that “*On an average 15.09 manhours of training per employee was provided. This training is inclusive of safety related training undertaken at plants.*”

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has stated that it has adopted a holistic approach for the socio-economic development of disadvantaged, marginalised and vulnerable stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** BPCL has undertaken the majority of its education projects like Computer Aided Learning Project, Libraries in School, Science / Maths learning level, Teacher Training Project, etc in Government or low-income schools which cater to students from underprivileged communities. Mumbai Refinery implemented the Project UTKARSH initiative in 25 schools for underprivileged children in and around Chembur, Mumbai. Group Medi Claim Policy was provided for fishermen at Mahul. BPCL’s BOOND (Rain Water Harvesting) project work continued in villages of Maharashtra, Tamil Nadu, Karnataka & Rajasthan etc. As part of Swacch Bharat initiatives, we are working to provide sanitation facilities to the underprivileged.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company states that its Human Rights policy only covers the operations controlled by the Company. It does not extend to its Group / Joint ventures etc.

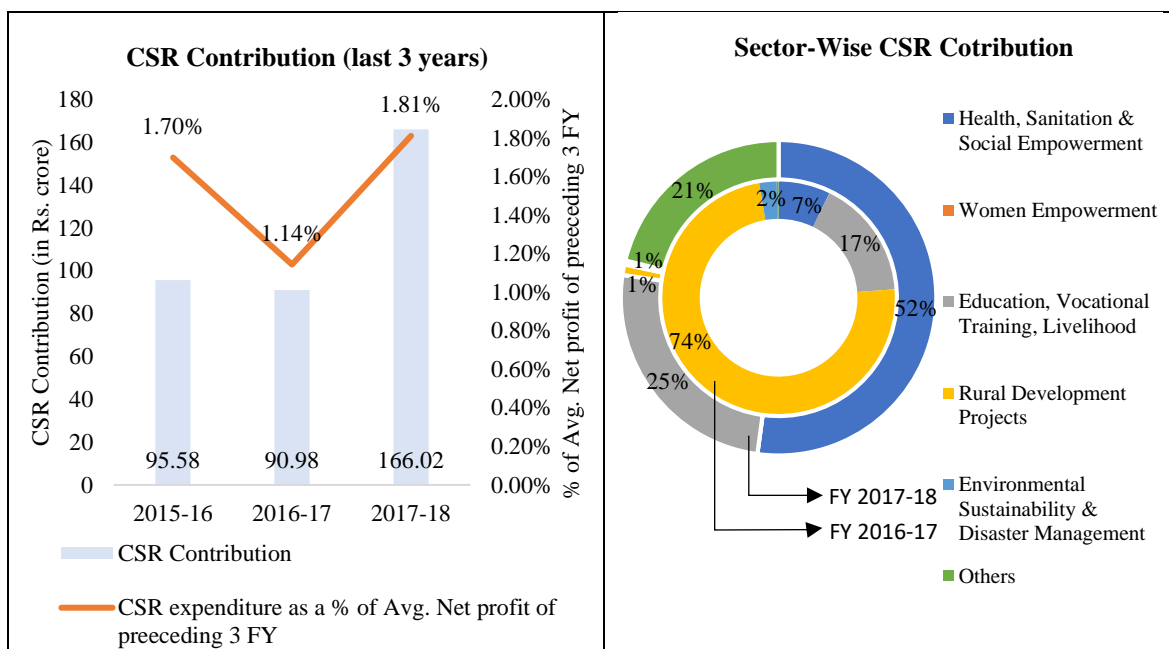
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that its Environmental Protection Policy is limited only to the operations in BPCL. The Group Companies and Joint Ventures have their own environmental policies.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that “Emission/waste generated during the course of operation are constantly monitored to ensure that they are within permissible limits prescribed by respective CPCB/SPCB.”

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 1 is an Independent member including the Chairman. The Company mainly undertakes CSR Activities through various NGO, foundations, Government structures and other professional agencies. The Company conducts impact assessment of its CSR initiatives.



The Company has failed to spend the full prescribed amount on its CSR activities for FY 2017-18 and has state the reason as follows:

“Against the above allocation of ₹ 183.33 Crores and carry forward amount of ₹ 127.23 Crores, an expenditure of ₹ 166.02 Crores was incurred. The shortfall from the stipulated prescribed spends is on account of the following reasons:

1. In the beginning of the financial year, BPCL had strategized to commit funds for major projects within identified thrust areas that were envisaged to begin in the financial year 2017-18 e.g. Swachh Iconic Place-Kalady, Project Akshar, ‘Waste to Fuel’ Project, maintenance of toilet blocks, some infrastructure projects and others. Due to delay on various fronts for commencement of the projects, the major activities of these projects are anticipated to happen in the coming year.
2. Significant shared value creation in the development sector becomes constructive and concrete through efficient implementation partners, sustained long term and continued intervention. Majority of its projects span between one to five years. A number of projects were approved in the 2nd, 3rd and 4th quarters of the financial year 2017-18 with implementation spread over more than one year. Furthermore, as per the Company’s CSR Policy, projects are executed in a project mode with payments being linked to achievement of key deliverables. The actual expenditure against approved projects rolls beyond the financial year. Hence, payments for projects committed during the reported financial year, will be released over the subsequent months.
3. CSR as a practice has grown exponentially bringing with it an increasing demand of transparency. Over the years, BPCL has been focusing on continuous improvement in social, environmental and economic performance that are both measurable and sustainable. This is also reflected in its CSR projects due to established diligence process for approving the projects. Hence, BPCL does not disburse funds on projects which are not ‘sustainable’ or not delivering ‘results’.

As a responsible corporate BPCL’s constant endeavour is to complete projects which have been initiated while ensuring the impact envisioned. In the process funds may have to be carried forward, sometimes even reallocated. The CSR funds that were unspent in the year 2017-18, despite being allocated, for the reasons mentioned above are being carried forward to the next year and will be rightfully spent/ reallocated as the

case may be. BPCL commits to continue enabling inclusive growth as a core component of sustainable development through focused and proactive social projects. BPCL strives to align its CSR initiatives with missions of national importance and sustainable development goals.”

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

- A total of 4,22,621 complaints were received from customers in FY 2017-18, out of which 4,22,290 complaints were resolved and 0.08% cases are pending.
- The Company has not undertaken any structured survey during the year 2017-18, but it does take customer feedback to identify customer satisfaction trends.

Substantial change from FY 2016 -17

There are no substantial changes identified from previous year report.

Bharti Airtel Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines. **The Sustainability Report has been independently assured by Ernst & Young LLP.**

The Company has prepared the Annual Report for FY 2017-18 as per IIRC Integrated Reporting format.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders? Note 1									
3	Does the policy conform to any national / international standards? If yes, specify (50 words). Note 1									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director? Note 2									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy? Note 2									
6	Indicate the link for the policy to be viewed online Note 3									
7	Has the policy been formally communicated to all relevant internal and external stakeholders? Note 4									
8	Does the Company have an in-house structure to implement the policy / policies? Note 5									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies? Note 6									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note 1: The policies are formulated with detailed consultation with relevant stakeholders and benchmarking across the industry. They are developed and aligned to applicable legal and regulatory requirements, and guidelines, SEBI listing regulation and its internal mandates.

Note 2: All policies are administered under the overall supervision of the Airtel Management Board (AMB) of the Company, headed by the Managing Director and Chief Executive Officer. The Audit Committee of the Board along with other Board Committees reviews implementation of policies.

Note 3: The following policies can be viewed on website www.airtel.com and www.bharti.com

Code of Conduct Policy & Code of Conduct Policy of Partners: https://www.airtel.in/partnerworld/Business_Code_of_conduct/
Corporate Social Responsibility Policy:

https://s3-ap-southeast-1.amazonaws.com/bsy/portal/images/CSR_Policy_10ACFEC1415DDCD4D533867DE5B8642D.pdf

Ombudsperson Policy and Process: http://125.21.240.248/partnerworld/Ombudsman_Policy&Process.html

Stakeholder Engagement Policy: <https://www.airtel.in/sustainability-file/embedding-sustainability/stakeholder-engagement>

Human Right Policy: <https://www.airtel.in/sustainability-file/embedding-sustainability/human-rights-policy>

Environment Health and Safety Policy and Tax Policy: <https://www.airtel.in/sustainability-file/embedding-sustainability/ehs-policy>
& <https://www.airtel.in/sustainability-file/embedding-sustainability/tax-policy>

Note 4: Except policies listed above, all other policies are meant for internal consumption of employees and are available on the Company's intranet. All policies have been periodically communicated to the relevant internal and external stakeholders.

Note 5: All policies are owned by the respective AMB member and their senior leadership teams are responsible for the effective implementation policy.

Note 6: All policies are owned by the respective AMB member and their senior leadership teams are responsible for the effective implementation policy.

Sustainability Report for FY 2017-18: <https://s3-ap-southeast>

[1.amazonaws.com/bsy/portal/images/sus_1158F5F8D240A731D28068742ADEA0FD_1533119483411.pdf](https://s3-ap-southeast-1.amazonaws.com/bsy/portal/images/sus_1158F5F8D240A731D28068742ADEA0FD_1533119483411.pdf)

Participation of Company, Subsidiaries and other entities in BR Initiatives:

Bharti Airtel Limited (hereinafter referred as Airtel) has 14 direct and 75 indirect subsidiary companies, as on March 31, 2018. The Company has disclosed that “*Nearly all subsidiary companies, either directly themselves or jointly with Airtel, participate in the BR initiatives Company*”.

Further, the Company has stated regarding participation of other entities in the BR initiatives of the Company that “*Airtel supports and encourages its partners to undertake sustainability and CSR initiatives. At present, the Airtel's infrastructure and facility management partners support its drive towards environment protection, which represents less than 30% of all its partners.*”

Governance Related to BRR

The Company has stated that “*The CSR Committee and Board assess and review the BR performance annually and give a strategic direction to Airtel's BR initiatives, as required.*”

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the “*Code of Conduct extends to employees at all levels and other individuals working with the Company, its subsidiaries, associates, suppliers, contractors, service providers, channel partners and explicitly prohibits bribes, kickbacks, improper payments and direct them to ensure ethical business conduct.*”
- During 2017-18, the Company had received 24 allegations of corruption or bribery. Investigations were completed in 22 cases. The remaining 2 cases are under various stages of investigation.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that “*The Company is strongly committed to building a responsive and sustainable supply chain. The Company carries out a due diligence process including outlining contract clauses before enlisting any supplier which includes certain sustainability and statutory aspects like environmental protection, health and safety, human rights and child labour, and ethics. In addition to this we target to empanel 100% of our suppliers through contract clauses of sustainability parameters by 2020. Regular assessments of suppliers are conducted through the vendor compliance monitoring process, on statutory and sustainability requirements like minimum compensation, benefits, labour issues etc. and the non-compliances identified are promptly remediated.*”

- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that “*The Company adheres to the Government of India’s (GoI) guidelines to recycle the waste generated from its source, due to technology up gradation or any other reason. In FY 2017-18, around 2,900 tons of e-waste generated from IT and network infrastructure was recycled through authorised recycling partners.*”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed that it does not have a recognised employee association.
- Approx. 16.70% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	9	*	5	**	8	***
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

* In FY 2017-18 nine cases regarding sexual harassment at the workplace were reported and investigated. In six of these cases, the allegations were substantiated and the accused personnel were released from their services.

** In FY 2016- 17, five cases regarding sexual harassment at the workplace have been reported and investigated. In three of these cases, the allegations were substantiated, and the accused personnel were separated from their services.

*** Eight cases related to sexual harassment were reported and investigated during the year; and all procedures were followed. Guilt was established in five cases, and of these, four were separated from their services with the organisations.

- In FY 2017-18, more than 14,000 employees attended the safety trainings including over 2,000 women employees and 31 especially abled employees.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that “*Airtel’s approach towards responsible and sustainable business practices undergoes a systematic mapping through regular engagement with its internal and external stakeholders.*”
- The Company has identified the disadvantaged, vulnerable and marginalised stakeholders through Bharti Foundation, the philanthropic arm of Bharti Enterprises.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** In 2018, The foundation’s beneficiaries include economically-challenged and disadvantaged groups, especially girls. Bharti Foundation touches all aspects of

stakeholder empowerment through multiple community initiatives in the realm of education, employment generation, sanitation along with healthcare, and disaster management. Conducting need-based training for key stakeholders forms a significant part of the foundation's empowerment and financial inclusion strategy.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“the Human Rights policy is applicable to all employees across the organization and the code of conduct for associates and the vendor compliance policy details acceptable standards and statutory obligations expected from the partners and suppliers.”*

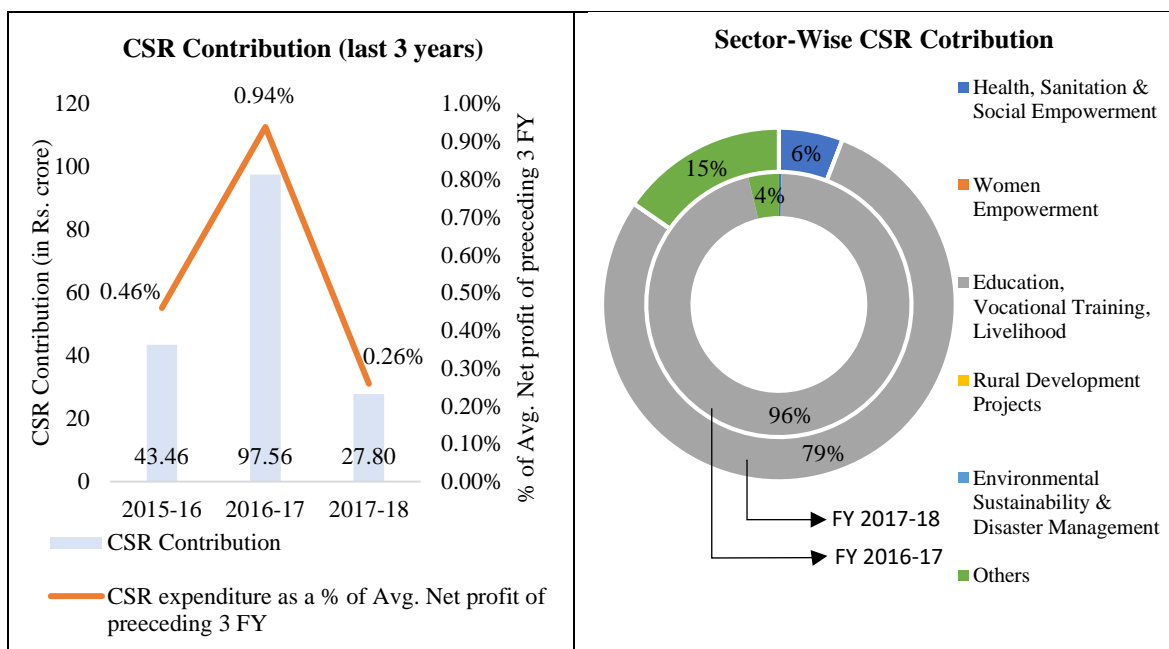
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the *“Health, Safety and Environment (HSE) policy specifies its approach towards protection of the environment; and is applicable for all employees of the Company and its subsidiaries.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emissions or wastes generated by the Company are within the permissible limits given by Central Pollution Control Board (CPCB) and State Pollution Control Boards (SPCBs).

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The CSR committee consists of 3 members out of which one Independent member. Chairman of the committee is Non-Executive Director. The Company mainly undertakes CSR Activities mainly via Bharti Foundation and through its own telecom circles offices at the regional level. The Company has not disclosed if any impact assessment of its CSR initiatives was carried out during the year.



Reasons disclosed by the Company for not spending the full prescribed amount on CSR initiatives is as follows:

The Company has not disclosed a reason for not spending the prescribed amount. However, the Company has disclosed that *“Company is committed to build its CSR capabilities on a sustainable basis and is also committed to gradually increase its CSR contribution in the coming years. The CSR spending is guided by the vision of creating long-term benefit to the society. The Company through its Board and CSR Committee is determined to beef up its efforts to meet the targeted CSR expenditure. With the strong foundation which has been established during the year along with the proposed scaling up of a number of its CSR Projects, the Company believes that it has made meaningful progress towards reaching the target in the coming financial years.”*

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

- As on March 31, 2018, 133 consumer cases and around 0.11% of the consumer complaints are at various stages of resolution. In FY 2017-18, no cases have been filed against the company before the Competition Commission of India for anti-competitive behaviour and 2 cases filed are pending resolution as on March 31, 2018. In addition to these 7 complaints were filed before ASCI in the last financial year out of which 5 have been resolved successfully.
- Company has not disclosed if customer survey or customer feedback was carried out.

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Bharti Infratel Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has prepared the Annual Report for FY 2017-18 as per IIRC Integrated Reporting format.

The Company has also stated that “the BR and Sustainability reporting is covered in the Integrated Report”.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words). *									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director? **									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy? ***									
6	Indicate the link for the policy to be viewed online #	Link1			Link2					
7	Has the policy been formally communicated to all relevant internal and external stakeholders? # #									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies? # # #									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency? # # # #									

* All the policies are formulated with detailed consultation and benchmarking across industry. The Policies also conform compliance majorly with all applicable laws.

** As per Company's practice, all the policies are approved by the concerned authority depending upon the nature of policy. The concerned authority could be either MD & CEO/Functional Head etc.

***All the policies have a Policy Owner and the respective policy owners are responsible for implementation of the Policy.

Except Code of Conduct / Ombudsperson Policy, all other policy documents are internal policies of the Company and thus, are not available on website of the Company. The Code of Conduct document can be accessed on the below link:

Link 1: <http://www.bharti-infratel.com/cps-portal/web/iSupplierTermsAndConditions.html>

Link 2: http://www.bharti-infratel.com/cps-portal/web/corporate_governance.html,

https://www.bharti-infratel.com/cps-portal/web/pdf/Corporate%20Social%20Responsibility%20Policy_07062018.pdf

Except the Ombudsperson Policy which is available on the website of the Company, all other policies being in house are uploaded on the intranet and are accessible to all employees of the Company.

Any Grievance relating to any of the policy can be escalated to the Policy owner/ MD & CEO/ Ombudsperson.

Implementation of the policies is evaluated as part of internal governance by policy owners.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that none of the Subsidiary participate in BR initiatives. The Company has not disclosed that participation of entities in BR initiatives. However, the company has stated that few initiatives have been undertaken by our supplier/s, as per common practice, however, there is nothing significant to report.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that Policy relating to ethics, bribery and corruption is duly covered under Bharti Code of Conduct. This policy extends to the entire Bharti Group and covers employees, suppliers and contractors, service providers and their employees.
- The Company has stated that *“In FY 2017-18, 27 cases of allegations of bribery/corruption were received. Post investigations, the allegations were substantiated in 5 cases in which action was initiated according to the Consequence Management Policy and in 6 cases, the investigation is in progress.”*

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company has implemented various sustainable supply chain practices and initiatives and at the same time ensures timely and cost effective deliveries for necessary resources.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company sells its products to recyclers for further usage. Also, the Company’s products are refurbished for reuse from its principle supplier/s.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 9.14% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Permanent employees were given safety and skill upgradation training in the last year

1	Permanent employees	100% New Joinees mandatory Safety Training, 97% Safety Refresher & 88% Skill Upgradation (Behavioral & Functional)
2	Permanent women employees	100% New Joinees mandatory Safety Training, 88% Safety Refresher & 73% Skill Upgradation (Behavioral & Functional)
3	Casual/ Temporary/ Contractual Employees	99% Safety Training (Refresher & New Joinee) and ongoing on the job training
4	Employees with disabilities	100% Safety Refresher & 75% Skill Upgradation (Behavioral & Functional)

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement process.
- Further, the Company through its CSR works with disadvantaged, vulnerable and marginalized stakeholders, in association with non-profit organizations like - Bharti Foundation, The Energy and Resources Institute (TERI), Shishu Sarothi, PanIIT Alumni Reach for India Foundation and Brookings Institute India Centre.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Through the Satya Bharti School Program, more than 45400 students are provided free quality education through 254 schools across 6 states of India (Haryana, Punjab, Rajasthan, West Bengal, Tamil Nadu and Uttar Pradesh). This program has also created employment opportunity for more than 1631 teachers from the surrounding communities. The education and other facilities like mid-day meals, books, uniforms, etc. are provided free.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company stated that does not have a specific policy only on human rights. However, aspects of the same have been covered in Bharti's Code of Conduct, which extends to all employees and contractors, group companies, joint ventures and suppliers.

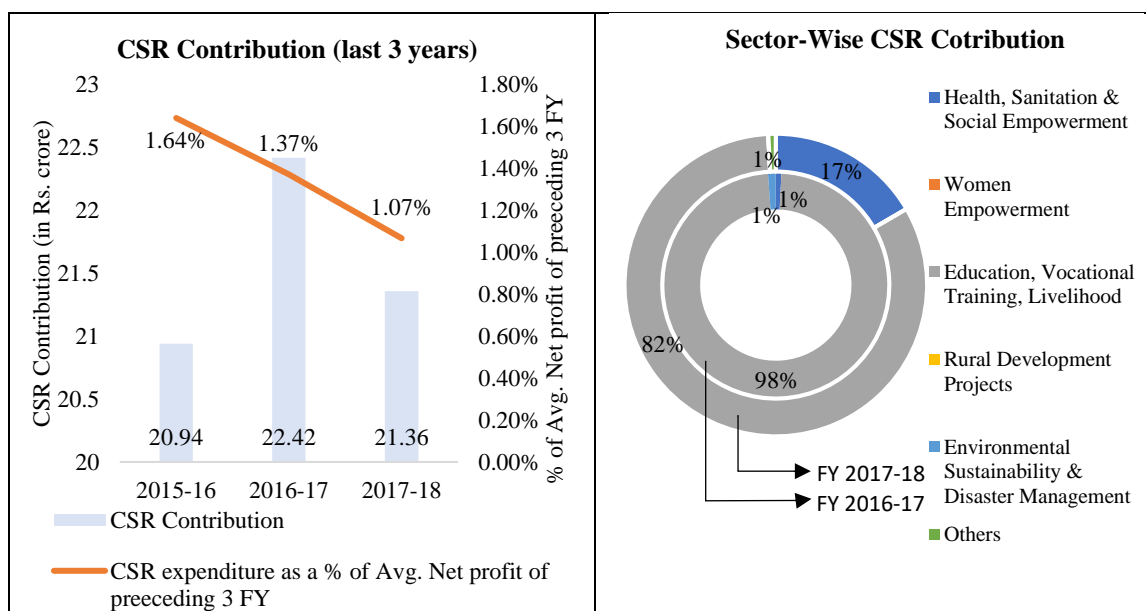
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the safety policy as of now is covering only the Company and its employees, contractors, etc.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Company has stated that in most of the cases it is well within the permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, owned foundation, external NGO, government structures. The Company also stated that Education and sanitation programmes at Bharti Infratel are being implemented through Bharti Foundation, TERI and Shishu Sarothi. Skill development and livelihood programmes are implemented in association with VSO India Trust and Oxfam India. The Company conducts impact assessment of its CSR initiatives done by Bharti foundation and also conducted a third party mid-term assessment.



The Company has failed to spent the full prescribed amount on its CSR activities for FY 2017-18 and has state the reason as follows:

“In FY17-18, the Company contributed ₹211.56 Mn under Section 135 of Companies Act, 2013; representing 1.06% of the average net profit before tax of the Company for last three financial years. The Company has also contributed ₹2.07 Mn towards other charitable causes, during FY 2017-18. The consolidated contribution of the Company towards various CSR activities during FY 2017-18 is ₹213.63 Mn.

The Company is in discussion with several non-profit organizations to explore new opportunities and also working on project/program scalability options with current partners to increase its CSR reach and expenditure to the prescribed level. To achieve this, Company has started a third party CSR project

monitoring and evaluation exercise, to ascertain the progress of each project and its impact on ground. As a socially responsible company, the Company is committed to play a larger role in India's sustainable development by embedding wider but need based economic, social and environmental objectives."

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

- The Company has not disclosed the number of customer complaints received and resolved. However, the Company has stated that *"Two consumer cases are pending one each in UPW and UPE. Percentage is less than 1% at the end of the financial year. Pertinently, none of these are maintainable as the complainants do not fall within the definition of consumers."*
- A Customer Satisfaction Survey done by engaged an external independent agency who has already carried out the Customer Satisfaction Survey across all customers for FY 2017-2018.

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Bharat Heavy Electricals Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability report for FY 17-18 was not found on the website. However, Sustainability Report for FY 2016-17 is as per GRI guidelines. ([weblink](#))

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1		Link 2	Link 3	Link 4	Link 2		Link 3	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1- http://www.bhel.com/investor_relations/pdf/business_ethics.pdf

Link2: <http://www.bhel.com/healthsafety/HSE%20POLICY.pdf>

Link3: http://www.bhel.com/CSR/pdf/BHEL_CSR_Policy_July%202017.pdf

Link4: http://www.bhel.com/index.php/global_compact

Sustainability Report for FY 2016-17: <http://www.bhel.com/healthsafety/27.06.2018-SR%202016-17.pdf>

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: “In respect of Principle 7 referring to Policy Advocacy, we have established practices based on ‘Policy advocacy in responsible manner’.”

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has one subsidiary Company - BHEL Electrical Machines Ltd. (BHEL-EML), Kasargod. It does not participate in the BR initiatives of BHEL. The Company has further disclosed that “In most of the cases, BR initiatives are carried out by BHEL only.”

Governance Related to BRR

The Company has not disclosed frequency of meetings to assess BR performance of the Company. However, the Company has stated that *“To assess & review the performance of CSR activities in BHEL, the Board Level Committee for CSR met four times during 2017-18, while BHEL Board met six times in 2017-18 for assessment & review of CSR activities in BHEL.”*

Extracts from Principle wise performance of the Company**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

- The Company has stated that ‘Code of Business Conduct & Ethics’ for all Board Members and Senior Management personnel in compliance with the requirements of DPE Guidelines on Corporate Governance for CPSEs and the SEBI’s Listing Regulations.
- The Company received 322 public grievance complaints were received from the general public under the Centralized Public Grievance Redressal and Monitoring Scheme during the year 2017-18. All the grievances were disposed of within the prescribed period of 60 days.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has not disclosed the percentage of inputs that were sourced sustainably.
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Company’s manufacturing processes generate fair amount of metal scrap. Some of the scrap subsequently undergoes recycling within the company and is reused. For example, Central Foundry Forge Plant (CFFP) in Haridwar manufactures Steel Forgings and Castings for which steel scrap is a major raw material. Reusable material is also used for packing of manufactured goods.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that all three categories of employees viz. Executives, Supervisors and Workers are represented by their Association/Trade Unions. However, since there is no check-off facility to ascertain the exact membership of Executive/Supervisory Associations and Workers’ Unions, a firm number in respect of the three classes of employees is not available.
- Approx. 5.72% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	6	Nil	4	Nil	4	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 30.48% of the permanent employees, 28.00% permanent Woman Employee, 26.72% Casual/Temporary/Contractual workers and 34.20% Employees with Disabilities were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that, “*BHEL has identified ‘Customers’, ‘Employees’, ‘Shareholders’, ‘Vendors’ and ‘Society’ as its stakeholders. Processes are in place to ensure inclusion of stakeholder expectations and concerns.*” The Company has not disclosed about mapping of its internal and external stakeholders.
- The Company has disclosed that it clearly identified the disadvantaged, vulnerable, poor, needy & marginalized stakeholders in the vicinity of the BHEL manufacturing units / regions / divisions / sites /offices and their concerns are addressed as per BHEL’s CSR Policy.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** BHEL units regularly organize vendor meets specifically for MSEs (including local suppliers) towards capacity and capability building, which also provide opportunities for open communication, mutual benefits and support. Customers are engaged through several modes like customers meets. Investor community is engaged through meetings, conferences etc and are provided with relevant information pertaining to their investment decisions.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Human Rights policy cover the Company. The Company has not disclosed whether the policy extends to Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others.

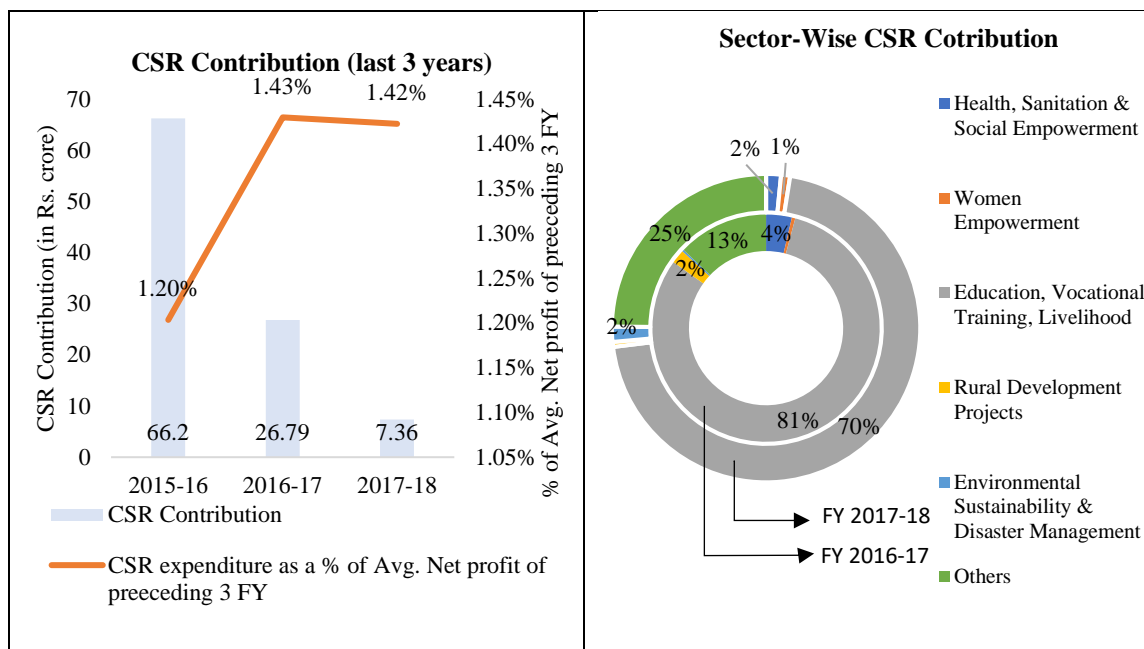
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, “*Based on the corporate HSE policy, all manufacturing units and regions have derived their HSE systems which are in line with the requirement of ISO 14001 ‘Environmental Management System’ standard. The EMS provides an excellent framework to proactively identify and manage the risks related to environment in a systematic manner.*”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed.

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, CSR Committee, NGOs, Govt Agencies etc.



Reasons disclosed by the Company for not fully spending the prescribed amount on CSR initiatives is as follows:

- o “Some projects taken up during the year are going to stretch beyond 2017-18. Fund required for completing these projects shall be met from funds already allocated to them from the CSR budget for FY 2017-18.
- o In line with CSR Policy of BHEL the unspent amount ₹ 3.04 crore will not lapse and the same will be carried forward to FY 2018-19 for expenditure on CSR projects.”

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

- o The Company has not disclosed data on customer complaints, but company mentioned that “There is no case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years and pending as on end of financial year i.e., March 31, 2018.”
- o Customer feedback is taken regularly through customer satisfaction surveys, customers’ meets and face-to-face interactions.

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Bosch Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines for the FY 2017-18.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle	*			*	*				*
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online								Link ↓	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* These principles are encompassed in the Company's code of Business Ethics and Principles of Social Responsibility.

Link 1: The CSR Policy of the Company can be accessed at <https://www.bosch.in/our-company/our-responsibility/corporate-social-responsibility/>

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company through the various industry forums endeavours to promote growth and technological progress, economic reforms, inclusive development policies and sustainable business principles. Therefore, need for a formal policy has not been felt.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has one subsidiary and the Company has stated that the said subsidiary has not commenced business. Hence, there is no participation by the said subsidiary in business responsibility initiatives.

Further, the Company encourages its suppliers, dealers and other stakeholders to support various initiatives taken by the Company towards its business responsibility.

Governance Related to BRR

The Company has stated that There is no defined frequency to meet. Assessment is an ongoing exercise and is an inherent part of corporate functions.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Company’s policy relating to ethics, bribery and corruption extends to Group Companies in India, its employees and representatives which include dealers, distributors, agents, sub-contractors and power of attorney holders.”*
- The Company has received 10 stakeholder complaints during the year under review. Out of them, 6 complaints were satisfactorily resolved during the period and 4 are pending as on the date of this report.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, however, the Company has disclosed that *“Sourcing of material for the product and Indirect material required for manufacturing has continuously evolved with the concept of using only material which can be recycled. The Company has implemented Transport Management Center (TMC) enabling consolidation of transportation requirements of various internal business divisions and achieving economies of scale.”*
- The Company has disclosed that the nearly 95% of components are recycled post its Life Cycle.

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed if it has constituted an Internal Complaints Committee as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to address concerns of sexual harassment.
- The Company has disclosed that it has a recognised employee association. Further, the Company has disclosed that approximately almost 100% of permanent employees are members of recognized employee associations.
- Approx. 4.53% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	6	Nil	2	Nil	3	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 56.13% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.

- The Company has identified the disadvantaged, vulnerable, and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company continues to engage with vulnerable and marginalised stakeholders for their sustainable livelihood. Training and employment is provided to underprivileged school dropouts. The Company provides medical and educational support to students of Government schools located close to the premises of the Company.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that Human Rights policy covers not only the Company but extends to its Group Companies, Joint Ventures, Suppliers, Contractors, NGOs, etc.

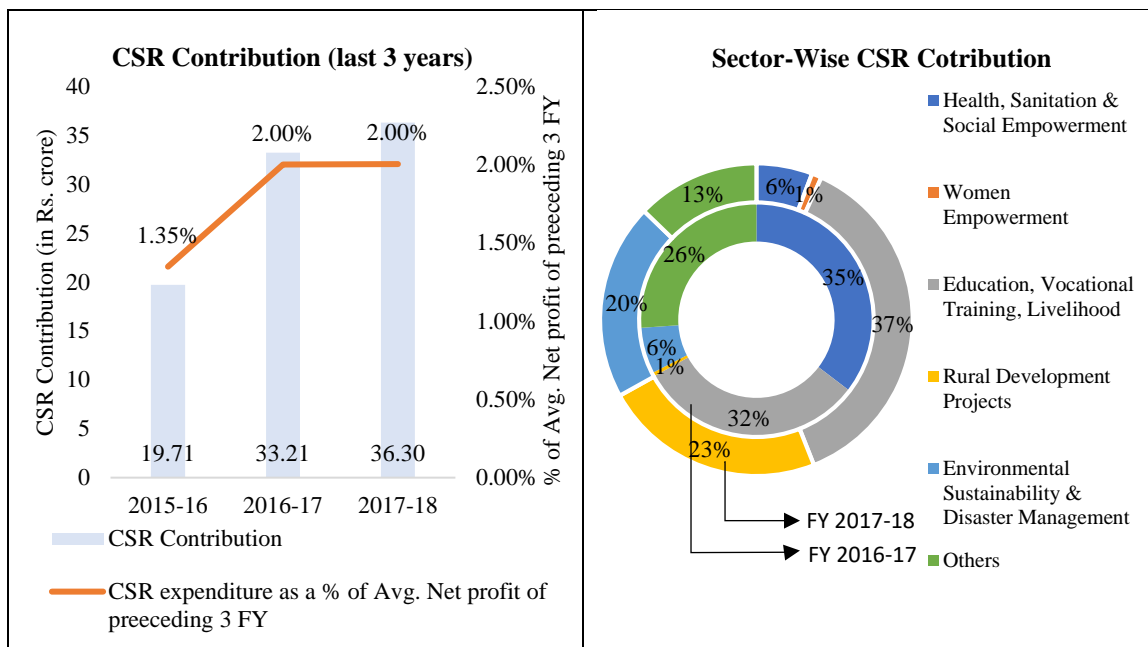
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that its policy is applicable not only to the Company but also extends to its suppliers, contractors, Recyclers & others with whom its activities are involved.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emission/waste generated across all locations are monitored at the prescribed frequency by the respective SPCB and have been found well within the permissible limits. Various air pollution control measures are adopted and it is ensured that the emissions meet the stipulated standards. Also, wastes are segregated based on their characteristics.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, external NGO, government structure and Bosch India Foundation trust. The Company conducts impact assessment of its CSR initiatives.



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

- During the financial year ended March 31, 2018, 1 new case was filed against the Company and the same is pending for adjudication.
- Company stated that company did not carry out consumer survey/ consumer satisfaction trends.

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Britannia Industries Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies confirm to the National and International standards like ISO 22K, ISO 14001, OHSAS 18001, ISO 22000, FSSAI standards etc								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Policies mandated under the Companies Act, 2013 and SEBI (LODR) 2015 are approved by the Board and other applicable policies are approved by the Managing Director or Functional Heads of the Company as appropriate.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The Company has Ethics Committee, Audit Committee, Risk Management Committee, Internal Complaints Committee, Stakeholders Relationship Committee, Safety Committee, CSR Committee and also adequate internal control systems to oversee the implementation of policies.								
6	Indicate the link for the policy to be viewed online	The links to view the public policies online are given herein below*								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes, wherever appropriate. **								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes, wherever appropriate. **								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Yes, wherever appropriate. **								

* Links to Company's Policies:

Link 1 - Code of Business Conduct for employees http://britannia.co.in/pdfs/Code_of_conduct/COBCforEmployeesFINAL.pdf

Link 2 - CSR Policy – http://britannia.co.in/pdfs/statutory_disclosures/Britannia%20Industries%20Limited-%20CSR%20Policy.pdf

Link 3 - Whistle Blower Policy – http://britannia.co.in/pdfs/statutory_disclosures/WHISTLE_BLOWER_POLICY.pdf

** As the Company has stated “yes, wherever appropriate”. Hence, it is not clear whether the answer is yes or no. Therefore, in absence of clarity the cells have been highlighted in green in the above table.

http://britannia.co.in/pdfs/Code_of_conduct/COBCforEmployeesFINAL.pdf: The Company has not disclosed this link in BR Report. However, SES has found the same. This link contains content for all policies applicable to BR.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that the Company has 23 subsidiaries and they operate in different geographies and conduct their own BR initiatives as appropriate. The Company has further stated that none of the other entity

/ entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that Board and Committees meets periodically to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“it has defined the Code of Conduct for its Directors and employees that cover issues related to ethics, workplace responsibilities and conflict of interest. It also covers all dealings with suppliers, customers and other business associates.”*
- Further, the Company has adopted a Whistle Blower Policy to provide a mechanism for employees and Directors of the Company to approach the Ethics Committee or Chairman of the Audit Committee and Risk Management Committee of the Company for reporting unethical behaviour, actual or suspected, fraud or violation of the Company’s code of conduct.
- The Company received 6 complaints under the Code of Business Conduct and the same have been satisfactorily resolved in accordance with the COBC procedures.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“Across the entire supply chain, the Company endeavours to integrate social, ethical and environmental factors in its operating/ strategic decisions. The Company endeavours to reduce the distance travelled overall by its products, thereby reducing emissions on account of transportation.”*
- The Company has stated that *“Most of the Company’s factories are committed to zero discharge. About 5% of the exhaust gases generated in the ovens are recycled to recover heat and also water from the effluent treatment plants is recycled within the factories to maintain greenbelts / gardens/ landscapes.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 18% of permanent employees are members of recognized employee associations.
- Approx. 5.17% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Not Disclosed		Nil	Nil	Nil	Nil
Discriminatory employment	Not Disclosed		Nil	Nil	Nil	Nil

- The Company has not disclosed the percentage of the permanent employees who were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has stated that “*the Company is committed towards proactively engaging with all the employees, business associates, customers and communities*”.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Community development and nutrition programs were undertaken across 6 states, reaching a total of 12,750 children. The programs were executed in geographies around 9 of Britannia’s factories with a focus on reducing malnutrition among children & women. The programs had participation from local government bodies and anganwadis, local primary schools and primary health centres to distribute fortified biscuits to children. Other support programs like counselling programs for parents, organizing health checks in villages, infrastructure improvement of anganwadis have also been taken up.

The BNF partnered with the Govt. of Karnataka to provide Iron fortified Tiger choco glucose biscuits to anganwadi children in Uttar Kannada district, Karnataka. The program reaches 43,260 children between 3- 6 years of age across 2,684 anganwadis. Each child gets 10 biscuits a week as part of the overall nutrition program in the anganwadis.

Around 55 metric tons of specially formulated, Iron Fortified Tiger Choco Glucose biscuits have been distributed, free of cost, this year, with the aim of addressing Iron deficiency Anaemia.

Britannia launched the first Employee Volunteering Program called ‘Britannia Big Hearts’. The program aimed to provide meaningful volunteering opportunities to employees, motivate social responsibility and creating Volunteer Champions. 236 employees were engaged in the initiative, 944 volunteering hours clocked, and 1,735 students were reached across 17 schools.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that “*Code of Business Conduct extends not only to employees of Britannia and others who work with, or represent Britannia directly or indirectly.*”

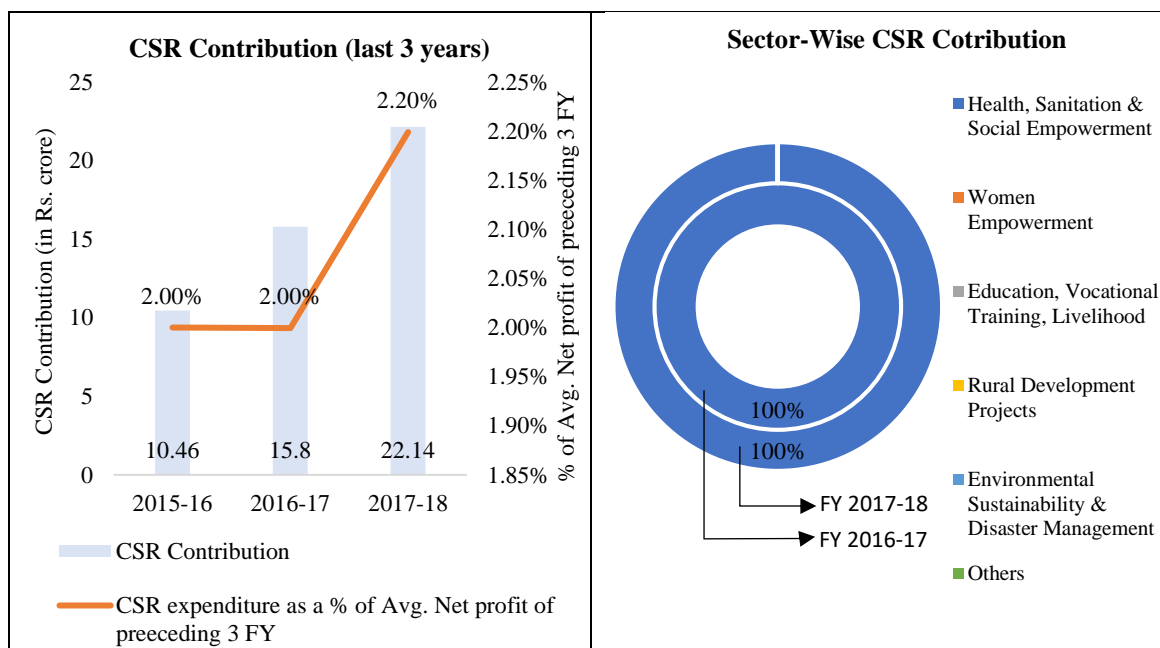
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that its Policy extends to all its subsidiary companies.
- **Are the Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?** Yes. All the factories file periodic statutory declarations with the pollution control boards on the emissions and waste generated and they are within permissible limits granted by the pollution control board.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 3 are Independent Directors. Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its own foundation Sir Ness Wadia Foundation, Britannia Nutrition Foundation and other NGOs as well. The Company conducts impact assessment of its CSR initiatives internally.



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

- Though, the Company has not disclosed the complaints received from customers (end-consumers) in FY 2018, however, the Company has stated that “Company has successfully resolved 90% of the complaints received during the financial year ended 31st March 2018”.
- The Company has stated that “As part of the consumer complaint handling process, the Company carries out consumer satisfaction survey on monthly basis against certain defined attributes”

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Cadila Healthcare Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle					*				
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The Company is abiding by the various laws and while framing the policies, the Company takes into account the best practices and national and international standards.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?		**	***						#
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The policies are implemented and being reviewed regularly by the respective business / unit head.								
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4		Link 5		Link 6	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes, all the policies are communicated to the employees via internal portal, where each employee has an access and the external stakeholders through Company's website. [www.zyduscadila.com]								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes, respective business / unit heads attend to any grievances pertaining to their department and address the grievances. The Company has formed a Stakeholders' / Investors' Relationship Committee to redress any grievances of shareholders and investors. Product related grievances are also resolved by the respective business heads to which the product pertains to.								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The Company regularly carries out an independent audit on working of policy on environment. CSR expenditure is also audited by the Company's statutory auditors.								

* The Policy is embedded in the Company's Code of Conduct, HR policies and various other HR practices.

** The Policy is embedded in the Company's Quality and Environmental Policies, which inter alia relate to safe and sustainable products.

***The policies for the wellbeing of employees are for internal circulation to the employees and approved by the Managing Director.

The Company fulfils the requirements by introducing innovative products and services. The Company has a customer complaint redressal system.

The Company has not disclosed the separate links for the approved policies. The Company should disclose the applicable policies to its stakeholders as a good governance practice. As some of the links for the applicable policy could not be located on the website, hence cells P7 & P9 for Q6 are highlighted in red.

SES has found some of the links on its website as follows:

Link 1 - https://www.zyduswellness.in/investor/Code_Con_Directors.pdf

Link 2- <https://www.zyduscadila.com/public/pdf/EHSPolicy.pdf>

Link 3- <https://www.zyduswellness.in/investor/Whistle%20Blower%20Policy.pdf>

Link 4- <https://www.zyduswellness.in/investor/CSR%20Policy.pdf>

Link 5- <https://zyduscadila.com/public/pdf/EHSPolicy.pdf>

Link 6- <https://zyduscadila.com/public/pdf/financial/Policy-on-csr.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that *“the Company is a global pharmaceutical Company with subsidiaries in India and across the world. As on date, the Company has 37 subsidiary Companies, including 26 subsidiaries outside India. Each of the Company’s subsidiaries abides by the law of the respective land, where it operates in a responsible manner. The subsidiary companies’ Business Responsibility (BR) initiatives are aligned with those of the Company.”*

Governance Related to BRR

The Company has stated that *“the BR performance of the Company is regularly monitored by the Company and reviewed by the Chairman and respective departmental heads.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“the Board of Directors has approved a Code of Business Conduct and Ethics, which is applicable to all Board Members and employees of the Company. This is reviewed and reported annually. The Company also has a Whistle Blower Policy approved by the Board and is applicable to all employees of the Company. Further, our major suppliers are also required to agree and to confirm to the code of responsible business conduct. The Company has also prescribed a very detailed Code of Ethics for its employees and every employee has to sign and affirm its compliance.”*
- The Company received 23 complaints from SEBI / Stock Exchange and Shareholders, out of which all were resolved during the year. However, there was no stakeholder complaint during the reporting period with regard to ethics, bribery and corruption.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, however, the Company has stated that *“The Company has identified approved vendors for procuring materials and a Standard Operating Procedure is in place for sourcing raw materials. This includes sample approvals, performance trials, plant audit and regulatory clearances. Majority of procurement of materials is from the approved manufacturers.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, however, the Company has stated that *“the waste generated in the Company’s operations is either recycled or disposed of safely & scientifically as per applicable rules / laws. Every manufacturing facility has its own Effluent Treatment Plant, which ensures discharge of waste meets the norms prescribed by respective pollution control boards. Important raw materials and solvents are recovered and recycled. It is a part of operational management. Full-fledged Solvent Recovery Plant at our API*

manufacturing sites recovers solvents generated during the process of manufacturing & reuses solvents in the manufacturing process.”

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment, as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 2.99% of permanent employees are members of recognized employee associations
- Approx. 6.58% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 52.95% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that *“The Company has mapped its internal and external stakeholders. We recognise employees, business associates, joint venture partners, suppliers, vendors, NGOs, communities, shareholders / investors, regulatory authorities and other governmental bodies and intermediaries as our key stakeholders.”*
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The company has stated that *“the Company works actively to enhance the employability of youth, leading to income generation and economic empowerment in the marginalised section of the communities. The shop floor workers in our manufacturing premises are from the economically disadvantaged groups and local communities. The Company invests in their skill development and upgradation, health check-ups and ensures other quality of life parameters. We have processes in place to ensure upholding of the rights of our employees and protect them against any form of discrimination.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“the Company is committed to promote human rights and adheres to the same in spirit and deed. This extends to all areas of business operations and various stakeholder groups. The Company is*

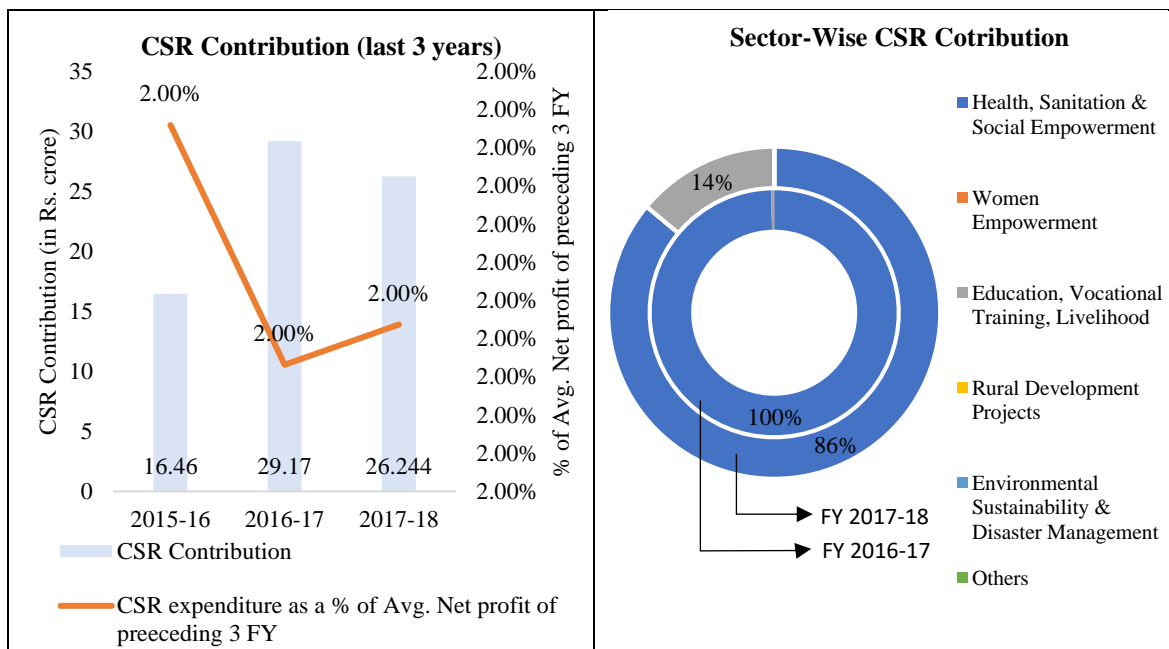
also committed to provide equal opportunities at all levels, safe and healthy workplaces and protecting human health and environment.” However, the Company has not disclosed that whether the policy relating to human rights extends to the Group/ Joint Ventures/ Suppliers/ Contractors / NGOs and others or not.

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“The Company is committed towards conservation of the environment and compliance with all requirements related to Environment, Health and Safety [EHS]. We have been looking at these initiatives beyond statutory compliance with a focus on the 4 Rs–Reduce, Reuse, Recycle and Recover for valuable resources. The Company has been engaging and involving every stakeholder across the Company in creating a unique culture in EHS. To bring the information asymmetry amongst the EHS group members & all employees, the Company has created dedicated EHS portal system and from time to time documents are posted for internal review and compliance, which include EHS management–SOPs, guidelines, checklists, etc. The Company organises EHS group discussions at various levels as a part of awareness and updating on regular basis.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Company has stated that *“The Company is committed to achieve all the norms within the limits for emission and discharge of air and water, as may be laid down by the regulators. The Company complies with pollution and environmental laws.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**
The Company’s CSR committee consists of 3 members out of which one is Independent director. The Chairman of the committee is not an Independent Director. The CSR Activities are spearheaded by Ramanbhai Foundation. Zydus Shrishti encourages employee volunteerism and is completely an in-house effort.



Note: The Company has stated that it has spent ₹ 26.24 crores, however, on addition of the separate expenditures on different sectors it comes to ₹ 26.04 crores. Hence, it does not match the spent amount.

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

- The Company has disclosed that no customer complaints received in the reporting period. There are no complaints or consumer cases pending as on the end of the financial year. There are no cases filed by any customer or consumer against the Company as at the end of Financial Year 2017–2018.
- The Company carries out the consumer satisfaction survey to measure the satisfaction among its consumers.

Substantial change from FY 16-17

For FY 16-17 the Company had not the policy for Principle 7. While in FY 17-18 the Company has developed the policy for Principle 7. However, the Company has stated that the policy P7 is not approved by the board.

Cipla Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has prepared Integrated Annual Report for FY 2017-18 as per IIRC Integrated Reporting format.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Cipla's Corporate Responsibility Policy is based on the National Voluntary Guidelines on Social, Environmental and Economical Responsibilities of Business as issued by Ministry of Corporate Affairs, Government of India, in July 2011. Cipla's Environment Policy is as per the requirements of ISO 14001, Environment Management System.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policy has been communicated to employees through the Intranet and external stakeholders through the Company's website. (www.cipla.com)								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The policies are evaluated internally								

Link 1: https://www.cipla.com/templates/home_tpl/images/Corporate_Social_Responsibility_Policy.pdf

Code of Conduct https://www.cipla.com/uploads/investor/1530274684_Cipla---Code-of-Conduct-FC.PDF

Corporate Social Responsibility Policy

https://www.cipla.com/uploads/investor/1536247932_Corporate_Social_Responsibility_Policy.pdf

Investor Grievance Redressal Policy

https://www.cipla.com/uploads/investor/1530538002_Investor%20Grievance%20Redressal%20Policy_v12.pdf

Environment, Health and Safety Policy https://www.cipla.com/uploads/investor/1530518599_ehs-policy-2006%201.pdf

Conflict of Interest Policy https://www.cipla.com/uploads/investor/1530187477_Conflict%20of%20Interest%20Policy%20-%20V1%20fc.pdf

Anti-Bribery and Anti-Corruption Policy https://www.cipla.com/uploads/investor/1530187172_Anti-Bribery%20and%20Anti-Corruption%20Policy.pdf

Anti-Trust and Fair Competition Policy https://www.cipla.com/uploads/investor/1530187230_Anti-Trust%20and%20Fair%20Competition%20Policy.pdf

Whistle Blower Policy https://www.cipla.com/uploads/investor/1530187336_Whistle%20Blower%20Policy%20V1%20fc.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 7 Indian and 42 overseas subsidiaries. Almost all the subsidiaries are aligned with the BR initiatives of the company. The Company also encourages its other stakeholders to participate in its BR initiatives however it does not track their actual participation and therefore for reporting purposes the percentage of such entities who participate in BR initiatives is less than 30%.

Governance Related to BRR

The Company has not disclosed the frequency of its board or committee meetings in which they assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The company states that they have a revised code which includes policies on Anti- bribery and Anti – Corruption Policy and Conflict of Interest Policy etc. Further the company states that besides board members and employees, the Code is also applicable to trainees, subsidiaries, affiliates, group companies and persons or entities contractually obligated across the globe. The other stakeholders e.g. contractors, consultants and other service providers are encouraged to adopt the its code.
- In FY – 2017-18 the Company received 33 complaints pertaining to unethical business practices were reported and the same have been resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that “*Cipla’s supply chain strategy emphasises sustainable procurement and the Company puts in dedicated efforts towards encouraging local sourcing of materials.*”
- The Company has disclosed that 35% of water was recycled during the year. Further the Company has stated that “*Waste solvents generated in the API manufacturing processes are recovered and partially reused, while the remaining is sold to authorised recyclers in line with the hazardous waste authorisations.*”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has 3 recognised employee association. Further, the Company has disclosed that approximately 9.94%, 4.48% and 10.79% of permanent employees are members of that 3 recognized employee associations.

- Approx. 11.11% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	5	Nil	3	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has disclosed that 99,470 Man-hours safety training was conducted for permanent employees.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders through stakeholder engagement strategy to ensure timely, accurate, consistent and relevant information exchange with each group.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders and has taken steps to improve their quality of life.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The CPC, was launched in 1997 in Warje, Pune to provide free-of-cost holistic care for cancer patients and their families. The centre provides physical, social, psychological and spiritual counselling to patients suffering from life-threatening diseases. It is focused on improving the quality of life of patients and their caregivers by helping them to effectively deal with distress. The Centre has a unique design that offers an atmosphere of peace and serenity. The CPC's multidisciplinary approach is supported by a competent team of doctors, nurses, pain specialists, nutritionists, physiotherapists and medical social workers. This integrated team works closely to influence the experience of care and to maximise the quality of lives for patients and their families. The multi-disciplinary approach includes OPD Care, In-patient Care and Home Care.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *"The Company ensures protection of human rights and upholds the dignity of every individual associated with it."*

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

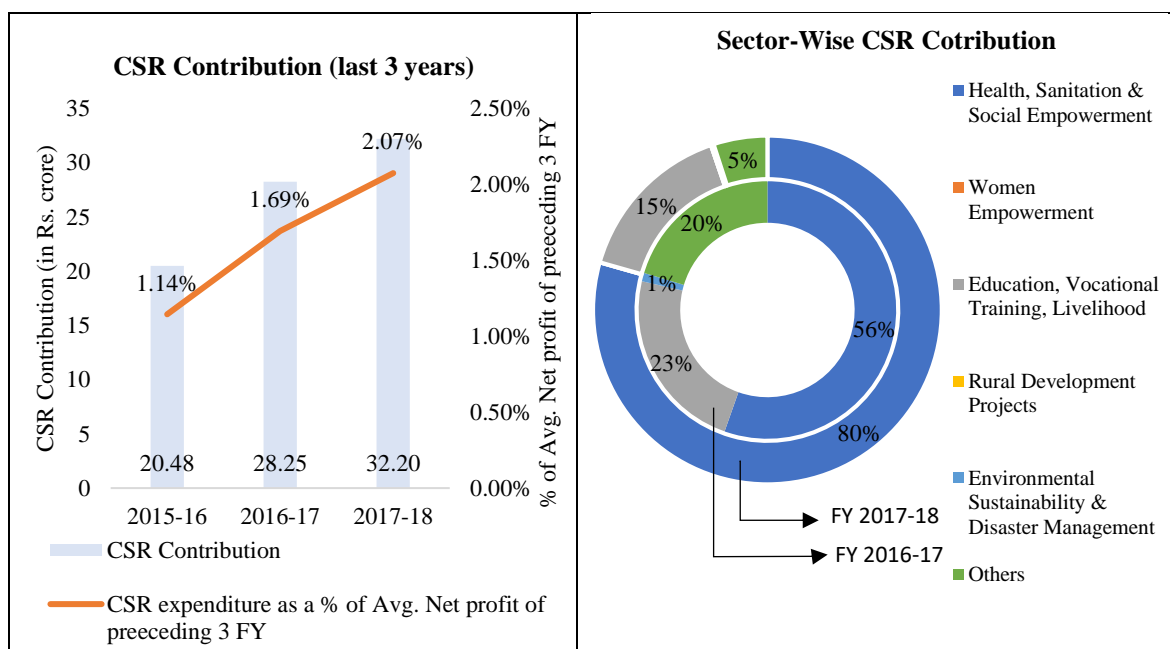
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *"The revised Code is a comprehensive of Environment, Health and Safety Policy and it is applicable to trainees, subsidiaries, affiliates, group companies and persons or entities contractually obligated across the globe."*

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, The Company has stated that “*air emissions and waste generation levels were well within the permitted limits.*”

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 2 are Independent members. The Chairman of the committee is an Non executive Non-Independent director. The Company mainly undertakes CSR Activities through its Cipla Foundation with credible institutions, NGO’s, government agencies, individuals, visionaries, domain experts and other foundations.



The Company has not spend required amount of CSR expenditure in previous year, however the Company has provided the reason for the same in respective annual report.

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

- During the year, the company successfully resolved 86% of the 2,603 complaints received.

Substantial change from FY 16-17

The Company has not disclosed the **Governance related to BR** under Section D: BR Information in Business Responsibility Report - 2018

Coal India Ltd. (2017-18)

The Company has disclosed the Sustainability Report as per GRI guidelines. **The Sustainability Report ([weblink](#)) has been independently assured by SR Asia.**

Sustainability Report for FY 2017-18: https://www.coalindia.in/DesktopModules/DocumentList/documents/Sustainability_Report_2017-18_10082018.pdf

Principle wise BR Policy/ Policies:

The Company has not provided response to question 2(a) of section D as per the SEBI format. However, the Company has provided mapping of BRR and questions under various principles.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that the Scope of Sustainability report covers CIL and its 8 subsidiary companies in India & one Subsidiary (CIAL) in foreign country.

Governance Related to BRR

The Company has stated that *“The sustainability agenda of CIL is reviewed every year and performance of the company disclosed through the Sustainability Report.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The code of conduct is applicable to Board Members as well as to Senior Members”*.
- Further the Company has stated that *“CIL strives to ensure transparency, disclosures and reporting and conforms wholly to the laws, systems and regulations of the country and infuses ethical conduct in all operations throughout the Company”*
- The Company received 6,539 complaints under the Vigilance and Anti- Corruption, and 640 pending grievances were carried forward from 2016-17 for redressal out of which 6,612 were resolved and the balance 567 cases were forwarded to the succeeding year for redressal.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that a key aspect of the Company’s sustainable management approach involves deploying sustainable mining practices, ensuring safety and health of the employees and creating value for community.
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that once the coal has been extracted, various kinds of wastes are left behind. CIL has an agreement with third party for proper disposal of hazardous waste and the responsibility of its subsidiaries through the state government ensures minimum human or environmental impact.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has not disclosed whether the Company has a recognised employee association and what percentage of permanent employees are members of recognized employee associations.
- Approx. 5.80% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 36.13% of the permanent employees were given training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its extensive engagements with all its stakeholders throughout the year to understand their prioritized concerns and needs and address these issues in a consistent and a transparent manner.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders with empowering them through implementing project.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Empowerment of destitute, marginalized and domestic violence victim women in Kolkata. The project is being implemented through Ankur Kala.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that all suppliers / contractors / vendors who undertake to provide services enter into a comprehensive formal agreement with CIL, which contains stipulations and conditions requiring them to ensure the compliance of various applicable labour statutes in respect of their employees / workers.

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

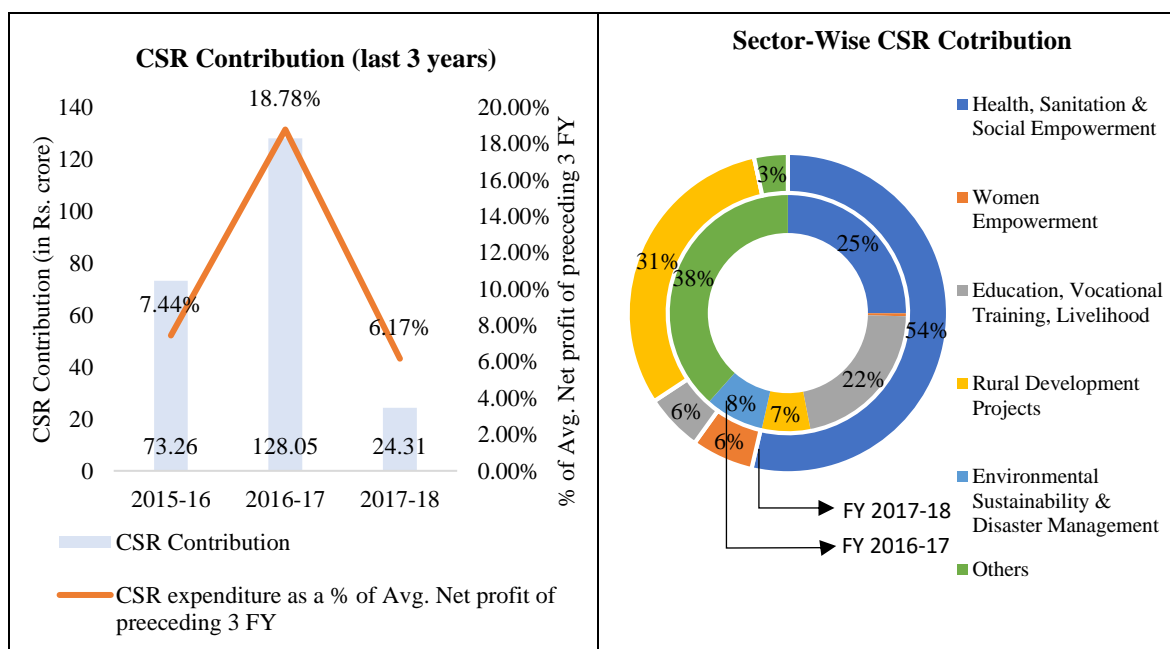
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not disclosed whether the policy covers the company or extends to its group/ Joint ventures etc.

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, CIL has agreed to install 16 CAAQMS in different cities of the country as decided by CPCB. During the year, the emissions from different monitoring stations have been recorded and are elucidated in the table on the right.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 7 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, external agencies Tata Institute of Social Sciences. The Company has not disclosed whether it conducts impact assessment of its CSR initiatives however the Company has stated that CSR audits are conducted regularly by a third party in line with International Standards ISO 9001, ISO 14001, OSHAS 18001 and CSR guidelines of GOI.



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

- A total of 30 complaints were received from customers (end-consumers) in 2017-18 and 3 pending grievances were carried forward from 2016-17, out of which 3 cases were forwarded to the succeeding year for redressal.

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Colgate Palmolive (India) Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1*								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1 *: Policies <https://www.colgatepalmolive.com/en-us/core-values/our-policies>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company does not have any subsidiary however it shares its ethical business practices, third party code of conduct and Global Anti-bribery Policy with its contract manufactures, warehouse agents, suppliers and other third parties associated with the company.

Governance Related to BRR

The Company has stated that it meets at such frequency as may be deemed necessary to evaluate the BR performance of the Company. The Audit Committee of the Company assesses the BR performance on a **quarterly** basis.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company states that it is committed to dealing legally and ethically in all aspects of business dealings. Its goal is to ensure that Colgate People and the third parties with whom they work reflect the same high ethical standards and demonstrate a commitment to compliance with all applicable

laws. Colgate's reputation depends on the conduct of its employees as well as the conduct of its third parties.

- Colgate has a robust Anti-Bribery Due Diligence process for its Vendors, Suppliers and other stakeholders dealing with the Government or statutory authorities on behalf of the Company, in accordance with its Global Anti-Bribery Policy.
- The Company received 1 code of conduct compliant during the FY 17-18

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company states that Most of our plants are situated close to raw material suppliers, thereby reducing transportation and carbon emission.
- The Company has disclosed that more than 90% of the waste generated during the manufacturing process at the Company's plants is being diverted towards recycling. Company has also contracted with a waste management Service Provider entity named NEPRA Environmental Solutions Pvt. Ltd. The said Service Provider is responsible for collection, sorting, processing, and recycling of an uncontaminated multi layered packaging waste from the market. This will help in diverting the Industrial waste towards recycling and co-processing of the waste to avoid landfills.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 19.42% of permanent employees are members of recognized employee associations
- Approx. 6.90% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	4	Nil	2	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 100% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.

- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has focused some of its CSR initiatives on the education and skills training of less privileged Members of society. Also, Company supports a program called ‘A Positive Step’ with an NGO working for the well-being of children infected / affected by HIV. More initiatives like its Saksham program are mentioned in its CSR activities.

Principle 5: Business should respect and promote human rights

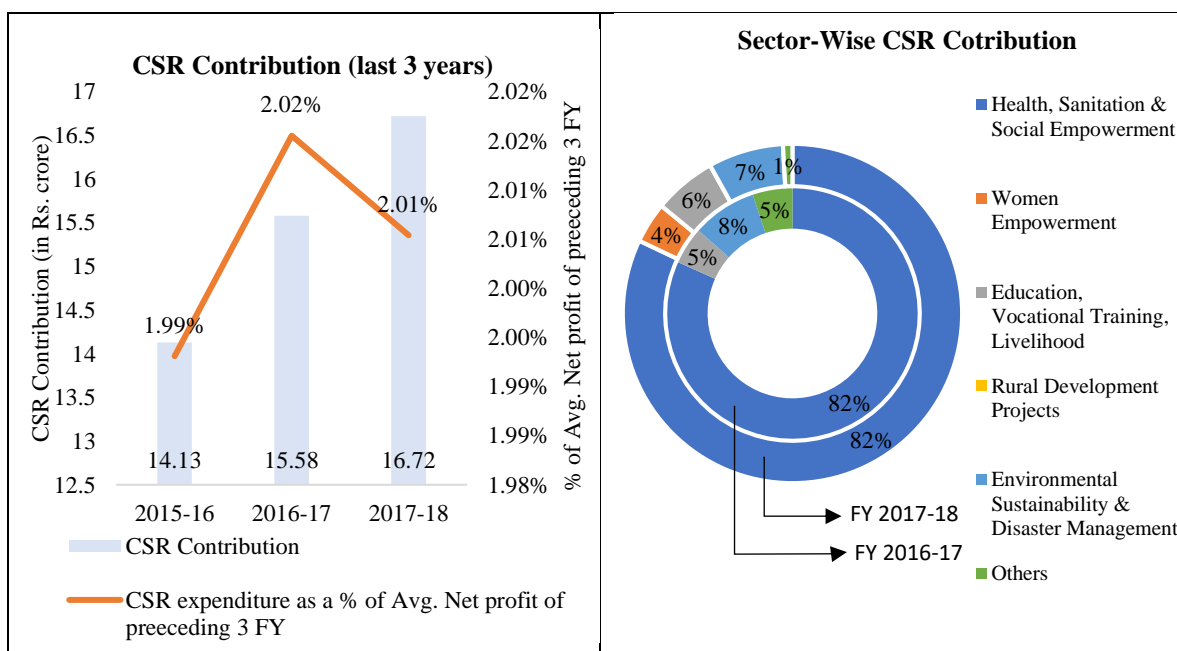
- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The policy for human rights forms part of the Third-Party Code of Conduct of the Company. The Third-Party Code of Conduct extends to the contract manufacturers, suppliers and other third parties associated with the Company.

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The policy extends to the major third parties associated with the Company through the Third-Party Code of Conduct.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Emissions / Waste generated by the Company is within the permissible limits given by the Central Pollution Control Board / State Pollution Control Board for the Financial Year 2017-18.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company:**
The Company’s CSR committee consists of 3 members out of which 1 is an Independent member as the Chairman of the committee. The Company mainly undertakes CSR Activities through five NGOs /registered non-profit Trusts / Societies. The Company conducts impact assessment of its CSR initiatives.



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

- As on 31st March 2018, total 13 consumer cases were pending before various consumer courts. Out of these consumer cases, 4 consumer cases have been dismissed as on the date of this report and the balance are pending. All these cases are sub-judice.
- The Company regularly conducts consumer surveys and monitors consumer satisfaction trends.

Substantial change from FY 16-17

- For the year 17-18, the company has mentioned **Yes** for “**Principle 7: Regulatory Policy**” whereas it was mentioned **NO** for the previous year.

Container Corporation of India Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle							Note 3		
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1 Link 2 Link 3	Link 4	Link 1 Note 1	Link 5	Link 1 Note 1			Link 6	Link 7 Note 2
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note1: All other policies are accessible by all employees online at the employee portal.

Note 2: Many other at www.concorindia.com under heading "Facilities and Services".

Note 3: The Company does not have separate policy for Principle 7, however the Company has stated that "CONCOR believes in the proactive policy advocacy with an aim to bring positive changes in the business ecosystems and industry at large. For us proactive advocacy is not lobbying with government and other agencies to secure certain benefits for ourselves. It is about adopting best policies and practices in our functioning and sharing the same with our stakeholders, industry and society at large so as to spread the benefits to all concerned on a sustainable basis."

The above practice is being followed.

Link 1: http://www.concorindia.com/assets/pdf/Code_of_conduct.pdf

Link 2 : <http://www.concorindia.com/assets/pdf/IntegrityPact.pdf>

Link 3: <http://www.concorindia.com/assets/pdf/WhistleBlowerPolicy.pdf>

Link 4: <http://www.concorindia.com/quality.asp>

Link 5: <http://www.concorindia.com/assets/pdf/csrpolicy.pdf>

Link 6: <http://www.concorindia.com/assets/pdf/mse-website.pdf>

Link 7: http://www.concorindia.co.in/lcl_services.asp

http://www.concorindia.co.in/bonded_services.asp

http://www.concorindia.co.in/reefer_services.asp

http://www.concorindia.co.in/concor_services.asp

<http://www.concorindia.co.in/assets/pdf/ccs.pdf>
http://www.concorindia.co.in/claims_proce.asp
<http://www.concorindia.co.in/DomesticCharges.aspx>
<http://www.concorindia.co.in/ddpickups.asp>
<http://www.concorindia.co.in/assets/pdf/vds.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 4 subsidiaries and all of them participate in the BR initiatives of the parent Company. The Company has further disclosed that *“In most of the cases, BR initiatives are carried out by CONCOR directly, however, the company and all its stakeholders who are having formal business arrangements, viz. Government, suppliers, distributors, contractors, customers and others are indirectly participating in the BR initiatives of the company.”*

Governance Related to BRR

The Company has stated that the BR report is placed before board annually for assessment.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“the company has policies for the ethics and prevention of bribery and corruption which are extending to subsidiaries. JVs have their own set of principles and procedures. For the suppliers/contractors/JV’s, it has strict terms and conditions for, pre and post engagement. These procedures are well documented in its internal documents such as purchase manual, model tender documents and others.”*
- The Company received 18 investors complaints and all the 18 complaints were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“CONCOR has e-tendering system in which procurement practices are followed in a transparent, fair, competitive and cost effective manner. It also contributes towards saving of paper and is a green initiative of the organisation.”*
- Further the Company has stated that *“According to a McKinsey & Company’s Report on India’s Logistics Infrastructure (July 2010), each tonne movement, done by rail vs road, reduces carbon dioxide emissions by 36 gms. per tonne per km. During the year CONCOR transported around 39.97 mn. tonnes over an average lead of around 858 km using rail infrastructure for transportation of containers. This resulted in reduction of carbon dioxide emissions by nearly 1.23 mn. tonnes by CONCOR in the year through use of rail transport.”*
- The Company stated that the percentage of recycling of e-waste products is more than 10%. The Company has stated that *“Old unserviceable containers are being auctioned to enable re-use of the good quality metal (<5%).”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has that it has a recognised employee association. Further, the Company has disclosed that approximately 90% of permanent employees are members of recognized employee associations.
- Approx. 11.88% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil*	Nil	Nil*	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed what percentage of employees were given safety and skill upgradation training. However, the Company has disclosed number of employee to whom the training were provided in respective programmes.

* Disclosure in BR Report and Annual report are different in terms of complaint received under Sexual Harassment. In Annual Report 2016-17 Pg. 30, and Annual Report 2015-16 Pg. 29 the Company has stated that 1 complaint was received, and which was found to be an administrative complaint. While in BR Report the Company has stated that No complaints received and pending.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its Internal and external stakeholders.
- The Company follows government policies on such matters.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that, *“the initiatives taken on this front are helping poor children for pursuing their elementary as well as higher studies, providing solar lights in those rural areas which have remained unelectrified, promoting cleanliness in society by constructing community toilets, imparting skill development training to OBC youths, organising health camps on Pan India basis, storage facility to small farmers etc. CONCOR has also adopted public procurement policy for goods produced and services rendered by Micro and Small Enterprises (MSEs) to promote their development.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the company and its subsidiaries are covered under this policy.

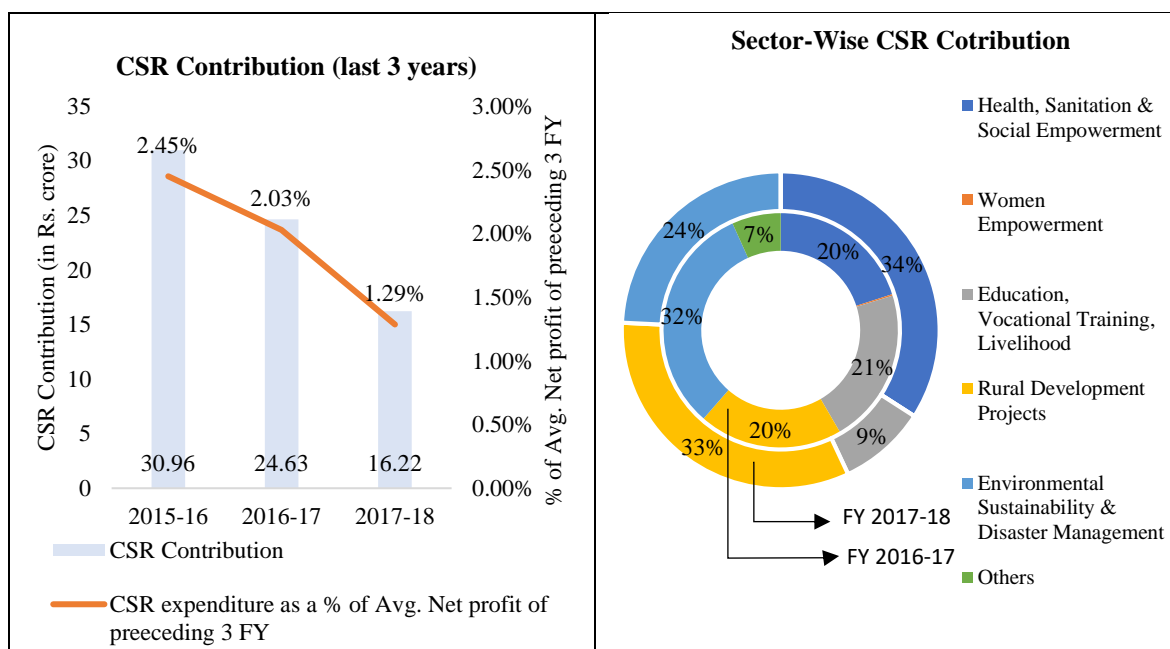
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that its Corporate Environment Policy covers the entire Company.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that “*The company adheres to the limits specified by CPCB/SPCB for all its equipment/machines at the time of procurement.*”

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent members. The Company mainly undertakes CSR Activities through in-house, State Governments, NGO’s, PSU’s, Private Companies, Panchayats, trusts, etc. Verification of monitoring of the CSR activities are being done by an independent external agency, wherever necessary.



Note: Total CSR Contribution of FY-2017-18 and FY-2016-17 includes unspent amount of previous year refunded of ₹ 47.27 lacs and ₹ 18.28 lacs respectively.

The reason for not spending requisite amount on CSR as stated by the Company: “*The company has taken up CSR projects worth ₹6,138.59 lacs, but due to longer period involved in implementation and completion of projects, the total CSR funds of ₹ 11.00 crores allocated for the year could not be utilized, hence carried forwarded and the same will be utilized in following year(s).*”

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

- The Company has not disclosed the percentage of customer complaints/ cases pending. The Company has disclosed that, “*the company ensures quick turnaround and resolution of Customer complaints through a real time system. Customers have the facility of knowing the exact location & movement*

of their container by accessing the online portal. For speedy resolution of any customer complaints, contact details and email addresses of the concerned officers have been put up on the company website. 'Customer Value Creation' is ethos of CONCOR."

- A Customer Satisfaction Survey is carried out by the Company every year.

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Cummins India Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle		*			*				*
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	**		**	**		**		**	
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* The policies relate to safe and sustainable products, Human Rights and Customer Relations and are embedded in the Company's Vision, Mission, Values, Strategic Principles, the Cummins Operating System and the Company's Code of Conduct.

** Policies are communicated to internal stakeholders and the same are available on the Company's intranet. Wherever required, the policies are also communicated to the external stakeholders.

The Company has not provided any link for the policy, however, SES has found links for some policies. Though, the Company has not provided yes/no, hence, cells for Q6 have been highlighted in red in the above table.

HR Policy: <https://www.cummins.com/sites/default/files/files/reports/cummins-human-rights-policy-1102018A.pdf>

CSR Policy: <https://www.cumminsindia.com/sites/india/files/CSRPolicy.pdf>

Link: COBC Policy: https://www.cummins.com/sites/default/files/files/ethics_code-of-conduct/Code-of-Business-Conduct-2018-English.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company has a track record of pioneering achievements, long experience and is a leader in the engine and power generation business and initiates dialogue with the government through various industry bodies and associations. However, no need for a formal policy has been felt.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that the Company engages in business with various Cummins entities in India that also actively participate in the Business Responsibility (BR) initiatives of the Company in a collaborative manner. However, entities outside of Cummins, like its suppliers, distributors, etc. are not included in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the Board of Directors of the Company review the BR performance of the Company on a regular basis, but at the least, annually.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the Cummins Code of Conduct applies to all its employees, customers and business associates. In addition, the Cummins Code of Conduct is also applicable to the joint ventures and its employees, customers and business associates. Cummins' commitment to fair treatment also extends to its joint ventures, suppliers and other partners.
- The Company received 73 complaints under the Ethics, Conflict of Interest, Theft, Bribery, Corruption and Fraud category and Improper supplier category, out of which 68 complaints resolved, The Company has also received 170 complaints under the Treatment of Each Other at Work Policy, out of which all complaints resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *"The Company continued to initiate waste reduction efforts during the year through several initiatives."*
- The Company has stated that the waste recycling rate of the Company is at a 95.19%.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 46% of permanent employees are members of recognized employee associations
- Approx. 24.12% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	8	Nil	8	Nil

Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed the percentage of permanent employees given skill and safety training. However, the Company has stated that Safety and skill up-gradation training to various categories of employees are being rendered as per the training policy of the Company.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders
- The Company has identified the disadvantaged, marginalized and vulnerable, Cummins strives to improve their lives focusing mainly in the areas of education and empowering under privileged to lead safe and healthy life in a greener environment among other initiatives.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** In 2006, Cummins India Foundation (CIF) initiated the ‘Cummins Scholarship Program’ for meritorious students from financially and socially disadvantaged backgrounds to pursue professional degree and diploma courses. Cummins also entrusts these scholars to its senior employees, who as mentors provide guidance through the entire duration of the course. Now in its 12th year, Cummins awarded 200 new meritorious and needy students with scholarships to pursue technical courses, taking the total number of scholars to 1139. The Company has also supporting the underprivileged to lead safe, healthy and a better life, the Company partners with NGOs (non-government organisation) serving the hearing impaired, visually impaired, physically challenged, orphans and old age-elderly.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the Company supports human rights around the world and complies with all applicable laws regarding treatment of the employees and other stakeholders. The Company is committed to fair treatment which also extends to its joint ventures, suppliers and other partners

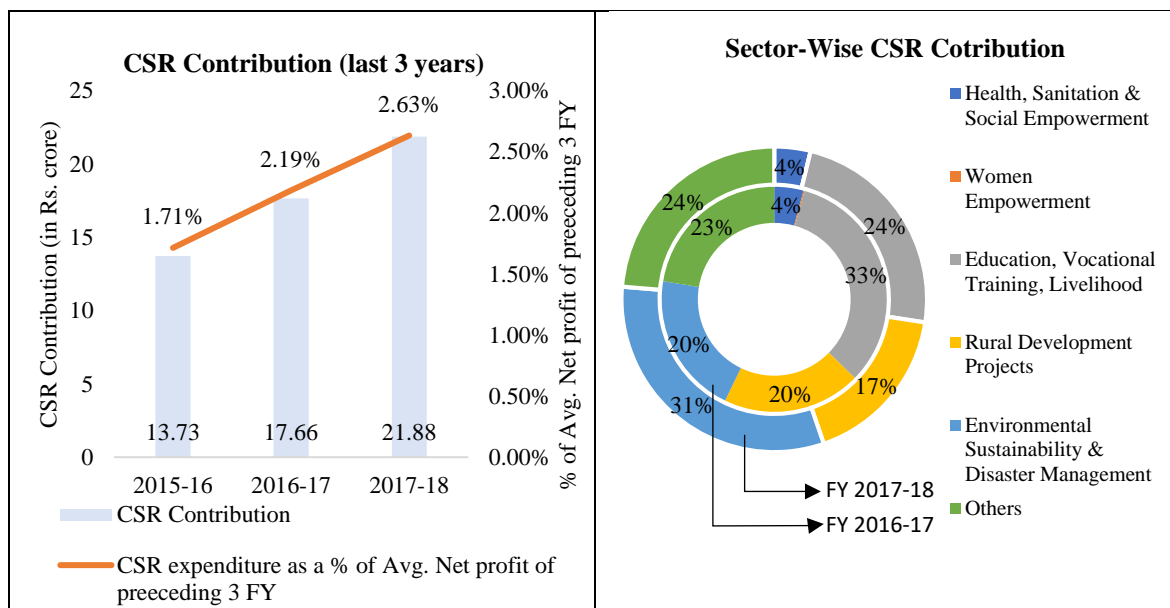
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not disclosed whether the policy cover only the Company or extends to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed whether such emissions are within permissible limits given by CPCB/SPCB. However, as stated by the Company, *“Environmental problems such as global warming and diminishing natural resources demand action, not only from government and individuals, but also from the business as well. Cummins demonstrates its commitment to the environment by producing the technology and products that reduce harmful emissions around the globe, and by reducing its own environmental footprint.”*

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members all of them are Independent members including the Chairman. The Company mainly undertakes CSR Activities through NGOs, Government Agencies, Cummins Employees, Research institute, Cummins India Foundation.



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

- o The Company has stated that During the FY 17-18, 323 complaints were registered, 29 of which were under resolution on March 31, 2018. There were 24 active consumer litigations at the end of March 2018, down from 31 in April 2017, with 10 cases resolved during the year.
- o The Company has not disclosed that the Customer Satisfaction Survey is carried out by the Company during the year.

Substantial change from FY 16-17

There are no substantial changes identified from previous year report.

Dabur India Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has prepared Integrated Annual Report for FY 2017-18 as per IIRC Integrated Reporting format.

Principle wise BR Policy/ Policies:

S no	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).			OHS AS 1800 1			OHS AS 1800 1			
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	1, 2, 3, 4, 5		1, 2, 3	1, 2, 3, 4, 5	1, 2	10		11	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?			OHS AS 1800 1 certification			ISO 1400 1 certification		*	

**The Company has stated that "However, an independent audit of complete CSR activities of the company is undertaken."*

1. Code of Ethics and Conduct: <http://www.dabur.com/img/upload-files/42-codeofconductslidesnew.pdf>

2. Whistle Blower and Protection Policy: <http://www.dabur.com/img/upload-files/41-direct-touch-2014.pdf>

3. Code of Fair Disclosure of Unpublished Price Sensitive Information: <http://dabur.com/img/upload-files/39-code-of-corporate-disclosure.pdf>

4. Policy on Related Party Transactions: <http://dabur.com/img/upload-files/1135-policy-on-related-party-transactions.pdf>

5. **Policy on Disclosure of Material Events and Information:** <http://dabur.com/img/upload-files/46-policy-on-disclosure-of-info-under-listing-regulations.pdf>

6. **Dividend Distribution Policy:** <http://dabur.com/img/upload-files/166-dividend-distribution-policy.pdf>

7. **Investors Policy:** <http://www.dabur.com/img/upload-files/40-investors-policy-2013.pdf>

8. **Policy on Rights of Shareholders:** <http://www.dabur.com/in/en-us/investor/investor-information/shareholder-services/shareholder-rights>

9. **Shareholder Services:** <http://www.dabur.com/in/en-us/investor/investor-information/shareholder-services>

10. **CSR Policy:** <http://dabur.com/img/upload-files/309-csr-policy.pdf>

11. **Occupational Health, Safety and Environment policy:** <http://www.dabur.com/img/upload-files/310-ohse-policy.pdf>

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: Dabur is member of various industrial and trade bodies and is part of task forces and forums within these bodies. We actively participate in these forums on issues and policy matters that impact the interest of our stakeholders. We prefer to be part of the broader policy development process and do not practice lobbying on any specific issue and hence do not feel such a policy is necessary given our way of doing business.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that “*the subsidiary companies operate in different geographies and conduct their own BR initiatives*”. The Company has further stated that “Dabur actively engages with its business associates through its BR initiatives”. And has disclosed as follows:

Entity	Initiative	% of entity
Suppliers (small farmers)	We directly engage with local & small producers for procuring inputs for our supply of rare herbs and medicinal plants through our greenhouse projects. (Details in response to question 4 in Section E, Principle 2)	<30%
Distributors	We actively engage with our distributors to build their capacity through workshops and training sessions.	<30%
B2B customers	We organise customized education programmes for our B2B customers like beauty parlours, doctors etc.	<30%
Suppliers and distributors	The Direct Touch policy (Whistle Blower & Protection Policy) applies to business associates (suppliers, stockists and dealers) as well. This provides a platform to business associates for reporting unethical business practices without fear of reprisal.	>60%

Governance Related to BRR

The Company has stated that Board of Directors meets every Quarter to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “*Company also has the Code of Ethics & Conducts which extends to the Board members, members of the Management Committee and all employees in and above Officers level in all of its offices/units/group/NGO but not to Joint Ventures/ suppliers/contractors*”.
- During the financial year, 2 complaints were received under the provisions of the Direct Touch policy out of which one is resolved, and another is under various stages of investigation and completion. While, 7 complaints from investors were received during the financial year. These complaints

pertained to non-receipt of shares on transfer / transmission. These complaints were addressed and were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that *“Dabur, over the years, has worked towards embedding sustainability throughout its inbound supply chain and will continue to do so. We are sourcing our important raw materials like palm oil, paper pulp from suppliers which are having sustainable sourcing certificate from accredited certifying agencies like Rainforest Alliance For procuring rare species of herbs and medicinal plants which are essential ingredients for making our products, we work directly with small and marginal farmers. This allows us to revive these endangered species and also promote sustainable agricultural practices. Inputs procured through this channel constituted around 5-10% of our total inputs purchased”*.
- The Company has stated that *“Our Environment & Quality policy outlines our focus on - reduce, reuse and recycle. Recycling of waste generated during production is taken up actively across all our production units. We regularly seek opportunities to increase the use of recycled materials as production inputs. Some of the initiatives taken are:*
 - *We have recycled 100% of herbal waste generated during production as fuel for boilers*
 - *The percentage of herbal waste recycled is more than 10% of the total waste generated and it also reduces GHG emission”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has employee association which is registered under “Trade Union Act - 1926” in Kolkata and has disclosed that Less than 5% of the permanent employees are members of this recognised employee association.
- Approx. 3.40% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1**	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 90% of the permanent employees, 100% of permanent woman employees were given safety and skill upgradation training in the last year.

**Disclosure in BR Report and Annual report are different in terms of reported cases related to Sexual Harassment. In Annual Report 2017-18 Pg 102, the Company has stated that 1 case of sexual harassment was reported and disposed off. While in BR Report the Company has stated that there was no instance of sexual harassment during the year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- The Company has stated that *“Yes, Dabur identifies communities around our manufacturing facilities (with a focus on women and children from these communities) and small farmers in our inbound supply chain as disadvantaged, vulnerable & marginalized stakeholders.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“Development and deployment of need-based community programmes in the areas of health, education, skill development, sanitation, livelihood etc. as part of corporate social responsibility (CSR) initiatives. Some of the initiatives taken during the financial year are:*
 - *to provide easy access to toilets and sanitation facilities in rural households*
 - *Construction & Repair work of school building, toilets*
 - *Vocational Training to women and villagers*
 - *Vocational Training to rural youth*
 - *Non-Formal Education and Remedial Education Centres for kids*
 - *School Support Programmes like benches & desks, educational aids*
 - *Adult Literacy Centres; self-help groups for women.*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that it has *“human rights related issues are covered under the Code of Ethics & Conduct and the Direct Touch policy (Whistle Blower & Protection policy). The Direct Touch policy applies not just to employees (employees in and above Officers level) of the group but to business associates (suppliers, stockists and dealers) as well. Company does not deal with any supplier/contractor if it is in violation of human rights and we do not employ any person below the age of eighteen as per our recruitment policy. It also prohibits the use of forced or compulsory labour at all our units and discourage the same with our business associates”*.

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

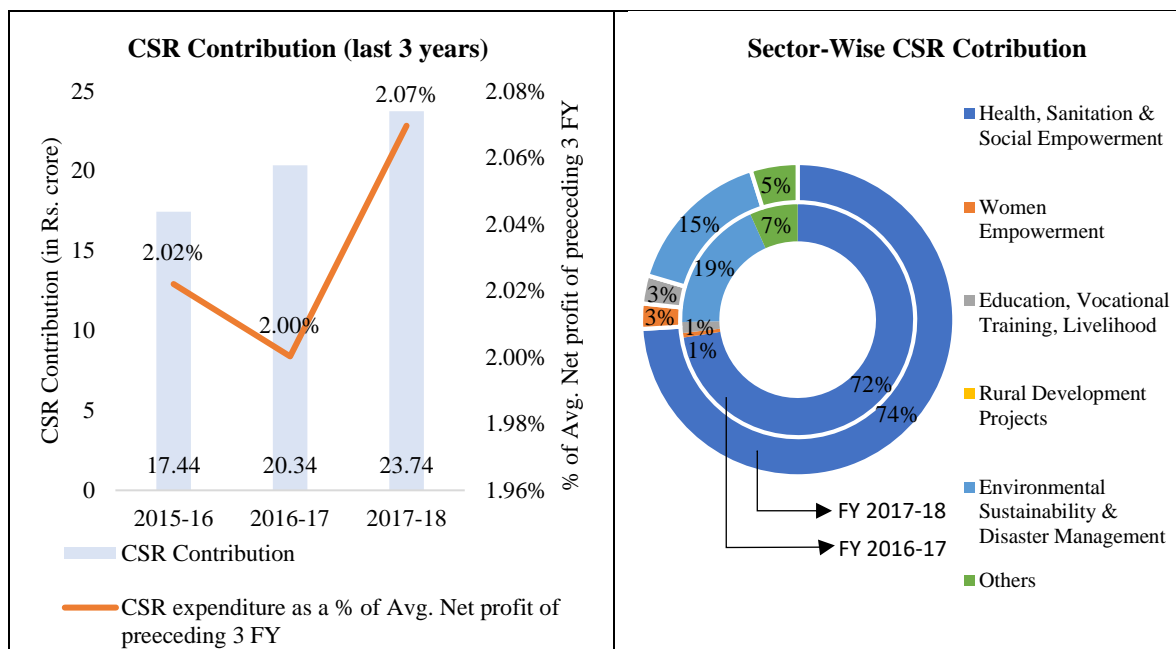
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“Dabur’s Environment and Pollution control policy and Quality policy pertaining to Principle 6 extend to its subsidiaries but do not cover joint ventures, suppliers and contractors.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that *“the emissions,*

solid waste and effluent generated are monitored on a regular basis and are within the limits as prescribed by CPCB or SPCB.”

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent. Chairman of the committee is Independent Director. The Company mainly undertakes CSR Activities through its in-house teams, SUNDESH, a registered society (own foundation), Jivanti Trust, a registered trust (own foundation), External NGOs and government structures. The Company conducts impact assessment of its CSR initiatives internally.



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

- o A total of 2 number of consumer cases were received during 2017-18 and 2 of these were disposed off. 7 consumer cases are pending as on the end of financial year.
- o The Company has stated that “as part of our stakeholder engagement strategy, Dabur engages with its consumers on an ongoing basis and conducts methodical research on their satisfaction with respect to our products and advertisements. These surveys are conducted through established third-party market research firms.”

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

DLF Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines for FY 2017-18.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	The Company has formulated the policies and adopted best practices in its own volition. However, while formulating the policies and adopting the same, the Company has been sensitive to the stakeholders and further, engaged experts of repute, as and when felt necessary.								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Yes, the policy/ practice broadly confirms to the National Voluntary Guidelines (NVGs) issued by the Ministry of Corporate Affairs, Government of India, July 2011 and the policies are compliant with the applicable laws as mapped against the principles mentioned in NVGs								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Note 1								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Internal Stakeholders are made aware of the policies. The aforesaid policies are uploaded in the website of the Company.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note 1: Internal policies are available for employees only. Other policies are available at <http://www.dlf.in/#>

i. Code of Conduct; ii. Code of Conduct to Regulate, Monitor & Report Trading by Insiders; iii. Whistle Blower Policy; iv. Environment Policy; v. Corporate Social Responsibility Policy; vi. Related Party Transactions Policy; vii. Material Subsidiary Policy; viii. Nomination and Remuneration Policy; ix. Dividend Distribution Policy; and x. Business Responsibility Policies

Link 1: <http://www.dlf.in/images/code-of-conduct/Code-of-Conduct.pdf>

Link 2: <http://www.dlf.in/prevention-of-insider-trading.aspx>

Link 3: <http://dlf.in/images/whistle-blower-policy/DLFWBP.pdf>

Link 4: <http://www.dlf.in/environmental-policy.aspx>

Link 5: <http://www.dlf.in/downloads.aspx>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 107 Subsidiaries. Further the Company has stated that *“Yes, a number of subsidiary companies participate/ contribute in the BR initiatives.”* However, the Company has not disclosed the number of subsidiaries that participate. The Company has further disclosed that no other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The company has not disclosed who evaluates the BR performance of the company. The Company has mentioned that Board has met 9 times during the year. Further, it has stated that CSR committee met once during the year. Further it has stated that advisory board DLF Foundation guides the social initiatives of the Company and meets regularly.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“No, apart from the Company, the Code of Conduct and Whistle Blower Policy including bribery and corruption extends to the entire DLF group including its subsidiaries, joint venture partners and other stakeholders as well”*.
- The Company stated that *“During the year 2017-18, the Company received ten complaints from shareholders and resolved/ disposed off the same to the satisfaction of the shareholders. Total no. of complaints/ disclosures received under Whistle blower policy were two during the period 2017-18.”*

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“It is difficult to specify a percentage, most inputs in construction like steel, cement, concrete slabs, electrical and mechanical equipment, paint, aluminium products are sourced sustainably”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company inter-alia, has implemented solid waste management technology to re-cycle house garbage into manure used for horticulture. The Company has commissioned state of the art sewage treatment plants which treat and re-cycle waste water for reusing in horticulture and toilets. The Company disposes some of the construction waste as a scrap to get them recycled and re-use the same in construction works.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed that there is no employee association in the Company.
- Approx. 10.33% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	3	1	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 30-32% of the permanent employees and 20-22% of the permanent women employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders. The Company has stated that “*The key stakeholders of the Company are employees, customers, government authorities, suppliers and shareholders.*”
- The Company has stated that “*Yes. To some extent, the Company has details of its disadvantaged, vulnerable and marginalized stakeholders.*”
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company while making its CSR plans ensures that some of the programs are so designed so as to take into considerations the needs of these communities, which includes providing scholarships to the children of vulnerable and marginalized stakeholders.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company’s policy and practices relating to protection of human rights viz., non-engagement of child labour, assuring safety measures etc. is applicable to the Company and its subsidiaries, joint ventures as well as to the contractors engaged by the Company.

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

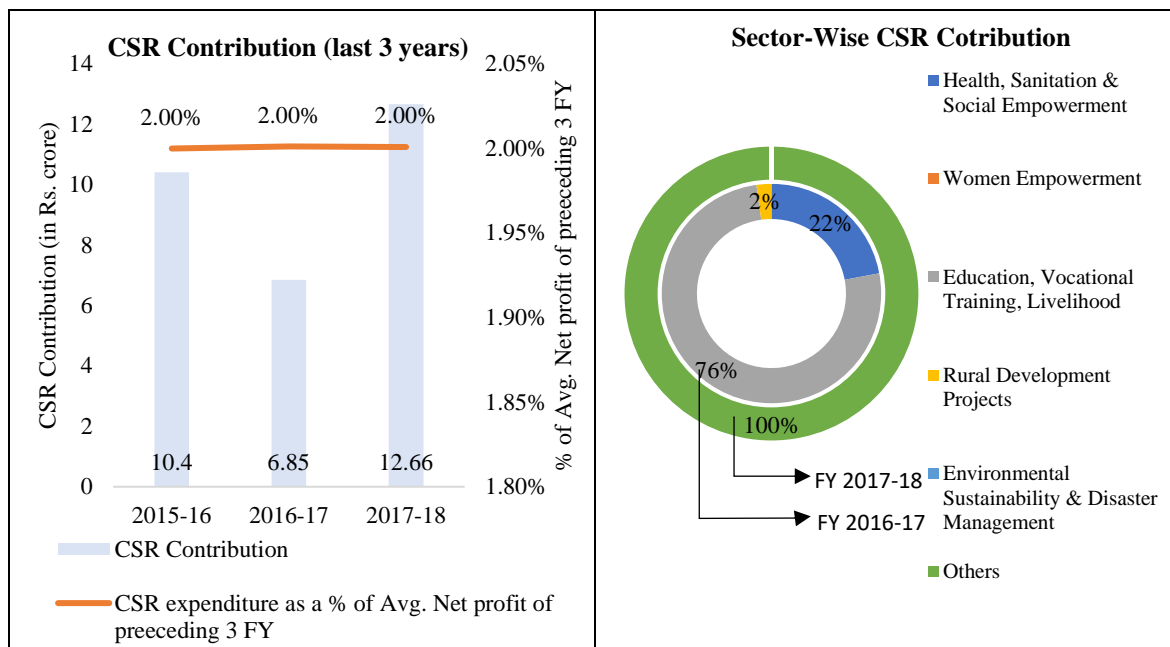
- **Does the policy pertain to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The policy and practices relating to Principle 6 covers employees of the DLF Group including its subsidiaries, joint ventures, vendors, suppliers, contractors, NGOs and others. The Company does business with such entities which have adopted this principle

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which 2 are Independent Directors and the Chairman is Executive Director. The Company mainly undertakes CSR Activities through its DLF Foundation is the executing arm for the social projects of the Company. The Foundation executes the programs/ projects through its own resources or by collaboration with other trusts, Civil/

Social organizations/ NGOs. The impact assessment of its CSR initiatives was undertaken by an Independent third-party Auditor “ASK”.



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

- The Company has not given exact number of customer complaints / consumer cases are pending however they have disclosed the percentage that on an average 10% to 20% of the consumer cases pending before the various forums/ courts get resolved and/ or disposed of during the year.
- During the Year 2017-18 no Customer Satisfaction Survey is carried out by the Company however, the Company has done brand awareness and perception survey about what the consumers feel about the brand.

Substantial change from FY 2016-17

Principle 4: Q- Out of the above has the Company identified the disadvantaged, vulnerable and marginalized stakeholder?

In 2016-17 Report Company has stated that: *All stakeholders are equally significant, and no one is considered as disadvantaged, vulnerable and marginalized.*

In 2017-18 Report Company has stated that: *Yes. To some extent, the Company has details of its disadvantaged, vulnerable and marginalized stakeholders.*

Tabular Format Question 4

In 2016-17 Report Company has stated that: *Since all the policies are not required to be approved by the Board, the approval of the Board has been obtained where it is mandatory.*

In 2017-18 Report Company has stated that: *all the policies were approved by the Board*

Dr Reddy's Laboratories Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI and IIRC guidelines. ([weblink](#)) **The Sustainability Report has been independently assured by DNV GL Business Assurance India Private Limited.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Lin k 1	Lin k 2		Lin k 2	Lin k 1	Lin k 2		Lin k 3	Lin k 2
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: Code of Conduct: <http://www.drreddys.com/media/720559/supplier-code-of-conduct.pdf>

Link 2: Safety, Health & Environment: <http://www.drreddys.com/media/636787/dr-reddys-she-policy-board.pdf>

Link 3: CSR: <http://www.drreddys.com/media/125014/csr-policy.html>

Sustainability Report for FY 2017-18 : <https://www.drreddys.com/media/904291/drl-sr-2017-18-23-10-2018-final.pdf>

Reasons disclosed by the Company for not formulating policies adhering to principle #7:

P7: The company has not disclosed any reason for not formulating a policy for Principle 7.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that its subsidiary companies are closely integrated with the Company's corporate BR initiatives.

Governance Related to BRR

The Company has stated that it meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company stated that the policy relating to ethics, bribery and corruption extends beyond the company employees, both whole-time and independent directors, covers the subsidiaries and affiliates of the group. While contracts with our suppliers, contractors and business partners include adherence to our principles concerning ethics, there is a separate code of conduct required to be adhered to by our suppliers and service providers.
- The Company did not receive any significant stakeholder complaint in the last financial year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company not disclosed the percent of the sustainable sourcing. However, the Company has stated that *“Dr. Reddy’s has well defined and documented “Supplier Code of Conduct” addressing all sustainable sourcing elements like ethics, labor & human rights, wages & benefits, health & safety, environment, management system including bribery and corruption.”*
- The Company has disclosed that 98.5% of hazardous waste was co-processed and recycled.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 4.2% of permanent employees are members of recognized employee associations.
- Approx. 17.19 % of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	7	Nil	15	3*	11	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

*Closed in April, 2017.

- The Company has trained 785 employees for skill upgradation and 9,776 employees for safety fresher training program.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“We have identified clusters of stakeholders who are directly and indirectly affected by our operations, and have developed targeted engagement mechanisms for each cluster.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“Dr. Reddy’s has well defined Safety, Health and Environmental policy and principles in place to motivate our employees to minimize our environmental impacts. The policy and principles are also communicated to all our stakeholders and ensure that they are in compliance with the policy.”*

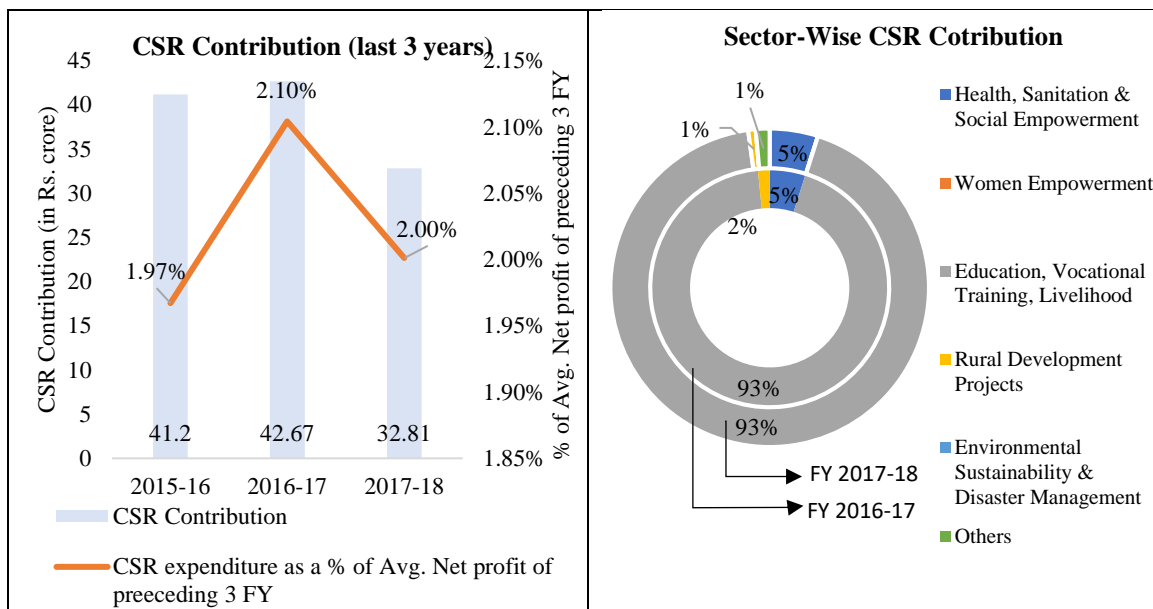
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that it has a well defined Safety, Health and Environmental policy and principles in place to motivate their employees to minimize our environmental impacts. Also, the policy and principles are communicated to all its stakeholders and ensure that they are in compliance with it.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported:** Yes, air emissions and waste generated by the Company are within the permissible limits prescribed by environmental regulators.

Principle 8: Businesses should support inclusive growth and equitable development

Corporate Social Responsibility by the Company

- The Company’s CSR committee consists of 3 members out of which 1 is an Independent Director and he is the Chairman of the Company. The Company mainly undertakes CSR Activities through its like DRF, Naandi Foundation, NICE Foundation, Agastya International Foundation and other similar organizations. The Company conducts impact assessment of its CSR initiatives internally.



In FY 15-16, the company had failed to spend two percent of the average net profits of the last three financial years, and has disclosed the reason stated as follows:

“In FY 2016, we targeted the implementation of all the budgeted projects. However, a small fraction of projects were shortened after field assessment, as those projects needed greater community ownership, particularly in areas of water and environment.”

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

- Although, the number of customer complaints received by the company is not disclosed, however, the company has disclosed that 2 customer complaints are pending.
- The Company does not carry any customer survey.

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Eicher Motors Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6	Link 7	Link 8	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1 – Code of Conduct: <http://www.eicher.in/code-of-conduct>

Link 2 – Environment policy & Quality Policy: Published in the intranet and to all Contractors.

Link 3 – Safety Policy, Employee welfare policy & Prevention of sexual harassment: Published in the intranet.

Link 4 - Corporate Social Responsibility policy:

http://www.eicher.in/uploads/1530165050_Eicher_Corporate_Social_Responsibility_Policy.pdf

Link 5 – Employee welfare policy & Prevention of Sexual harassment: Published in the intranet.

Link 6 – Environment policy: Published in the intranet.

Link 7 – Code of Conduct: <http://www.eicher.in/code-of-conduct>

Link 8 – Environment policy: <http://www.eicher.in/code-of-conduct>

Reason disclosed by the Company for not formulating policies adhering to Principle 9 is as follows:

P9: EML has implemented detailed systems and processes for address in issues pertaining to customer satisfaction, without a formal board approved policy.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that *“The Company and its subsidiary VE Commercial Vehicle Limited have incorporated Eicher Group Foundation (a not for profit Company) for the purpose of discharging their respective CSR obligations. Other subsidiaries do not participate in BR initiative of the Company. Suppliers and distributors are independent businesses that are within the circle of influence of the Company but function as independent entities. The Company’s suppliers and distributors are not involved in BR initiatives of the Company.”*

Governance Related to BRR

The Company has stated that it meets periodically to assess the BR vision, strategy and performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Code of Conduct for Directors & Senior Management, Policy for Determining Materiality of Events and Information and Code of Conduct for fair disclosure of unpublished price sensitive information extend to the Company’s subsidiary and joint venture companies as well. In addition, several subsidiary and joint venture companies also have their own whistle blower policies in place.”*
- The Company received 56 complaints out of which 55 (out of the total number of complaints resolved, 3 complaints were pertaining to previous financial year) were resolved and the balance 4 pending at the end of the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company encourages its suppliers to set up units close to its manufacturing facilities. This helps in not only reducing cost, time and environment footprint associated with logistics, but also creates a potential win-win situation for both the company and the suppliers. The Company has taken initiatives to reduce wastage in in-bound supply chain to eliminate the use of packaging Material. For the Export finished product (Motorcycle), the Company uses the Chennai port, which is close to its manufacturing sites. This reduces its transportation related emissions”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Recyclability is an outstanding feature of the motorcycles that EML manufactures. A large part of the materials used in the motorcycles can be recycled at the end of its life (up to 85%).”*
- The Company has also disclosed that the company ensures that any waste generated during its manufacturing process is responsibly recovered and recycled.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has internal and independent labour unions at Thiruvottiyur plant. All the permanent workers at the plant are members of the employee associations.
- Approx. 4.92% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 100% of the total regular employees including permanent employees, women employees, casual/ temporary/ contractual employees and employee with disabilities of the Company were given safety and skill upgradation training.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has identified stakeholders as person, a group of people or organisation that have vested interests in the Company and its products.
- Yes, of all the major stakeholder groups of the Company, it has identified certain sections of the local community as disadvantaged, vulnerable & marginalised people.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company also considers socio-economically disadvantaged sections of society as a disadvantaged group. This particular group is not geographically restricted to areas where the Company has institutional presence, instead, it is spread PAN India. The Company has taken various initiatives to engage with the disadvantaged, vulnerable and marginalized stakeholders.

Principle 5: Business should respect and promote human rights

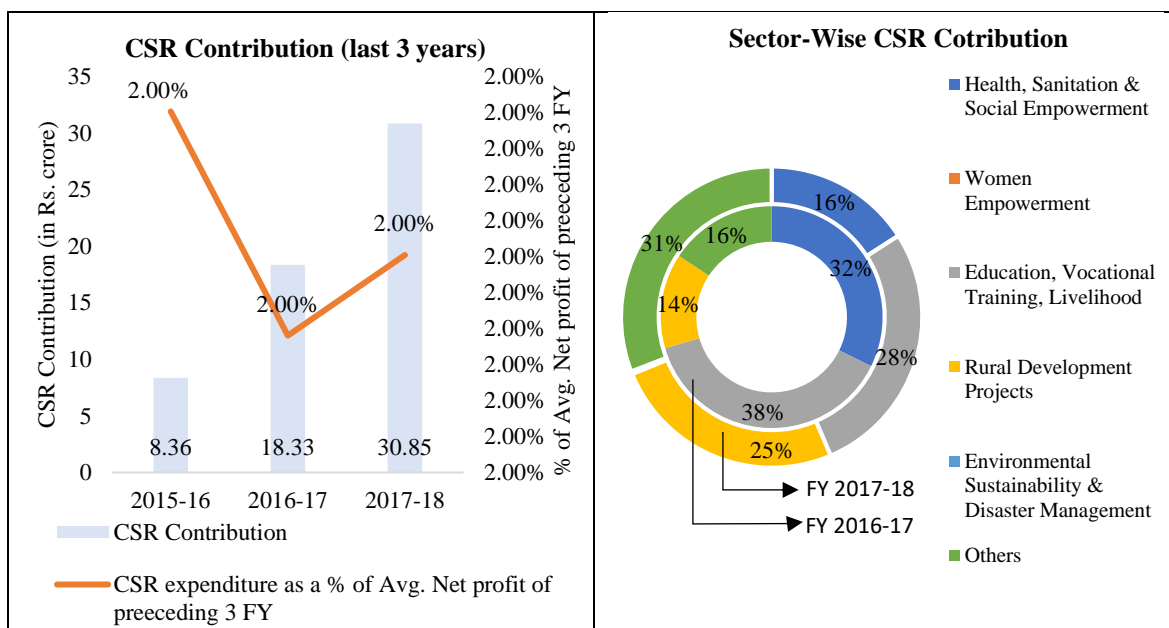
- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** EML has in place policies on employee welfare, medical assistance and prevention of sexual harassment which address the human rights aspects. Subsidiary and Joint Venture companies are also covered under Company's Policies and/or have their own Policies of similar nature.

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “*at present, the Company’s environmental policy does not cover Group/Joint Ventures/Suppliers/Contractors/NGOs, however, all stakeholders are encouraged to implement similar environmental practices across their operations.*”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that “*During the year 2017-18, all emissions and waste generated by the Company were within the permissible limits given by CPCB and TNPCB and no show cause or legal notices were received.*”

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**
The Company’s CSR committee consists of 3 members out of which 2 are Independent Directors. Chairman of the committee is an Independent Director. The Company mainly undertakes CSR Activities through its in-house team and NGOs. The Company’s CSR programmes are managed and monitored by an in-house CSR steam facilitated by Eicher Group Foundation.



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

- Although, the Company has not disclosed the number of complaints received during the year, however, the Company has stated that “*All customer complaints received during the reporting year were resolved promptly with only 0.77% of the complaints being carried forward to the next year (2018-19).*”
- Customer satisfaction surveys are undertaken regularly at the dealer’s end and directly by the Company also.

Substantial change from FY 2016-17

There are no substantial changes identified from previous year report.

Emami Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Yes. The policies are based on the 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' released by the Ministry of Corporation Affairs. The policies are based on the above guidelines								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Yes. The policies have been approved by the Managing Director.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link : http://www.emamiltd.in/investor-info/pdf/Business_Responsibility_Policy.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that “The Business Responsibility policies of the subsidiaries are in line with the Company’s requirement”. The Company has disclosed that less than 30% of the other entity / entities that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that BR Heads periodically assesses the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“All individuals working in the Company are subject of the Company’s policies on Ethics, Transparency and Accountability along with the Code of Conduct. The Code is applicable in line with the local requirements prevailing in the country of operation so far as the subsidiaries are concerned. Business Partners of the Company are encouraged to follow the code.”*
- The Company received 287 complaints under the Ethical View Reporting Policy and the same have been satisfactorily resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“Emami has a dedicated Bio Resource Department which in turn supports the procurement team to directly/ indirectly connect with farmers who cultivate ayurvedic medicinal herbs ensuring constant supply from sustainable sources.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Initiatives like using light-weight materials, optimising structural and material design and eliminating unnecessary packaging, have resulted in effective management of packaging waste.”*

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed if there is an Internal Complaints Committee to address concerns of sexual harassment as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has 8 recognised employee associations. Further, the Company has disclosed that approximately 23.10% of permanent employees are members of recognized employee associations.
- Approx. 12.64% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 42% of the permanent employees and 56% of permanent women employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders and the Company continuously engages with all such stakeholders to serve these needs accordingly.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company provides healthcare facilities to the underprivileged in and around its business premises. Emami conducts community development initiatives and disaster management initiatives across its factory locations. Emami also conducts drinking water and sanitation programme in schools, provides scholarships to deserving students, computer training programmes, beautician training programmes, stitching and tailoring programmes to the underprivileged across its business locations.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“the policies applicable to all employees in the Company. For its subsidiaries, the policy is applicable in line with the local requirements prevailing in the country of operation. The Company encourages its Business Partners to follow the policy.”*

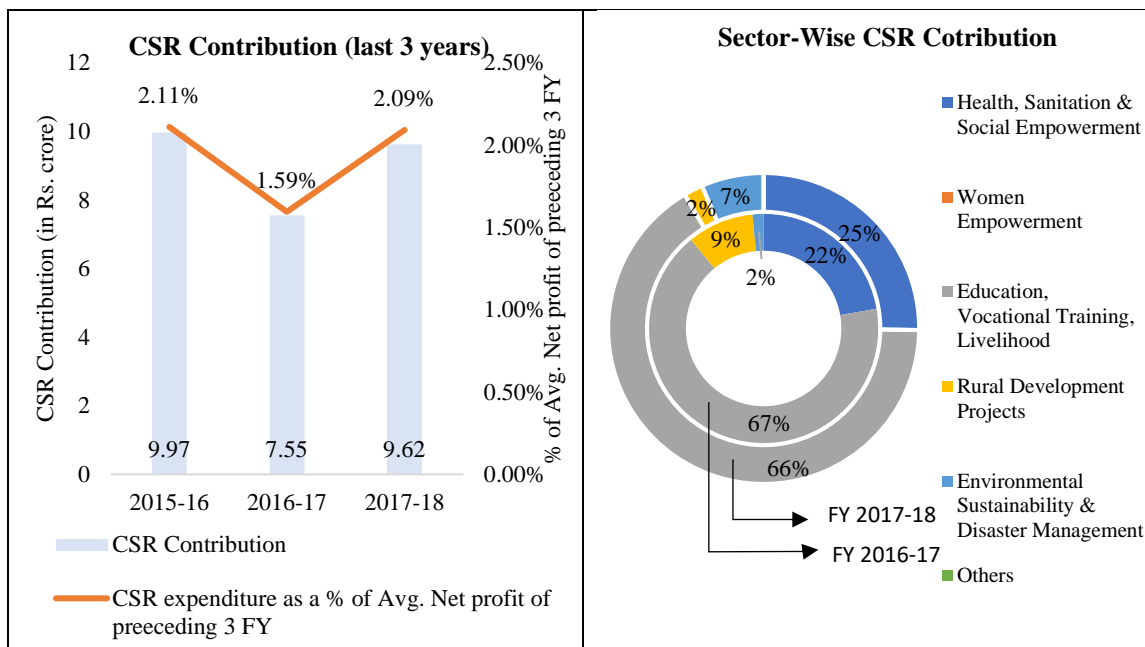
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“the policies applicable to all its business places. For the subsidiaries, the policy is applicable in line with the local requirements prevailing in the country of operation.”*
- **Are the Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?** The Company has stated that *“In FY18, the emissions, solid waste and effluents generated were within the limits as prescribed by CPCB or SPCB.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which only 1 is Independent member. Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house team or implementing agencies. The Company conducts impact assessment of its CSR initiatives internally.



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

- A total of 273 complaints were received from customers (end-consumers) in FY 2018, the same have been satisfactorily resolved and none were pending as on 31st March 2018.
- The Company has not disclosed whether the Customer Satisfaction Survey is carried out by the Company, however it has stated that “Our innovation process ensures that we validate the concept, product and its packaging with the consumers through its lifecycle with the consumers and also follow up with them for their satisfaction post launch”.

GAIL (India) Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines for FY 2016-17. ([weblink](#)) The Sustainability Report for FY 2017-18 could not be found on company's website. The Sustainability Report for FY 16-17 has been independently assured by **DNV GL Business Assurance India Private Limited ('DNV GL')**.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1 Link 2 Link 3	Link 4	Link 6 Link 9	Link 6 Link 4 Link 9	Link 6 Link 9	Link 6 Link 4		Link 5 Link 4	Link 4
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1 - Code of Conduct:

http://gailonline.com/pdf/InvestorsZone/Code_of_Conduct_2014.pdf

Link 2 - Fraud Prevention Policy:

http://www.gailonline.com/pdf/others/Drfat_Policy2012.pdf

Link 3 - MoU between GAIL (India) Ltd and TII

<http://gailonline.com/pdf/others/MOU-With-TII-23rd.July-2007.pdf>

Link 4 - Sustainable Development Policy:

http://gailonline.com/pdf/Sustainability/GAIL_Sustainable_Development_Policy-English.pdf

Link 5 - GAIL CSR Policy:

http://gailonline.com/pdf/CSR/final_policy2010.pdf

Link 6 - Constitution of internal Complaints Committee post notification of 'Policy for Prevention ,Prohibition and Redressal of Sexual Harassment of Women at Workplace:

http://gailonline.com/pdf/others/Sexual_Harassment_Women_Workplace.pdf

Link 7 (1) - GAIL Material Subsidiary Policy:

http://gailonline.com/pdf/InvestorsZone/GAIL_Material_Subsiary_policy.pdf

Link 7 (2) - GAIL Related Party Transaction Policy:

http://gailonline.com/pdf/InvestorsZone/GAIL_Related_Party_Transaction_Policy.pdf

Link 7 (3) - GAIL Policy for Determination of Materiality and Disclosure

http://gailonline.com/pdf/InvestorsZone/GAIL_Determination_Material_Policy_Disclosure.pdf

Link 8 - Dividend Distribution Policy:

<http://gailonline.com/pdf/InvestorsZone/GAIL%20Dividend%20Distribution%20Policy.pdf>

Link 9 – Policy on diversity of Board of Directors:

<http://gailonline.com/pdf/InvestorsZone/Policy%20on%20Diversity%20of%20Board.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that the number of subsidiaries as on 31st March 2018 was 5. Out of the 5 subsidiaries 3 are operating out of India and 2 subsidiaries are India based. The subsidiaries which are operating in India have taken up CSR and BRR initiatives. The Company has further disclosed that BR initiatives taken by GAIL(India)Ltd. has the collaboration of all its such as Govt. of India, employees, contractors, suppliers, customers and the community at large. The percentage of such stakeholders is less than 30%.

Governance Related to BRR

The Company has stated that *“In FY 17-18 total 2 meetings were held by Sustainable Development Committee, further GAIL has various related sub committees of Board which meets from time to time to review aspects related to Business Responsibility.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“Apart from company employees, the policy relating to ethics, bribery and corruption is also extended to GAIL employees on secondment or deputation in any subsidiary or Joint Venture Company.”*
- The Company received 287 complaints, out of these 94% were resolved by the management. The Company has stated that *“Most of the complaints remaining unresolved were received in the last quarter of the FY 2017-18.”*

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“GAIL has implemented Public Procurement Policy for Micro and Small Enterprises (MSEs). The policy targets 20% of procurement from MSEs with a sub target of 4% from*

MSEs owned by the Scheduled Caste or the Scheduled Tribe entrepreneurs for the Goods and Services rendered by such organizations. In addition, GAIL implements all policies of the Government which contributes to sustainable sourcing.”

- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Natural Gas (NG) is the major input for GAIL’s process plants. After processing NG, it is sent to customers and only a small fraction of NG is flared as per safety requirements. This process leaves us with limited scope for reusing/recycling NG as input or raw material. Further, products and processes are designed for NIL/ minimum wastage.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 18.65% of permanent employees are members of recognized employee associations
- Approx. 6.06% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	3	Nil	1*	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 95.31% of the permanent employees, 94.23% of permanent women employees and 99% of employees with disabilities were given safety and skill upgradation training in the last year.

* Disclosure in BR Report and Annual report are different in terms of complaint received under Sexual Harassment. In Annual Report 2015-16 Pg. 27 the Company has stated that *“During the year 2015-16, two sexual harassment complaints received and the same were disposed off.”* While in BR Report the Company has disclosed that 1 complaint was received.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. All CSR projects undertaken at GAIL are aimed at providing a better life to the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company states that it undertakes CSR Projects specifically focusing on target groups recognized in the clause including BPL, SCs, STs, OBS, PwDs, and

communities around work centres of GAIL etc. Additionally, specific interventions have been designed and implemented by GAIL to bring about holistic and sustainable development of the marginalised stakeholder groups and the community at large.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that “GAILs policy covers all the legal requirements pertaining to Human Rights. The policy is applicable to all Joint Ventures, Subsidiaries, Contractors of GAIL.”

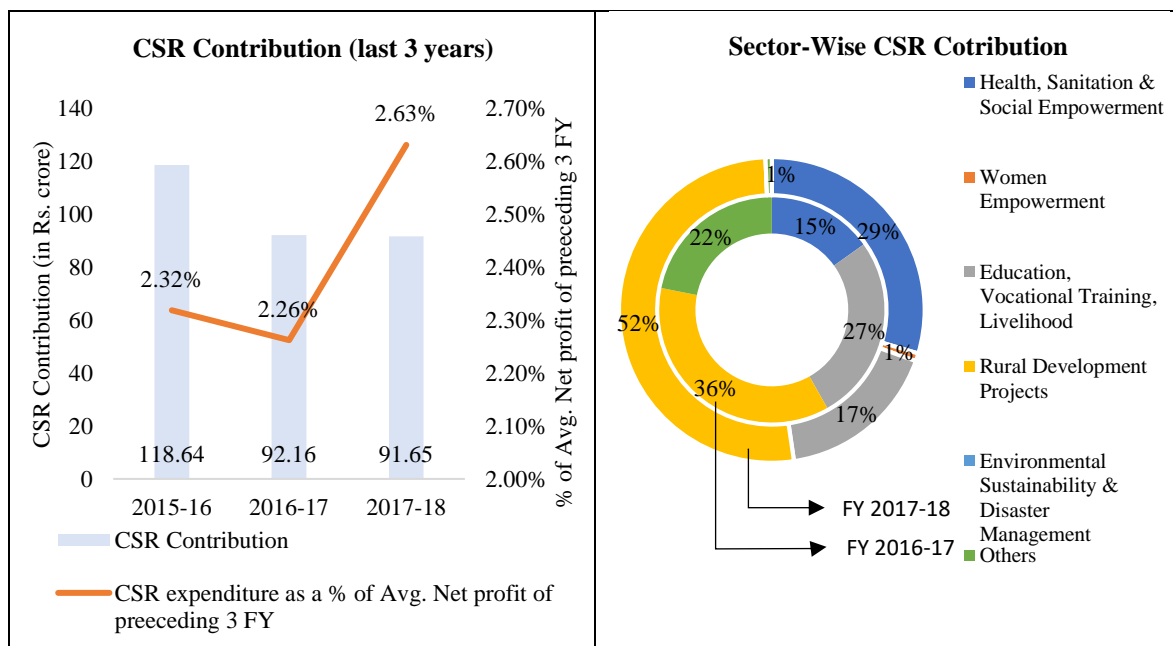
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The policy covers the company as well as extends to its other stakeholders excluding Joint Ventures.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes. Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent members. The chairman of the committee is an Executive director. The CSR Projects are implemented through specialized external agencies including NGOs, Trusts, Foundations, Govt. agencies, PSUs, Pvt Companies etc. The Company conducts impact assessment of its CSR initiatives through an independent agency preferably reputed academic institutions or Government agencies.



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

- A total of 40 complaints were received from customers in 2017-18 and the same have been resolved.
- The Company has an on-line SAP based survey for obtaining customers feedback/ responses through Stakeholder Satisfaction Index (SSI). For FY 2017-18, weightage average SSI score is 88.30%.

Godrej Consumer Products Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability report for FY 2017-18 as per GRI guidelines. ([weblink](#)) **The Sustainability Report has been independently assured by TUV India Private Limited.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link							Link	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link - GCPL Human Rights Policy, Sustainable Procurement Policy, Waste Management Policy, CSR Policy, Whistle Blower Policy and Code of Conduct etc.

<http://www.godrejcp.com/codes-and-policies.aspx>

Sustainability Report for FY 2016-17: http://www.godrejcp.com/Resources/uploads/sustainability_reports/2016-17/GCPL_SR_V1_15Dec2016_17.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has subsidiaries in foreign countries and encourages subsidiaries to participate in Business Responsibility (BR) initiatives. The Company has further disclosed that less than 30% of the other entity / entities participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that BR committee meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Company has a Code, which is applicable to all employees. For subsidiaries and joint ventures, the Code is applicable in line with the local requirements prevailing in the country of operation. The Company encourages its business partners to follow the Code.”*
- The Company received 213 complaints from stakeholders, and all the complaints were resolved during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that *“We have over 600 suppliers on board and approximately 50 per cent of them are local suppliers. We source nearly 50 per cent of our materials locally from our local suppliers. We have started numerous initiatives for sourcing materials locally to helps us reduce carbon emissions and our overall carbon footprint.”*
- The Company has stated that *“By the end of FY 2017- 18, we had diverted more than 99 per cent of waste from landfill to recycling or coprocessing. As part of Extended Producer’s Responsibility, we have collected over 1460 tonnes of postconsumer plastic packaging waste during FY 2017- 18 and sent it for environmentally friendly processing; this constitutes approximately 15 per cent of our total plastic packaging consumption.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 11% of permanent employees are members of recognized employee associations.
- Approx. 9.66% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18*		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

* The Company has stated in Business responsibility Report 2017-18 that *“One complaint was reported in last financial year.”* However, the Company has not specified the complaint received under which Category.

- Safety and skill upgradation training in the last year was as follows:

Category	Safety				Skill upgradation			
	North. Cluster	North. E Cluster	South Cluster	Central West Cluster	North Cluster	North East Cluster	South Cluster	Central West Cluster
Permanent Male Employees	95%	100%	98%	96%	97%	95%	95%	96%
Permanent Female Employees	100%	100%	100%	93%	98%	95%	100%	86%
Employees with disabilities	100%	NA	100%	100%	99%	88%	NA	93%
Casual/Temporary/Contractual employees	100%	100%	100%	100%	100%	85%	55%	100%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders and engaged with them through various mechanisms.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders by inviting an independent third-party external agency to carry out the needs assessment of the communities we work in.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company organise short-term volunteering activities. The annual Godrej Global Volunteering Day is a platform for our team members to connect with our communities more meaningfully. In 2017, over 1212 of our GCPL team members across 16 countries volunteered in over 40 educational institutions and reached out to over 8211 children to improve their teaching-learning experience.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“Policy applies to all Godrej business units, the entities we own and the entities in which we own a majority interest, and the actions of any associated employees.”*

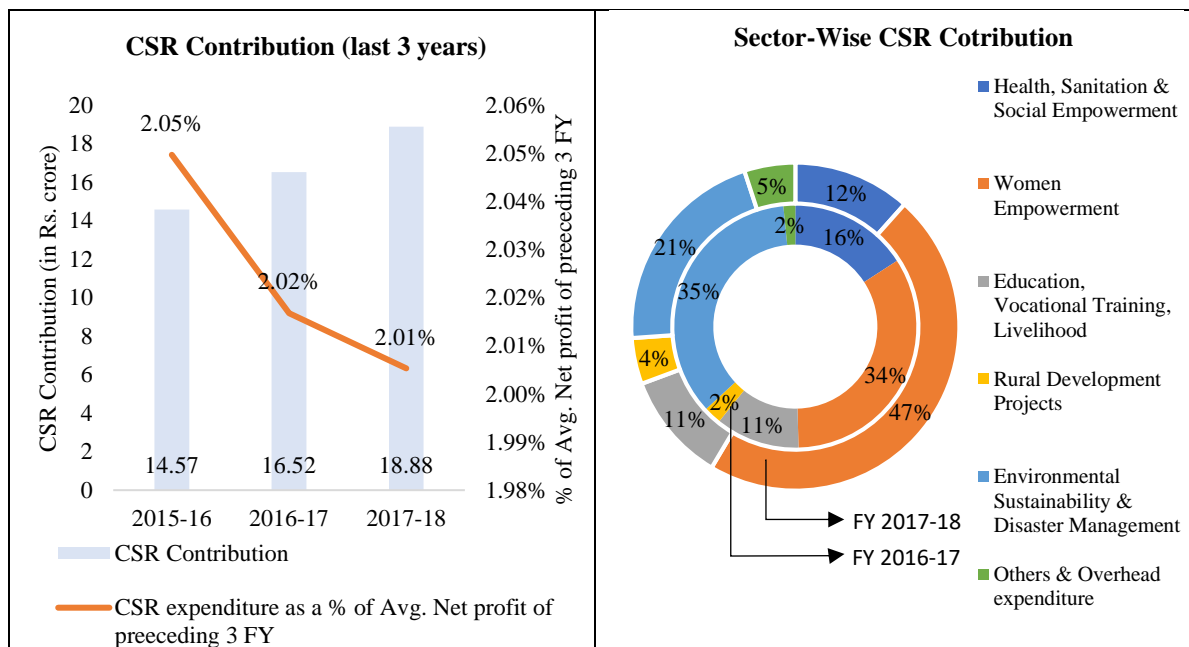
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“All our major manufacturing units have policies on environment, health care, and safety measures. For the subsidiaries and joint ventures, the Code is applicable in keeping with the local requirements prevailing in the country of operation. We encourage our business partners to follow the policy.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes. All the units are compliant with the norms of CPCB and SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through non-profit organisations and social enterprises. The Company conducts impact assessment of its CSR initiatives.



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

- o The Company has not disclosed how many complaints were received from customers (end-consumers) in 2017-18, however it stated that it has addressed all feedback reported in the last financial year.
- o A Customer Satisfaction Survey is carried out by the Company every year.

Grasim Industries (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	View restricted to employees								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been communicated to key internal stakeholders. The communication is an on-going process to cover all the internal and external stakeholders								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Participation of Company, Subsidiaries and other entities in BR Initiatives:

All the subsidiaries participate in the BR initiative of the Company. Further, no other entity/ entities (suppliers, distributors etc.) that the Company does business with participate in the Business responsibility initiatives of the Company.

Governance Related to BRR

Although the Company has not disclosed the frequency of the meeting to assess the BR performance however, the Company has stated that, *“The Management of the Company periodically assesses the BR performance of the Company.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company stated that *“The Company’s governance structure guides it keeping in mind its core values of Integrity, Commitment, Passion, Seamlessness and Speed.”*
- The Corporate Principles and the Code of Conduct cover the Company and all its subsidiaries and are applicable to all the employees of the Company and its subsidiaries.
- No stakeholder complaints were received during the year on the conduct of business involving ethics, transparency and accountability

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although the Company has not disclosed the percentage of the inputs that were sources sustainably. The Company has stated that, *“The Company has built up highly integrated horizontal and vertical integration processes in its operations. All the major inputs under the Company’s control are sourced sustainably.”*
- The Company has stated that it recycles its products and wastes in the range of around 10%. at its various locations.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association and almost all the workers are members of recognized employee associations
- Approx. 2.49% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 100% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal as well as external stakeholders

- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders through baseline surveys.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Several initiatives such as health care, education, infrastructure, watershed management, safe drinking water and sanitation, sustainable livelihood, self-help groups and income generation, etc., are extended to the people living near to the Company's manufacturing units. The safety of the workers is of utmost importance and a culture of safety is brought in, not just for the Company's employees but also for the other stakeholders

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has a Human Rights Policy which is also applicable to its subsidiaries

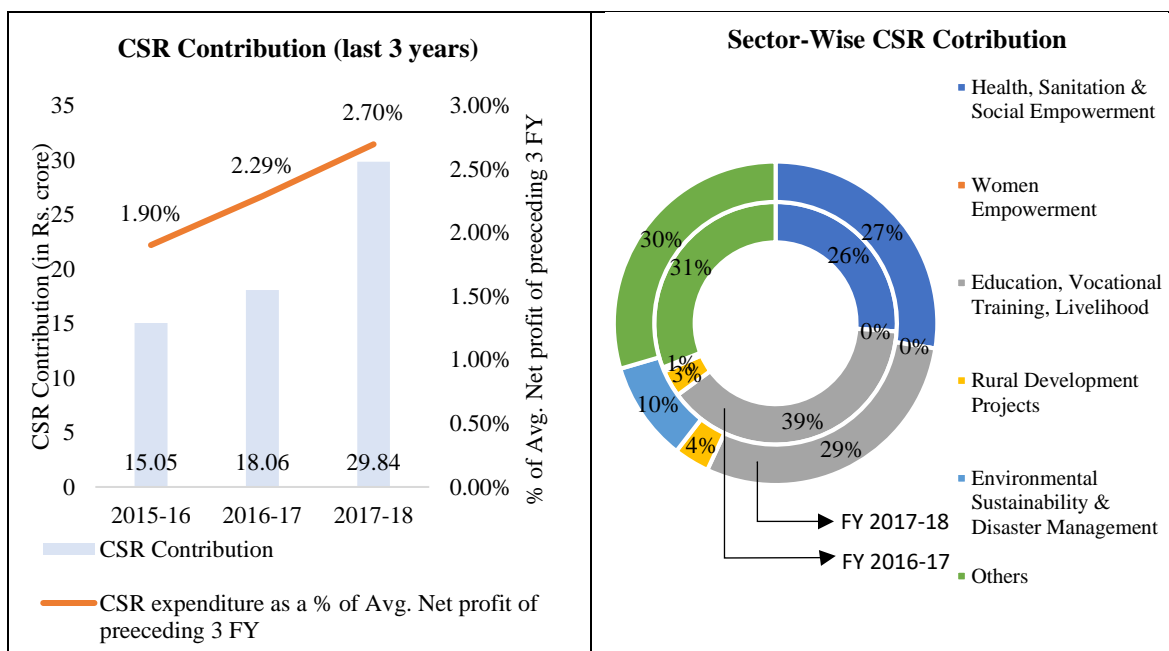
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company's Policy on Safety, Health and Environment also extends to its subsidiaries. The Policy **covers the whole Group**. Common guidelines/frame work for the Group is being framed by Group Sustainability Cell, incorporating key points from all businesses.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Emissions/Waste generated by the Company are within the permissible limits given by CPCB/SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which 1 is Independent members and the Chairman is promoter Executive director. The Company mainly undertakes CSR Activities through its in-house team, Company's trust, External NGO and government structure. The Company conducts impact assessment of its CSR initiatives.



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

- Although the Company has disclosed the number of customer complaints or consumer cases pending however, the Company has stated that, *“The Company has a well-defined system of addressing customer complaints. All complaints are appropriately addressed and resolved.”*
- The Company conducts Consumer Satisfaction Surveys periodically to assess the consumer satisfaction levels.

Havells India Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines for FY 2017-18. ([weblink](#)) **The Sustainability Report has been independently assured by KPMG.**

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	*							*	
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	**							**	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online #	Link1	Link2	Link3	Link4	Link5	Link6	Link7	Link8	Note1
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: Code of Conduct for Board Members and Senior Management Personnel, Idea and Satark Policy https://www.havells.com/content/dam/havells/Corporate_Governance/Code%20of%20Conduct.pdf

Link 2: EHS Policy – This is an internal policy available on Company's intranet.

Link 3: Human Resources Policies including Recruiting and Employment Policy, Leave Policy, Medical and Hospitalisation Policy – These are internal policies available on Company's intranet.

Link 4: CSR Policy - <http://www.havells.com/en/investor-relations/Codes-and-Policies.html>.

Link 5: Human Resource policies, Supplier code of conduct – These are internal policies, available on Company's intranet.

Link 6: EHS Policy- This is an internal policy available on Company's intranet.

Link 7: No specific policy exists for this principle; however Havells actively participate in policy advocacy through its memberships in various industry associations and forums.

Link 8: CSR Policy - <http://www.havells.com/en/investor-relations/Codes-and-Policies.html>

Link 9: Quality Policy- This is an internal policy available on Company's intranet.

* Relevant internal and external stakeholders were consulted, as deemed appropriate, during the formulation of the policies.

** All the policies have been developed considering relevant national and international standards including but not limited to Companies Act, Factories Act, UN Global compact-India and GRI Standard.

Sustainability Report for FY 2017-18: https://www.havells.com/HavellsProductImages/HavellsIndia/Content/pdf/About-Havells/Investor-Relations/Sustainability/Reports/Havells_SustainabilityReport_2017-18.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 7

The Company has not disclosed any reason for not formulating policy for principle 7 in its Business Responsibility Report 2017-18.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 11 subsidiaries out of them 7 are incorporated outside India and 4 are incorporated in India. None of the subsidiaries and entities participate in BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the BR performance of the Company is discussed every 3 months.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Havells’ Code of Conduct is mapped to the highest standards of accountability and transparency. We take all steps to ensure that the Code of Conduct is communicated to and signed by each employee at the time of joining.”*
- Further, whether the policy extends to Group/ Joint ventures/ Suppliers/ NGOs/ others the company has stated that, *“Yes, Havells Code of conduct defines the commitment on ethical behaviour by the Company and all employees sign the Havells Code of Conduct. Awareness program conducted for all employees across the locations, corporate and marketing offices.”*
- The Company received 5 complaints all are resolved during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has Stated that *“Our partnership approach, which encompasses not just our external relationships but also our employee relations, is a key enabler of our sustainability agenda. When it comes to sourcing raw materials, our efforts are concentrated on local sourcing, where possible.”*
- The Company has stated that Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“We sell this waste to authorized vendors, enabling recycling/reuse of **more than 95% of the total waste generated at our plants.**”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 4.78% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	1	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 23.83% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its Internal and External Stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has not disclosed directly that the policy on human rights extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others. However, the company has stated that *“The agreements with contractors and suppliers also mandatorily include necessary clauses on human rights and child labour as specified by the Government of India and Factory Act.”*

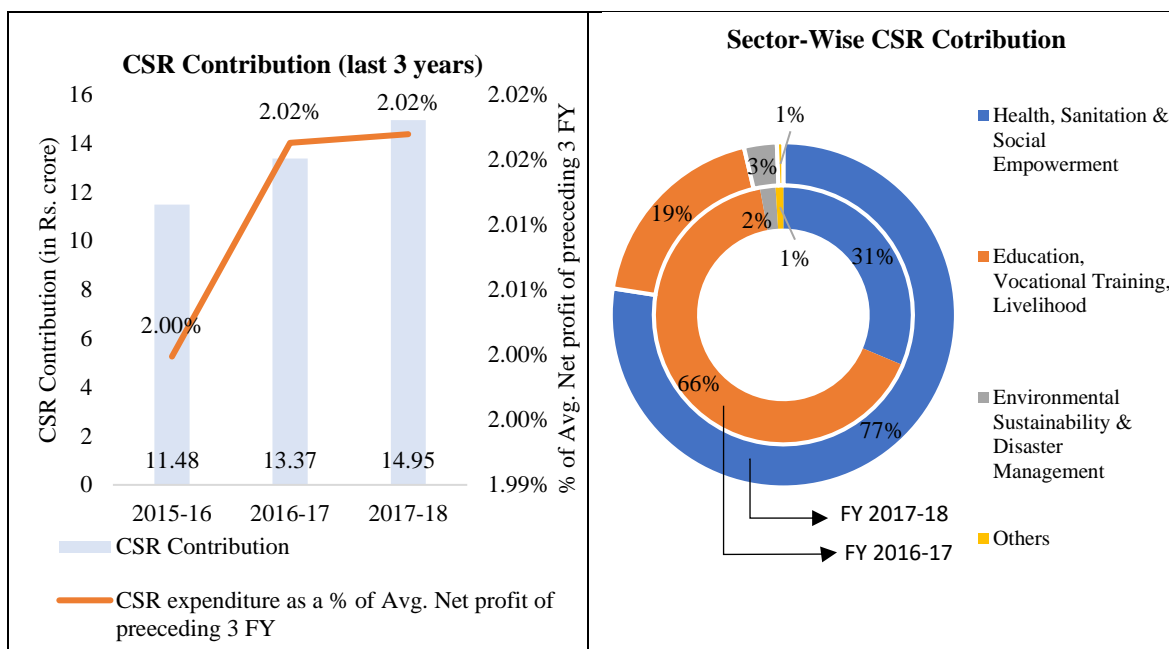
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the?** The Company has not disclosed whether the policy extends to its Group / Joint Ventures / Suppliers / Contractors / NGOs / others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, The Company has stated that *“Any emissions or waste generated within our business is within the permissible limits set by CPCB/SPCB for the financial year 2017-2018 and there have been no show causes/legal notices received from CPCB/SPCB.”*

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 3 are Independent members including the Chairman. The Company has disclosed that CSR activities done by in-house team, trust, NGOs etc. The Company has stated that *“Our project teams closely interact with the local teams to ensure that our interventions are beneficial to the communities in the vicinity of our Plants.”*



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

- The Company has stated that *“During the year, we received nine complaints relating to minor product defects, of which three were resolved and six are in the process of being resolved.”*
- Customer satisfaction survey was conducted with a total of 2,053 customers, and 55% reported satisfaction with products.

HCL Technologies Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has disclosed Sustainability Report for FY 2016. ([Weblink](#)) However, the Company has not disclosed Sustainability Report for FY 2017-18. Latest available Sustainability report is for 2015-16.

Principle wise BR Policy/ Policies

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1 Do you have a policy/ policies for principle									
2 Has the policy been formulated in consultation with the relevant stakeholders?									
3 Does the policy conform to any national / international standards? If yes, specify (50 words).									
4 Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5 Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6 Indicate the link for the policy to be viewed online	All the policies are hosted on the Company's intranet site www.myhcl.com (Note)								
7 Has the policy been formally communicated to all relevant internal and external stakeholders?									
8 Does the Company have an in-house structure to implement the policy / policies?									
9 Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10 Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link - www.myhcl.com

Note: The Company has Annexure some of the policy excerpts are given in the Business Responsibility Report 2017-18, Further Some of the policies are available in Company's [website](#).

<https://www.hcltech.com/investors/governance-policies>

Sustainability Report for FY 2016: <https://www.hcltech.com/socially-responsible-business#sustainability>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that all 94 subsidiaries as on 31st March, 2018 participate in the BR initiatives of the parent Company. The Company has not disclosed what percentage of suppliers/distributors are participate in BR initiative however, the Company has stated that, "As a responsible organization, we

educate our suppliers and distributors on the BR initiatives of the organization. Also, during various vendor meets and other knowledge sharing platforms, we engage in sharing the BR initiatives.”

Governance Related to BRR

The Company has not stated that who assesses the BR performance of the Company and what is the frequency of such assessments. However, the Company has stated that, *“The Board Committees play a crucial role in the governance structure of the company and are being set out to deal with specific areas / activities of the organization. We have a Corporate Social Responsibility (CSR) Committee of the Board which monitors and reviews the CSR activities. For details on the frequency of the CSR Committee meetings, kindly refer the “Frequency and length of meeting of the Committees of the Board and Agenda” section in the Corporate Governance Report which forms part of the Annual Report.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has an anti-bribery and anticorruption policy which is applicable to the entire value chain comprising of all individuals working for all affiliates and subsidiaries of the Company across all levels.
- The Company has stated that *“The Company did not have any significant complaint regarding non-monetary sanctions, fines, anti-competitive behavior, anti-trust, and monopoly practices litigation registered during the financial year ended March 31, 2018”.*

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“the organisation has procedures in place for sustainable sourcing. The procurement approach is guided by the Purchase Manual, which is based on our equal opportunity policy. The organisation do not discriminate any vendor based on gender, nationality, ethnicity, religion, disability etc. Vendors that are committed to upholding human rights and operate keeping environmental issues in mind are given preference, while all other factors relating to quality and the competitive aspects of the quotes remain the same as others.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Yes, the organisation does undertake techniques for waste management in order to optimize resources”.*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has not disclosed what percentage of total employees that are members of recognized employee associations however, the Company has disclosed number of employees in particular employee association.

- Approx. 24% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	4	Nil	8	Nil	6	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 41.64% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders. Further the Company has stated that, *“The stakeholder’s engagement during the financial year ended March 31, 2018 helped us to reconfirm our materiality matrix against our four pillars of Responsible Business, Redefine Workplace, Renew Ecosystem and Repay Society.”*
- The Company has identified basis the materiality matrix index.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** There are various community engagement activities which are undertaken for the welfare of disadvantaged, vulnerable and marginalized stakeholders. Details of various activities are listed under Principle 8.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“its policies extend to all group companies, suppliers, vendors and NGO partners”*.

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

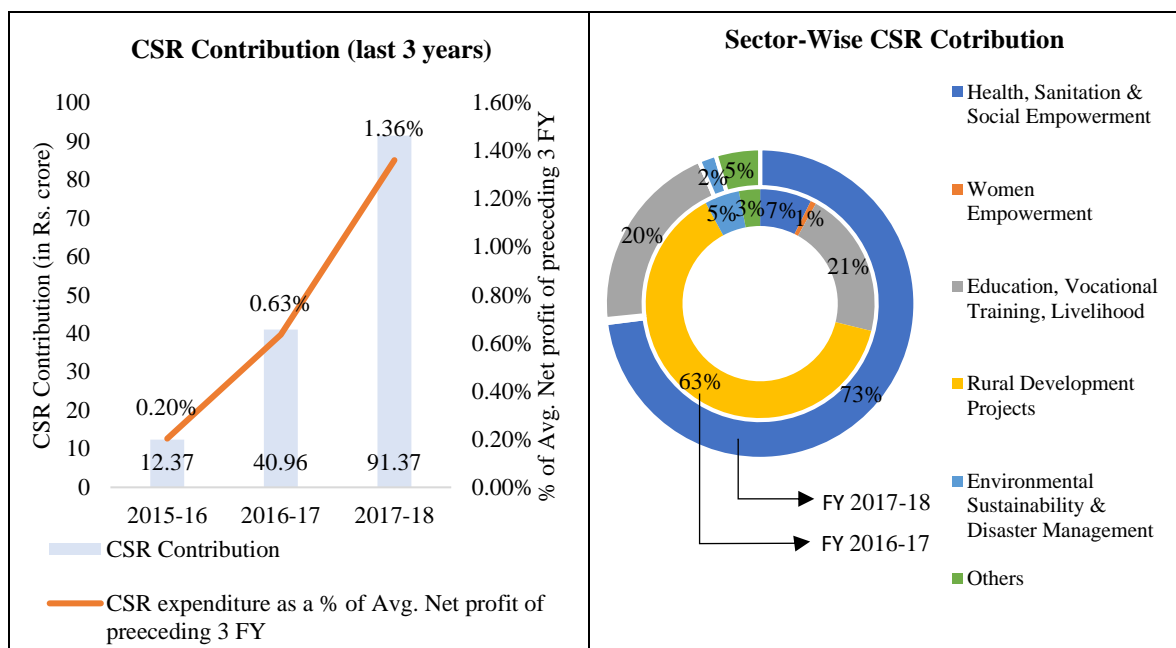
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** Yes, the organisation’s Environmental Policy is for all the persons working for and on behalf of the organization including all companies, suppliers, contractors, NGOs and all stakeholders.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, all the emissions and waste generated are well within the CPCB / SPCB permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through organisation’s own foundation in collaboration with the employees, customers and

external NGOs. The Company conducts impact assessment of its CSR initiatives. The periodic field audits are supplemented by the regular interaction between the volunteers and the community members.



The Company has not spent the prescribed amount on CSR activities. The Company has disclosed the following as reasons for being unable to spend the prescribed amount.

“The Company has primarily identified various main segments i.e. education, healthcare, community, art and culture, rural development, environment sustainability, promoting gender equality and disaster management for CSR expenditure. HCL Samuday, a flagship program of HCL Foundation, is an outcome of HCL’s commitment to provide long lasting solutions in rural development. HCL Samuday works across Agriculture, Education, Health, Infrastructure, Livelihood, and Water, Sanitation & Hygiene (WASH).

The Capital Projects of Samuday (Solar electrification of villages, Piped Water Schemes & refurbishment of Public Health facilities) have a long gestation period. This is due to technical complexities, stringent procurement process, requirement of land from the government and community participation issues.

During the year, the Company has spent ₹ 91.22 crores on its CSR activities. As a socially responsible company, your Company is committed to increase its CSR impact over the coming years, with its aim of playing a larger role in India’s sustainable development by embedding wider economic, social and environmental objectives.”

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

- The Company has stated that, they did not record any significant complaints regarding breach of customer privacy, loss of customer data and noncompliance with laws and regulations concerning the usage of our products and services.
- A Customer Satisfaction Survey is carried out by the third party every year.

HDFC Bank Ltd (2017-18)

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Bank has published a Sustainability Report for FY 2017-18. **The Sustainability Report ([weblink](#)) has been independently assured by DNV-GL.**

The Bank has also stated that *“the Bank has started work on Integrated Reporting from Current year.”*

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	*		*	*	*	*		*	*
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1							Link 2	Link 3
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	**		**		**			**	**

* All policies have been developed as a result of detailed consultations and research on the best practices adopted by banks and organizations across the industry, and per the requirements of HDFC Bank.

** All policies of the Bank are evaluated internally.

Link 1: <https://www.hdfcbank.com/aboutus/cg/codes-and-policies.htm>

Link 2: https://www.hdfcbank.com/csr/pdf/CSR_Policy.pdf

Link 3: <https://www.hdfcbank.com/assets/pdf/Customer-Acceptance-Care-Customer-Severance-Policy.pdf>
https://www.hdfcbank.com/assets/pdf/grievance_redressal_policy.pdf

Sustainability Report for FY 2017-18: https://www.hdfcbank.com/assets/pdf/HDFC_Bank_Sustainability_Report_17-18.pdf

These policies of the Bank are internal documents and are not accessible to the public.

Reasons disclosed by the Company for not formulating policies adhering to principle 2 and 7:

The Bank has not disclosed the reasons for not formulating policies to Principles 2 and 7.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Bank has 2 Subsidiaries as on 31st March, 2018 and none of the Subsidiaries participate in BR initiatives.

Governance Related to BRR

The Bank has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank has stated that *“The Bank has always adopted the highest governance standards to ensure the protection of all stakeholder interests. The Bank’s Code of Conduct and Ethics Manual details the ethical principles that all employees are expected to adhere to. The code is applicable to all employees and covers aspects related, but not limited to, ethics, accountability, conflict of interest, bribery, and corruption.”*
- The policy relating to Ethics, Transparency and Accountability extend to the Group/ Joint ventures/ suppliers/ contractors/ NGOs/ others.
- The Bank has received 2,620 complaints from shareholders of which 12 remain pending and two have not been solved to the satisfaction of the shareholders as on March 31, 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Since the Bank is service oriented organization, material purchase for operations is not significant, except for paper. However, the Bank has stated that *“The Bank ensures that energy efficiency standards are considered during the purchase of electronic equipment such as computers, ACs, etc.”*
- The Bank has stated that *“The Bank has limited scope for using recycled material as processed inputs. The waste generated by the Bank is primarily e-waste. The e-waste generated is disposed of with the help of authorized recyclers.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the bank has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Bank has disclosed under Section E of the BR Report under Principle 3 that, it has a recognised employee association. and 0.31% of permanent employees of the Bank are members of recognized employee associations.
- Approx. 17.48% of the permanent employees are women.
- The Bank has not disclosed the number of employees with disabilities. The bank has stated that *“HDFC Bank is a fair employer and does not discriminate among its employees. Therefore, the Bank does not track this information.”*

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	14	Nil	16	Nil	Not Disclosed	
Child labour /forced labour/ involuntary labour	Not Disclosed		Not Disclosed			
Discriminatory employment	Not Disclosed		Not Disclosed			

- The Bank has not disclosed the percentage of the permanent employees that were given safety and skill upgradation training in the last year. However, it has stated that during the year 2016-17, the average number of training hours per employee was 38.05.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its internal and external stakeholders.
- The Bank has identified women, people with disabilities, children, youth, and farmer communities as its disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Bank to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Bank stated that *“The rural and inclusive banking initiatives help the Bank engage with these sections of the society to spread financial literacy and further the agenda of financial inclusion through specialized products. The Bank also undertakes various initiatives in the field of rural development, skill training, and livelihood enhancement, education, healthcare, and hygiene, in addition to financial literacy and inclusion.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Bank on human rights cover only the Bank or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The bank has stated that, *“No, the policy on human rights is only limited to HDFC Bank and does not extend to the group/joint ventures/suppliers/contractors/NGOs/others.”*

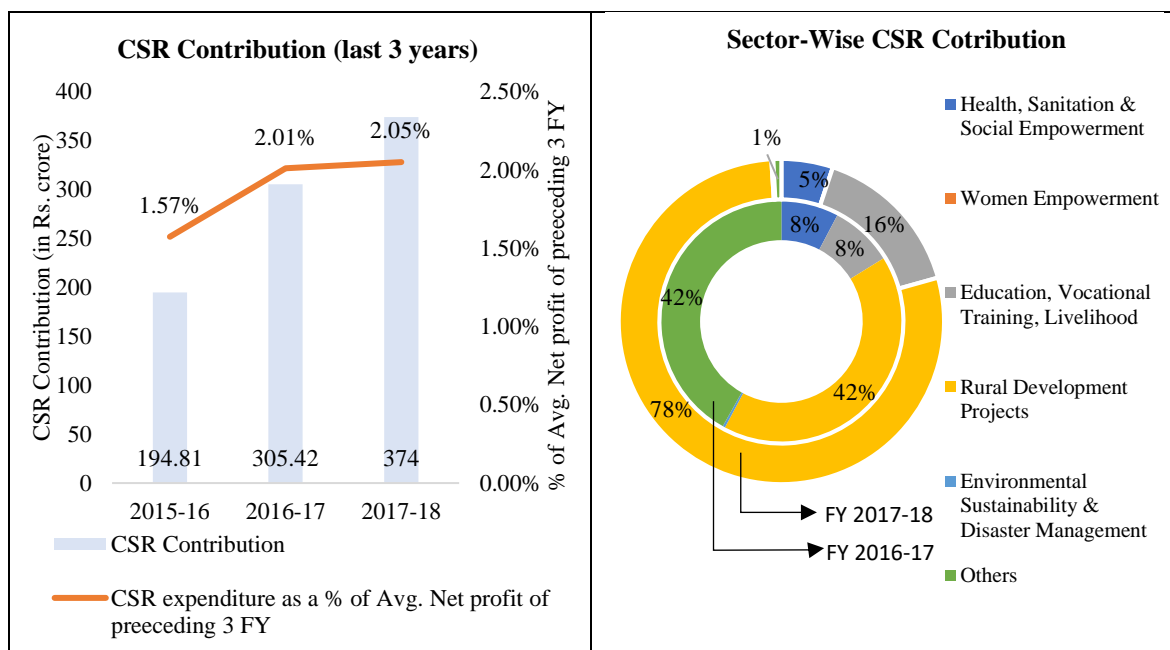
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Bank or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that, *“No, its applicability is limited only to HDFC Bank and does not extend to the group/joint ventures/suppliers/contractors/ NGOs/others.”*
- **Are the Emissions/Waste generated by the Bank within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not Applicable.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Bank**

The Bank’s CSR committee consists of 6 members out of which 4 are Independent members including the Chairman. The Bank mainly undertakes CSR Activities in-house team and NGOs, The Bank conducts impact assessment of its CSR initiatives taken up by HDFC Bank.



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

- o No Customer complaints/ consumer cases pending as on March 31, 2018.
- o The Bank has stated that “A HDFC Bank’s *Quality Initiative Group (QIG)* is responsible for conducting surveys to measure and analyse the satisfaction of its customers with its products and services.”

Substantial change from FY 16-17

	FY 2016-17	FY 2017-18
Reasons for not formulating policies	<p>P2: The Bank has stated that “We have internal guidelines on procurement of energy efficient equipment. Considering the nature of our business, this principle has limited applicability for us.”</p> <p>P7: The Bank has stated that “We do not take part in any lobbying or policy advocacy.”</p>	Not Disclosed
Governance Related to BRR	The Bank has stated that it meets periodically to assess the BR performance of the Bank.	The Bank has stated that it meets annually to assess the BR performance of the Company.

Principle 1	The Bank has stated that guidelines cover only HDFC Bank and do not extend to other group companies/joint ventures/suppliers/contractors/NGOs/others.	The Bank has stated that the policy relating to Ethics, Transparency and Accountability extend to the Group/ Joint ventures/ suppliers/ contractors/ NGOs/ others.
Principle 5	The Bank has stated that Code of Conduct and Ethics Policy applicable for all employees, associates and business partners.	No, the policy on human rights is only limited to HDFC Bank and does not extend to the group/joint ventures / suppliers / contractors / NGOs / others.

HDFC Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Company has also disclosed that Integrated Report placed on ([website](#)), however, the Company has not disclosed that whether the report is mapped with GRI or IIRC.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note 1							Note 1	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link BR							Link BR	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 4							Note 4	

Note 1: The policies have been developed based on the best practices or as per the regulatory requirements and through appropriate consultation with relevant stakeholders.

Note 2: May include a combination of internal policies of the Corporation which are accessible to all internal stakeholders and the policies placed on the Corporation's website. The hyperlink is <http://www.hdfc.com/investor-services/allpolicies>.

Note 3: The policies of the Corporation are internal documents and are not accessible to the public.

Note 4: The policies are internally evaluated by various Department Heads, Business Heads and the management.

The Company has not provided links for all the policies. However, SES has found link for Business Responsibility Policy on the web and considered the same.

Link BR: https://www.hdfc.com/allpolicies/BR-Policy_0.pdf

Sustainability Report for FY 2017-18: https://www.hdfc.com/sites/default/files/2018-07/Integrated%20Report_17-07-18_CC.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company has not disclosed the reason for not formulating to principle P7.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

As at 31st March 2018 the corporation had 18 subsidiary companies and 3 associate companies. The Company has stated that the major subsidiary companies have their own BR initiatives and generally do not participate in the BR initiatives of the Corporation. Other entities do not participate in BR initiatives.

Governance Related to BRR

The Business responsibility performance is reviewed by the Board of Directors on annual basis. The Company has disclosed that the executive directors and senior management of the Corporation monitor various aspects of social, environmental, governance and economic responsibilities of the business on a continuous basis.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“HDFC ensures compliance of ethical standards not only by its employees but also by its vendors, contractor’s etc. through appropriate clauses in the work contract signed with them.”*
- The Company has stated that *“The codes and policies are designed to cover employees in all functional areas by adhering to the laws applicable to the Corporation’s business. Ethical values and zero tolerance to bribery and corruption percolates to all group companies of the Corporation.”*
- The Company received 19,439 complaints from the stakeholders, out of which 156 complaints were pending as on 31 March 2018 further out of 156 pending complaints 8 complaints were pending as on 30th April 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Corporation endeavours to use environmentally friendly materials with higher recycle content, such as green guard rated furniture and gives regional priority to material purchases of such recycled products.”*
- The Company has stated that *“The Corporation is a housing finance Company. The key waste products of the Corporation primarily entail paper and electronic waste. The Corporation engages with certified e-waste handlers for disposal of e-waste and uses local vendors for disposal of paper for recycling. HDFC has also installed a plastic bottle flaking machine.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 24.85% of the permanent employees are women.

- The Company has not disclosed the number of employees with disabilities. However, the Company stated that *“The Corporation upholds the importance of being an equal opportunity employer and hence makes no distinction between employees based on disabilities.”*

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 97.79% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Corporation has given housing loans to categorised customers as ‘economically weaker sections’ and ‘low income group’ under the various scheme of government. The Corporation’s CSR activities focus on disadvantaged, vulnerable and marginalized segments of society.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Corporation given the growth of urbanization and consequent housing demands in India. HDFC has also supported and funded social initiative project like premises for educational purpose, hostel blocks and senior citizen housing. During the year ended March 31, 2018, credit linked subsidy amounting to ₹ 455 crore has been credited to the account of 20,794 borrowers.

In May 2017, 131 employees of HDFC & HDFC Sales volunteered for ‘Shramdaan’ in 2 drought prone villages in Maharashtra. A Blood donation drive was conducted at its head office during the last year where employees participated wholeheartedly to support the noble cause.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“HDFC complies and adheres to all human rights laws and guidelines, national laws and policies and treats all its stakeholders and customers with dignity, respect and due understanding. While the key subsidiary and associate companies of the Corporation have their own independent policies, they all respect and promote human rights.”*

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that key

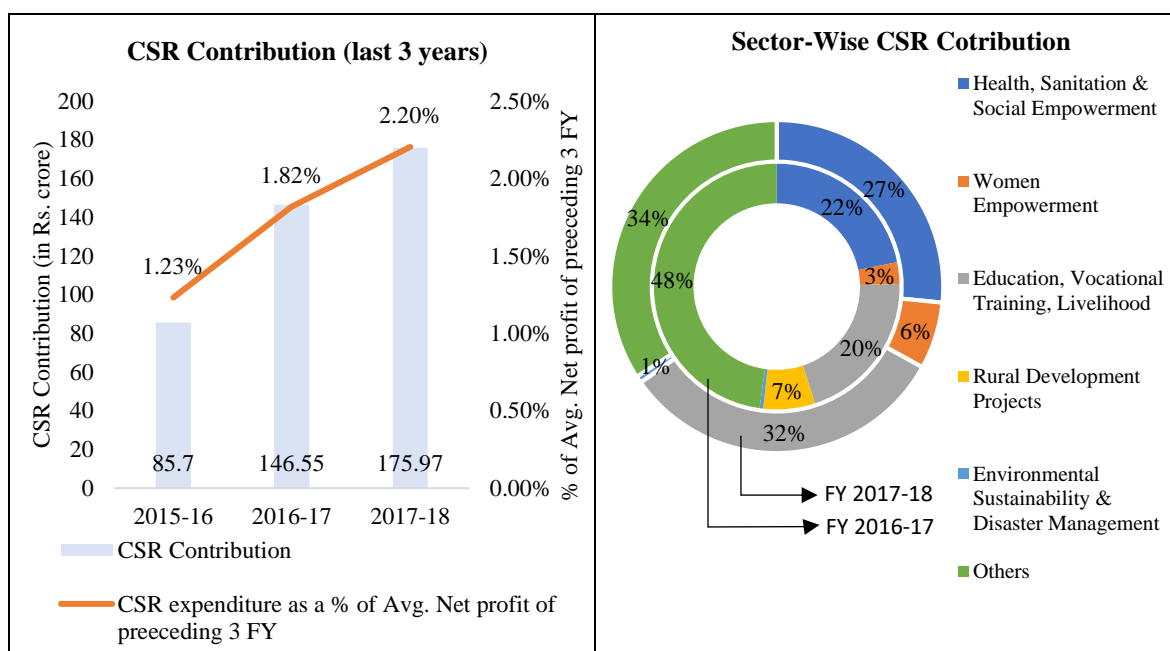
subsidiary and associate companies of the Corporation have their own independent policies, they all respect, protect and make efforts to restore the environment.

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Corporation complies with requisite environmental regulations in respect of its premises and operations.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through large part of its social welfare activities through HT Parekh Foundation (a CSR initiative of HDFC) which partners with exemplary NGOs. The Company conducts impact assessment of its CSR initiatives. The number of beneficiaries who have benefited, specific case studies and assessment results are analysed in-depth for the Corporation’s social initiatives.



Note: The CSR Contribution of 2017-18 (₹ 175.97 crore) includes ₹ 14.59 crore of unspent CSR expenditure, carried forward from financial year 2016-17.

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

- The Corporation has resolved 99.2% of complaints received from customers and 100% of investor complaints received during the year.
- The Corporation has placed a software called CREAMS to record and redress the grievances / feedback from the customers which helps in ensuring standard operating procedure and maintaining high service standards.

Substantial change from FY 16-17

In FY 16-17 the Company has not followed the complete SEBI format for Business Responsibility Report. The Company has omitted Q2 of Section D of BR Report. However, in FY 2017-18 the Company has followed the format as per SEBI guidelines and has also provided 9 principles in tabular format.

Hero MotoCorp Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note 1								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Note 2								
6	Indicate the link for the policy to be viewed online	Link 1 Link 2	Link 1	Link1 Link 2 **	Link 3	Link 2	Link 1	Link 1 Link 2	Link 3	Link 1 Link 4
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Note 2								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 1								

Link 1 Vigil Mechanism/ Whistle Blower, Safety, Environment, Quality, Corporate Social Responsibility Policy

<https://www.heromotocorp.com/en-in/about-us/key-policies.html>

Link 2 Code of Conduct

<https://www.heromotocorp.com/en-in/about-us/code-of-conduct.html>

Link 3 - Corporate Social Responsibility Policy

<https://www.heromotocorp.com/en-in/about-us/key-policies/corporate-social-responsibility.html>

Link 4 - Policy on warranty and service maintenance schedule

<https://www.heromotocorp.com/en-in/rider-zone/bike-warranty-details-and-policy.html>

** Available on Company's intranet

Note 1: *The Whistle Blower Policy, Code of Conduct, Prevention of Sexual Harassment Policy and Corporate Social Responsibility Policy are framed as per the requirements of the respective legislations of India. Environment policy conforms to ISO 14001 which is an international standard released by International Organisation for Standardization (ISO).*

Note 2: *The Whistle Blower Policy and Code of Conduct are overseen by the Audit Committee of the Board of Directors of the Company and Corporate Social Responsibility Policy is overseen by the Corporate Social Responsibility Committee of the Board of Directors of the Company. Prevention of Sexual Harassment Policy is being overseen by Internal Complaints Committee (ICC) constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The grievance, if any, arising out of Whistle Blower Policy, Code of Conduct and Prevention of Sexual Harassment Policy is being redressed by the respective committees which oversee them.*

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has 5 subsidiaries (including step down subsidiaries) outside India and 1 subsidiary in India. They are not required to comply with the Business Responsibility/Corporate Social Responsibility initiatives as per the laws applicable to them. The Company has disclosed that currently, percentage of suppliers under the Green Vendor Development Program (GVDP) is more than 66% of total Tier - I supplier universe and suppliers are continuously added to this program.

Governance Related to BRR

The Company has stated that, the management regularly monitors the BR initiatives and a complete assessment is done at the end of financial year.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“the policies under this principle include (a) Code of Conduct and (b) Vigil Mechanism/ Whistle Blower Policy. While the above-mentioned policies/codes are currently not applicable on the Group/Joint Ventures/Suppliers/ Contractors/NGOs/Others, the Company plans to extend the applicability of the same to other entities going forward.”*
- The Company received 14 complaints with regard to violation of the Code of Conduct in FY 2017-18 out of which 12 of these cases have been investigated and requisite actions have been taken and remaining 2 cases are currently under investigation.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“the Company has taken few initiatives in past years, wherein sustainable sourcing has been ensured. However, it is difficult to ascertain the percentage of inputs sourced from these suppliers accounting towards total input due to the different kinds of materials being used by the Company.”*
- The Company has disclosed that it has a mechanism for recycling of its waste. The Company has recycles 90% of trade effluents which are re-used in the process using Zero Liquid Discharge (ZLD) platform. All the treated domestic effluents are either converted to soft water, used in cooling towers or in green belt maintenance. About 59% of the paint sludge is co-processed/ recycled and balance 41% is incinerated and waste heat from incinerator is recovered and used for process water heating.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 100% of permanent employees are members of recognized employee associations.
- Approx. 3.10% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 67% of the permanent employees, 53% of the permanent Women Employees and 97% of Employees with Disabilities were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped and identified its external stakeholders, including disadvantaged, vulnerable and marginalised stakeholders.
- The Company has stated that, *“the disadvantaged and vulnerable stakeholders include differently-abled employees, women and rural communities in the vicinity of its plants.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders** The Company has taken special initiatives which are:

Differently abled employees: All employees have equal opportunity on career growth, coaching and mentoring.

Women: During the year, the Company enhanced its efforts on overall development of women with focus on education. Key highlights of the drive are:

- Organising literary classes as well as skill development programmes.
- Imparting science education and training.
- Career counselling sessions for rural girls.
- Organisation of camps for health and other recreational activities.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“the Company is committed to protect and safeguard human rights. The Company has put in place a Code of Conduct and expects its stakeholders to adhere and uphold the standards contained therein.”*

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, “the policy on environment extends to the suppliers and dealers through “Green Dealer Development Program”, “Green Vendor Development Programme” and “Green Charter”.”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that Yes, the emission/waste generated by the company within the permissible limits.

The Company has stated in BRR that it received notices from CPCB and CETP as follows:

1- Direction for installation of online stack/air emission monitoring system connected to CPCB server before 31.03.2018, was received vide notification dated 20.03.2018 at Dharuhera Plant.

Status: HMCL is exploring available technologies and assessing suppliers.

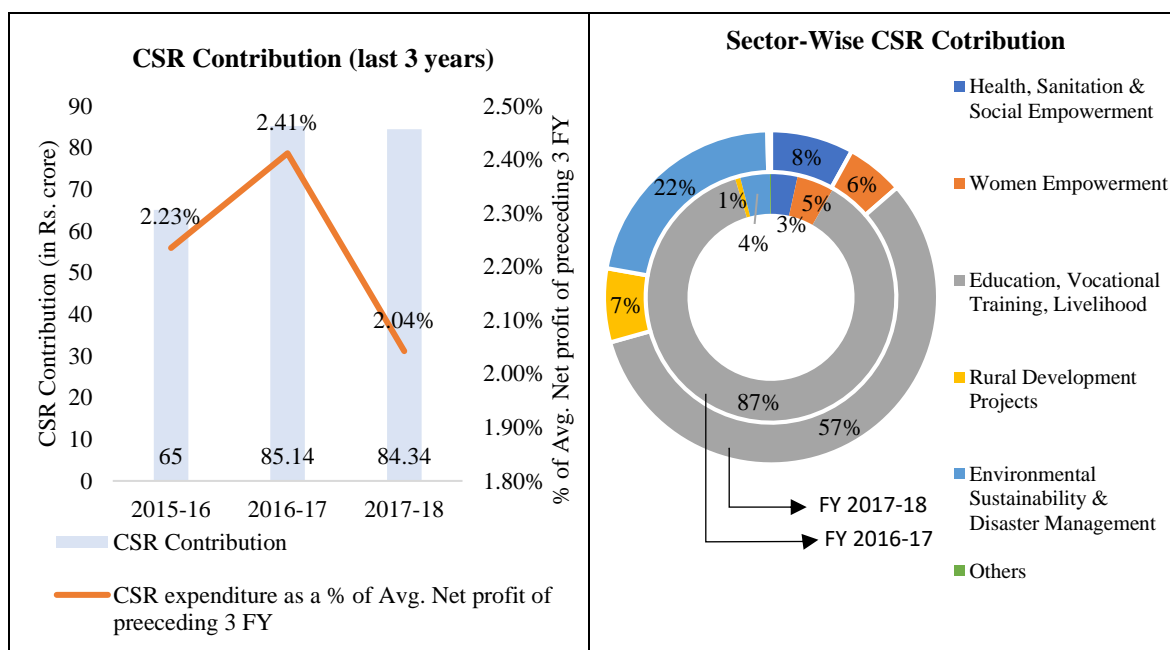
2 - Direction from Uttarakhand State Pollution Board for connection to CETP. The Direction has been issued in relation to a NGT order dated 23.01.2018.

Status: Appeal filed before the NGT to set aside the directions

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 2 are Independent members. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities directly or through specialized agencies / NGOs and government departments. The Company conducts impact assessment of its CSR initiatives through its Aspect/Impact Assessment (AIA) activity and Hazard Identification and Risk Assessment (HIRA) technique.



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

- As on the end of FY 2017-18, 1.12% of total customer complaints are pending. The complaints are insignificant in comparison to the number of customers.
- The Company has stated that, the company undertake studies to measure customer satisfaction with sales process, service process and for the new products launched last year through a third party research agency. Also, a brand track study was conducted on a monthly basis to gauge health of the product brands as well as corporate brand vis-a-vis competition.

Hindalco Industries Ltd (2017-18)

The Company has not disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. However, the Company has published the Sustainability Report ([weblink](#)) as per GRI guidelines for FY 2017-18. The mapping of all 9 principles as prescribed in the SEBI guidelines has been made in the Sustainability report 2017-18.

Sustainability Report 2017-18: <http://www.hindalco.com/upload/pdf/sustainability-report-2017-18.pdf>

The Company has not provided response to question 2(a) of section D as per the SEBI format. However, the Company has provided mapping of BRR and questions under various principles

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that as on 31st March, 2018, the Company has 50 subsidiaries – 13 domestic and 37 foreign. The Company has not disclosed whether Subsidiary Company/Companies participate in the BR Initiatives of the parent company, however, it has been stated that, *“Hindalco’s Sustainability Report covers the India Operations including Mines. Further, Novelis Inc., also publishes Sustainability Report based of Global Reporting Initiative (GRI) framework.”* Further, the Company has stated that, *“At present, suppliers and distributors with whom the Company does business, do not participate in the Business Responsibility initiatives of the Company directly.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“We promote ethical behaviour in all our business activities and have put in place mechanisms to report unethical behaviour. We have constituted a Value Standards Committee (VSC) wherein the whistle blower may raise a concern. The concern is handled by an independent reporting mechanism through the ethics hotline and the VSC at the respective locations.”*
- The Company received 22 investor complaints and all the 22 complaints were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“We have undertaken various initiatives that aim to facilitate transformation into a more sustainable corporate. We are focused on energy efficiency of operations, increasing the share of renewable energy in the overall energy mix, progressive waste management techniques, sustainable mining practices, material recycling, safety practices and employee empowerment.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that, *“We have made efforts to reduce our specific water consumption across our operations. We have also recycled wastewater generated from our processes. We closely monitor the quantities of wastewater generated and recycled at various metering points.”* The Company has further stated that *“Achieved 100% utilisation of non-hazardous solid waste in the copper manufacturing facility.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment. However, the company has stated *“during Fiscal 2018, the Company has received one complaint on sexual harassment which has been substantiated and appropriate actions were taken”*.
- Approx. 1.88% of the permanent employees are women.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The it has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“Sustainability criteria, including environmental, human rights and social criteria are used to screen all our new suppliers to ensure sustainable supply chain operations. We are expanding our scope of the risk assessment to include more suppliers with goal to cover 100% of the existing suppliers.”*

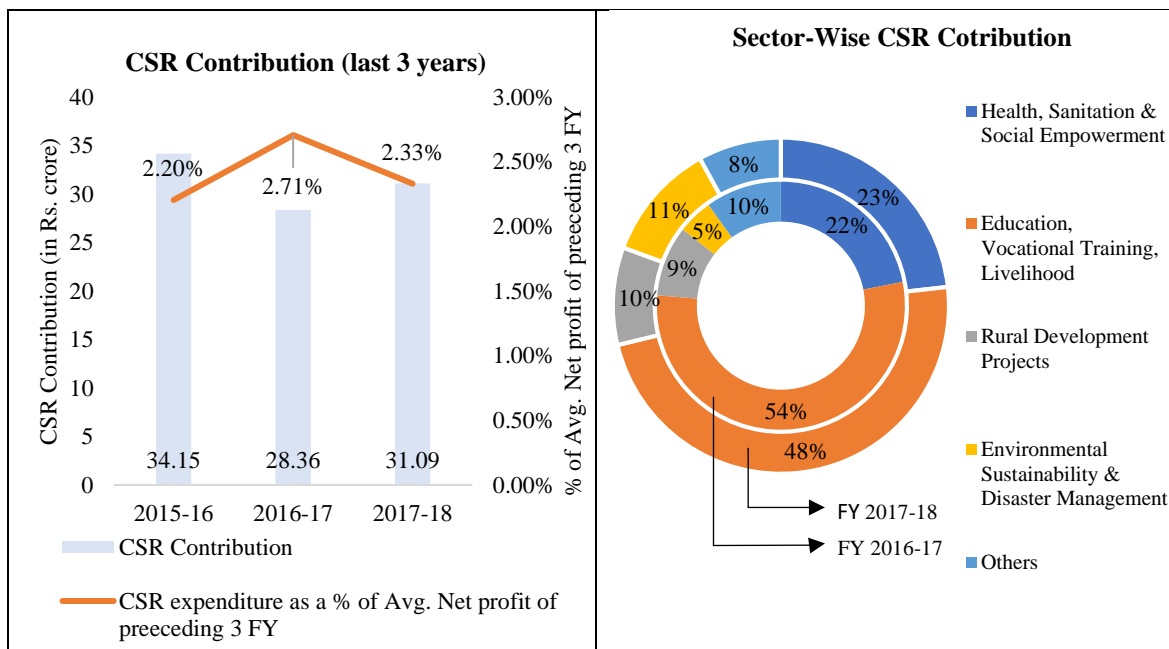
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that, *“We monitor our wastewater quality parameters to ensure that they are within permissible limits as prescribed by respective State Pollution Control Boards (SPCBs). The destinations of discharges are also as specified by respective SPCBs.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house team. The company has stated *“HJST- Hindalco Jana Seva Trust is the implementing agency in some of our projects, registered under Trust Act.”* The Company has Conducts impact assessment by third party. The Company has stated that, *“To measure the impact of the work done, a social audit or an impact assessment study is carried out by a third party on a case-to-case basis. Reputed NGOs, universities and institutions are assigned to conduct the impact assessment study.”*



Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.

- Although, the Company has not disclosed the no of the complaints received during the year, however, the Company has stated that *“We haven’t received any complaints regarding breaches of customer privacy or loss of customer data either.”*
- The Company has stated that *“We conduct extensive stakeholder engagement exercises to identify concerns of stakeholders. This is carried out through carefully designed engagement platforms We have a mechanism to identify and engage with stakeholder groups that have impacts on our stakeholders are updated through monthly review meetings chaired by the MD. The mechanism helps us for engagement with stakeholders at regular intervals. Based on the feedback from stakeholders, action plans are prepared and implemented by the respective teams.”*

Hindustan Petroleum Corporation Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines. **The Sustainability Report ([Weblink](#)) for FY 17-18 has been independently assured by M/s. Bureau Veritas (India) Pvt. Ltd.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	All the policies have been formulated in accordance with the relevant statutory laws, guidelines issued by Government of India, Regulatory bodies and industry best practices.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD/ owner / CEO / appropriate Board Director?	The Policies are approved by Board/ Competent Authorities as per Delegation of Power.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1 Link 2	Link 3 Link 4	Link 2 Link 5 **	Link 4 Link 6	Link 5 **	Link 3 Link 4 Link 7	Link 4	Link 6	Link 4 Link 8
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

** Internal Human Resource Policies

Link 1: Code of Conduct: <https://www.hindustanpetroleum.com/codeofconduct>

Link 2: Whistle Blower Policy: https://www.hindustanpetroleum.com/documents/pdf/Whistle_Blower_policy.pdf

Link 3: HSE Policy: <https://www.hindustanpetroleum.com/csrpolicy>

Link 4: Sustainable development Policy <https://www.hindustanpetroleum.com/CSRPolicies>

Link 5: UNGC <https://www.hindustanpetroleum.com/CSRGCCCommitment>

Link 6: CSR Policy <https://www.hindustanpetroleum.com/documents/pdf/csr/CSR-POLICY.pdf>

Link 7: Climate Change Policy Statement

https://www.hindustanpetroleum.com/documents/pdf/HPCL_Climate_Change_policy.pdf

Link 8: Citizen's Charter, Quality Policy <https://www.hindustanpetroleum.com/citizens-clients-charter>

Sustainability Report for FY 2017-18: https://www.hindustanpetroleum.com/documents/pdf/HPCL_Sustainability_Report_2017-18.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 4 subsidiaries and the subsidiaries are aligned to Corporate social responsibility (CSR) philosophy and agenda of the parent company. The Company engages periodically with more than 60% of its suppliers, distributors, dealers, transporters etc. for raising awareness on sustainability issues.

Governance Related to BRR

The Company has stated that it has constituted a "CSR Sustainability Development committee" for periodic review discussion and guidance on various CSR initiatives and Sustainability Development Initiatives and measures. Annual Review was conducted by the committee for 2016-17.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the policies relating to ethics, bribery and corruption cover itself only. The Joint venture companies have their own policies. The suppliers/contractors are governed as per the terms & conditions of the contract.
- During the year 2017-18 following number of complaints were received and resolved.

Type of Complaints	Complaints received	Resolved Complaints	Resolved Complaints
Public grievances	3,936 (includes 133 pending from 2016-17)	3823	113
Shareholders	31	31	0
Vigilance Department	160	146	14

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that "HPCL has term contracts with NOCs and MNCs for its crude oil sourcing. HPCL also have Contracts for additional crude quantities on Optional basis to take care of additional crude oil requirement. Further, efforts are made on continuous basis to enhance the crude basket. HPCL also imparts training to transport crew on defensive driving practices, safety training, fuel conservation techniques and first aid, driving simulators etc."
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that "Company has a mechanism to recycle waste. HPCL has installed Effluent treatment plant (ETP) at both its refineries."

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 97.97% of permanent employees are members of recognized employee associations.
- Approx. 9.29% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	Nil	Nil	NA	NA
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	NA	NA
Discriminatory employment	Nil	Nil	Nil	Nil	NA	NA

Note: For the FY 2015-16 the Business responsibility report was not applicable for the Company.

- Man-days of training given to various employees in 2017-18 is as follows: Training Man-days: 40554 (Permanent Management & Non-Management)
 - a) Permanent Women Employees: 2390
 - b) Employees with Disability: 32

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped both its internal and external stakeholders and continuously engages with them in order to have synergetic relationship.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Company has adopted a holistic approach for the socio-economic development of the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** HPCL has undertaken special initiatives primarily focused on provision of basic amenities including health and education infrastructure in remote rural areas; providing scholarship to meritorious school/college students from SC, ST, OBC and PWD communities, entrepreneurship development program for women from SC community. The focused efforts of the corporation towards social development through creation of community infrastructure and social interventions has led to empowerment and socio-economic welfare of the host communities and society at large.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The policy relating to human rights covers only the company i.e. HPCL. Joint ventures have their independent policies and procedures towards protecting human rights.

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

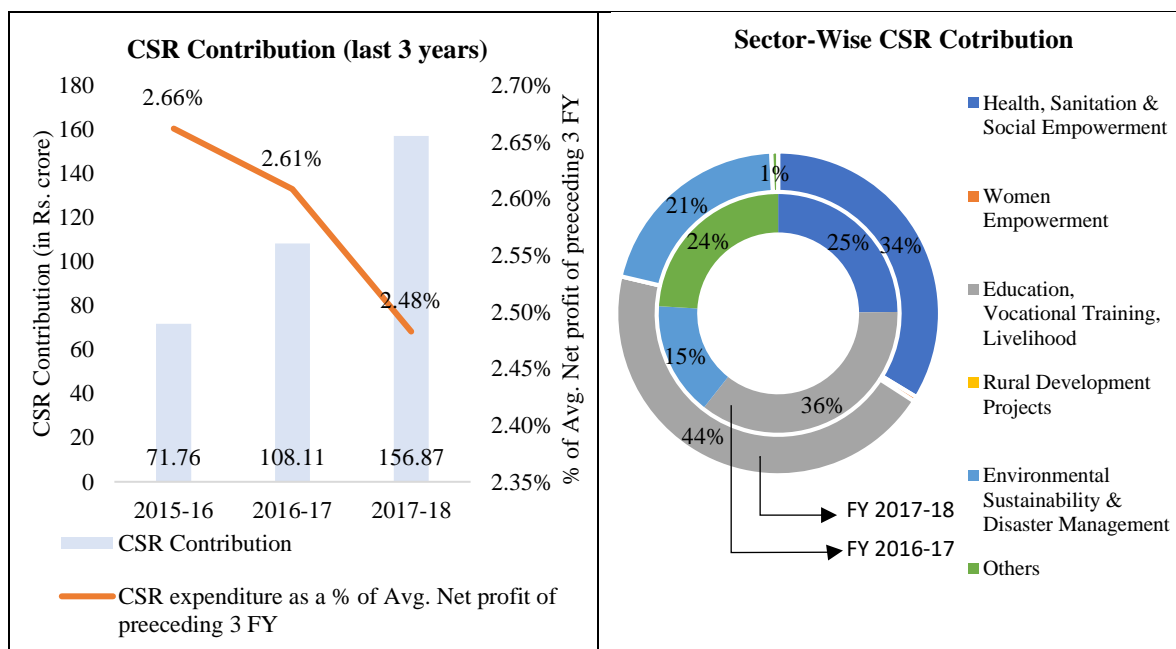
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** HPCL has an “Environment Policy” in place which covers only the company and all the joint ventures have their independent policies.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emission/Waste generated during the course of operations are within the permissible limits given by CPCB/SPCB norms.
- **Pending Case related to Emissions:** *The Company has disclosed that one case is pending related to emission as follows:*

(Cause Title: Charudatt Koli & Anr Vs Sealord Containers & Others)

HPCL has complied with the directions of MPCB pursuant to the aforesaid NGT Orders. Matter is pending for further hearing and has been transferred to NGT, New Delhi.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**
The Company’s CSR committee consists of 5 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities either directly by HPCL or through NGO’s and Government agencies etc. The Company conducts impact assessment of its CSR initiatives. CSR Committee and CSR Council monitors the activity on quarterly basis.



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

- A total of 2,39,872 complaints were received from customers in 2017-18, out of which 2,39,323 (99.78%) have been resolved. The Company has stated that “*remaining 549 (0.22%) cases shall be addressed within the timelines*”
- Yes, Consumer surveys are carried out by the company.

Hindustan Unilever Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The CoBP of the Company conforms to the United Nations Global Compact (UNGC) guidelines and International Labour Organisation (ILO) principles.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	The CoBP and the USLP are frameworks adopted by Unilever globally and have been followed by the Company.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The CoBP is administered under the overall supervision of the Management Committee of the Company, headed by the Chief Executive Officer and Managing Director. The Audit Committee reviews the implementation of CoBP. The CSR Committee reviews the implementation of the USLP besides the scope that has been laid out for this Committee under the Companies Act, 2013.								
6	Indicate the link for the policy to be viewed online*	Link 1 , Link 2 , Link 3								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1: <https://www.hul.co.in/sustainable-living/>

Link2: <https://www.hul.co.in/investor-relations/corporate-governance/hul-policies/>

Link3: https://www.hul.co.in/Images/4297-cobp-summary-doc_tcm1255-409220_en.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

- The Company has stated that, “*The Company has 11 subsidiaries as on 31st March 2018. Hindustan Unilever Foundation and Bhavishya Alliance child Nutrition Initiatives-both are not for profit companies incorporated to promote and implement the CSR agenda. Both companies work in the areas of social, economic and environmental concerns and contribute to the sustainability initiatives of the company. In addition, Unilever India Exports Limited also contributes to the sustainability initiatives of the Company.*”
- The Company has not disclosed the percentage of other entity/entities that participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the CSR committee meets atleast twice a year to review the progress on various sustainability initiatives.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“The standards on ethics, transparency and accountability are stated under the COBP and Code policies of the Company. COBP is the statement of values and represents the standard of conduct which everyone associated with the company is expected to observe in all business endeavours. The Company also has a Whistle Blower Policy which allows employees to bring to the attention of the Management, promptly and directly, any unethical behaviour, suspected fraud or irregularity in the Company practices which is not in line with the COBP.”*
- The Company has not disclosed the number of complaints received.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although the Company has not disclosed the percentage of the inputs that were sourced sustainability, the Company has stated that, many of the food products are made from sustainably sourced agricultural raw materials. For example, 100% of tomatoes used in your Company’s Kissan ketchup are from sustainable sources.
- The Company has not disclosed the percentage of recycling of products and waste.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has not disclosed the percent of permanent employees which are members of recognized employee associations.
- Approx. 1.82% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	1	Nil	2	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Although the Company has not stated percentage of the permanent employees were given safety and skill upgradation training in the last year. The Company has stated that, *“In 2017, your Company*

rolled out well-being workshops and healthy-eating awareness sessions for employees, that were attended by nearly 4,000 employees. It also conducted purpose workshops for over 1,000 employees.”

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders.
- The Company has not disclosed whether it has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has disclosed various initiatives taken by it for its stakeholders.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that it fully adheres to Unilever’s approach to human rights. In addition to this, your Company’s COBP upholds the principles of human rights and fair treatment. The Code also conforms to the International Labour Organisation (ILO) principles.

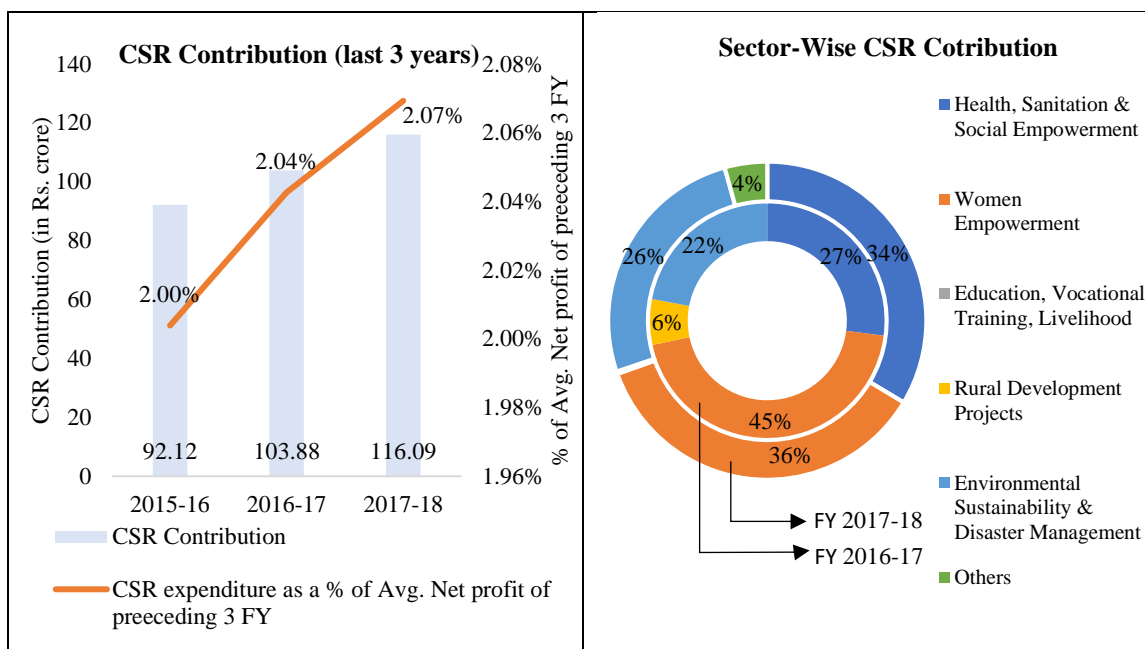
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not explicitly disclosed whether Company’s Environment Policy covers only the Company, or it is extended to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** All the emissions / waste generated by the Company are generally within the permissible limits given by respective state Pollution Control Boards (PCBs).

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which 4 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, foundations and various other implementing agencies.



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

- During the year, 55 complaints were filed with ASCI against advertisements made by your Company, out of which all but two were closed at the end of the year.
- The Company has certain legal cases, including those relating to consumer / customer disputes. At the end of the year, there were 57 consumer cases pending.

Hindustan Zinc Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines. **The Sustainability Report ([Weblink](#)) for FY 17-18 has been independently assured KPMG India.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been communicated to the key internal stakeholders and are enshrined in the Company website.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes, any grievances or the feed-back relevant to the policies can be sent to hzl.cosecy@vedanta.co.in or hzl.whistleblower@vedanta.co.in								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The policies have been evaluated internally. Several of the policies are also included in third party audits.								

Link: <http://www.hzindia.com/sustainability/sustainability-policies/>

Note: All the policies of the Company emanate from Vedanta Sustainability Governance Standards, which are aligned with International Finance Corporation and meet the requirement of IMS Standards. Most of these policies are enshrined in the Company's Business Ethics & Code of Conduct, which has been approved by the Board.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company does not have any Subsidiary Company/ Companies. The Company has disclosed that none of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that CEO & Whole-time Director and Senior Management assess the BR performance on an on-going basis, at least annually.

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Business Ethics and Code of Conduct serves as the guiding philosophy for all employees, suppliers, customers, NGOs and others who have dealings with the Company All stakeholders are expected to comply with the Business Ethics and Code of Conduct. A separate Vendor’s Code of Conduct specifically covers our vendors and partners.”*
- The Company received 26 complaints during FY 2017-18 and all were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company sources its primary raw-material from captive mines. Beneficiation is generally carried on within the mine premises to minimise transportation. For the past several years, the Company has added more to its mining reserves and resources than it has depleted, through systematic exploration efforts.”*
- The Company has stated that *“During the reporting year, the water recycling rate was 35% (FY 2017: 33%) and 42% of the waste generated during the year recycled. (FY 2017: 39%)”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company have constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, it has a recognised employees trade unions. Further, the Company has disclosed that 100% of all non-executives are members of recognised employees trade unions.
- Approx. 8.28% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	1	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Safety and skill upgradation training in the last year was as follows:

Category	Safety Training	Total (as on March 31, 2018)	%	Skill Upgradation Training	%
Permanent Executives	8,540	4398	NA	14,697	NA
Permanent Women Employees	60	364	NA	2,372	NA
Contractual Employees	2,32,830	15,262	NA	4,991	NA
Employees with Disability	Separate list not available				

Since many employees go through multiple training programs, percentage is not relevant.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that “*Yes. Our primary stakeholders are our employees, vendors, customers, Governments, shareholders and the communities around our operations. We continuously engage with each of our stakeholder groups on a pro-active basis and have different grievance redressal mechanisms and stakeholder engagement methodologies in place*”.
- The Company has identified and engage with the disadvantaged, vulnerable and marginalised stakeholders. In particular, for any new proposed project or expansion, we map and engage with all such stakeholders on a proactive basis, particularly through our CSR activities.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Under our project Jeevan Tarang Zinc Ke Sang for the differently abled people we have join hands with the institutions working with them near our locations in Ajmer, Bhilwara, Chittorgarh and Udaipur district and reached to about 600 differently abled children. The Company has also engaged Noida Deaf Society through which we have been able to carry out following major activities in these institutions:
 - Indian Sign Language training has been integrated for hearing impaired students and their teachers.
 - Technology based learning for visually impaired students by giving android smart phones to access books through Bookshare, world’s largest online library for visually impaired.

Further to this we have partnered with National Handicapped Finance and Development Corporation wherein skill training of 100 differently abled people is being provided in various trades.

Sakhi Women’s Empowerment Program is running for rural and tribal women to empower them socioeconomically and to build grass-root institutions.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that tis “*Human Rights policy is aligned to the United Nations Guiding Principles on Business and Human Rights. The policy also covers all its suppliers, contractors and NGOs. The clauses of the Code of Conduct and SA 8000 standards extend to all business partners.*”

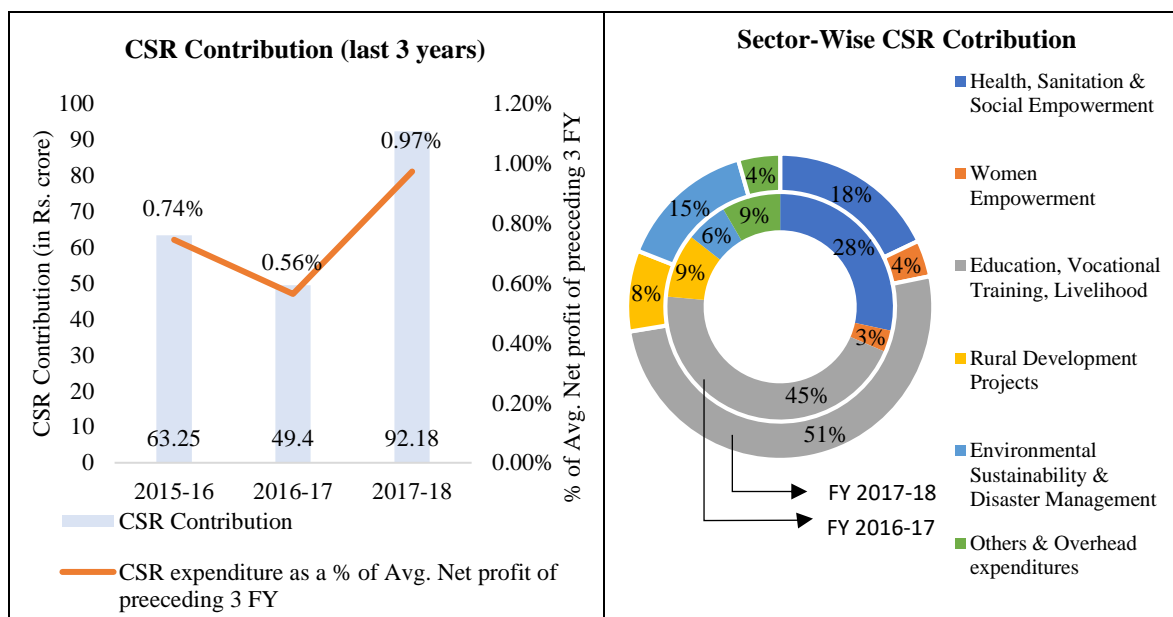
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that all our Sustainability policies is applicable and extended to Suppliers/ Contractors/NGOs/others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, The Company is well within the prescribed limits by the relevant pollution control authorities.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through all the routes i.e. in-house team, own foundation – Vedanta foundation, external NGO and government structures. The Company conducts impact assessment of its CSR initiatives internally.



The Company has failed to spent the full prescribed amount on its CSR activities for FY 2017-18 and has state the reason as follows:

“We spent ₹ 92.18 Crore as CSR this year. This is a significant increase over last year's expenditure and we are continuing to scale up many of our programmes. Further, several new projects were launched this year, which are gradually ramping up. In addition to the above, the Company has also provided ₹ 660.24 Crore as contribution to District Mineral Foundation which will be utilised by the Government for the interest and benefit of persons and areas affected by mining related operations, which is also quasi CSR.”

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

- A total of 36 complaints were received from customers in FY 2017-18, out of which 7 was pending as of March 31, 2018.

- A Customer Satisfaction Survey is carried out periodically by the Company.

ICICI Bank Ltd (2017-18)

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2		Link 2	Link 3			Link 2	Link 4
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: Anti Bribery & Anti Corruption Policy, Group Code of Business Conduct and Ethics and Whistle Blower Policy: www.icicibank.com

Link 2: <http://www.icicibank.com/managed-assets/docs/about-us/ICICI-Bank-CSR-Policy.pdf>

Link 3: www.icicibank.com The Company has disclosed the link but the link is not working properly. Hence above cells are in red for Q3, Q6 for principle 4

Link 4: <http://www.icicibank.com/managed-assets/docs/personal/general-links/code-of-commitment/customer-rights-policy.pdf>

Reasons disclosed by the Bank for not formulating policies adhering to principle 6 and 7 is as follows:

#6: The aspects outlined under this Principle are not substantially relevant to the Bank given the nature of its business. The Bank complies with applicable environmental regulations in respect of its premises and operations. Further, the Bank participates in initiatives towards addressing environmental issues. The Bank also requires the borrowers of project loans to comply with the various national environmental standards.

#7: While there is no specific policy outlined for this principle, the Bank, through trade bodies and associations, puts forth a number of suggestions with respect to the economy in general and the banking sector in particular. The Bank, directly, and along with the ICICI Foundation for Inclusive Growth has been working on several initiatives for promotion of inclusive growth.

Participation of Bank, Subsidiaries and other entities in BR Initiatives:

The Bank has disclosed that it has subsidiaries and the major subsidiaries of the bank contribute to the corpus of ICICI Foundation and towards relief and welfare. Some subsidiaries also undertake additional activities independently. No other entity participates in the BR initiatives of the company.

Governance Related to BRR

The Bank has stated that it meets annually to assess the BR performance.

Extracts from Principle wise performance of the Bank

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank, through the Group Code of Business Conduct & Ethics, has adopted a ‘zero-tolerance’ approach to bribery and corruption. The Bank has put in place an ‘Anti-Bribery and Anti-Corruption Policy’, which sets forth obligations on part of every employee for prevention, detection and reporting of any act of bribery or corruption. The Group Code of Business Conduct & Ethics which captures the behavioural and ethical standards along with the ‘zero tolerance’ towards bribery covers all subsidiaries of the Bank.
- Also, the Code is applicable to directors and employees of the Bank as well as the directors and employees of the subsidiary companies.
- The number of complaints received from shareholders were 196 and all of them have been resolved. Of the 4,272 customers complaints outstanding at the beginning of the year and 237,343 complaints received during the year, 235,406 complaints have been resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Being in a service industry, sustainable sourcing does not apply to the Bank.
- Considering that the Bank is not a manufacturing unit, the waste generated at its offices is managed as per the waste disposal process. The Bank has procedures in place to dispose off e-waste through authorised e-waste vendors. There are sewage treatment plants at two of our large offices where waste water is entirely treated & re-utilised for gardening, flushing & cooling tower requirements.

Principle 3: Businesses should promote the well-being of all employees

- The Bank has not disclosed that whether it has constituted an Internal Complaints Committee or not as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Although, It has disclosed that it has a policy against sexual harassment and a formal process for dealing with complaints of harassment or discrimination
- The Bank has disclosed under Section E of the BR Report under Principle 3 that, Bank does not have any recognised employee association.
- Approx. 28.11 % of the permanent employees are women.

Number of Complaints received: As disclosed by the Bank in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	99	Nil	95	Nil	87	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Bank has not disclosed the percentage of permanent employees who were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its internal and external shareholders.
- The Bank is guided by Reserve Bank of India (RBI) prescribed guidelines on priority sector lending, lending to small and marginal farmers, lending to weaker section etc., and government-led initiatives to improve access to financial services, and insurance and pension cover for reaching out to disadvantaged, vulnerable and marginalised stakeholders.
- **Special initiatives taken by the Bank to engage with the disadvantaged, vulnerable and marginalized stakeholders:** ICICI Foundation undertakes a number of initiatives for the underprivileged, including a large scale skill development initiative. The Bank's Rural & Inclusive Banking Group focuses on rural and below poverty line customers. The Bank is taking steps to enable easier access to the Bank's branches and ATMs for the physically challenged and is also providing facility for the visually challenged to transact at ATMs. The Bank through its Technology Finance Group has supported/granted assistance to entities engaged in a number of activities that benefit the underprivileged, including skill development, healthcare, medical research & treatment facilities, school education and upgrading quality of nursing education for girls.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Bank on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank's philosophy of non-discrimination among employees, meritocracy and mechanisms for redressal of employee issues applies across the Bank and its subsidiaries.

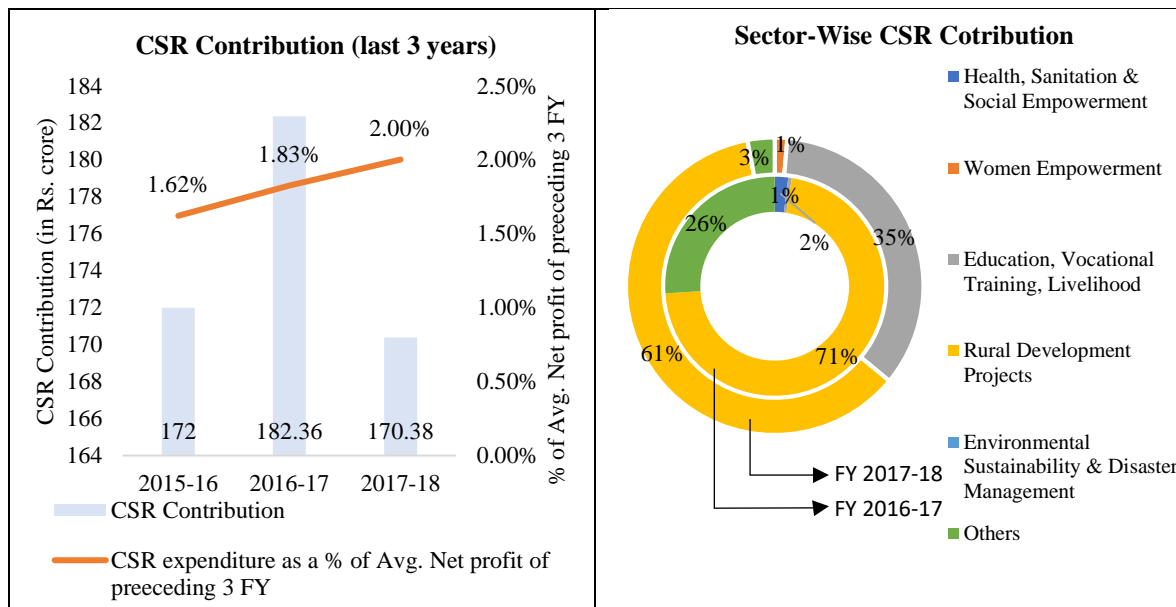
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Bank or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that as outlined under Principle 2, the aspects outlined under this Principle are not substantially relevant to the Bank given the nature of its business. The Bank complies with applicable environmental regulations in respect of its premises and operations. Further, the Bank participates in initiatives towards addressing environmental issues.
- **Are the Emissions/Waste generated by the Bank within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, The Bank complies with applicable environmental regulations in respect of its premises and operations.

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Bank**

The Bank’s CSR committee consists of 4 members out of which 2 are Independent directors. Chairman of the committee is an Independent director. The Bank mainly undertakes CSR Activities through its in-house team and ICICI Foundation with the assistance of implementation partners as required. The Bank conducts impact assessment of its CSR initiatives.



The Bank has failed to spend the full prescribed amount on its CSR activities for FY 2016-17. Although, the Bank has spent full prescribed amount on CSR for FY 2017-18. The Bank has stated the reason for FY 2017 as follows:

“The amount spent in FY2017 was ₹ 1.82 billion, 5.8% higher compared to ₹ 1.72 billion spent towards CSR in FY2016. The amount spent in FY2017 was 1.8% of the average net profits of the last three financial years. The lower spend vis-à-vis the budget was primarily on account of lower capital expenditure incurred by ICICI Foundation for Inclusive Growth under its ICICI Academy for Skills initiative.”

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

- o The Bank has not disclosed the no of complaints received during the year. However, the Bank has stated that it resolved 97.40% of customer complaints/consumer cases during fiscal 2018.
- o Yes, The Bank on a continuous basis measures the satisfaction levels of customers transacting across various touch points. As part of this exercise, which is referred to as FOCUS (Feedback of the Customer), the customer's feedback and satisfaction levels with the transaction experience are measured.

ICICI Prudential Life Insurance Company Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?*									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2		Link 2	Link 3			Link 2	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?#									

Link1 - https://www.iciciprulife.com/content/dam/icicipru/about-s/corporate_policies/whistle%20Blower%20establishment.pdf

Link2 - Corporate Social Responsibility Policy

https://www.iciciprulife.com/content/dam/icicipru/about-us/corporate_policies/Corporate%20Social%20Responsibility%20Policy_Final.pdf

Link3: <https://www.iciciprulife.com/content/dam/icicipru/code-of-conduct/Code%20Of%20Conduct.pdf>

<https://www.iciciprulife.com/about-us/corporate-policies.html>

Q 4 - Policies wherever stated have been approved by the Board/ Committee of the Board/ senior management of the Company.

Q 10 - All policies and processes are subject to audits and reviews done internally in the Company from time to time.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that ICICI Prudential Pension Funds Management Company Limited. participate in the Business Responsibility initiatives of the Company. No other entity / entities participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the Company shall review and assess the initiatives periodically.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“through the Code of Conduct, has adopted a ‘zero-tolerance’ approach to bribery and corruption. The Company has put in place an ‘Anti-Bribery and Anti-Corruption Policy’, which sets forth obligations on part of every employee for prevention, detection and reporting of any act of bribery or corruption. The Code is applicable to directors and employees of the Company as well as the directors and employees of the Subsidiary Company.”*
- The Company received 442 complaints under the Ethical View Reporting Policy, out of which 441 were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Being in a service industry, the Company has stated that *“Not applicable considering the nature of business of the Company”*.
- Being in a service industry, the Company has stated that *“As our Company is not a manufacturing company, this point is not applicable.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or not.
- The Company does not have any recognized employee association.
- Approx. 24.12% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	14	Nil	11	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Although, the Company has not disclosed the percentage of the permanent employees were given safety and skill upgradation training in the last year, however, the Company has stated that, *“All employees undergo periodic training on basic & advanced fire safety including evacuation drills. In the area of Learning and Skill up-gradation, an integrated learning & development framework has been institutionalised to nurture and build capabilities of employees for superior performance in their current role and prepare them for future challenges. All new employees undergo mandatory orientation sessions as well as regulatory and compliance training.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its key stakeholder groups.
- The Company has stated that *“its guided as per regulations prescribed by IRDAI on a certain percentage of our insurance products to be sold to rural and social customers. These are customised low premium products. These customers can call our partial toll free national call center number or visit our branches for any servicing requirement.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that, *“the Government of India introduced Pradhan Mantri Jeevan Jyoti Bima Yojana (PMJJBY) as a low premium insurance scheme to widen the penetration of insurance in India. It is aimed at creating a universal social security system. This scheme will be administered in partnership with banks and the participating bank will be the Master Policyholder under this scheme.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“the Company is an equal opportunity, gender neutral employer and has a zero tolerance policy towards any discrimination based on gender, religion, caste or class. The Company strives to uphold meritocracy and fairness at the workplace through transparent policies, systems and processes and has instituted a structured grievance redressal mechanism to address employee concerns. All employee concerns are investigated and action taken based on the findings and the Company’s Code of Conduct.”*

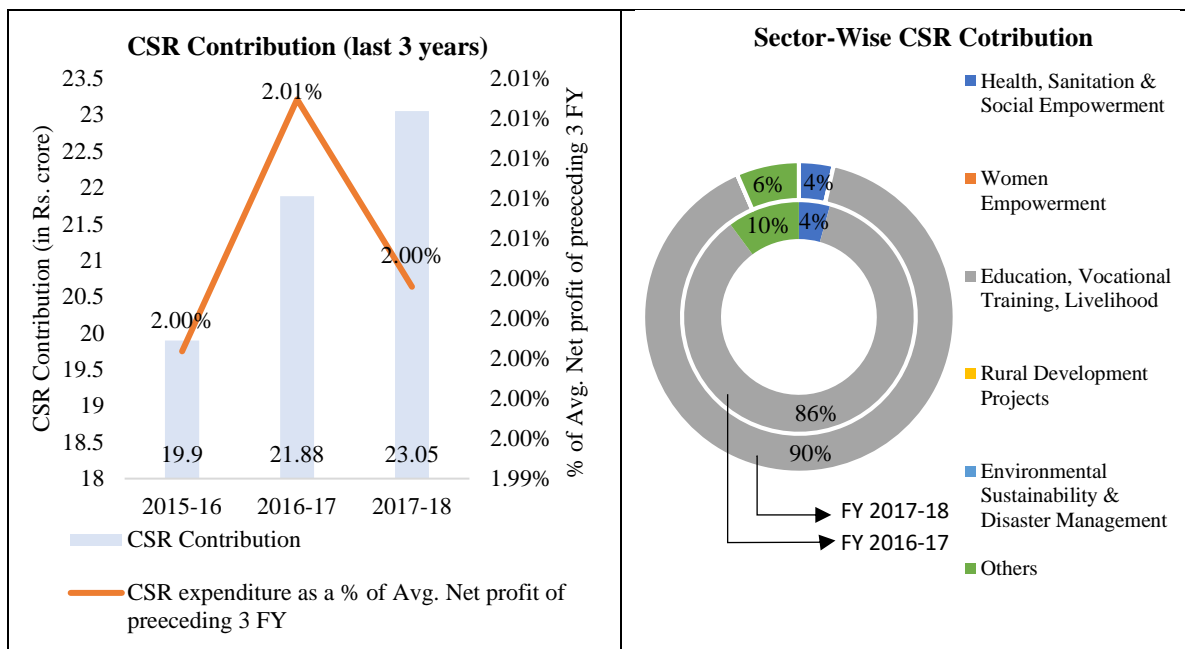
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“the aspects outlined under this principle are not substantially relevant to the Company given the nature of its business.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that, *“It’s not applicable considering the nature of business of the Company.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent directors. Chairman of the committee is an independent director. The Company mainly undertakes CSR Activities through ICICI Foundation. The Company conducts impact assessment of its CSR initiatives. The Company has stated that, *“The Company’s initiatives through its partners is reviewed regularly against the defined milestones and outcomes. In addition, ICICI Foundation assesses the impact of all programmes undertaken by it.”*



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

- The Company has not disclosed the no of complaints received during the FY 2017-18. However, the Company has stated that, 10 complaints are pending as on March 31, 2018. 99.87% complaints resolved in the financial year.
- The Company has stated that, *“the Company on a continuous basis captures the experience of customers buying a new life insurance policy or transacting across various touch points. As part of this exercise, once the customer’s transaction is completed, we send an email to customers soliciting feedback. This feedback is then analysed and the insights from the same are implemented to improve processes and systems.”*

Indiabulls Housing Finance Ltd (2017-18)

The Company has disclosed the Business Responsibility Report for FY 2017-18. However, the Report format is not as per the prescribed format under SEBI guidelines.

Principle wise BR Policy/ Policies:

The Company has not disclosed the answer to Section D: Question 2 in the tabular format as prescribed in SEBI guidelines of BRR.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

- The Company has stated that subsidiaries companies have their own BR initiatives.
- The Company not disclosed percentage of entities that participate in BR initiatives of the Company.

Governance Related to BRR

The Company has stated that BR policies are reviewed periodically. It has not disclosed any specific term of review whether annually or quarterly

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“With the objective of enhancing the standards of governance, the Company has formulated and adopted a Code of Conduct & Ethics for its Board Members and Senior Management team. The Code is placed on the website of the Company, which provides for ethical, transparent and accountable behavior by its Directors and Senior Management team.”*
- The Company has stated that *“All employees are handed over a copy of the Employee Code of Conduct on their first day of joining the Company, as a part of the employee joining kit. Additionally, the contents of the Code of Conduct are also shared in detail with the employees through a specific module that forms part of the HR session during the employee induction training program.”*
- The Company received 776 (1 complaint included of previous year) complaints and all of the complaints resolved during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company works at minimizing its carbon footprint and there is particular focus on reduced resource usage. The Company has been able to reduce energy consumption by using star rated appliances where possible and also through the replacement of CFL lights with LED lights. Monitoring resource usage, improved process efficiency, reduced waste generation and disposal costs have also supported the cause.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Ethics cell and Complaint Committee to address concerns of sexual harassment.

- The Company has not disclosed whether they have any recognised employee association.
- Approx. 10.74% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	The Company does not employ child labour directly or indirectly in any of its offices.				Not Disclosed	
Discriminatory employment	The Company has always advocated a business environment that favours the concept of equal employment opportunities for all without any discrimination with respect to caste, creed, gender, race, religion, disability or sexual orientation.				Not Disclosed	

- 90% of the permanent employees were imparted training during the year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has not disclosed whether it has mapped its internal and external stakeholders.
- The Company has not disclosed whether it has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“In its sixteen plus years of operations, the Company has been providing home loan products that cater to the employed and self-employed sections in the organized sector. Housing requirements, for both formal and informal segment customers, have been growing rapidly largely owing to the pace of urbanization and migration of people from rural to urban areas.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company complies and adheres to all the human rights laws and guidelines of the Constitution of India, national laws and policies. The Company has not disclosed whether it extends the same to Group / Joint Ventures / Suppliers / Contractors / NGOs / Others.

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

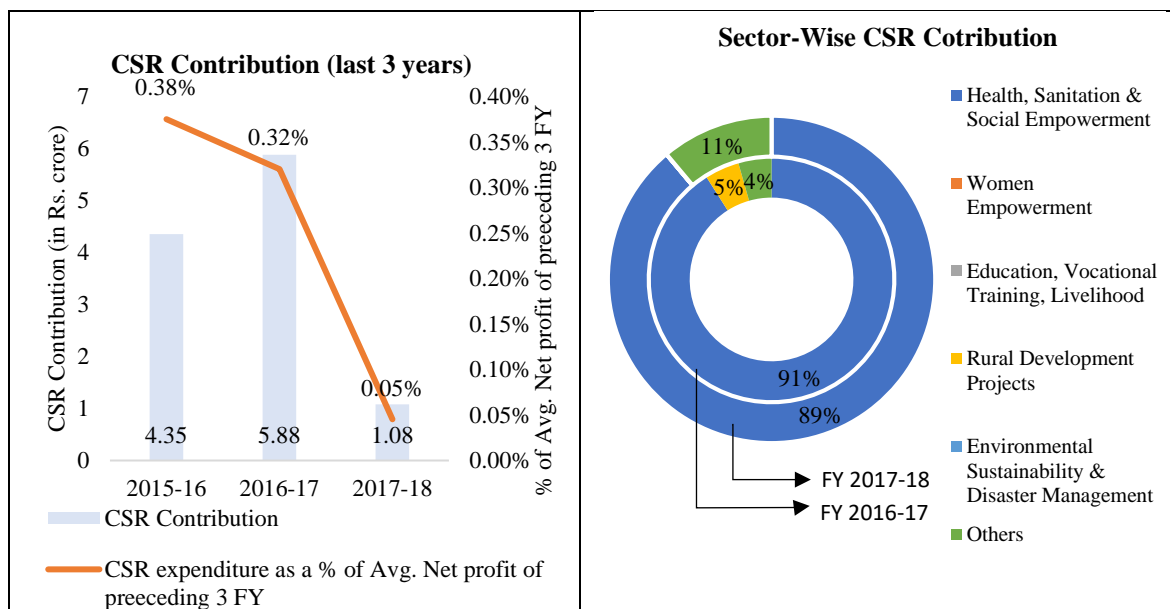
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company promotes ecological sustainability and green initiatives, and adopts energy saving mechanisms, by encouraging its employees, customers and all its other stake holders to use electronic medium of communication and to reduce usage of papers as much as possible. **However,** the Company has not disclosed whether the Policy extends to Group / Joint Ventures / Suppliers / Contractors / NGOs / Others.

- Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported? Not Disclosed.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one Independent member and Chairman of the committee. The Company has disclosed that *“The Company will continue to engage with stakeholders including experts, NGOs, professional bodies / forums and the government and would take up such CSR activities in line with the government’s intent, which are important for the society at large.”*



Reason for not spending the Requisite amount on CSR activities. The Company has stated that *“During the financial year 2017-18, the Company has contributed its entire CSR expenditure aggregating to, ₹ 466,010,190/- to the corpus of Indiabulls Foundation, for undertaking CSR projects, on its behalf and spent directly ₹ 10,814,810, total aggregating to ₹ 4,76,825,000/-.”*

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

- The Company has not disclosed the number complaints received and resolved during the year.
- The Company has not disclosed whether it has conducted any customer satisfaction survey during the year. However, the Company has stated that *“The Company is extending its presence to various social and digital platforms to engage and connect with existing customers and also to reach out to newer audiences through constant communication, which is in consonance with its brand values and the prescribed regulatory framework.”*

Indian Oil Corporation Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines. **The Sustainability Report has not been independently assured by third party.**

The Company has stated that *“This time, we have attempted to publish an Integrated Annual Report that not only details the Company’s financial performance but also reflects its commitment towards value creation for its stakeholders.”*

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Indian Oil has framed various policies, which conform to different applicable statutes / guidelines / rules / policies etc. issued by Government of India from time to time. Industry practices, national / international standards are kept in view while formulating the policies.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	The policies are approved by the Board / Competent Authorities as per the approved Delegation of Authority.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Yes. The details are provided under the respective principles.								
6	Indicate the link for the policy to be viewed online	The details of the links are given below. (*)								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The policies are not audited / evaluated by external agencies. However, the policies are formulated within the ambit of the statutory guidelines and business requirement, which are amended from time to time as per business / environmental / Government requirements.								

* Links of the policies given below:

Link 1: Code of conduct for Directors and Senior Management Personnel.

https://iocl.com/download/Code_of_Conduct_for_Board_Members_&_SMP.pdf

Link 2: Code of conduct for prevention of Insider Trading.

https://iocl.com/download/IOC_Insider_Trading_Code_2015.pdf

Link 3: Whistle Blower Policy

https://iocl.com/InvestorCenter/Whistle_Blower_policy.pdf

Link 4: Sustainability & Corporate Social Responsibility Policy

https://www.iocl.com/AboutUs/IOC_S&CSR_Policy_07_2015.pdf

Link 5: Policy on Related Party Transactions

https://www.iocl.com/InvestorCenter/Policy_on_Related_Party_Transactions.pdf

Link 6: Policy for determining Material Subsidiaries

https://www.iocl.com/InvestorCenter/Policy_on_Material_Subsiary.pdf

Link 7: Policy for determination of material / price sensitive information and disclosure obligations

https://iocl.com/download/Policy_on_Materiality_of_events_or_information_rev.pdf

Link 8: Dividend Distribution Policy

<https://iocl.com/download/Dividend-Distribution-Policy-1-12-16.pdf>

Link 9: Policy for Preservation of Documents

https://iocl.com/download/Policy_on_preservation_of_documents.pdf

Link 10: Citizens charter

<https://www.iocl.com/Talktous/CitizensCharter.aspx>

Sustainability Report for FY 2017-18: <https://www.iocl.com/SustainabilityReport.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 1 subsidiary and 7 overseas subsidiaries. The Subsidiaries of the companies not participate in BR initiative. The Company has Stated that *“its environmental responsibilities and actively pursues solarisation of Retail Outlets (ROs) through its network of RO dealers. The initiative has gained traction over the years, with 9140 ROs having been solarised as on 31.03.2018, which is approximately 34% of the Indian Oil’s RO network.”*

Governance Related to BRR

The Company has not disclosed whether it meets to assess the BR performance of the Company, however it stated, *“Various principles of BR performance are integral to the day-to-day operations of the Company and the same are industries reviewed by the Board / Committees of the Board as and when required.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the policy related to ethics, bribery and corruption cover only the company and Group Companies/Joint ventures companies are separate legal entities have their own policies and procedures.
- The Company received 7,693 complaints related to services & tenders, 3,747 shareholders` Complaints (Public Grievances) and 13 Related to Integrity Pact. All these complaints were resolved. In addition to this the Company received 3,73,588 complaints from consumers/ customers out of which 3,71,549 complaints resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“During the year, Corporation improved its share of indigenous procurement (17.88%, in terms of value vs. 16.96% during the previous year) leading to reduced*

dependence on imports. Indian Oil's vast network of pipelines or the "Underground Highways", as they are referred to within the organisation, are the most energy-efficient and environment-friendly mode of transportation"

- The Company has stated that "During 2017-18, the refineries have recycled around 89% of waste water generated. During the year, about 89% of treated effluent water was reused/ recycled within the refineries." Further the Company has stated that "All polymer products produced by IndianOil are 100% recyclable."

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has 25 recognised employee unions representing non-executive employees of the organisation and one officers' association representing the executives. Further, the Company has disclosed that above 95% of permanent employees are members of recognized employee associations
- Approx. 8.35% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	3	7	6	2	4
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

Note: There were 6 complaints of sexual harassment, which were pending as on 1st April, 2017. During the year 2017-18, 1 complaint was received, out of which 4 complaints were disposed off.

- 67.50% permanent male employees, 89.20% Permanent Women Employees and 32% Permanent Employees with Disability were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified its disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Yes, Indian Oil meticulously follows the presidential directives and guidelines issued by Government of India regarding reservation in services for SC/ ST/ OBC/ PWD (Persons with Disabilities)/ Ex-servicemen to promote inclusive growth. There is also a 33% reservation for women entrepreneurs in award of Kisan Seva Kendra distributorships. This initiative has not only helped in motivating women entrepreneurs to take up business activities but has also helped in making them independent and contributes positively to the society. Special initiatives are

taken up under Corporate Social Responsibility to empower the disadvantaged, vulnerable and marginalised sections of the society.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that Group Companies/ Joint Venture Companies are separate legal entities having their own policies and procedure.

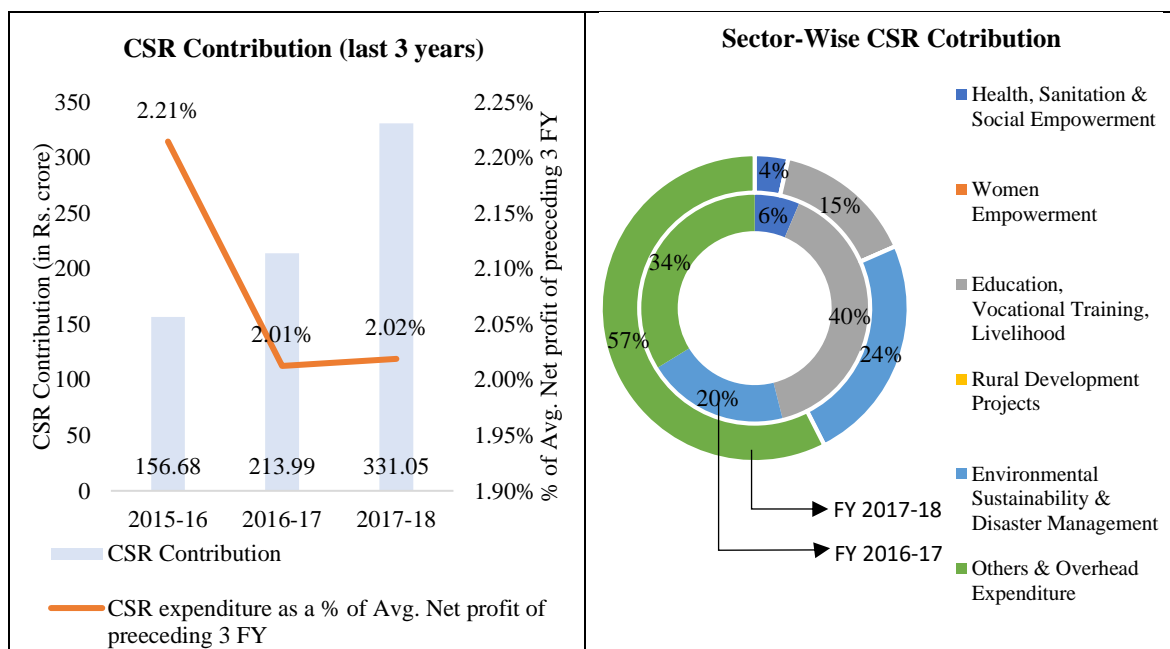
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the policy on Health, Safety and Environment covers the Company only.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that “The Emissions/Waste generated by the company is within the permissible limits given by Central Pollution Control Board (CPCB)/State Pollution Control Board (SPCB) for FY 2017-18.”

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through in-house teams, third party vendors, Government agencies, foundations, societies, trusts, NGOs, etc. The Company conducts impact assessment of its CSR initiatives.



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

- A total of 3,68,775 complaints were received, out of which 3,66,736 resolved and 2,039 were pending during the year.
- A Customer Satisfaction Survey is carried out on regular basis by the Company during the year.

IndusInd Bank Ltd (2017-18)

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Bank has also published Annual Report ([weblink](#)) as per (IIRC) integrated reporting format. Further the Bank has stated that “*Reported content is, additionally, in accordance with the Global Reporting Initiative (GRI) G4’s set of ‘Comprehensive’ disclosures for sustainability reporting.*” The report has been independently assured by KPMG.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The Policies are in line with Reserve Bank of India, Ministry of Corporate Affairs (MCA) guidelines and other regulations / guidelines as applicable.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online								Link 1	Link 2
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: <https://www.indusind.com/content/csr-home/our-approach/csr-policy.html>

Link 2: <https://www.indusind.com/important-links/grievance-redressal.html>

Sustainability Report for FY 2017-18: <https://www.indusind.com/content/dam/indusind/csr-pdf/integrated-report-2017-2018.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Bank has disclosed that it does not have Subsidiaries. The Bank has further disclosed that none of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Bank has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Bank

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank states that the Policy relating to Ethics, Bribery and Corruption cover the Bank and the Suppliers / Contractors / Others, and is embedded in the Bank's Human Resources Policy, Code of Conduct and Discipline, Employee Service Rules as well as the Outsourcing Agreements with vendors and contractors. The Bank strictly ensures that none of its business processes or its vendors and suppliers, support child, forced or compulsory labour.
- The Bank has received 12 complaints in the category of corruption and bribery, of which 9 complaints were not found to be true 1 case is under disciplinary action and 2 complaints are currently under investigation.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Bank has not disclosed the percentage of inputs that were sourced sustainably, however the Bank states that it conducts sustainability assessments for large volume suppliers that provide technology, equipment, IT Hardware, White goods, manpower, security and housekeeping services. These suppliers were assessed on their social and environment practices including Health & Safety, Employee Welfare, Water Management, Environment Health & Safety, GHG emissions management, etc.
- The Bank has stated that it recycles electronic and toxic waste through authorized e-waste vendors. In 2017-18, the Bank recycled more than 20,000 kgs. of e-waste. The Bank also manages its paper waste through a Waste Collection Arrangement as part of the 'Wealth-Out-of-Waste' (WOW) initiative. Through this initiative, the Bank has recycled more than 12,000 kgs of paper. Besides, the Bank's Green Champions and Green Commandos conduct several e-waste and paper waste recycling campaigns throughout the year.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bank has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Bank has disclosed under Section E of the BR Report under Principle 3 that it does not have a recognised employee association.
- Approx. 18.68% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	7	Nil	9	Nil	20	Nil

Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Bank has not clearly mentioned what percentage of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its internal and external stakeholders
- The Bank has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Bank to engage with the disadvantaged, vulnerable and marginalized stakeholders:** *“The Bank has a dedicated Inclusive Banking Group which supports the marginalized sections of the society by providing micro-loans. The Bank has provided loans to more than 2.7 million women across 17 states and 151 districts across the country. The loan size ranges from ₹ 1,000 to ₹55,000. The Bank’s Micro-finance program has an embedded component of financial literacy which educates the members on various components of financial services being offered. Additionally, as part of CSR, the Bank reaches out to weaker sections, beneficiaries, children from marginalized socioeconomic backgrounds and the differently abled, through long term CSR programmes. Thus, the Bank’s community development initiatives through Inclusive Banking channels and CSR contribute to a well-rounded engagement at the Base of the Pyramid. Internally, the Bank engages with the differently-abled employees to identify their needs and concerns and ensure their seamless integration into the system. The Bank has also been conducting women safety awareness training sessions for its women employees.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Bank on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Policy on Human Rights covers only the Bank.

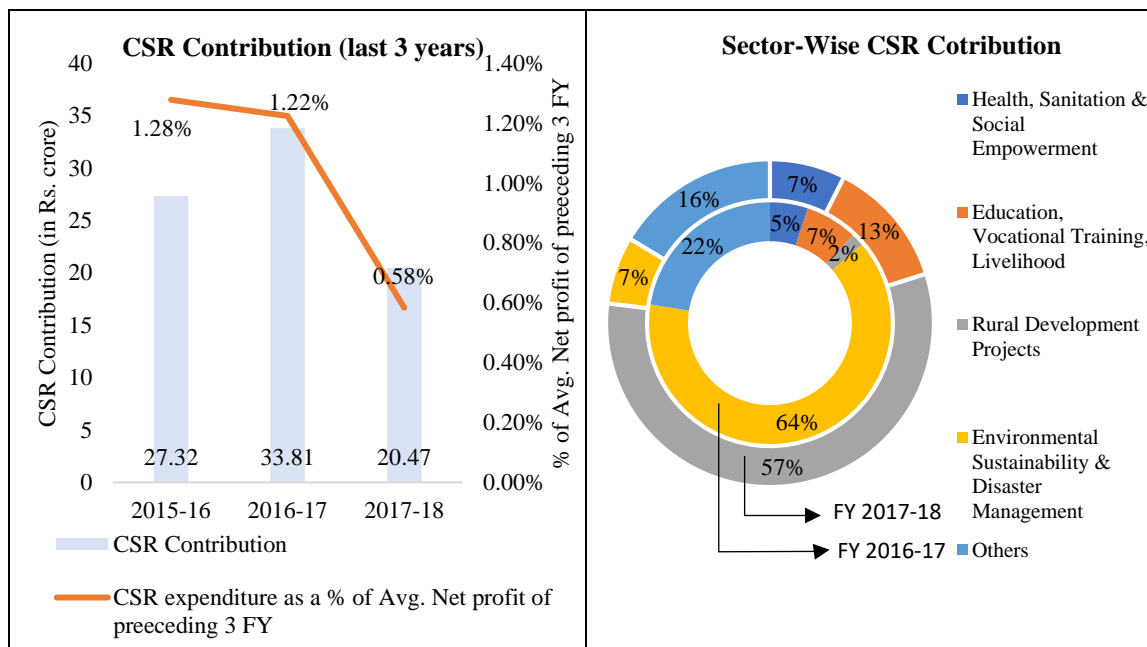
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Bank or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** While the Policy related to Principle 6 is applied across the Bank, the Bank’s endeavour is to empanel the vendors who follow best environment practices, including, Carbon Emissions, Water Management, Environment Health & Safety, GHG emissions management, Environment Management Systems, etc.
- **Are the Emissions/Waste generated by the Bank within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not Applicable

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Bank**
The Company’s CSR committee consists of 3 members out of which 1 is an Independent director, the Chairman. The Company mainly undertakes CSR Activities through its in-house team, NGO,

Implementation Agencies, environmental consultants and Business Correspondents. The Company conducts impact assessment of its CSR initiatives.



The Bank has stated the reasons as follows for not spending requisite amount on CSR activities:

- “In FY 2017-18, the Bank has spent ₹ 20.47 crores on various Social and Environmental Projects.
- The Bank has deepened its efforts on community engagement by partnering with Government communities and Non- Profits Organisations. Our programmes are of large scale and hence the absorption of funds is milestone linked for larger impact.
- The Bank has expanded its exposure to social projects in the CSR Spend portfolio by 40% while constantly investing in projects of scale. The Bank will be spending 20% of our spent towards projects in water stewardship including water revival, advocacy and security which will increase absorption of spend in the coming years.
- The Spend on Sports will also increase significantly with the advent of 2020 and 2024 Olympics / Paralympics, Commonwealth Games and Bilateral series in Blind Cricket.
- In line with the Bank’s agenda on Digitization, the Bank has pledged support to the PM’s initiative of digitizing Rural India reaching out to 2 lakh candidates across 275 districts in 11 Indian states of Haryana, Punjab, Rajasthan, Madhya Pradesh, Maharashtra, Gujarat, Jharkhand, Chhattisgarh, West Bengal, Odisha and Uttar Pradesh. For our water conservation and solid waste management projects, the Bank has partnered with the State Governments of Maharashtra and Uttarakhand.
- The Bank has been consciously investing in Energy conservation and Carbon reduction initiatives as a responsible corporate. While these investments have not been considered as part of the reported spend this year, it has had tremendous impact on the environment, in line with global targets of the UN Sustainable Development Goals.”

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

- During the Financial Year ended 2017-18, 1.56% customer complaints were pending, which were subsequently resolved.

- The Bank conducts monthly transactional surveys called 'Voice of Customer' conducted through net-banking portals, ATMs, and e-mails to gauge customer engagement and experience with day-to-day transactions

Infosys Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines. **The Sustainability Report ([weblink](#)) has been independently assured by DNV GL.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1, Link 2, Note 1	Note 3		Link 3, Note 2	Note 3			Link 3, Note 2	Note 3
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: Whistle blower Policy - <https://www.infosys.com/investors/corporate-governance/Documents/whistleblower-policy.pdf>

Link 2: Code of Conduct and Ethics - <https://www.infosys.com/investors/corporate-governance/Documents/CodeofConduct.pdf>

Note 1: The Company has disclosed the Whistle blower policy and Code of Conduct and Ethics for Principle 1 however, the Company has disclosed that Anti-Bribery Policy (available on our intranet)

Link 3: CSR Policy - <https://www.infosys.com/investors/corporate-governance/Documents/corporate-social-responsibility-policy.pdf>

Note 2: The Company has disclosed the CSR Policy for Principle 4 & 8 however, the Company has disclosed that Sustainability Report (available on our intranet)

Note 3: The Company has disclosed that Available on our intranet.

Sustainability Report FY 2017-18: <https://www.infosys.com/sustainability/Documents/infosys-sustainability-report-2017-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed it has 43 Subsidiaries and they participate in the BR initiatives of the Company. The Company has further disclosed that less than 30% of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Board of Directors, committees of the Board, and the CEO assesses the BR performance of the Company every three months.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company's corporate governance practices apply across the Infosys Group and extend to our suppliers and partners. Our Code of Conduct and Ethics complies with the legal requirements of applicable laws and regulations, including anti-bribery and anti-corruption policies, ethical handling of conflicts of interest, and fair, accurate and timely disclosure of reports and documents that are filed with the required regulatory bodies in the regions we operate. Additionally, we have the Supplier Code of Conduct which sets out standards of ethical conduct for our third parties.
- The Company also have the Anti-Bribery Policy and Anti-Corruption Policy for our employees in the Infosys Group.
- The Company received 12,349 Investors complaints during the year related to Dividend/Annual Report and Buyback queries, out of which all were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *"we have a responsible Supply chain Policy and a supplier code of conduct. Our suppliers are categorized into three broad categories – People, Services and Products. Our contracts have appropriate clauses and checks to prevent the employment of child labor or forced labor in any form. We also provide forums where suppliers can voice their concerns and issues. We continue to engage with all supplier segments working within our boundary covering people and services categories by conducting training, assessments and audits on health and safety, compliance and Anti-corruption, Human rights and Anti Harasment. We engage with local suppliers for our people and services categories."*
- Although, the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *"As a company aware of the responsible use of finite natural resources, we have adopted a focused approach to manage the waste generated by our operations. Our waste management strategy is framed around the three Rs – Reduce, Reuse and Recycle. Rigorous waste-segregation at source, followed by appropriate treatment or disposal in adherence to applicable legislations, ensures that we send minimum waste to landfills."*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has stated that it recognizes the right to freedom of association through Collective Bargaining Agreements (CBAs) in accordance with the guidelines and compliance frameworks put forth by governments in countries where we have our operations. A de minimis percentage of our employees are covered by CBA.
- Approx. 36.12% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

The Company has disclosed reported cases as per the sexual harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013, and the Ministry of Women and Child Development notification dated 9th December, 2013 as under the following format.

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	77	7	88	11*	62	Nil
Employee Grievances	1995	30	1470	50	1661	Nil

*11 cases evaluated by the internal committee (IC) were reported in March 2017 and the investigation process was under way as on 31st March, 2017.

- 2,04,107 number of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has stated that the Company has different foundation to work for disadvantaged, vulnerable and marginalized shareholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that as a socially responsible organization, the Company has committed to work for the welfare of the communities around us. The company's community engagement interventions include
 - Grant-making
 - Organization-led projects
 - Employee-driven initiatives
 - Community sabbaticals

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** Yes, all companies in the Infosys Group including employees and contractors are covered by the policy

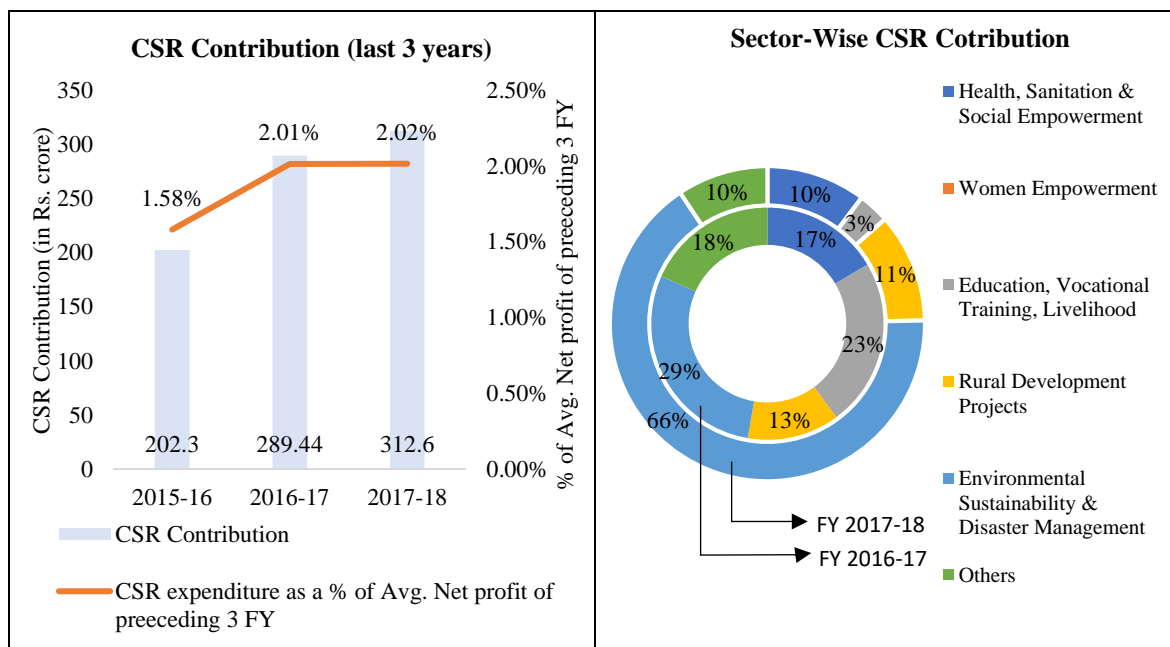
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, *“Protection of the environment ranks high among our corporate goals and as a responsible corporate citizen, we have established a global Health safety Environment HSE policy which defines our commitment to ensure environmental protection”*.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, company comply with all applicable environmental legislations in the locations we operate from. We monitor and track all parameters as defined by CPCB or SPCBs and ensure they are maintained within norms.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 3 are Independent Directors. Chairman of the committee is an independent director. The Company mainly undertakes CSR Activities through its various Foundations. The Company conducts impact assessment of its CSR initiatives.



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

- The Company has not disclosed the no of complaints which were received during the year, however, the Company has stated that none of customer complaints / consumer cases are pending as on the end of financial year 2017-18.
- The Company Stated that *“we interacts with its clients on a regular basis and across multiple platforms. In addition to various client interactions, we have adopted a formal and robust approach in the form of an annual Client Value Survey. The survey enables us to comprehensively understand the client’s expectations and needs, and serves as one of the inputs to make investment decisions”*.

Interglobe Aviation Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Lin k1		Lin k2	Lin k3	Lin k1			Lin k3	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

*The Company states that the policies mentioned above can be viewed at Investor Relations section of the website of the Company at www.goindigo.in. Rest of the policies are internal documents of the Company and/or available at intranet for all employees of the Company. Hence, in the above table cells are colored in red.

Link1: <https://www.goindigo.in/content/dam/goindigo/investor-relations/policies/IGAL-code-of-conduct-for-directors-and-senior-Management.pdf>

Link2: <https://www.goindigo.in/content/dam/goindigo/investor-relations/policies/IGAL%20-%20Whistle%20Blower%20Policy.pdf>

Link3: <https://www.goindigo.in/content/dam/goindigo/investor-relations/policies/InterGlobe-Aviation-Limited-Corporate-Social-Responsibility-Policy-july-2018.pdf>

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company has not formulated any policy for principle 7 and has provided the reason “The Company does not take part in any lobbying in the aviation sector.”

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has subsidiary company, but subsidiary has not commenced its business operations. The Company has further stated that no other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that the “*CSR Committee of the Board of Directors reviews the implementation of various projects/ initiatives/ programmes undertaken by the Company on a quarterly basis.*”

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has a comprehensive code of conduct (COC) which is applicable to the employees of the company at all locations, India or abroad, its Board of Directors and all those acting on behalf of IndiGo (such as vendors, suppliers, consultants, agents, etc. and their employees).
- The Company has not disclosed no of complaints received in the BRR section in Annual Report. However, under corporate governance section of Annual Report 2017-18, the Company has stated that total number of complaints received during the year were 15, all of which were resolved. There was no pending complaint as on March 31, 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has not disclosed the percentage of the sustainable sourcing.
- The Company has not disclosed the % of recycled waste, if any.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company doesn't have any recognised employee association.
- Approx. 43.38% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	9	Nil	4	Nil	6	1*
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

*The issue was raised in Mid-March and was closed in the month of April.

- The Company has not mentioned the % of the permanent employees who were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders.

- The Company has stated that “*we are conducting programmes structured in a way to create an impact on disadvantaged, vulnerable and marginalised sector of the society through engagement of various implementation partners and organisations. Our CSR programme focusses on children and education, women empowerment and environment.*”.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** We continue to work and reach out to the community in the 4 key areas of our focus- Women Empowerment, Children & Education, Environment and 6e responsibility. This year we have initiated new programs which will help us reach out to approximately 62,000 women, helping them with skill development through farm based and non-farm based initiatives and 33,000 children for education.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** Various policies of the company on human rights are applicable to its vendors, associates, business partners and group companies.

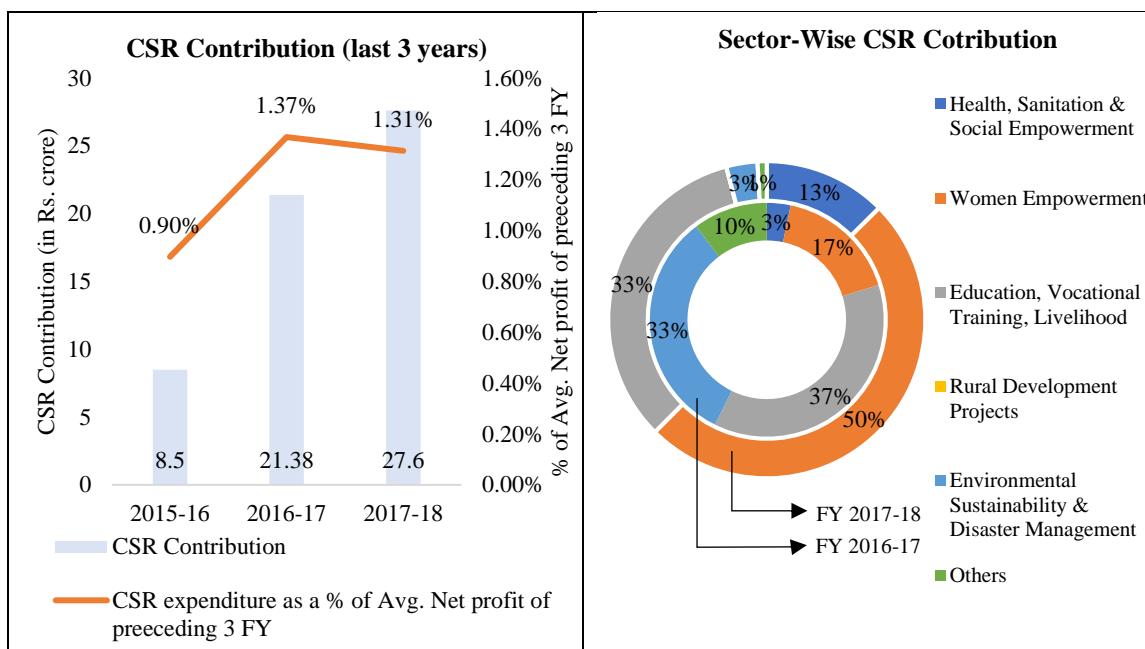
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not disclosed that whether its environment policy covers only the company or extends to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not Disclosed.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 2 are Independent members. Chairman of the committee is not an independent director. The Company mainly undertakes CSR Activities through its in-house team, Company’s trust “IndigoReach” and external NGOs. “IndigoReach” monitors the CSR projects.



The Company has failed to spent the full prescribed amount on its CSR activities for FY 2017-18 and has stated the reason as follows:

“Our Programs have a periodicity of 3-5 years and for better monitoring of the programs and fund utilisation, we have broken up the total amounts into tranches spread across the project period, hence resulting in lesser utilisation of earmarked budget for the financial year 2017-18.”

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

- The Company has not disclosed the number of complaints received by the Company during the FY 2017-18, however, the Company has stated that “As on March 31, 2018, there were 273 consumer cases pending against the Company”. The Company has further stated that they have closed 1146 complaints of our customers’ upto their satisfaction.
- Consumer Survey are carried out by the Company, which are post passenger travel to capture customer experience. The endeavour is to continually improve our service experience across the travel lifecycle through customer feedbacks.

ITC Ltd. (2017-18)

The Company has disclosed the sustainability report ([weblink](#)) as per GRI guidelines and provided a mapping of principles as per SEBI guidelines for FY 17-18. The sustainability report of the Company is Independently assured by M/s Ernst & Young Pvt. Ltd. ITC Ltd has prepared Integrated Annual Report for FY 2017-18.

Principle wise BR Policy/ Policies:

The Company has not provided response to question 2(a) of section D as per the SEBI format. However, the Company has provided mapping of BRR and questions under various principles.

Sustainability Report of FY 2017-18 <https://www.itcportal.com/sustainability/sustainability-report-2018/sustainability-report-2018.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 24 subsidiaries, including 9 subsidiaries outside India. The subsidiary companies define their own initiatives based on their specific context and have access to information and expertise residing with the parent company.

Governance Related to BRR

The Company has not disclosed about the assessment of the BR performance of the Company. However, the Company has disclosed that the Company have Sustainability Compliance Review Committee for monitoring and evaluating compliance with the Sustainability Policies of the Company. SCRC committee meet four times to review the sustainability performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“ITC believes that every employee is a trustee of its stakeholders and must strictly adhere to a Code of Conduct and conduct himself/ herself at all times in a professional and ethical manner. Integrity is a core value and forms the basis of the Company’s organisation culture.”*
- Further the Company has stated that *“In addition, Board approved policies of ITC supplemented by a ‘Code of Conduct for Vendors and Service providers’ provide the direction for sustainable sourcing of raw materials to ensure their long-term availability.”*
- During the FY 2017-18, the Company received 2 investor complaints and were promptly resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company endeavours to integrate sustainability in the procurement process for its products and services across its diversified business portfolio. The Policy on ‘Responsible Sourcing’ encourages resource efficiency in the supply chain which together with the ‘Code of Conduct for Vendors and Service Providers’ provides guidance to supply chain members and partners to adopt sustainable practices.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that 10,439 (approx. 39.92%) of permanent employees are members of recognized employee associations.
- Approx. 11.35% of the employees are women. ITC has disclosed the total number of employees. It has not disclosed whether these were contractual or permanent. Hence, total number of employees were taken.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	4	1	Nil	Nil	7	2
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- In 2017-18, there were 83,600 person-days of formal training were provided to employees at various levels.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has identified its Stakeholder and placed systems and procedures to identify, prioritise and address the needs and concerns of its stakeholders across businesses and units in a continuous, consistent and systematic manner.
- The Company has identified the marginalised and vulnerable stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Implemented mechanisms to facilitate effective dialogues with all stakeholders across businesses, identify material concerns and their resolution in an equitable and transparent manner. These measures have helped the Company develop strong relationships, which have withstood the test of time. The Company's collaborative partnerships with communities are manifest in its programmes such as watershed development, social forestry, animal husbandry services and women empowerment. These initiatives augment the natural resource base of the nation and create sustainable rural livelihoods.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that The Company has Policies on Human Rights applicable to its employees and its value chains. The Company has also stated that the Company has Code of Conduct for vendors and service providers across Businesses and a Grievance Redressal Procedure to address concerns.

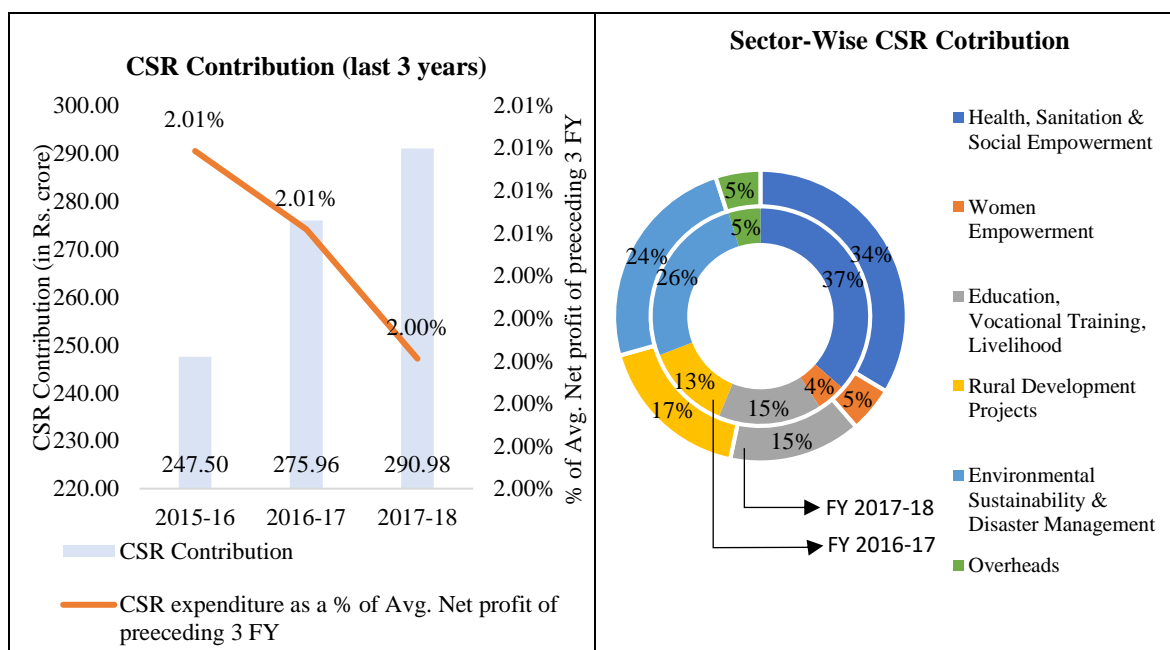
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not stated that whether the policy is applicable to the Company only or extends to the Group, however, The Company has stated that *“The Policies on ‘Life-cycle Sustainability’, ‘Environment, Health and Safety’ and ‘Responsible Sourcing’ provide the necessary direction towards climate change mitigation and adaptation efforts as well as natural resource replenishment initiatives.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed that Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB. However, the Company has stated that *“The Centre has been engaged in policy dialogue with the Ministry of Environment, Forest and Climate Change (MoEFCC) and the Central Pollution Control Board (CPCB) on plastic waste management, based on which an approach paper for implementation of Extended Producer Responsibility was prepared by the Centre and submitted to the Chairman–CPCB and the Joint Secretary, MoEFCC.”*

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members and out of that 2 are Independent Directors. Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house team, external NGO/ Trusts such as BAIF Development Research Foundation, Pratham Education Foundation, Ramakrishna Mission, Bandhan Konnagar, SEWA Bharat, Foundation for Ecological Security, etc and government structure.



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

- The Company has not disclosed the customer complaints / cases pending at the end of financial year.
- The Company has disclosed in sustainability report that a Customer Satisfaction Survey is carried out by the Company during the year.

JSW Steel Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines for FY 2017-18. The Sustainability Report had been independently assured by Deloitte Haskins and Sells LLP. For FY 2017-18 the Company has published Integrated Annual Report and followed GRI Standard for Sustainability Reporting.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6	Link 7	Link 8	Link 9
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: Policy on Business Conduct:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Business%20Conduct%20-%20I%20A.pdf>

Link 2: Policy on Sustainability:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Sustainability.pdf>
and Policy on Sustainable steel production:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Sustainable%20Steel%20Production%20-II.pdf>

Link 3: Policy on Employee Welfare:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Employee%20Welfare%20-%20III.pdf>

Link 4: Policy on Stake Holder Engagement:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Stake%20Holder%20Engagement%20-%20IV.pdf>

Link 5: Human Rights Policy:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Human%20Rights%20-%20V.pdf>

Link 6: JSW Steel-Environment Policy:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/JSW%20Steel%20-%20Environment%20Policy.pdf>

Link 7: Policy on Public Regulatory Policy:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20Public%20Regulatory%20Policy%20-%20VII.pdf>

Link 8: CSR Policy:

https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Corporate%20Social%20Responsibility%20Policy/JSW_Steel_CSR_policy.pdf

Link 9: Policy on Customer Relations:

<https://www.jsw.in/sites/default/files/assets/industry/steel/IR/CSR/Sustainability%20Policies/Policy%20on%20value%20to%20customers%20-%20IX.pdf>

Sustainability Report for FY 2017-18:

https://www.jsw.in/sites/default/files/assets/downloads/steel/IR/Financial%20Performance/Annual%20Reports%20Steel/Integrated_Report_2017-18.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that five major Subsidiaries participate in the BR initiatives of the parent Company. The Company has stated that *“JSW Steel’s value chain, currently less than 30% of the entities directly partner with JSW Steel in its BR initiatives.”*

Governance Related to BRR

The Company has stated that it meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“JSW Steel believes in pursuing its business objectives ethically, transparently and with accountability to its stakeholders across the value chain. The Company is committed to promoting integrated responsible behaviour and value for social and environmental wellbeing. To this end, it has a policy on business conduct that is applicable to all its employees and value chain partners.”*
- further the Company has stated that *“Not only do the suppliers and vendors of the Company agree to abide by its Code of Conduct covering ethical, social and environmental aspects, it also subscribes to similar requirements from its customers.”*
- The Company received 361 complaints and all complaints were resolved during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“JSW Steel aspires to align with global benchmarks in the areas of*

energy management and use of environment-friendly inputs and processes and will continue to set new milestones on these fronts. It is also taking initiatives to bring down logistics costs across the plants to optimise the process of transporting inputs as well as finished products.”

- The Company has disclosed that 3.3 MnT material, 17.7 Mn m³ water recycled and reused and about 96% waste off-gases utilised.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed, Company has a recognised employee association. Further, the Company has disclosed that approximately 28% of permanent employees are members of recognized employee associations
- Approx. 4.13% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed the percentage of the permanent employees were given safety and skill upgradation training. However, the disclosed the average hours of training per employee as under:

Sr. No.	Category	
1	Permanent Employees	37
2	Management	11
3	Non-management	34
4	Permanent Female Employees	17
5	Temporary/contractual employees	6

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of it the Company conduct formal engagement with stakeholder. The Company has state that *“The Company has formal mechanisms to continually engage with its key stakeholders to understand their expectations and concerns.”*
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders through engaging with the adjacent communities.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Engaging with the adjacent communities to provide them healthcare in

areas such as Palghar, Vijayanagar and Ballari, among others enabling them to lead a better life. Some sample results include about 8,000 community and individual toilets were built, neurological and ophthalmologic support was provided to 5,500 persons, and a 20% reduction in malnutrition cases in Vijayanagar. JSW Foundation selected as training partner for the new Skill Enhancement Scheme of Government of Maharashtra, to improve employability of youth; 810 persons benefitted from these skill enhancement initiatives while over ₹15 crore was spent on village transformation.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“The Company’s Guidelines and Code of Conduct are in harmony with the UN Declaration on Human Rights as well as the ILO (International Labour Organisation) Conventions. The policies address human rights issues across the supply chain.”*

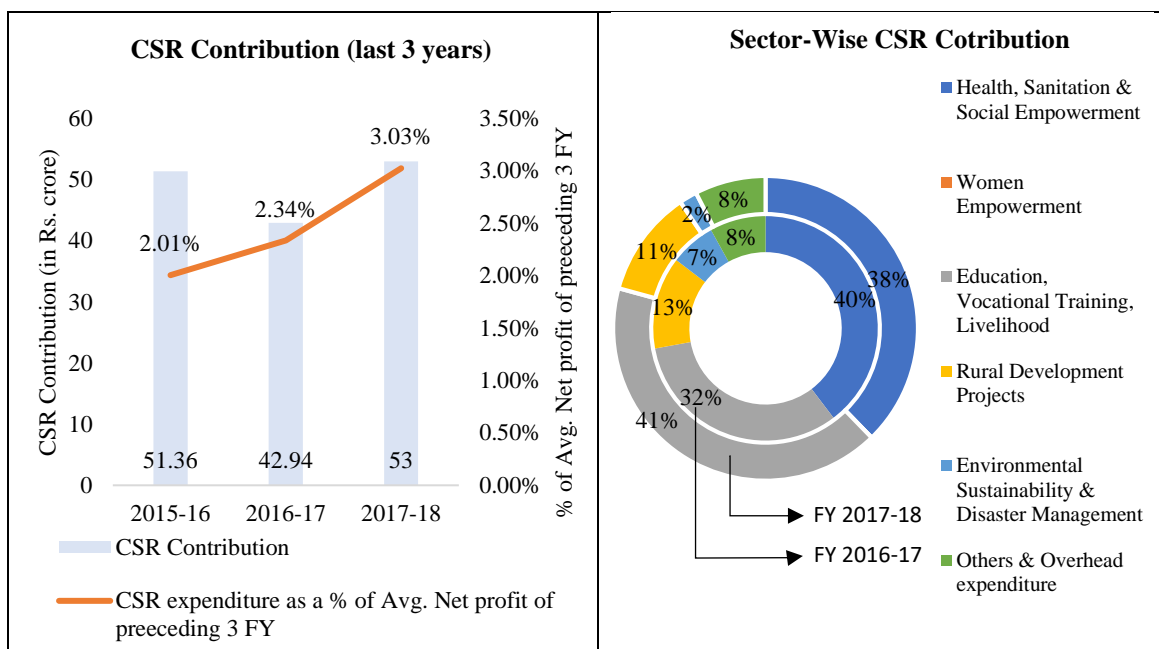
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“To tackle concerns such as climate change and diminishing natural resources, the Company has a policy on Conservation and Preservation of the Environment which extends to the entire value chain.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that *“As a responsible corporate citizen, the Company complies with all regulatory and legal requirements, has not been subject to any penalties on account of the same, and also not been subject to any cases filed by any stakeholder relating to unfair trade practices, irresponsible advertising or anti-competitive behaviour.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 7 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through directly and through several other Private, Non-Governmental Organisations & Charitable Institutions and Company trust – “JSW Foundation.” The Company conducts impact assessment of its CSR initiatives on regular basis.



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

- A total of 1,145 complaints were received from customers, in FY 2017-18, out of which 99% were resolved.
- The Company has stated that “*JSW Steel strives to ensure an efficient customer feedback mechanism and conducts regular customer satisfaction surveys to understand their expectations and concerns. JSW Steel conducts customer satisfaction surveys through a third party.*”

Kotak Mahindra Bank Ltd (2017-18)

The Bank has disclosed the Business Responsibility Report for FY 2017-18 in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	All policies are available on the Bank's intranet								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes. Policies have been communicated to all key internal stakeholders of the Bank. The communication on policies covering all internal and external stakeholders is an on-going process.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Evaluation done through internal audit mechanisms								

Participation of Bank, Subsidiaries and other entities in BR Initiatives:

The Bank has disclosed that none of the Subsidiaries and entities participate in BR initiatives.

Governance Related to BRR

The Bank has not disclosed the frequency of the review of BR performance, however, during the year 2017-18, the Board and CSR Committee meeting was held twice.

Extracts from Principle wise performance of the Bank

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank has not disclosed whether the policy extend to Group/ Joint Ventures/ Suppliers/ NGOs/ Others. Although, the bank has stated that *“Kotak upholds the highest standard of integrity and ethical behaviour. Effective corporate governance and ethics are the fundamental principles followed across all functions and practices at the Bank. The Code of Conduct reinforces ethical and transparent conduct of its employees. The Bank's Board of Directors and its employees are expected*

to understand, adhere, comply, and uphold the provisions of this code without exceptions. It is mandatory for all new employees joining the Bank to complete a comprehensive induction training programme that provides clear instructions on transparency, integrity and ethical standards. The induction training programme has one module dedicated to 'Being a Compliant Employee'."

- The Company received 9 complaints from Stakeholders, out of which all were resolved during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Bank has stated that sustainable sourcing is not applicable to the Bank.
- Although the Bank has not disclosed the percentage of recycling of products and waste, the Bank has stated that *"Kotak Mahindra has overhauled its processes in a way that not only improves customer experience but also reduces environmental impacts associated with its products and services. Project velocity was launched to encourage a paperless environment. The project ensured that all types of physical and call-based service requests are processed digitally with minimal manual intervention. This led to a significant reduction of physical forms, thereby reducing paper consumption. The Bank also implemented an Aadhaar-based biometric authentication system for the opening of a new savings bank account. The unique process enabled paperless account opening within 5 minutes using only an Aadhaar or PAN card."*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bank has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, it has a recognised employee association. Further, the bank has stated that approximately 7.20% of permanent employees are members of recognized employee associations
- Approx. 20.96% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	34	14	19	7	8	4
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The details of the permanent employees were given safety and skill upgradation training in the last year as under:

Sr. No.	Category	Percentage of employees covered with safety and skill upgradation training
1	Permanent Employees	58%

2	Permanent Women Employees	58%
3	Casual/ Temporary/ Contractual Employees	16%
4	Employees with Disabilities	Included in total number of employees

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its internal and external stakeholders.
- The bank has identified the disadvantaged, vulnerable and marginalized stakeholders with the help of Kotak Udaan initiative.
- **Special initiatives taken by the Bank to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Bank has stated that, *“Kotak Udaan gives helps 13-18 year old students (std. 8-12) from marginalised communities who are battling severe hardships and are at a high risk of dropping out from the education system. It offers a range of activities in academics as well as organises personality development events for children to ensure growth in their formative years.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Bank on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank has not disclosed whether the human rights policy extend to Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others. However, the Bank has stated that *“The Bank respects and upholds the dignity and rights of all its employees, customers, and business partners regardless of race, colour, religion, sex, national origin, ancestry, age, marital status, sexual orientation or disability. Kotak has a well-established Fair Practice Code, which ensures that there are no violation of human rights in its conduct - externally or internally.”*

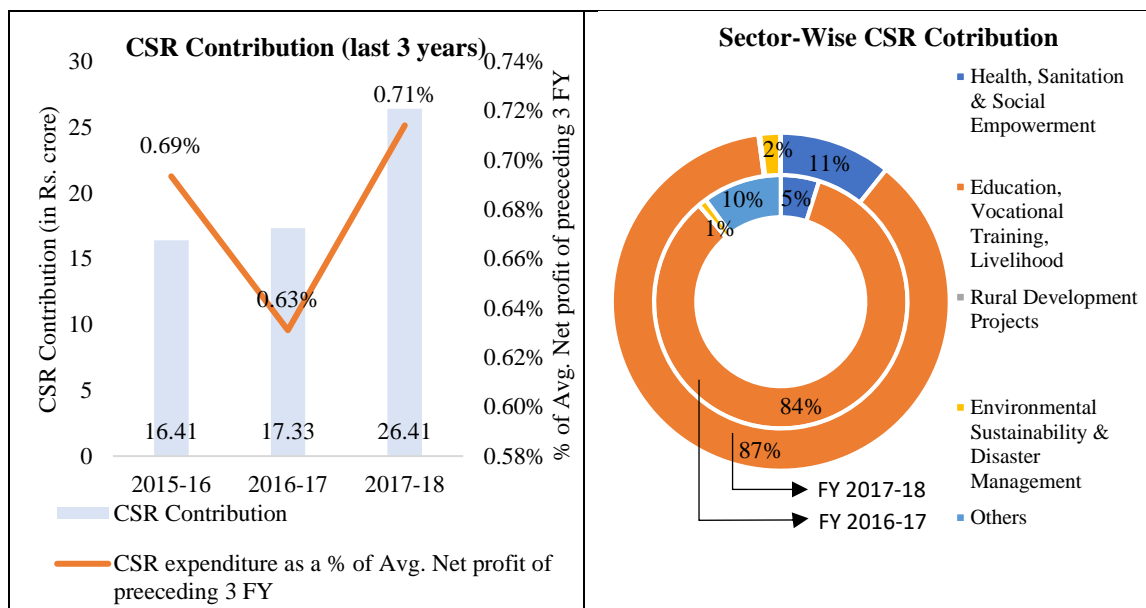
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that *“At Kotak, responsible Environmental Social Governance (ESG) practices have been embedded into existing systems and processes that help the Bank manage its environmental and social requirements beyond statutory regulations. It actively works to develop solutions and minimise it’s impact on environmental through various digital innovations, implementation measures to reduce energy, reduction in water consumption and waste management.”*
- **Are the Emissions/Waste generated by the Bank within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, The Bank has also stated that *“Used oil from DG sets is sent to a government authorised disposer/recycler for disposal. The Bank takes a proactive approach towards handling it’s electronic waste (e-waste). It has tied up with the CPCB licensed authorised e-waste recyclers. The e-waste collected for FY 2017-18 amounted to 1,000 units of old non-functional laptops and desktops along with 4,000 units of IT equipment like printers, router, network switch.”*

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 are Independent member. Chairman of the Committee is Non-Executive Director. The Company mainly undertakes CSR Activities through in-house team, Kotak Foundation and NGOs.



Reason for not spending requisite amount on CSR activity:

- o The Bank has not provided the reason for not spending the requisite CSR amount. However, the Bank has stated that “Bank is building its CSR capabilities on a sustainable basis and is committed to gradually increase its CSR spend in the coming years since the projects undertaken by Bank are long-term ongoing projects wherein Bank will have a continuing engagement over the next few years”

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

- o The Bank has not disclosed the total no of customer complaints received, however, the Bank has disclosed that 0.43% complaints are pending at the end of the year.
- o A Customer Satisfaction Survey is carried out by the Bank on an ongoing basis and whenever required

Larsen & Toubro Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has published integrated Annual Report ([Weblink](#)) for FY 2017-18.

The Company has stated that “After 10 years of Sustainability Reporting in the public domain, disclosures on sustainability parameters will now be made in the form of an Integrated Report (<IR>. The IR will be in accordance with the Global Reporting Initiative (GRI) Standard ‘Comprehensive’ option.”

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Yes. The policies are aligned with the principles of NVG guidelines and conform to international standards of ISO 9001, ISO 14001, OHSAS 18001 and ILO principles.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Lin k1	Lin k2	Lin k3	Lin k4	Lin k5	Lin k6		Lin k7	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: <http://investors.larsentoubro.com/CodeOfConduct.aspx>

Link 2: http://www.larsentoubro.com/media/29846/corporate_ehs_policy.pdf

Link 3: <http://www.larsentoubro.com/corporate/sustainability/employee-engagement/>

Link 4: http://www.larsentoubro.com/media/29845/corporate_csr_policy.pdf

Link 5: <http://www.larsentoubro.com/corporate/sustainability/employee-engagement/>

Link 6: http://www.larsentoubro.com/media/29846/corporate_ehs_policy.pdf

Link 7: http://www.larsentoubro.com/media/29845/corporate_csr_policy.pdf

Sustainability Report for FY 2017: <http://www.larsentoubro.com/media/36084/sustainability-report-2017.pdf>

Integrated Report for FY 2017-18: <http://www.larsentoubro.com/media/37735/lt-integrated-report-2017-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has subsidiaries. The Business Responsibility (BR) initiatives of the Company are extended to the Subsidiary/Associate Companies and they are also encouraged to participate in BR Initiatives of the parent organization. In addition, companies like L&T Finance Holdings, Larsen &

Toubrro Infotech, L&T Technology Services (listed entities) will have their separate BR Report (BRR) as a part of their Annual Reports. L&T Hydrocarbon Engineering and other subsidiary companies participate in our BR initiatives.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company states that the vision and corporate policies of the company are extended to all subsidiaries and associate companies. The Company has adopted the Code of Conduct (CoC) for employees, including board members, to remain consistently vigilant and ensure ethical conduct of its operations.
- The Company received 32 complaints, 75% of these were investigated and dealt with in accordance with the Company's protocol and 25% are under review.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has taken certain steps towards sustainability, however, has not disclosed percentage that were sourced sustainably.
- The Company has adopted the 3R (Reduce, Recycle & Recover) principle for material conservation. Material recycling and use of alternative material (in place of natural material) is extensively practiced by infrastructure business. Further the Company has stated that, the Sustainability Roadmap 2021 targets increasing recycling / use of recycled material by 5%.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association and approximately 6.78% of permanent employees are members of recognized employee associations
- Approx. 5.29 % of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Although the Company has not disclosed percentage of the employees that were given skill training however, the company stated that it has provided that more than 3.8 million man hours of safety training.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has an Integrated Community Development (ICD) which focuses on improving the quality of life of communities living in the 'water-stressed' regions of India. The ICD programme works towards providing access to clean drinking water, sanitation facilities and water for agriculture in water stressed regions. It is followed up with CSR interventions in health, education and skill-building.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the policies and practices related to human rights are extended to subsidiary and associate companies as well.

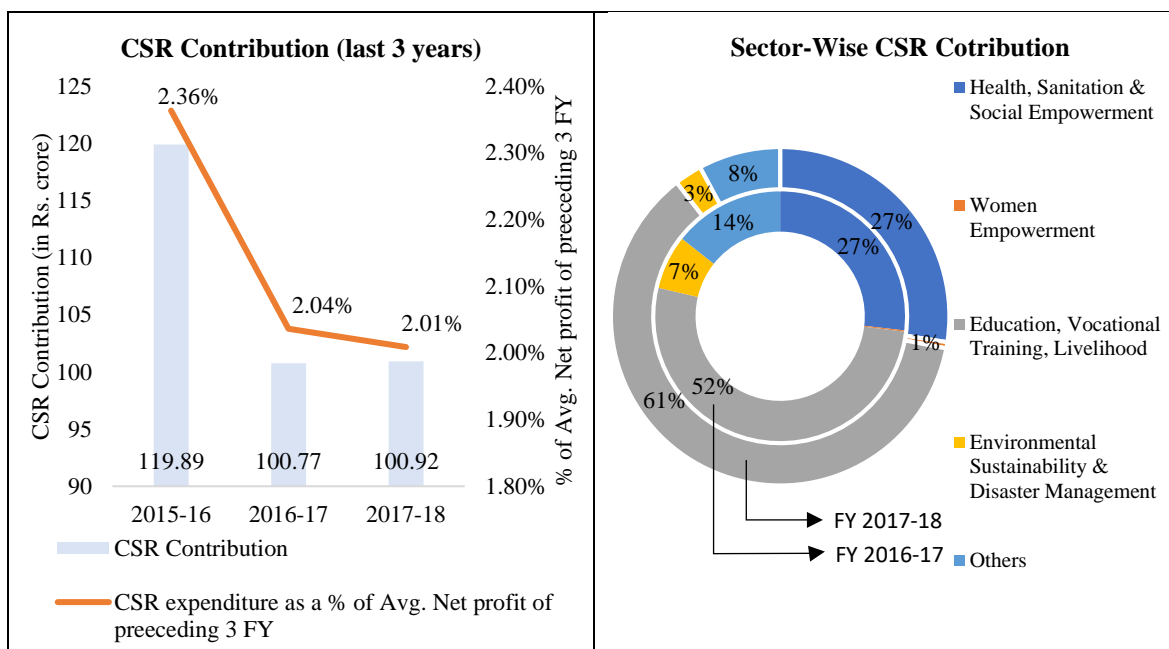
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated, *"Periodically, environmental risks and opportunities are identified from operations and addressed at the business level. We also share with our vendors, opportunities made available by following sustainability practices and its benefit to them. More than 18,000 suppliers have signed our combined CoC, which is the first step towards following a structured sustainability programme in our supply chain."*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Company complies with applicable environmental regulatory requirements from the State Pollution Control Board (SPCB) and Central Pollution Control Board (CPCB).

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 3 members out of which 1 member is an Independent director and Chairman of the Committee. The CSR committee of the Company mainly manages CSR Activities. The Company conducts impact assessment of its CSR initiatives. The Company has disclosed that *"The indirect impacts that accrue are also factored and documented in the monthly reporting process. These subsequently vetted/ measured during the external Social Audit or Impact Assessment."* (page no 80)



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

- The Company has stated that, no complaints were received from any of our stakeholders about incorrect or misleading marketing communication or anti-competitive behaviour or irresponsible advertising. that no complaints from stakeholders were received during the period.
- Further, the Company engages with its customers through regular customer meets, customer satisfaction surveys, market-based research including training and capacity-building programmes for customers.

LIC Housing Finance Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines as per NVGs guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	*								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	All the policies adopted by the Company are in line with the best practices in the industry and are in compliance with the various statutes governing the Company.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes, the policy/policies have been communicated to concerned stakeholders. The Company ensures to keep the communication as an on-going process. Further, the said policy/policies have also been hosted on the Company's website and are available in the public domain								
8	Does the Company have an in-house structure to implement the policy / policies?	Yes, the Company has an in-house structure to implement the policy / polices and the Board of Directors review the same at regular intervals								
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes, the Company has a full-fledged grievance redressal mechanism to address grievances of different stakeholders at different level								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The Company has conducted the impact analysis of the CSR projects through an external agency and the report thereof has been deliberated upon by the CSR Committee. The same has also been taken note of by the Board of Directors.								

Link: <https://www.lichousing.com/pdf/Principles-and-Policies-of-Business-Responsibility.pdf>

*Reasons disclosed by the Company for not following Q-2 for all P1-P9 policies?

Q-2: The Company has given reason that “*The Company is primarily engaged in providing the business of providing financial services by way of extending housing loans, thus this point has limited applicability. However, all the operations of the Company are carried out in compliance with all the applicable statutes, rules and regulations. Also, wherever possible, the Company designs its products in such a manner such that it helps in uplifting the deserving sections of the society.*”

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 4 subsidiaries and the Company has disclosed that The Subsidiary Companies have their own BR Initiatives. Although, the Company has not disclosed the % of other entities, participate in BR Initiatives of the Company. Further, as regards the participation of the suppliers in the BR initiative of the Company is concerned, the Company has various code of conduct in respect of various categories of suppliers of services and strict adherence to such codes of conduct is mandatory to remain empanelled with the Company.

Governance Related to BRR

The Company has stated that it meets Annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

- The Company has stated that *“The policies relating to ethics, bribery and corruption not only covers the Company and its employees but also extends to its suppliers”*.
- The policies relating to ethics, bribery and corruption extends to the suppliers such as agents, valuers, etc.
- The Company received 12,396 complaints during the year 2017-18, from various stakeholders such as shareholders, deposit holders, investors and customers. Out of the total complaints, 12,320 complaints, working out to 95.36 percent has been satisfactorily resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Since the Company is not involved in any manufacturing activity, the reporting on sustainable sourcing is not applicable.
- Since the Company is not involved in any manufacturing activity, the reporting on recycle mechanism is not applicable. However, the IT wastes are outsourced to an agency which disposes off the wastes as per proper waste disposal mechanism. Also, the old papers and documents are scrapped in a manner such that they may be recycled.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has stated that *“there is no management recognised employee association. However, mechanisms are in place for employees to represent their issues, if any, and the same is resolved amicably.”*
- Approx. 30.29% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	20	Nil
Child labour /forced labour/ involuntary labour	NA	NA	NA	NA	NA	NA
Discriminatory employment	NA	NA	NA	NA	NA	NA

- The Company has stated that *“The Company does not discriminate among employees while imparting training this is evident from the fact that out of the total employees trained during the year 26.49 per cent employees are from the Non-officer cadre and on the whole 79.35 per cent of employees trained during the year were of deputy manager or cadre below that.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that *“The Company has continuous engagement with its various stakeholders in order to understand their concerns and assess their requirements and respond to their needs in an effective manner.”*
- The Company has stated that *“the Company through its CSR activities partners through Implementation Agency (NGOs) for catering to the needs of common people, especially of those belonging to marginalised group.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders.** The Company through its CSR initiative in association with various implementation agencies such as Akshaya Patra Foundation, Concern India Foundation, Smile Foundation, Chetna Institute for Mentally Retarded, Indian Association of Blood Cancer, M K Educational Society and Indian Association of Blood Cancer & Allied Disease as supported various programmes, projects and activities that of providing education, skill training facilities for the differently abled sponsoring kitchen vessels for the purpose of distribution of cooked mid-day meals to the students of government schools, sponsoring school uniforms, supporting skill development of girls in computer based interventions and Information Technology and extending medical Aid by contributing to the purchase of mobile medical van.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?**
The Company has stated that *“the policies and code of conduct in respect of fair practices also cover the suppliers of the Company such as the home loan and recovery agents etc. No act of the Company has resulted into violation of Human Rights of any stakeholders and all the practices of the Company have been based on the principles of just and equitable grounds.”*

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company commits itself to take

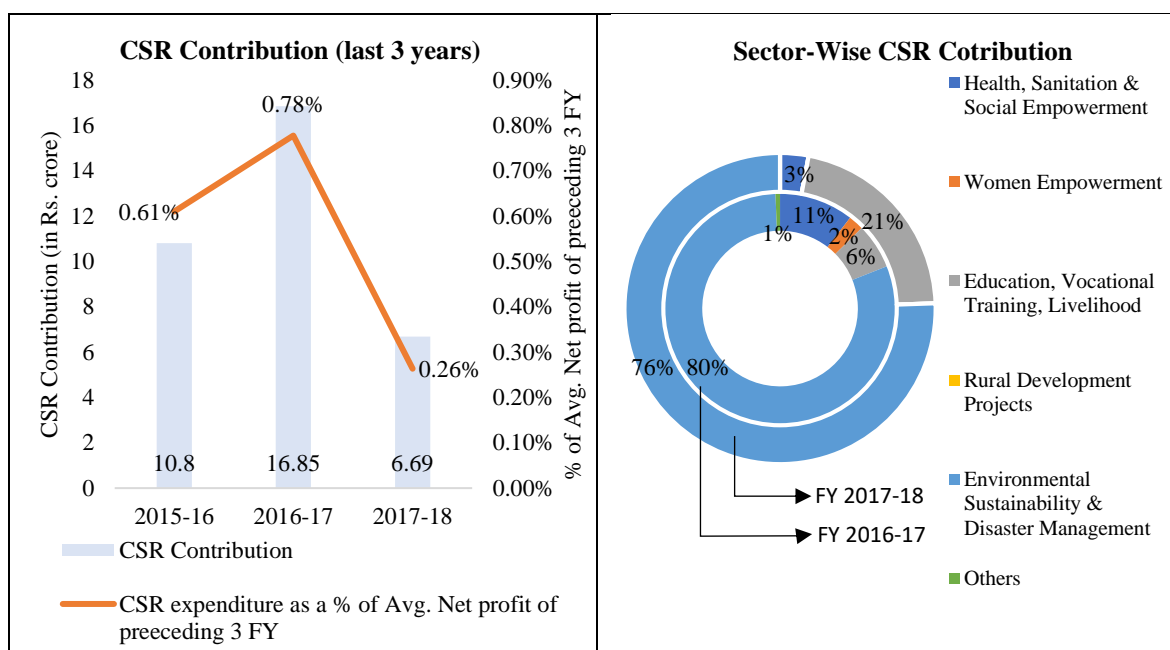
all necessary initiatives towards optimization and continual reduction in utilization of natural resources and also man-made resources.

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company stated that *“Since the Company has been engaged in the business of extending housing loans the above question is not applicable to the Company. However, as mentioned above the Company is determined to focus its attention to achieve the goal of “Reduce, Reuse and Recycle” in its entire operation / process for sustainable development.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent Directors. The Chairman of the Committee is Non- executive Director. The Company carries on its CSR activities through various implementation agencies (NGOs) which are identified by its in-house CSR team. The Company also conducts an impact analysis of the ongoing CSR projects through an external agency, which submits its report to the Board Level CSR Committee.



The Company has failed to spent the full prescribed amount on its CSR activities. The Company has stated the reason as follows:

“The Company in the process of gradually building and developing the internal CSR appraisal mechanism, for appraising CSR projects, as it intends to contribute towards genuine projects and partner with only reputed implementation agencies with proven track record. The Company is also laying emphasis on periodically monitoring the CSR contribution made by it. In financial year 2017-2018 the Company has made its best endeavour to appraise and process the contribution requests received by it. The Company is committed towards spending maximum CSR funds.”

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

- Although, the Company has not disclosed the no of complaint which were received during the year, however, the Company has stated that “*there are no customer complaints that are pending as on 31st March, 2018 as all the complaints that had been received during the year had been solved by the in-house Customer Relationship Management team of the Company.*”
- The Company has not carried out any consumer survey/ consumer satisfaction trends directly, however the Company has an Input Committee consisting of experienced senior employees having considerable experience in grass root operations of the Company.

Lupin Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. Further, the Company has stated that, “*The Company does not publish a BR or a Sustainability Report. The CSR arm of the Company, Lupin Human Welfare and Research Foundation carried out GRI 4 sustainability reporting process.*”

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle					*				
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	***							***	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1				Link2			Link3	**
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* The policy is broadly covered in various HR policies and practices as also codes of conduct

** The Policy related to P9 has not been found at Company's website and therefore marked it red.

*** The policies are broadly based on the National Voluntary Guidelines on social, environmental and economical responsibilities of business issued by the Ministry of Corporate Affairs, Government of India.

Link1: <https://www.lupin.com/pdf/Whistleblower-Policy.pdf>

Link2: <https://www.lupin.com/pdf/shareholder/Code-of-Conduct-Directors.pdf>

Link 3: <https://www.lupin.com/pdf/LupinCSR-Policy.pdf>

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company is a member of various trade bodies, chambers and associations through which it has been advocating from time to time in a responsible manner, about measures to be taken by the government to address issues related to the pharmaceutical industry. However, no need has been felt to formulate a specific policy for the same.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that “of the 33 subsidiaries, 32 were incorporated outside India, which comply with the regulatory requirements of their respective countries and have independent business responsibility initiatives. Lupin Healthcare Limited, the only Indian subsidiary has not commenced commercial operations”. The Company has further disclosed that none of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that it meets Annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

- The Company has stated that, “*The Company promotes a culture of open deliberations, transparency and impartiality. It does not tolerate corrupt and immoral practices. The Company adheres to the well-accepted norms of ethical, moral and legal conduct in its business operations. The Company instituted an initiative encompassing three important policies viz. Code of Conduct, Whistleblower Policy and Prevention of Workplace Harassment including sexual harassment at workplace. This initiative empowers employees to report unethical practices, adopts specified mechanisms to deal with workplace harassment and ensures swift redressal.*”
- However, the Company has not clearly disclosed whether it covers only company or extends upto group/Joint ventures/suppliers/contractors/NGO/others.
- The Company received 22 minor complaints which were examined, investigated and satisfactorily resolved by the team of Strategic Business Unit Heads/Officers, appointed by the Ombudsperson by taking requisite actions within the stipulated time-frame.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that it has formulated standard operating procedures for approving vendors. Materials, (local as also imported) are procured from approved vendors. Quality assurance teams conduct periodic vendor audits, especially those supplying key materials. Annual freight contracts are entered into with leading transporters for movement of materials. The Company has enduring business relations with regular vendors and receives their unrelenting support.
- Further, the Company has a mechanism of recycling and reuse wherein, it actively and continually promotes the concept of recovery, reuse and recycling. About 63% of the waste water generated in plants, is recovered, recycled and reused thereby reducing usage of fresh water. Steam condensate is recovered and reused resulting in reduction in the use of fresh water. Treated waste water is used in place of fresh water for gardening Company premises.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association and approximately 12% of permanent employees are members of recognized employee associations
- Approx.5.62% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	62	0
Child labour /forced labour/ involuntary labour	NA	NA	NA	NA	NA	NA
Discriminatory employment	NA	NA	NA	NA	NA	NA

- 95% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company's ophthalmology division, 'Lupin Blue Eyes' is associated with Eye Bank Association of India (EBAI) in a unique co-campaign called 'Punarjyoti' (literally meaning 'Rebirth of Eyes'). The campaign promotes the noble message of pledging donation of eyes after death in a simple, yet effective manner. The eye drop pack contains an insert encouraging eye donation and the process of pledging along with helpline numbers in Hindi and English language.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?:** The Company remains committed to respect and protect human rights. Code of conduct and human resource practices of the Company covers the said aspects. The Company does not hire child labour, forced labour or involuntary labour and never discriminates between its employees. This policy extends to the entire Lupin Group

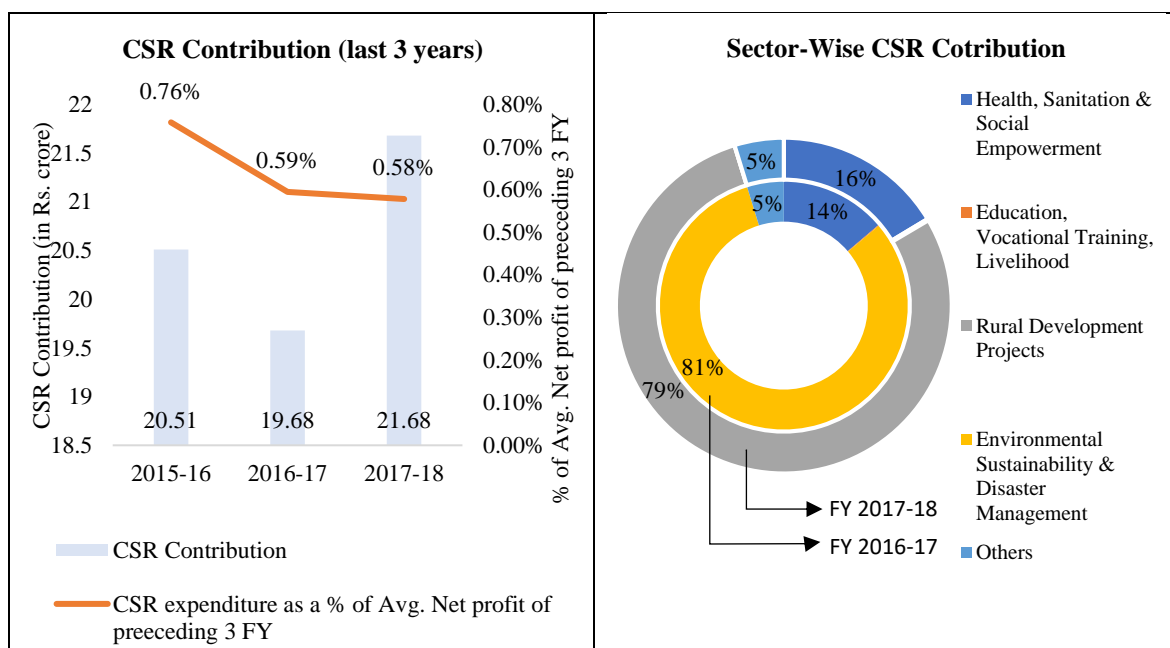
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “its Corporate Environment Policy covers the entire Company, its subsidiaries and all contractors working within the Company premises.”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, and both internal and approved external agencies monitor the same.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 1 is Independent Director and Chairman is Non-Executive Director. The Company mainly undertakes CSR Activities through its in-house team and own foundation named LHWRF (Lupin Human Welfare and Research Foundation). The Company regularly conducts impact assessment of its CSR initiatives through qualitative feedbacks collected from the beneficiaries of projects.



The Company has failed to spend the full prescribed amount on its CSR activities for FY 2017-18 and has stated the reason as follows:

“The actual CSR spend of the Company was less than 2% of the average net profit for the last three years. The Company plans to accelerate its CSR spend by setting-up a state-of-the-art JCI and NABH accredited hospital through ‘Lupin Foundation’, a charitable trust, set up by the Company. The proposed hospital would offer a wide mix of therapies which shall entail huge investment in land, infrastructure, medical equipments /instruments, over the next few years. The Company has engaged services of a reputed consultancy firm for conducting preliminary feasibility study. The Company is in the process of identifying the right opportunity and is looking out for a suitable plot in Mumbai for setting up a hospital. The Company has explored eight sites in Mumbai, keeping in mind strategic location, accessibility, presence of major hospitals/nursing homes

and diagnostic/pathology centers in the vicinity, etc. While some plots were narrow or too small, others were reserved in the Development Plan or were encroached upon or had disputed titles.”

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

- Although the Company has not disclosed the number of Customer complaints received during the year. however, the Company has stated that *“as on March 31, 2018, about 1% of customer complaints received during the year, were pending, which have since been resolved.”*
- The Company has stated that *“Consumer surveys are regularly carried out by the Company at doctor level.”*

Mahindra & Mahindra Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines. **The Sustainability Report has been independently assured by DNV GL Business Assurance India Private Limited.**

The Company has prepared the Annual Report for FY 2017-18 as per IIRC Integrated Reporting format.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle		Note 1							
2	Has the policy been formulated in consultation with the relevant stakeholders?								Note 2	
3	Does the policy conform to any national / international standards? If yes, specify (50 words).							Note 3		
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Note 4								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?					Note 5		Note 3		
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note.1 The Company complies with consumers' awareness through appropriate product labelling and operator manual & instructions which ensure safe usage by the customer. However, Company's current control is limited till warranty period. The Company is in the process of addressing this by appropriate communication to all value chain members for their responsibilities.

Note.2 While there is no formal consultation with all stakeholders, the relevant policies have evolved over a period of time by taking inputs from concerned internal stakeholders.

Note.3 This question is not applicable for influencing public and regulatory policy.

Note.4 It has been Company's practice to upload all policies on the intranet site for the information and implementation by the internal stakeholders. The Code of Conduct for Directors, the Employee Code of Conduct, Business Responsibility Policy and Corporate Social Responsibility Policy are available on the following websites:

<http://www.mahindra.com/resources/pdf/about-us/Code-of-Conduct.pdf>
<http://www.mahindra.com/resources/investor-reports/FY18/Governance/whistleblower-policy-july-2018.pdf>
<http://www.mahindra.com/resources/pdf/csr/CSR-Policy-01-April-2018.pdf>
<https://www.mahindra.com/resources/investor-reports/FY16/Governance/MM%20Business%20Responsibility%20Policy.pdf>

Note.5 The Company has a “Whistle blower Policy” to address grievances. There is a Corporate Governance Cell where these issues are dealt with.

Sustainability Report for FY 2017-18: <https://www.mahindra.com/resources/pdf/sustainability/Mahindra-Sustainability-Report-2017-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 172 subsidiary companies as on 31st March, 2018. The Company has a Code of Conduct for Employees and Directors as well as a set of Governance Policies. This Code is followed by the Subsidiary Companies also with modifications depending on its business requirement. For FY2017-18, Sustainability initiatives have been implemented at 19 subsidiaries. The Company has further disclosed that, more than 60% of entities covered for Suppliers initiatives.

Governance Related to BRR

The Company has stated that, the CSR Committee of the Board meets at an interval of 6 months to assess the BR performance. Other supporting councils/cells viz. Group Sustainability Council, Group CSR Council, Central Safety Council and Corporate Governance Council meet every 3 months.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, the Company has a Code of Conduct for Directors as well as all employees of the Company that covers issues, inter alia, related to ethics and bribery. It covers all dealings with Suppliers, customers and other business partners including Joint Ventures, and other stakeholders. The Company also has a Code of Conduct for Suppliers and Vendors.
- During the reporting year, 34 complaints were received from the shareholders, all of which were attended to/ resolved till date.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that, “*The Company has been working to enhance the degree of sustainability associated with its sourcing practices under the umbrella of “ONE SOURCING”. This includes strategy of one supplier per platform and common supplier basket for multiple businesses, setting up of vendor parks at its new plants, sourcing from tightly knit clusters, optimizing logistics to reduce fuel consumption, emissions and carbon footprint, re-working packaging to minimize waste and maximize re-use.*”
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that, “*the batteries used in vehicles are recycled in a structured manner through the battery manufacturing companies in India. Similarly other parts such as tyres, body components,*

etc. are recycled in an unstructured manner through licensed scrap dealers who either recover the material used or cannibalize/refurbish the parts for reuse.”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 90% of permanent employees are members of recognized employee associations
- Approx. 3.31% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	4	1	4	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 94% of the permanent employees and 85% of permanent women employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The company mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable & marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has made conscious efforts to design products and offerings, specifically to improve the earning potential and encourage entrepreneurship amongst rural and semi-urban stakeholders through offering accessible and affordable technology. Moreover, in the Farm equipment business vertical, there is a conscious focus to deliver ‘Farm Prosperity’ through various products and services that are designed to improve farm productivity especially amongst small farmers.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“the Business Responsibility Policy covers the aspects on Human Rights for the Company. Human Rights issues are a part of the supplier selection process and are also included in the contracts drawn up with them.”*

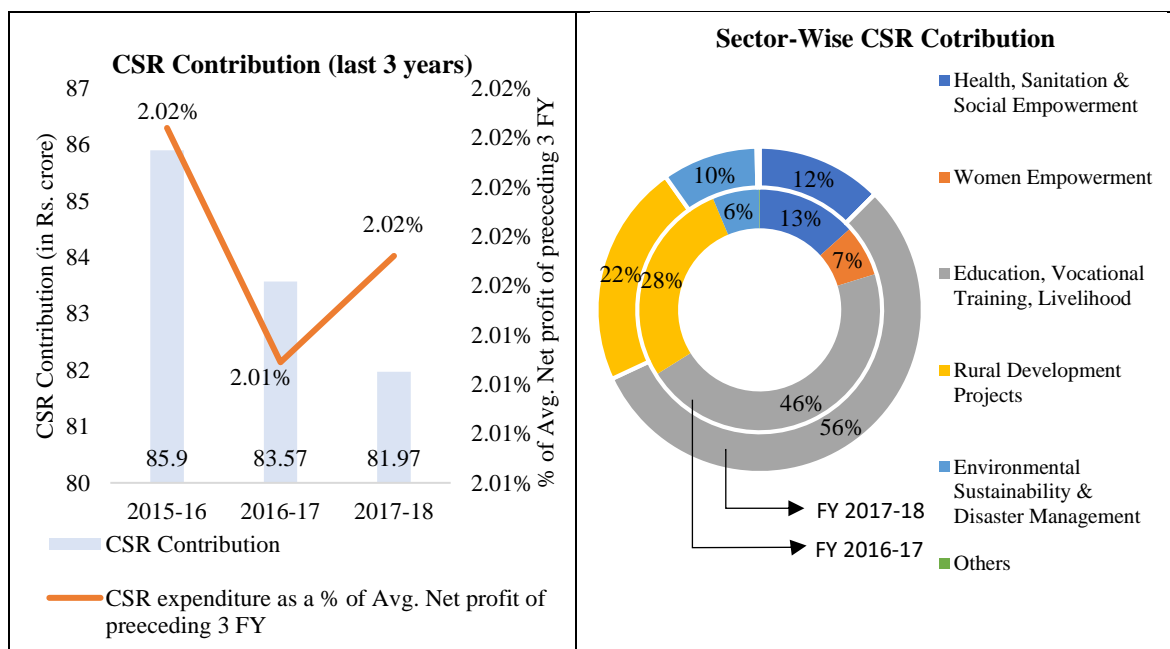
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, “The Company has various policies related to environmental protection. The Green Supply Chain Management Policy includes environment protection and covers suppliers. The subsidiaries/Joint Ventures have their own policies which are in sync with the Company’s environmental policies.”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emission/waste generated by the company is within the permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, Company’s trust or foundation like Mahindra Foundation, The K C Mahindra Education Trust, Tech Mahindra Foundation and NGOs. Impact assessments were conducted by Deloitte Touche Tohmatsu Limited to measure the outputs and outcomes.



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

- The Company has disclosed customer complaints from the different divisions. In Auto Division the Company has stated that it received 73,586 complaints and out of that 99.81% complaints are closed. Similarly, in Farm Division it received 19,514 complaints and 99.41% are resolved during the year. Further, for Swaraj Division, 725 complaints were received and 99% was resolved.
- A Customer Satisfaction Survey is carried out by the Company every year, through JP Power Syndicate Study - Applicable for Personal Model, CaPS Study (Done by Central Team at Worli)-

Applicable for Personal and Commercial Model, CSat (Customer Satisfaction for Commercial Channel) through TNS, Brand Track Study, Premonasia Survey for Tractors.

Marico Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Policies are prepared ensuring adherence to applicable laws and in line with international standards such as ISO, GRI, ILO, and OSHA.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1 Link2 Link3								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1: http://marico.com/investorspdf/Marico_CoC.PDF

Link2: [http://marico.com/investorspdf/CSR_Policy_\(1\).pdf](http://marico.com/investorspdf/CSR_Policy_(1).pdf)

Link3: http://marico.com/investorspdf/Sustainability_Policy.pdf

Sustainability Report for FY 2017-18: <http://marico.com/investorspdf/marico-sustainability-report-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that one subsidiary company participates in BR initiatives of the parent Company. The Company has further disclosed that Marico actively encourages its associated entities to adopt BR initiatives. Currently less than 30% of the associated entities participate in BR initiatives of Marico.

Governance Related to BRR

The BRR Committee reviews the Business Responsibility and Sustainability performance of the Company on annual basis.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The COC policy provides guidelines on ethics, bribery and corruption to be abided by all the members of the group. It is mandatory for all Marico members (employees) to undergo the COC course. The MCOBE policy provides guidelines on ethics, bribery and corruption to be abided by the associates. The guidelines are communicated to most of our key associates like vendors, suppliers and it is expected that they will follow it during their interactions with Marico.”*
- The Company received 20 complaints during FY 17-18, The Company satisfactorily resolved 75% of the registered complaints. It continues to investigate into the remaining cases through internal as well as independent external investigation agencies.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company endeavours to integrate sustainability in the procurement of its products and services. Every supplier of Marico is required to adhere to these principles.”*
- The Company has further stated that *“As the company sells consumer goods, it is difficult to reach to the end consumers to enhance the recycling process of products. However, the Company has a well-defined policy to take-back products which have expired or found with some packaging defects in order to recycle them to best possible extent. All the operations of Marico have established waste management systems. Presently <5% of waste is recycled.”*

Principle 3: Businesses should promote the well-being of all employees

- As per the requirement of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and Rules made thereunder, your Company has constituted the Prevention of Sexual Harassment Committee (PoSH Committee).
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 10% of permanent employees are members of recognized employee associations.
- Approx. 11.47% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2017-16		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	1	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 100% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of the stakeholder's engagement process. The Company engages with its internal and external stakeholders through a constructive consultation process.
- The Company has identifies communities around the manufacturing facilities focusing on women, children and small farmers as disadvantaged, vulnerable & marginalized stakeholders. The Company works towards betterment of these stakeholders which are located in underdeveloped regions of the country.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Marico makes conscious efforts for the disadvantaged, vulnerable and marginalized stakeholders residing in close proximity of the production units. The Company deploys need based community programs in the areas of education, health, skill development, sanitation, livelihood improvement. Some of the initiatives taken during the financial year are:
 - Providing access to toilet and sanitation in rural households
 - Skill development through vocational trainings to youths and women's
 - Education for underprivileged girls and boys
 - School infrastructure support like benches, library, education kits
 - Health camps like dental check-up, eye check-up, oral hygiene, blood donation camps etc.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company COC and MCOBE cover the guidelines on human rights and are applicable to all members and associates of Marico group.

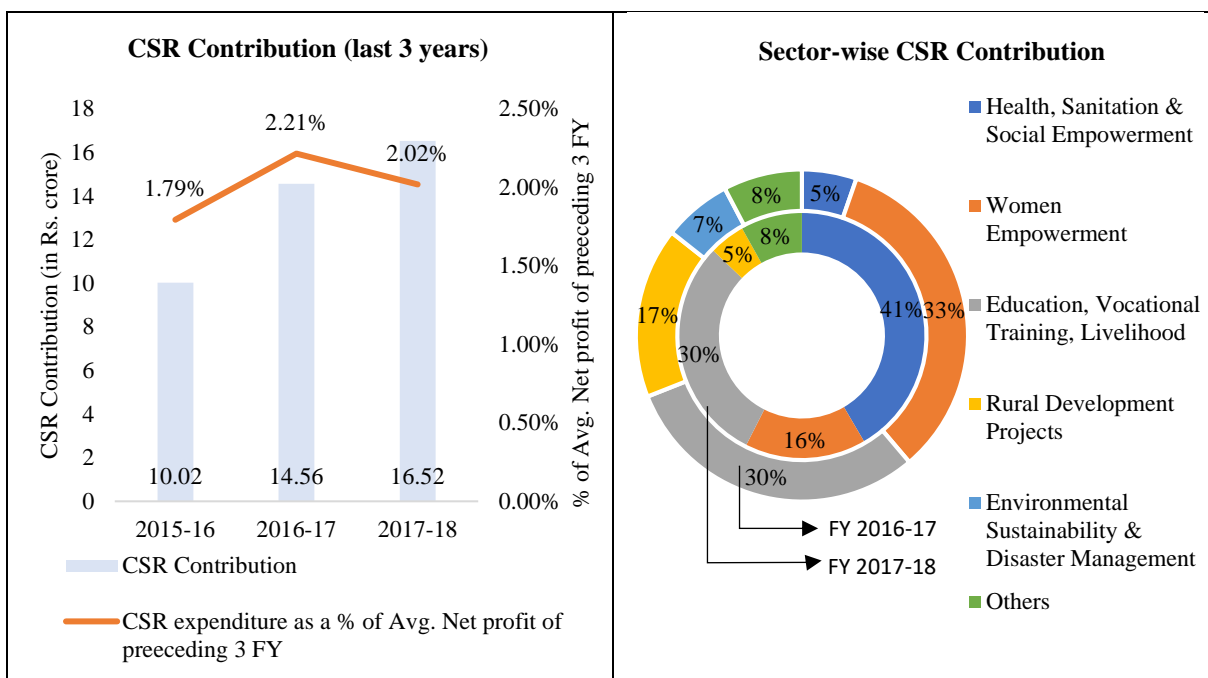
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Sustainability Policy instituted by the Company is focused on nurturing and safeguarding the environment for sustainable business. It extends to all the stakeholders the Company deals with which include suppliers, contractors, NGOs and others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Emissions/Waste generated by the Company is within the permissible limits given by CPCB/SPCB for the FY2017-18.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 5 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through directly, external NGO and government structure. The Company conducts impact assessment of its CSR initiatives.



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

- There are 3 consumer cases pending as on the end of financial year ended on 31st Mar 2018.
- The Company has stated that “Consumer satisfaction is important for the Company business sustenance. Marico connects with consumers through multiple touch points. A survey is conducted with sample consumers to understand the product quality feedback by Corporate quality team.”

Maruti Suzuki India Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines for FY 2017-18. The Company has published its sustainability report within its Annual Report at Page 84. **The Sustainability Report has been independently assured by DNV GL Business Assurance India Pvt. Ltd.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note 1					Note 1		Note 1	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link	Note 2	Link	Note 2		Link		Link	Note 2
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?					Note 3		Note 3		
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note 1: Policies have been formulated over time taking into consideration national environmental & safety norms for vehicles, and international standards such as Global Reporting Initiative Framework, ISO standards on Quality & Environmental Management Systems, British Standard for Occupational Health & Safety, and ILO Standards on labour practices.

Note 2: Policies available on internal portal and are accessible only to employees.

Note 3: Although standalone policies are currently not in place, grievance redressal mechanism is in place to address stakeholder concerns regarding human rights and policy advocacy.

Link: Policies available on Company website <https://www.marutisuzuki.com/corporate/investors/codes-and-policies>

Link for Sustainability Report 2017-18: https://marutistoragenew.blob.core.windows.net/msilintivebpdf/MSIL_AR_2017-18_HR.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 5 and 7 is as follows:

P5: The Company does not have a standalone Human Rights policy. Aspects of human rights, such as child labour, occupational health and safety and non-discrimination are covered in its various Human Resource policies.

P7: The Company does not have a standalone advocacy policy. For advocacy on policies related to the automobile industry, the Company engages with industry associations and expert agencies.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that, none of its Subsidiaries participate in the BR initiatives of the parent Company. Further, the Company has also disclosed that none of the entities that Company does business with participate in BR initiatives of the Company.

Governance Related to BRR

The Company has stated that, *“the Company’s top management along with the Managing Director reviews the Company’s performance on a weekly basis through Business Review Meetings (BRM) which is a part of ISO 9001:2015 framework and is periodically audited by an external agency.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“The Company’s Code of Business Conduct and Ethics (COBCE) for senior management and other employees addresses compliance with internal standards of business conduct and ethics, as well as regulatory requirements.”*

The COBCE is not applicable to the Company’s subsidiaries, joint ventures, suppliers and dealers. However, adherence to applicable regulatory compliances, including but not limited to prohibition on employment of child labour, forced labour and prevention of sexual harassment of women at workplace, are included as contractual requirements for dealers and suppliers.”

- The Company received 72 investor Grievance complaints during 2016-17 and all were resolved. Further, 1 complaint received during 2017-18 under Whistle blower policy which was investigated and closed.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that, *“The Company’s Environment Policy conveys its commitment towards sustainable usage of natural resources, reducing the pressure on environment and working collaboratively with customers, suppliers and the surrounding communities.”*
- The Company has stated that, *“In 2017-18, the volume of waste water recycled was approximately 60% of the total water demand (fresh water plus treated water) of the facilities. During the reporting period, 3,577 MT aluminium scrap, 2,370 MT steel scrap and 19,358 MT trim scrap were sent to suppliers for recycling.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed that, Company has a recognised employee association. Further, the Company has disclosed that approximately 100% of permanent employees are members of recognized employee associations.
- Approx. 3.45% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	2*	2	1*	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

* Under investigation

- The Company has stated that “*In the reporting period, 77% of the regular employees were covered under various training program*”.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped internal and external stakeholders.
- The Company has identified the vulnerable sections of the local community.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company’s initiatives focus on Community Development, Skill Development and Road Safety, and are aimed at creating opportunities for people to live a dignified, healthy, safe and productive life.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** Though the Company does not have a standalone policy, aspects of human rights such as child labour, forced labour, occupational safety and non-discrimination are covered by various policies applicable to the Company.

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

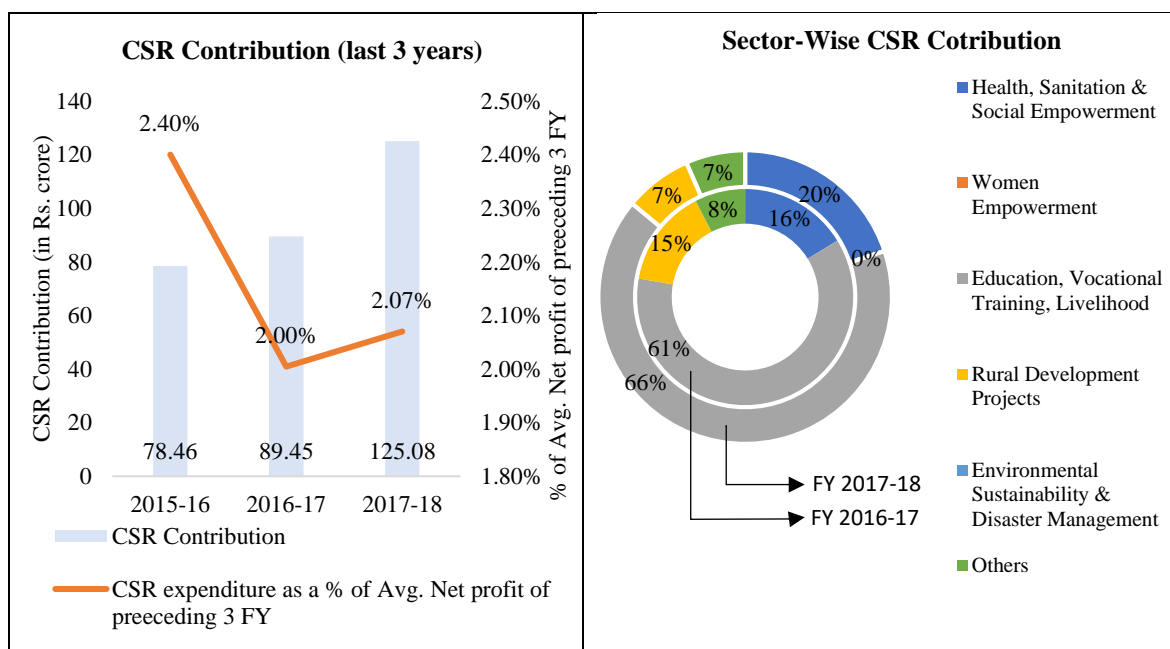
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, “*the Company is committed to complying with environmental regulations and strives to improve the environmental performance of its manufacturing facilities, products, supply chain and dealers.*”

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that “All emissions and waste generated by Maruti Suzuki were within the limits defined by the Pollution Control Board.”

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through directly by the Company. The Company conducts impact assessment of its CSR initiatives.



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

- As on 31st March 2018, 1,252 consumer cases are pending, in various forums.
- A Customer Satisfaction Survey is carried out by the Company. The Company has stated that, “it regularly engages with customers to get their feedback on products and gauge their satisfaction levels. Engagement mechanisms include brand track, customer meets, product clinics, mega service camps and free check-up camps.”

Motherson Sumi Systems Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1	**	Link2	**	Link2	**	**	Link3	**
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

**The links for policies cannot be found on the Company's website.

Link1: <https://www.motherson.com/assets/corporate-governance/code-of-conduct-new.pdf>

Link2: <https://www.motherson.com/assets/corporate-governance/whistle-blower-policy-new.pdf>

Link3: <https://www.motherson.com/assets/corporate-social-responsibility/csr-policy-17.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that all the subsidiaries (in total 140) participate in BR activities. The Company has further stated that, “All our customers are Original Equipment Manufacturers (OEMs) and as per our understanding & information, all of them have their own BR initiatives. Suppliers are encouraged to participate in the Company's BR initiatives being a responsible business.”

Governance Related to BRR

Although the Company has not disclosed the frequency of the meeting to assess BR performance of the Company. However, the Company has stated that it meets periodically to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Company’s Code of Conduct and Ethics ensures compliance to the Company’s standards of business conduct and ethics and regulatory requirements, it is available on the intranet and on the Company’s webpage.”*
- All the group companies are covered by the Code of Conduct. Code of conduct forms part of term of appointment letter and is signed at the time of joining the Company. The middle and senior management sign the Code of Conduct every year.
- No complaints were received during the year 2017- 18 from stakeholders.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“Sustainable sourcing describes a sourcing exercise which goes beyond economic considerations and takes into account environmental, social and ethical factors as well. It is a widely practiced tool within Motherson and the endeavour is to maximise its reach with every passing year. Motherson has a stated environment policy and an occupation health and safety policy. The vendors have to ensure compliance to these policies.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The nature of the Company’s business is such that there are no significant emissions or process wastes. The focus of the Company is to recycle the waste. The Company recycle materials wherever it is usable within the Company, which cannot be reused is disposed off in a manner that waste will be recycled”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Motherson group has participation of work councils and associations in different locations. Further, the Company has disclosed that approximately 26% of permanent employees are members of recognized employee associations.
- Approx.33.59% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	Nil	Nil	5	2
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	1	Nil	Nil	Nil	1	0

- 79% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** For socio-economically disadvantaged sections of the society, the Company has implemented various CSR programmes.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company policy on human rights policy is applicable to Motherson, its subsidiaries and vendors.

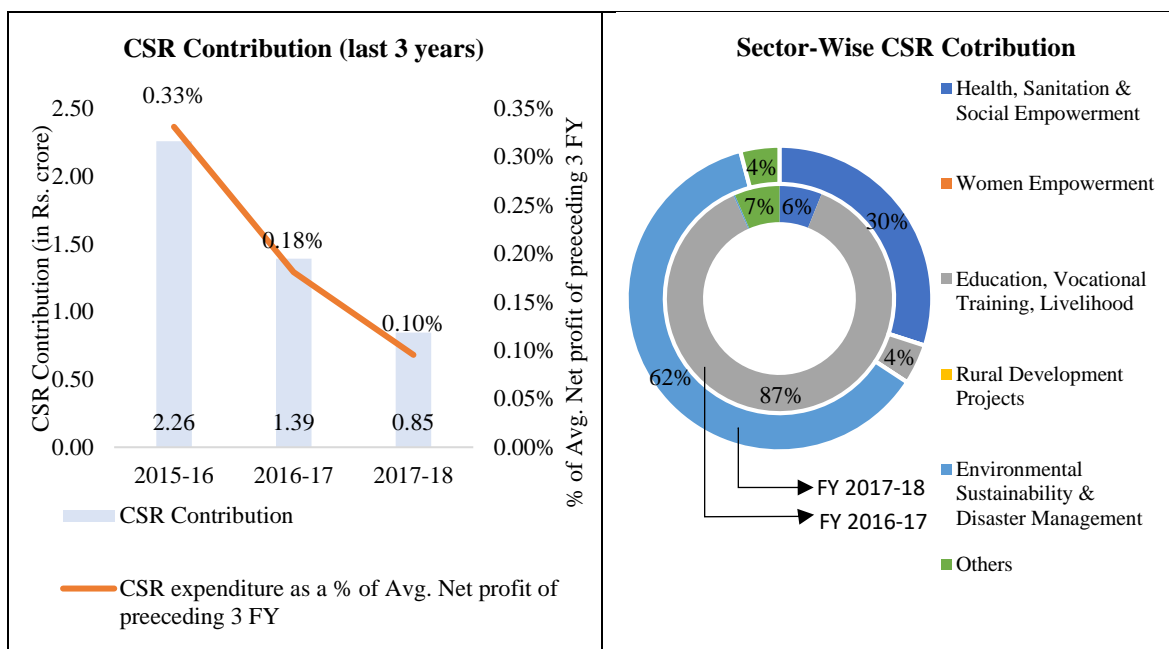
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“Environmental Policy is applicable to all the business units/groups and extends to business partners including suppliers, vendors and contractors.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, all emissions and waste generated by the Company are within the permissible limits given by CPCB/ SPCB

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one is Independent member. Chairman of the committee is non-executive director. The Company mainly undertakes CSR Activities through its "Swarn Lata Motherson Trust" and run through NGO partners and other agencies having subject expertise. The CSR programmes and their impacts/ outcomes are monitored and reviewed by the CSR Committee periodically.



The Company has failed to spend the full prescribed amount on its CSR activities for FY 2017-18 and has stated the reason as follows:

“The Company has been working on identifying the projects for carrying out CSR activities, this has taken more time than estimated. The Company is now working on various projects mainly for Skill Development, Digital Learning Program and sustainable development program in villages with cattle care distribution & collection, product development etc. The expenditure on these projects shall be accounted for as and when incurred.

The Company is also proposing CSR activities through Swarm Lata Motherson Trust which has been established for CSR activities at group level.”

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

- The Company has not disclosed percentage of customer complaints pending however, the company has stated that *“a robust system for addressing customer complaints. The customer cases filed against the Company for defects in the vehicles or relating to sales are not significant in number compared with annual sales volume”*
- The company has not disclosed whether it conducts Customer Satisfaction Survey however it has stated that, *“The Company receives numerous customer awards for contribution to their business such as quality excellence, design development, best performance etc. which represents customer satisfactions. Awards are mentioned in details in “Awards and Recognition” of the annual report. is not done directly but indirectly manner by receives numerous customer awards for contribution to their business such as quality excellence, design development, best performance etc. which represents customer satisfactions. Awards are mentioned in detail in “Awards and Recognition” of the annual report.”*

MRF Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link: <https://www.mrf tyres.com/shareholder-info>

The above link contains the link for the Business Responsibility Policy.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has Stated that the subsidiary companies being unlisted companies have not yet commenced any such activities. The Company has further disclosed that None of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Board of Directors of the Company **annually reviews** the various initiatives forming part of the BR performance of the Company. The CSR Committee reviews the implementation of the projects/ programmes/activities **once in about 6 months**. The Chairman & Managing Director and the Vice Chairman & Managing Director deliberate on issues relating to the BR when the respective functional review is done **(1-6 months)**.

Extracts from Principle wise performance of the Company:**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

- The Company has stated that *“It has laid down a Code of Conduct for the Company as per the SEBI Regulations. This covers issues, inter alia, related to ethics etc. It extends to all dealings between the Company and its stakeholders”*.
- During the financial year 2017-18 the Company received 33 complaints from the shareholders, which have been attended to. The complaints are in the nature of non-receipt of dividends, rejection of share transfer, share transmissions, Demat requests etc. The Stakeholders’ Relationship Committee at its meetings reviews the complaints and the status of their resolution.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that it has taken initiatives to source engineering consumables and spares through local vendors for execution of activities like servicing and maintenance of machines, mould repair, engineering correction jobs etc.
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The solid waste that is generated (including product rejects) are systematically segregated and sold to scrap vendors who either recycle the same or find alternative uses for it. Almost all of the solid waste is disposed in this manner.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that 100% of workmen are members of Unions. 90% of the unionised employees are members of recognised unions.
- Approx.0.28% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 40.40% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders in the form of - Underprivileged rural youth
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has MRF Institute of Driver Development (MIDD), a pioneering institute providing driver training in light and heavy commercial vehicles, has a track record of about 3 decades. Right from its inception, the institute epitomized a mission far nobler than merely training drivers. The objective was of moulding rural youngsters who were deprived of opportunities, into competent and cultured professionals, contributing immensely to the road transport industry and the society at large. The institute has turned out 245 drivers during the year 2017-18, which includes 128 drivers who have done a refresher course. Immediately after training, placement assistance is provided for all needy drivers, with reputed transporters and fleet operators.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“its human resource policies are intended to ensure adherence with applicable labour laws governing work place practices, contractual obligations are also stipulated in engagements with suppliers and contractors on compliance with applicable regulations”*

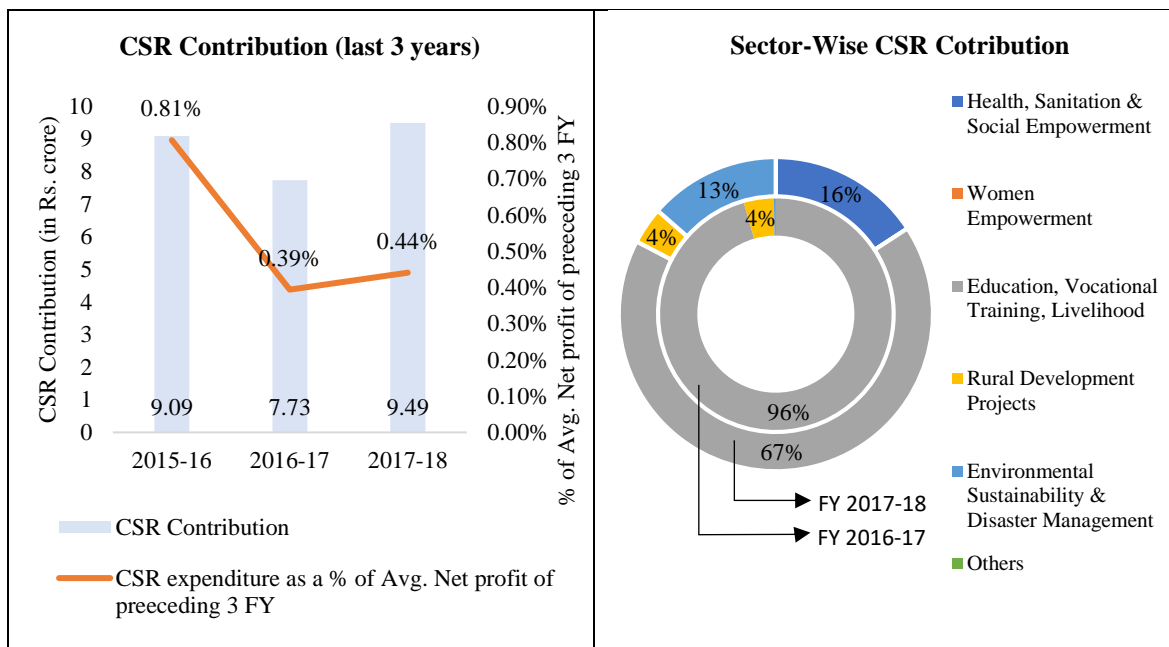
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“Environment, health and safety EHS Policy covers all manufacturing plants of the company and includes employees, contractors and customers. The policy addresses compliance with legal, statutory, regulatory and customer specific requirements related to health, safety and environment”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emission/waste generated across all locations are monitored at the prescribed frequency by the respective CPCB/SPCB and have been found well within the permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which one is Independent Director and rest others are Executive Directors including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, Company’s trust The CSR Committee reviews the implementation of the projects undertaken. Reports are sought from the implementing agencies to understand the impact of the initiatives. Likewise, in case of inhouse projects, the same is reviewed and monitored. The Company’s In-house team / external NGO / government structures Execute the CSR programmes/projects.



The Company has stated the reasons as follows for not spending the full prescribed amount on CSR initiatives during the financial year FY 17-18:

The Company has been engaging in socially relevant projects viz., MRF Pace Foundation (which provides training for promising youngsters to become pace bowlers of national and international standard) and MRF Institute of Driver Development (which trains under privileged youngsters to become competent drivers), well before the requirements of CSR became a legal requirement. These projects are being carried on for about two decades. These on-going projects were continued under the new regulatory framework and certain new CSR projects have also been identified and implemented.

During the last quarter of the financial year and in May 2018, the Committee has recommended various CSR projects (including two major projects) aggregating to ₹.25.73 Crore. Since these projects could be identified for implementation by the Company only during the later part of the year, the total amount required to be spent as per regulatory requirements in 2017-2018 could not be done. Moreover, the Company is also considering various proposals for undertaking long term infrastructure development for its ongoing CSR initiatives. The above initiatives, when implemented, is expected to take care of the unspent amount of earlier years which was required to be incurred by the Company to fulfil its obligations as per Section 135 of the Companies Act, 2013 and also will go a long way in fulfilling the obligations of the Company towards CSR requirements for financial year 2018-2019.

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

- The company has not disclosed the total number of Complaints received during the FY 2017-18, however, the Company has stated that “0.31% of customer complaints are pending as at the end of the financial year.”
- A Customer Satisfaction Survey is carried out by the Company.

NHPC Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link					Link			
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

*The respective Policies are available as per below mentioned links:

Link:

- CSR & Sustainable Development Policy: http://www.nhpcindia.com/writereaddata/Images/pdf/CSR_Policy_Final.pdf
- Resettlement & Rehabilitation policy: www.nhpcindia.com/r-and-r-initiative.htm.
- Fraud Policy: www.nhpcindia.com/writereaddata/images/pdf/NHPCFraudPrevention-Detectionpolicy-may16.pdf.
- Whistle Blower Policy: www.nhpcindia.com/writereaddata/images/pdf/wbp.pdf.
- Policy for Business Banning dealings: www.nhpcindia.com/writereaddata/images/pdf/Guidelines-BanningofBusinessDealings-Revised.pdf.
- Corporate Governance compliance: www.nhpcindia.com/corporate-governance.htm.
- Integrity pact: http://www.nhpcindia.com/writereaddata/images/pdf/ip_ip_program.pdf.
- Integrated Management System Certificate are available at www.nhpcindia.com/writereaddata/images/pdf/9001-2015.pdf.
- www.nhpcindia.com/writereaddata/images/pdf/14001-2015.pdf.
- www.nhpcindia.com/writereaddata/images/pdf/18001-2007.pdf.

Code of Business Conduct and Ethics and NHPC Conduct, Discipline and Appeal Rules are available over the Company intranet.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has Four (4) subsidiaries and the Company has disclosed that, “The subsidiary companies do not participate in any of the BR initiatives of the parent Company.” Further, the Company has stated that, “None of the entities that the company does business with participate in its BR initiatives”.

Governance Related to BRR

The Company has stated that, “*The BR performance of the Company is assessed annually at the end of Financial Year.*”

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “*the Company considers Corporate Governance norms as an integral part of good management.*”
- The Company has a Code of Business Conduct and Ethics which is applicable to its Board Members and Senior Management Personnel. In addition, the Company has a Fraud Policy to prevent fraud or suspected fraud. Whistle Blower policy has also been adopted.
- NHPC also has policy and procedure in place for banning business dealings with bidders (i.e. Group / Joint Venture / Suppliers /Contractors) in the event of an unethical behaviour.
- The company has 4 Pending Complaints of previous year and the Company received 3,507 Shareholder complaints during FY 2017-18, out of which 3,509 were resolved and the balance 2 complaints are pending as on 31st March, 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that “*The Company emphasizes to establish good relationship with its vendors and include them in its growth story. The Company follows International Competitive Bidding (ICB) system for selecting agencies for executing the construction of Hydro Power Projects. The techno commercial bids are examined in line with ICB practices, CVC guidelines and various other vendor practices like safe working conditions, implementation of labour laws, environment policies etc. The Company officials interact with all agency / agency’s representatives on regular basis in a transparent manner. However, it is difficult to ascertain the percentage of inputs sourced from these suppliers as different kinds of materials are being used by the Company.*”
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that “*Hydro-electric power generation does not produce any waste. Electricity which is the product of hydro-electric power plants is produced by non-consumptive use of water. Further, sound & optimal design practices are being followed to build safe & sustainable structures for our projects.*”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, no formal recognition has been extended to any association or union from the Corporate.
- Approx. 10.43% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	1	Nil	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 124 Number of employees were given safety and skill upgradation training in the last year i.e 1.68%.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped and identified internal and external stakeholders, including disadvantaged, vulnerable and marginalized stakeholders. Our stakeholders include employees, customers, local communities, suppliers and contractors, investors and shareholders, government and regulators and peers and industry eco-system.
- The Company has identified the disadvantaged and vulnerable stakeholders include differently-abled employees, girl/women, SC/ST communities and rural / project displaced communities in and around our projects.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Differently-abled employees: Company endeavours to make NHPC a workplace which is conducive to differently abled employees and employees with special needs. It aims to make these employees self-confident through an array of events, forums and trainings specifically organised for their benefit. Girl / women and SC/ST communities: In the vicinity of project locations, the Company provides scholarship to SC/ST & girl students for education and facilitating literacy programmes in rural areas.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“the Company commits to conduct its business in a socially and ethically responsible manner by conforming to all the requirements of SA 8000 standard. Currently, the “NHPC Conduct, Discipline and Appeal Rules” is applicable to our employees only, though we expect our stakeholders to adhere and uphold the standards contained therein.”*

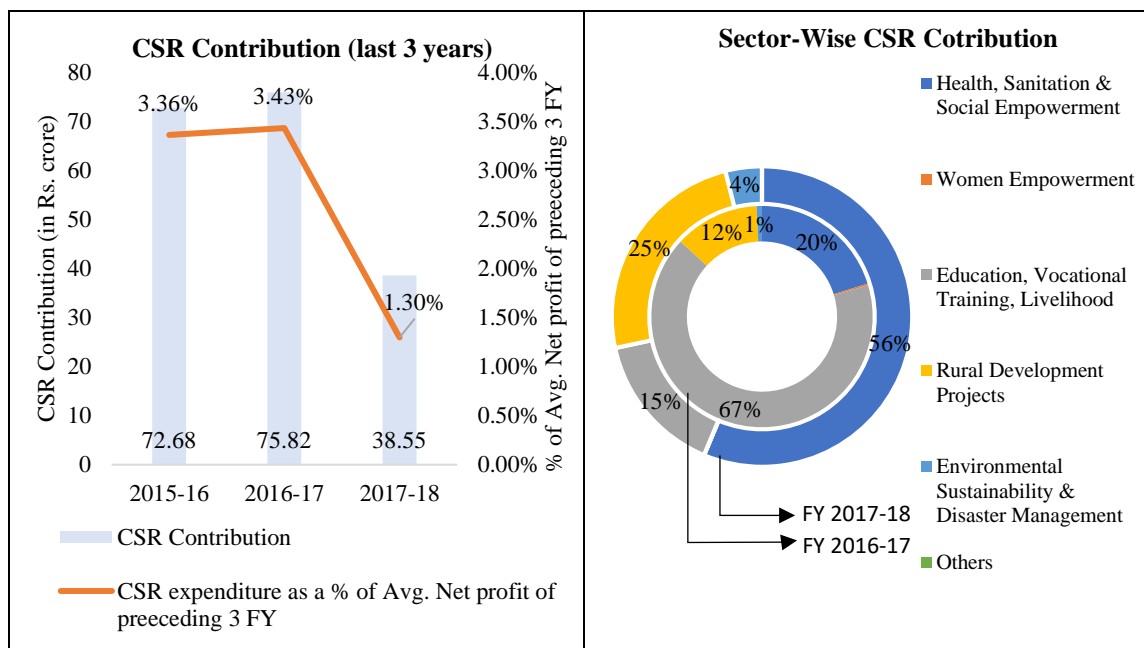
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “*NHPC possesses Integrated Management System certificate, which covers quality, environment and occupational health & safety management system for its Corporate Office and projects/ power stations.*”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes. During the course of power generation from hydro project, no solid waste, liquid effluent or gaseous emissions are generated. In addition, there is no contamination of water during the process of Hydro power generation. However, river water quality is being regularly analysed to assess any change in quality of river water after power generation which one within the permissible limits given by CPCB/SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 directors out of which one is an Independent Director. Chairman of the Company is an Independent Director. The Company mainly undertakes CSR Activities through in-house teams, besides few programs in association with Non-Government Organization (NGO)/ Government Institutions. The Company conducts impact assessment of its CSR initiatives The Company has stated that “*Impact assessment is a long term phenomenon. In CSR policy of NHPC, it is mentioned that impact assessment studies by external agencies will be undertaken after completion of long term scheme/ projects and for other schemes wherever possible.*”



The Company has failed to spent the full prescribed amount on its CSR activities for FY 2017-18 and has stated the reason as follows:

“All the CSR activities approved by the Committee of Directors on CSR & SD for financial year 2017-18 were initiated. However, several of them could not be completed and are still under various stages of execution. We anticipate to complete all such CSR activities during financial year 2018-19 and the balance unutilized amount of the allocated funds shall be utilized for completion of these activities during financial year 2018-19. Some of the reasons for less spending during the year are:

1. Spillover of works and payments, which are under different stages of tendering/ work award/ release of final balance payments:

CSR activities such as electrification of Hamlets in Alchi Village (Leh), construction of Toilets by Uri-II Power Station and Skill Development training by TLD-IV Power Station were completed and payment shall be released in financial year 2018-19.

Some CSR works such as Swachh Bharat Abhiyan related activities of Banikhet, Construction of Library and water supply work of Loktak, School/ Orphanage up-gradation work of RO-Siliguri/ Teesta-V, Various CSR activities related to Rural development/ education in respect of Teesta-IV/ Parbati II/ Dibang/ BRRP Patma, Skill Development training activities for north eastern state beneficiaries and Mobile Medical Units deployed by Subansiri HE Project are under progress and payment shall be booked in financial year 2018-19.

CSR activity related to Ambulance/ Community hall in respect of TLD-III power station has been spilled over to next financial year.

2. CSR works which are being executed by Kishanganga Project (J&K) suffered badly due to law and order problems in and around Bandipora (J&K).

3. Progress of CSR works suffered in Projects/ Power Stations under Siliguri Region due to Gorkhaland issue and strike called by GJM.”

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

- No customer complaints received during FY 2017-18. No cases from FY 2016-17 remain pending.
- NHPC is taking regular feedback from our beneficiaries which help us to serve our customers in a better and more effective way. We have received 93% feedback from our beneficiaries and most of the feedbacks are either ‘Very Good’ or ‘Excellent’.

NMDC Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has published the sustainability report ([weblink](#)) as per GRI G4. Latest available sustainability report of the Company is for FY 2017.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle	*	*	*	*	*	*	*	*	*
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 2	Link 5	Link 2	Link 6	Link 2
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	#	#	#	^	#	^	#	#	#

*All the policies are embedded and aligned to ISO 14001:2004 (Environmental management systems), ISO 9001:2008 (Quality management systems) and OHSAS 18001:2007 (Occupational health and safety), United Nations Global Compact, Corporate Environmental Policy and CSR policy.

Impact assessment of two major Flagship CSR initiatives i.e. the Integrated Village Development Programme & hospital on Wheels (Mobile Medical Unit) of the Company have been carried out by a third party in 2016-17. Process for empanelment of Agencies for carrying out Impact Assessment studies on a regular basis has been initiated.

Internal; ^ External

Link 1: Memorandum of understanding between NMDC Ltd. and Transparency International (India) TII

Link 2: <https://www.nmdc.co.in/Handlers/DownloadCommunicationOnProgress.ashx?ID=65243eb7-5ad1-4ba5-9fd8-24fa0012c626>

Link 3: <https://www.nmdc.co.in/Docs/Service%20Regulations.pdf>

Link 4: <https://www.nmdc.co.in/CSR/Default.aspx>

Link 5: <https://www.nmdc.co.in/EnvironmentalMgmt.aspx>

Link 6: <https://www.nmdc.co.in/Docs/CSR/CSR%20Policy.pdf> **Addendum in CSR Policy:**

<https://www.nmdc.co.in/Docs/CSR/Addendum%20to%20CSR%20Policy.pdf>

Sustainability Report for FY 2017: <https://www.nmdc.co.in/Docs/NMDC-Sustainability/NMDC-Sustainability-Report-2017.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed “NMDC keeps all its subsidiaries informed about the Business Responsibility initiatives. It also encourages its subsidiaries to participate in such initiatives”. Further, none of the other entities the Company does business with participate in BR initiatives of the Company.

Governance Related to BRR: The Company has stated that “NMDC assesses its BR performance on regular basis. Also, the Chairman-cum-Managing Director of NMDC communicates the performance of the NMDC on the ten principles of the International framework ‘United Nations Global Compact’ annually”.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “*NMDC and its subsidiaries are committed to working with stakeholders in government, business and civil society to promote good governance, responsible use of mineral wealth and to prevent corruption. NMDC has also signed the Integrity Pact (IP) with Transparency International India (TII). Also, The Vigilance department at NMDC guides and facilitates for impartial, fair and transparent decision making and gives priority to preventive vigilance, with proactive attitude*”. However, the Company has not disclosed if the policy relating to ethics, bribery and corruption cover only the Company or it extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs /Others.
- About 34 shareholder complaints have been received in the financial year 2017-18 and all of them have been successfully resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that “*NMDC is encouraging procurement through vendors to adopt sustainable practices and also takes due care in handling of bulk materials by giving specific instructions for the transportation of materials like HSD petrol, explosives etc. NMDC also makes proper arrangement to control the dust emission during loading and unloading of the products at site. The bulk transportation is mainly through rail.*”
- Yes, NMDC mining projects are implementing productivity improvement mechanism and waste reduction initiatives along with exploring the possibility for re-use of by products. One of the waste reduction and mineral conservation is blending of low grade ore. is set for achievement for blending of low grade ore (less than 55% Fe) is < 16% towards mineral beneficiation”

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or not as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that All our permanent employees (100%) are members of their respective recognized employee association.

- Approx. 4.92% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	1	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 65.21% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholder. The key categories are Government and Regulatory Authorities, Customers, Investors, Employees, Local Community, NGO's and other stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders with the help of sociodemographic data of the community through base line surveys conducted as the part of its CSR policy objectives.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that, “Yes, some of the major CSR activities implemented by NMDC which have benefitted the disadvantaged, vulnerable and marginalized stakeholders.” The Company has disclosed a list of initiative in the report related to sponsorship for Nursing Course, Scholarship Scheme for SC/ST background students, Village Development Programme, Mid-Day Meal Scheme, Skill Development Programme.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that “NMDC and its subsidiaries are committed to working with stakeholders in government, business and civil society to promote good governance, responsible use of mineral wealth and to prevent corruption. NMDC. has also signed the Integrity Pact (IP) with Transparency International India (TII). Also, The Vigilance department at NMDC guides and facilitates for impartial, fair and transparent decision making and gives priority to preventive vigilance, with proactive attitude.”

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

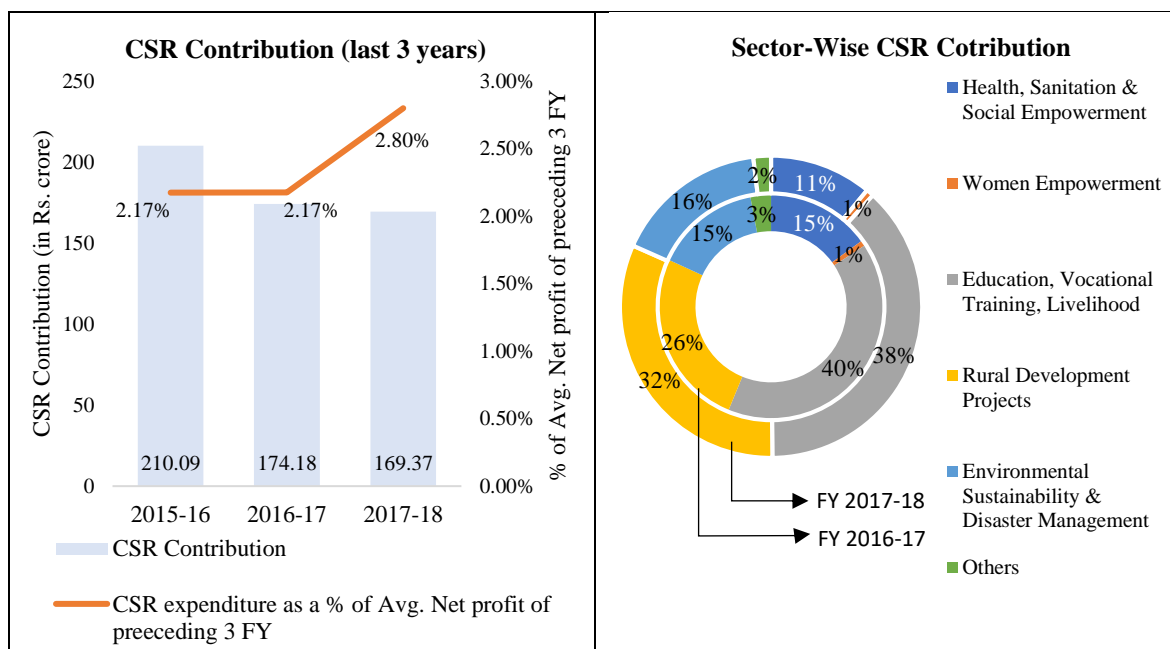
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “Businesses should respect, protect, and make efforts to restore the environment. The environmental management at NMDC is governed by its Corporate Environmental Policy. The policy extends to NMDC and its subsidiaries.”

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes. All emissions & wastes generated by NMDC are monitored on a regular basis and are within permissible limits as specified by CPCB/SPCB. Also, the returns are filed regularly to the statutory authorities as per requirement.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which 3 are Independent directors. Chairman of the committee is an Independent Director. The Company mainly undertakes CSR Activities through its in-house team, NGOs, State / District Authorities and trust. The Company conducts impact assessment of its CSR initiatives. The Company has stated that “*Baseline study, Impact assessment, Monitoring & Evaluation and Social Audit connected with the CSR Programme of the Company with the CSR Programme of the Company has been commissioned through reputed institutions viz., NIRD, Hyderabad & IHD, New Delhi.*”



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

- Although, the Company has not disclosed the no of the complaints reported, however, the Company has stated that “*there have been three (3) customer complaint pending in FY 2017-18.*”
- No consumer survey has been done in FY 2017-18. However, regular customer meets are being conducted at Hyderabad / Chennai / Raipur to assess customer satisfaction.

NTPC Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has published a Sustainability Report ([weblink](#)) as per GRI format for FY 17-18 on its website.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	¹ (i)	² (i)	³ (ii)	⁴ (i)	⁵ (ii)	⁶ (i)	⁷ (i)	⁸ (i)	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?			\$		\$				
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

¹ P1 is covered under following policies: Code of conduct, core values, Fraud Prevention Policy, CDA Rules, Whistle Blower Policy, Internal Code of Conduct for prevention of insider trading, Code of Corporate Fair Disclosure Practices for prevention of insider trading, Related Party Transaction policy, Policy for determining materiality of events or information for disclosure, Policy on maintenance and preservation of documents, policy on determining material subsidiaries, Training policy for Directors of NTPC.

² P2 is covered under safety policy and NTPC Policy for CSR and Sustainability

³ P3 is covered under HR policies and Placement and transfer policy

⁴ P4 is covered under R & R Policy, Initial Community Development policy and HR Policies

⁵ P5 is covered under HR policies

⁶ P6 is covered under Environment Policy and NTPC policy for CSR and Sustainability

⁷ P7 is covered under Code of Conduct and Core Values

⁸ P8 is covered under R & R Policy and Initial Community Development policy

⁹ P9 is covered under Commercial System and Procedures

(i) Web links for the Policies:

a) Code of Conduct- <http://www.ntpc.co.in/investors/code-of-conduct>

b) R&R Policy- <http://www.ntpc.co.in/en/corporate-citizenship/r-and-r-policies>

- c) *CSR and Sustainability Policy*- <http://www.ntpc.co.in/download/ntpc-policy-csr-sustainability>
- d) *Fraud Prevention Policy*- <http://www.ntpc.co.in/about/FraudPolicy.asp>
- e) *Internal Code of Conduct for prevention of insider trading*- <http://www.ntpc.co.in/download/internal-code-conduct-prevention-insider-trading-dealing-securities-ntpclimited>
- f) *Code of Corporate fair disclosure practices for prevention of insider trading*- <http://www.ntpc.co.in/download/code-corporate-fair-disclosure-practices-prevention-insider-trading>
- g) *Related Party Transaction Policy*- <http://www.ntpc.co.in/download/related-party-transaction-policy-ntpc>
- h) *Whistle Blower Policy*- <http://www.ntpc.co.in/sites/default/files/downloads/WhistleBlowerPolicy.pdf>
- i) *Policy for determination of materiality of events or information for disclosure*- <http://www.ntpc.co.in/sites/default/files/downloads/NTPC%20-%20Policy%20For%20Determination%20of%20Materiality%20of%20events.pdf>
- j) *Policy on maintenance & preservation of documents*- <http://www.ntpc.co.in/sites/default/files/downloads/Document%20Preservation%20Policy.pdf>
- k) *Policy for Determining Material Subsidiaries*- <http://www.ntpc.co.in/download/policy-determining-material>
- l) *Training Policy for Directors of NTPC*- <http://www.ntpc.co.in/download/training-policy-directors-ntpc>
- m) *Initial Community Development Policy*- <http://www.ntpc.co.in/download/initial-community-development-policy-2009>
- n) *Environment policy*: <https://www.ntpc.co.in/en/environment/environment-policy-and-management>

Sustainability Report for FY 2017-18: <https://www.ntpc.co.in/sites/default/files/downloads/NTPC-Sustainability-Report-Final.pdf>

(ii) *Policies not hosted on web:* <https://www.ntpc.co.in/flipbook/#p=8>

Safety Policy, HR Policies & Placement and Transfer Policy: Available for internal stakeholders only and not hosted on web.

\$. *Communicated to Internal Stakeholders only.*

Reasons disclosed by the Company for not formulating policies adhering to principle 9 is as follows:

P9: *All the sub-principles identified under principle -9 are duly followed by NTPC through its commercial systems and procedures. However, NTPC feels that a separate Policy on Principle -9 is not required because:*

- *The Company supplies power to the Bulk Customers (State Electricity Distribution companies) majority of which are owned by the respective State Govt.*
- *The CERC, while finalizing Tariff and other Regulations engages all Stakeholders and takes views of them. CERC Tariff Regulations and relevant orders are being displayed on CERC Website www.cercind.gov.in.*
- *The Company & Our bulk customers i.e. Discoms work under regulated Environment. NTPC strives for supplying cheapest power deploying all resources optimally in best possible ways resulting in well-being of customers & Society*

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has five (5) Subsidiary Companies as on 31st March 2018. Further it has stated that “*The Business Responsibility Initiatives of the parent company are applicable to the subsidiary companies also. However, none of the entities that the Company does business with participate in the BR initiatives of the Company.*”

Governance Related to BRR

The Company has disclosed that it meets every 3 to 6 months to assess the BR performance.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “*Conduct Code of Conduct for Board Members & Senior Management Personnel covers all the Directors and Senior Management Personnel of the Company.*”

- Further the company has also stated that “*Fraud Prevention Policy applies to any fraud, or suspected fraud involving employees of NTPC as well as representatives of vendors, suppliers, contractors, consultants, service providers or any outside agency (ies) doing any type of business with NTPC*”.
- The Company received 6790 complaints under the Ethical View Reporting Policy, out of which 6789 were resolved and the balance 1 complaints are under various stages of investigation and completion. “*These complaints are received related to Equity Shares, Bonus Debentures, Private Placement of Bonds, and Public Issue of Bonds.*”

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that
 - Coal Linkage: Coal linkage for a new project is accorded by Standing Linkage Committee-Long Team (SLC-LT) under the aegis of Ministry of Coal, GOI.
 - Fuel Supply Agreement (FSA): FSA is signed between the Buyer and Coal Companies for a period of 20 years with a provision of review after every 5 years.
 - During 2017-18, NTPC sourced about 168.95 Million Metric Tons of domestic coal and no imported coal.
 - Bilateral MOUs: Short-term coal procurements are done as per requirement through Bilateral MoUs with coal companies for the quantity, price & period mutually agreed by buyer & Coal Company.
 - E-Auctions: Coal is also procured for critical stations by participating in E-Auctions conducted by Coal companies as approved by NTPC Board
 - Import: NTPC imports coal with the approval of NTPC Board. NTPC procures the coal on short-term basis and in multi packages to enable cost benefit to NTPC.
- The Company has stated that The Company has disclosed that, “***Our Product viz. Electricity gets completely consumed and hence there is no scope of its recycling. Guidelines have been issued in line with National Environment Policy for disposal of hazardous wastes from NTPC power stations. The hazardous wastes generated at our power stations such as used transformer oil, used lubricants, lead acid batteries etc. are sold only to government approved recyclers or given back to the sellers for recycling under buy back arrangements, which takes care of 100% recycling of such wastes. Around 53.45% of the total ash generation from electricity generation has been used for various productive purposes during 2017-18.***”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- Company has a disclosed that “*Workmen of various NTPC Units have formed unions. The same are accorded recognition by NTPC Limited as per applicable law / practice.*” Further, the Company has

disclosed that approximately 50-55% of permanent employees in workmen category are members of recognized employee unions.

- Approx. 6.45% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 66.27% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has disclosed that it has mapped its stakeholders as a part of its stakeholder engagement strategy development process.
- *The Company has a well structure R&R and CSR Policy to take care of the disadvantages, vulnerable and marginalized people in and around the plants Vulnerable category of persons has been detailed in NTPC's CSR and R&R Policies. These include old-aged, women, PCPs, SC/ ST/OBC etc. They are identified through Socio Economic Survey (SES), Need Assessment Survey (NAS) and other consultations with the stakeholders etc at the time of formulation of CSR/ R&R Plans.*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** *“Yes, NTPC has always been sensitive to the needs of disadvantaged, vulnerable and marginalized stakeholders. As part of R&R, in addition to the entitlements and packages as envisaged for PAP's, NTPC makes special efforts for the welfare measures for this section of the society in the neighborhood community of NTPC locations. NTPC has also taken up the activities for women empowerment, construction of SC/ST multipurpose halls & hostels, relief through distribution of various articles & support to orphanages & old age homes in the vicinity of its stations. Some of the initiatives to address the needs of differently abled include Information and Communication Technology (ICT) Centers and Disability Rehabilitation Centers by NTPC Foundation and inclusive education, distribution of equipments like tricycles, wheelchairs, vocational training etc.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“All HR Policies of NTPC are applicable to all its employees posted in various stations, projects, offices, JVs and Subsidiaries. Human Rights provisions are also built in our bidding documents for supply cum erection and civil packages invited on competitive bidding basis covering our suppliers and contractors.”*

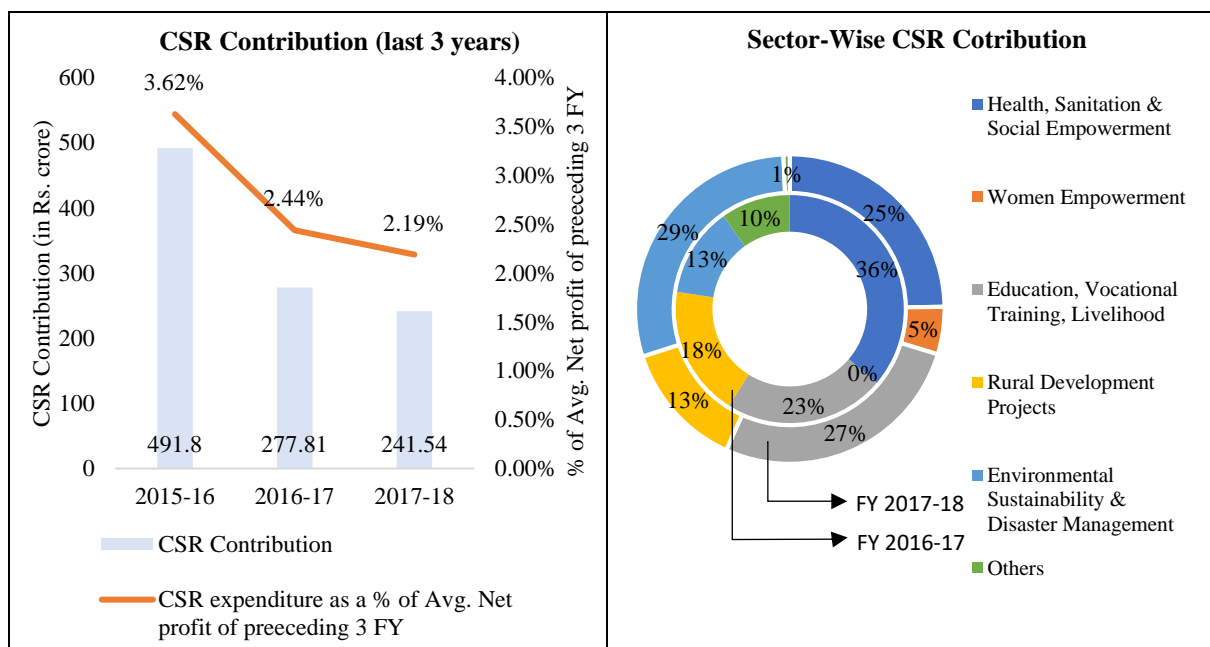
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** Company has stated that *“The environment policy of the company and implementation thereof covers the core business activity of producing thermal power through its power stations. However, the Joint Ventures / Suppliers / Contractors / Other stake holders are free to adopt the same voluntarily.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Company has stated that *“All the legal parameters including emission norms and effluent (wastes) norms are being adhered to by NTPC stations. Change of Law in certain cases, has necessitated up-gradation of pollution control equipment’s which are being addressed through R&M Schemes for which actions plans have been submitted to the Regulators.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, Company’s foundation and NGOs The Company has not carried out Independent Audit or impact assessment. However, it is stated that *“Social Impact Evaluation (SIE) studies/ surveys are conducted by NTPC as per policy provisions for all its major community development activities at various stations/ projects at regular interval. Annual Internal Audit of CSR Activities are also carried out. This year SIE has been conducted at 04 locations.”*



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

- *There are no complaints as such from customers. However, as part of the tariff determination process under the overall Regulatory System, different cases have been filed by NTPC against CERC/ Customers or filed at the Appellate Tribunal/ Courts by different Beneficiaries against NTPC/ CERC.*
 - *APTEL: 44 Cases*
 - *Supreme Court and Other courts: 28 Cases*
 - *Total: 72 Cases as on 01st June 2018*
- A Customer Satisfaction Survey is carried out by the Company to assess the satisfaction level of the customers, captured through an Index and to get feedback from the customers

Oil and Natural Gas Corporation Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI G4 guidelines. The latest available sustainability report found on the Company's website was for FY 2016-17. **The Sustainability Report has been independently assured by Emergent Ventures India Pvt. Ltd.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	All the policies of the Company have been formulated confirming to applicable statutes/ guidelines/ rules/ policies etc. issued by the Government of India. These policies were formulated keeping in view industry practices and standards.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Policies of the Company have been approved by the Board/ Competent Authorities as per Board Delegated Powers.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Lin k 1	Lin k 2	Lin k 3	Lin k 4	Lin k 5	Lin k 6		Lin k 4	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Policies of the Company as such are not audited, however Policies have been amended from time to time as per regulatory/ business/ environmental requirements.								

Link 1: https://www ONGCINDIA.COM/wps/wcm/connect/e9f997fc-f96b-4ca3-a626-45388c55ba1c/Amcoba.pdf?MOD=AJPERES&CONVERT_TO=url&CACHEID=ROOTWORKSPACE-e9f997fc-f96b-4ca3-a626-45388c55ba1c-lZnleUL

Link 2: <https://www ONGCINDIA.COM/wps/wcm/connect/en/sustainability/corporate-sustainability/>

Link 3: https://www ONGCINDIA.COM/wps/wcm/connect/5703d0df-3bc0-49f1-a459-a32cd48c307d/WB+Policy_110219_PV.pdf?MOD=AJPERES&CONVERT_TO=url&CACHEID=ROOTWORKSPACE-5703d0df-3bc0-49f1-a459-a32cd48c307d-mzs7C9N

Link 4: https://www ONGCINDIA.COM/wps/wcm/connect/f857b9b9-d0e1-41c5-a5e8-abbfc1a5f2cf/ONGC_CSRSDpolicy.pdf?MOD=AJPERES&CACHED=ROOTWORKSPACE-f857b9b9-d0e1-41c5-a5e8-abbfc1a5f2cf-m0RSmQU

Link 5: <https://ONGCINDIA.COM/wps/wcm/connect/en/about-ONGC/interface/human-resource/>

Link 6: <https://www ONGCINDIA.COM/wps/wcm/connect/en/sustainability/health-safety/>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that Subsidiaries of the Companies are separate entities, they carry out Business Responsibility initiatives on their own as per the policies applicable to the respective companies. The Company has further stated that *“The BR initiative of the Company has the cooperation of all its stakeholders, including Government of India, employees, vendors, and the local populace. However, it is difficult to establish the extent their support helps in facilitating the BR initiatives of the Company.”*

Governance Related to BRR

The Company has stated that *“Various principles of BR performance are integral to the day-to-day operations of the Company and the same are reviewed by the Board/ Board Level Committee(s) as an integral item of business concerned.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“All the policies relating to ethics, bribery and corruption are “inclusive” and covers Company as well as its employees and all other external stakeholders.”*
- The Company has received 44 complaints from vendors during FY 2017-18 and all representations were forwarded to IEMs who promptly gave their opinions in all cases for further action. Further, the Company has received 7,992 complaints from investors and 3 grievances were pending at SCORES Platform on 31st March 2018 and all were related to the divestment of shares by the Govt. of India - Offer for Sale- 2004.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company has put in place a well-devised procedure for sustainable sourcing. Company has a well-documented Material Management Policy. The Company at present does not have a process in place to measure this particular parameter. However, in future, efforts will be made to capture relevant information.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company has a policy for Management of Hazardous Chemicals and Materials that was issued in 2002. As per the policy, personnel handling hazardous chemical are to be trained for safe handling practices. Separate designated areas are provided for storage of hazardous chemical sand all personnel are to be provided Personnel Protective Equipment (PPE) and first aid training.”*
- The Company has further stated that *“The Company is committed to recycling of materials, wherever feasible. ONGC’s Mehsana Asset has established effective infrastructure to control expenses, non-optimal usage of costly materials, ground water and also to effectively manage waste disposal and has upgraded existing mud preparation plants through enhancing the mud preparation and storage capacity.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. The Company has not disclosed what percentage of permanent employees are members of recognized employee associations. However, the Company has stated that *“Most executives are members of ASTO. The nonexecutive cadres of employees are affiliated to various recognised unions. Twelve recognised unions have been conferred recognition by the Company on the basis of verification through secret ballot. They represent all the unionized categories of employees in their respective work-centres, though some employees may hold membership with rival unions.”*
- Approx. 6.84% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	4	1	2	Nil	2	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 65.63% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped internal and external stakeholders.
- The Company has identified disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The CSR policy of ONGC covers CSR Projects / Programmes undertaken by ONGC listed in Schedule-VII of the Act, within the geographical limits of India, preferably towards the benefit of marginalized, disadvantaged, poor and deprived sections of the community and the environment. This way the ultimate objective is to reach the bottom of the pyramid in our demographic strata and touch their lives in a positive manner. Thus, while ONGC has been engaged in serving the society through various welfare measures since its inception, it has now adopted a more structured approach in undertaking such welfare measures. Many projects related to infrastructure development, education and healthcare have been undertaken in remote areas mainly populated with such disadvantaged groups. One of such initiative includes ONGC Merit Scholarship Scheme for 1000 SC/ST students and 1000 OBC/Economically backward students every year.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the policies towards upholding the Human Rights extend to JV's and subsidiaries of the Company.

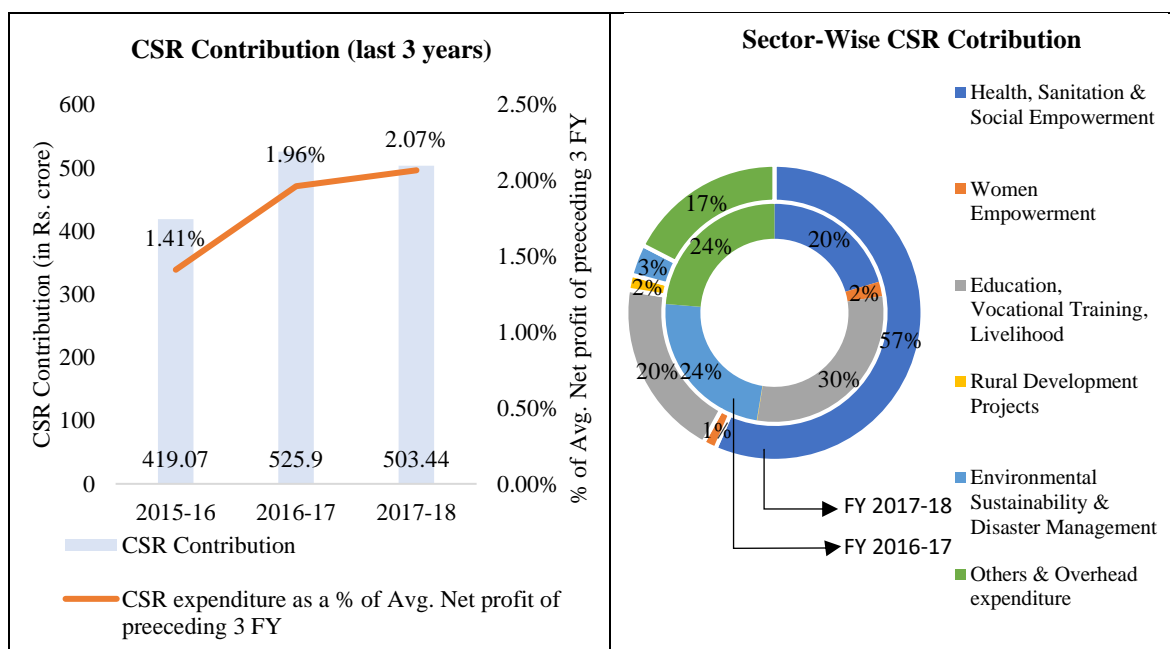
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the HSE policy and processes cover all the stakeholders of the Company including its vendors and its vendors. The policies of the Company extend to its wholly owned subsidiaries, other subsidiaries and to joint ventures after getting approval of its JV partners on the tenets & premises of environmental commitment.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emissions & waste generated by the Company is within permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members and all of them are Independent members including the Chairman. The Company mainly undertakes CSR Activities through in-house, ONGC Foundation, other trust, Society or company established under Section-8 of Companies Act, 2013. The Company conducts impact assessment of its CSR initiatives by expert third party agency.



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

- The Company has stated that no customer complaints were pending during the FY -2017-18.
- The Company carried out Satisfaction Survey during the financial year.

Substantial change from FY 16-17

	FY 2016-17	FY 2017-18
Principle wise BR Policy/ Policies	FY 2016-17, the Company has not given tabular format for questions of principles as per SEBI Guidelines.	FY 2017-18, the Company has given tabular format for questions of principles as per SEBI Guidelines.
Principle wise BR Policy/ Policies Q 10	FY 2016-17, the Company carried out independent audit policies by internal or external agency. However, the Company also stated that for principle 9 that “The COSA/GSA is subject to review as may be mutually agreed upon.”	FY 2017-18, the Company has stated that “Policies of the Company as such are not audited, however Policies have been amended from time to time as per regulatory/ business/ environmental requirements.” The Details explanation given in respective principles.
	The Company has stated that the BR performance of the Company is assessed annually.	The Company has not disclosed that it meets to assess the BR performance of the Company. Although, the Company has stated that “Various principles of BR performance are integral to the day-to-day operations of the Company and the same are reviewed by the Board/ Board Level Committee(s) as an integral item of business concerned.”

OIL INDIA Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and the Sustainability report in GRI format for 3 years i.e. 2016-18 ([weblink](#)). The report is not externally assured.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1	Link2	Link3	Link4	Link5	Link6		Link7	**
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Note 1						Note 1		
8	Does the Company have an in-house structure to implement the policy / policies?	Note 2						Note 2		
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Note 3						Note 3		
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 4						Note 4		

Link 1: <https://www.oil-india.com/Document/Financial/Code for regulating Insider Trading OIL.pdf>

Link2: <http://oil-india.com/PDF/policy on purchase preference.pdf>

Link3: https://www.oilindia.com/pdf/TOPSUBMENU94872MainMenuEnglishLevel2_TOPSUBMENU7787MainMenuEnglishLevel2_OIL_Campus_presentation.pdf

Link4: <https://www.oil-india.com/Document/Financial/Code of Fair Disclosures.pdf>

Link5: <https://www.oil-india.com/Document/Financial/Whistle Blower Policy.pdf>

Link6: <https://www.oil-india.com/HSEnew.aspx>

Link7: http://www.oil-india.com/Document/Revised_CSR_Policy_of_OIL_2016.pdf

Sustainability Report for FY 2016-18: <https://www.oil-india.com/Document/Sustainability-Report-2016-18.pdf>

** **Link related to P9 not found on website.**

Note 1: The policies have been communicated to key internal stakeholders. The communication is an on-going process to cover all internal and external stakeholders. More over every citizen of India has free access to these policies under RTI Act, 2005. Also, many of the policies are available on OIL website (www.oil-india.com).

Note2: Yes. Various Sub Committees of the Board are responsible for overseeing the implementation of the Policies.

Note3: Yes, The grievance redressal mechanism related to the policy / policies is monitored by Board Committees such as SRC, Audit, & Ethics HSE, 'CSR & SO Committee. Any stakeholder of the company can file online complaint on company website through public grievance portal. Besides this, any shareholder can file complaint to the compliance officer/RTA about his shareholding in the Company.

Note 4: At regular intervals, audits are conducted by the Internal Audit Team combined with audit conducted by Statutory Auditors.

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated, *“The Subsidiaries of OIL are SPVs / Investment arms for acquisition of overseas E&P Assets, therefore BR initiatives are undertaken through OIL only.”*

Further regarding the participation of other entities in the BR initiatives of the Company it has stated that, *“OIL supplies crude oil to refineries viz. NRL, IOCL etc, which have their BR mechanism in place. Moreover, our contracts with external agencies also address the BR issues.”*

Governance Related to BRR

The Company has stated that it meets 12-13 times in a year to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the policies regarding ethics, bribery and corruption extend to group, joint ventures, suppliers, contractors and other associated entities.
- The total number of investors' complaints received during the year was 425 and all complaints received during the year 2017-18 have been duly attended to by the Company and there was no outstanding complaint as on 31st Mar 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that, *“For strategically managing increasing volumes of produced formation water (FW) and to reduce the volumes of fresh water from shallow aquifer, OIL embarked upon an ambitious & a geographically large project of Produced Water Re-injection into its reservoir.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“OIL has implemented the project where E-waste across different spheres viz, FHQ, Pipelines, Kolkata Office, Corporate Office Noida, Rajasthan Project and BEP is collected and disposed/ recycled as per norms. M/s Attero Recycling has been awarded contract for the same. During the year under review, 60 tonnes (approx.) of E-waste was disposed and the process is on for more disposal.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a 2 recognised employee association. Further, the Company has disclosed the Percentage of permanent employees is members of each recognized employee association are as follows:

i) Oil India Executive Employees Association -86.67%

ii) Oil and Gas Employees Union - 66.78%

- Approx. 5.52% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 25.71% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders with the help its structured CSR policy to take care of the disadvantaged vulnerable and marginalised people in and around OIL's operational areas. The vulnerable category includes SC/ST/OBC, women, children and senior citizens.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that, *“Yes OIL has been sensitive to the needs of the disadvantaged vulnerable and marginalised stakeholders OIL makes special efforts for welfare of the society neighbouring the OIL's Operational areas .The measures taken by OIL includes programmes on Empowering women through initiatives on sustainable livelihood generation, Self-employment programmes, Self Help Groups, Computer training Programme, Skill development programmes for hospitality, housekeeping, food & beverages, Electrician, Fitter etc Certificate course on Nursing, Developmental and Welfare projects for SC/ST/OBC ,Educational projects, programme on medical assistance etc”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that

“OIL tries to extend its value system to those in the value chain through contracts that sets standards for compliance with these values. Apart from the internal stakeholders, the policy extends to its suppliers / contractors / others. Moreover, OIL has been a signatory to the Principles of UN Global Compact since 2006.”

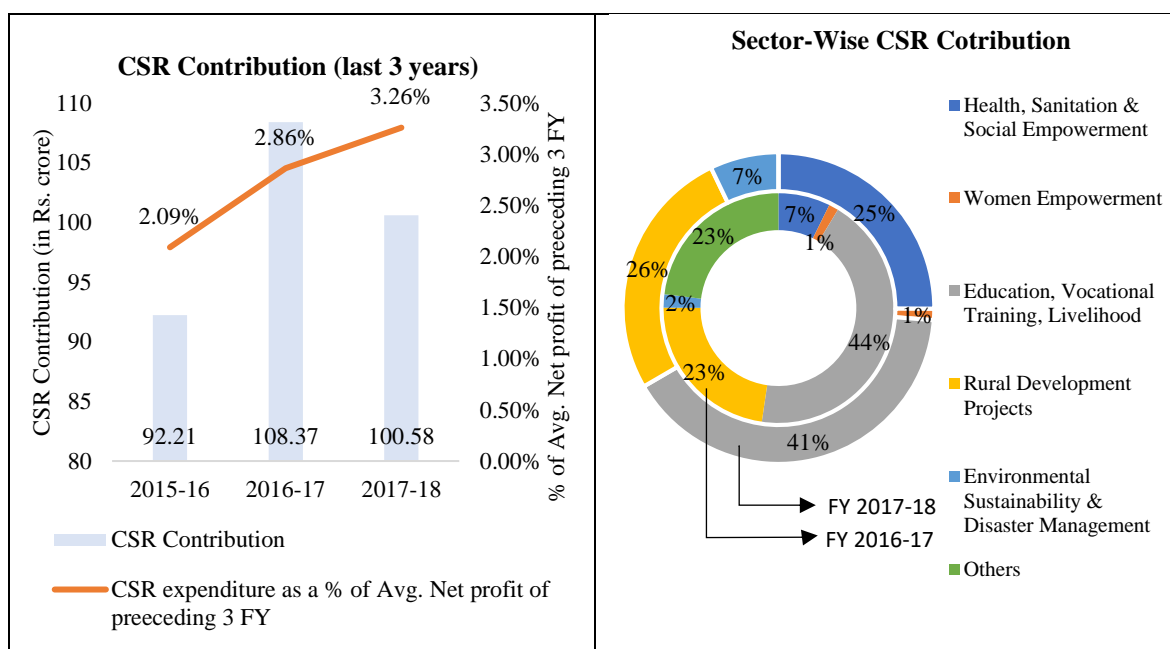
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company is fully committed to Health, Safety and Environment (HSE)", policy related to the Principle and extends it to all 'stakeholders' and society at large in its operational domain. Restoring environment has been a keyword in OIL's business operations
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed whether the emission/waste generated across all locations are within the permissible limits as prescribed by SPCB/CPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through External NGO’s and Government agencies in association with its in-house team. The Company conducts impact assessment of its CSR initiatives internally as well as externally. The Company carry out evaluation of its CSR projects through Webcon Consulting (India) Ltd., Kolkata.



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

- Although the Company has not disclosed the number of customer complaints received during the year. However, the Company has stated that no customer complaints are pending for FY2017-18.
- The Company collects the customer feedback in the form of Assessment of Customer perception from IOCL and also from condensate buyers yearly.

Oracle Financial Services Software Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The BR policy of the Company is formulated on the basis of the National Voluntary Guidelines on Social, Environment and Economic Responsibilities of Business.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1 Link 2 Link 3	Link 1	Link 4 Link 5	Link 1 Link 6	Link 1	Link 1 Link 7	Link 1	Link 1 , Link 6 Link 7	Link 1
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies are accessible by employees of the Company. The policies are available to other stakeholders on the internet or intranet as relevant and required								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes, the Company maintain an "open door" policy with regard to the questions from customers, suppliers, partners and others, including any questions related to business conduct, ethics, anti-trust, unfair competition, employee relations concerns, environmental, health and safety, concerns, Incidents can be reported to the regional legal counsel or logged using the Compliance and Ethics Helpline or reported through the Incident Reporting Website (https://www.compliance-helpline.com/oracle.jsp .)								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link of the Policies disclosed as under:

Link 1 – Code of Ethics and Business Conduct

<http://www.oracle.com/us/corporate/investor-relations/cebc-176732.pdf>

Link 2 – Supplier Code of Ethics and Business Conduct

<http://www.oracle.com/us/corporate/supplier/coe-070625.pdf>

Link 3 – Global Anti-Corruption Policy and Business Courtesy Guidelines

<http://secure.ethicspoint.com/domain/media/en/gui/31053/anticorruption.pdf>

Link 4 – Workplace Safety

http://my.oracle.com/site/hr/RegionalSites/India/India_Handbook/workplace_safety/workplace_safety

Link 5 – Health and Safety

<https://cloud.oracle.com/opc/saas/ghr/datasheets/oracle-hcm-workforce-health-and-safety-incidents-datasheet.pdf>

Link 6 – Corporate Social Responsibility

<http://www.oracle.com/us/industries/financial-services/ofss-social-responsibility-2437852.pdf>

Link 7 – Global Environment, Health and Safety Policy Statement

<https://www.oracle.com/corporate/citizenship/sustainability/ehsms.html>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed whether its Subsidiaries participate in the BR initiatives of the parent Company. However, the Company has stated that Company's Business Responsibility and Sustainability Policy (BR Policy), which is ethical conduct, anti-corruption, workplace and community, etc. is also applicable to all its Subsidiaries. The Company has further disclosed that none of the other entities participate in BR initiatives.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

- The Company has stated that *“The Company's Code of Ethics and Business Conduct and Anti-Corruption Policy covers aspects of improper payments, insider trading, anti-corruption and financial integrity, amongst others. These are applicable to its employees and Directors and business partners. The Supplier Code of Ethics and Business Conduct are applicable to its suppliers.”*
- The Company received 4 complaints in relation to policies governing ethics, out of which 3 were resolved and the balance 1 complaints is pending resolution. The Company has also stated that no complaints received in relation to policies governing bribery and corruption.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company strives to reduce environmental impact by employing sustainable procurement practices and limiting business travel, wherever possible. In the process of selecting suppliers for product/ services required, suppliers are first evaluated through a set of prequalification criteria. Qualification criteria include BR-related aspects such as adherence to norms of compliance, Code of Ethics and Business Conduct and existence of Environment, Health and Safety (EHS) policy.”*
- Although the Company has not disclosed the percentage of recycling of products and waste. However, the Company has stated that *“the Company strives to recover, reuse or recycle its workplace tools. The Company has policy for asset sale, donation and disposal outlines what employees should do with technology assets that are not being fully utilized or have reached their end of useful life.”*

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or no as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 31.31% of the permanent employees are women.
- The Company not disclosed the number of employees with disabilities. However, the Company has stated that “As per the data privacy and non-discrimination principles, Company does not maintain/ disclose this information.”

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	2	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 95% of the permanent employees and all permanent women employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has identified its stakeholders in the Business Responsibility Policy.
- The Company has stated that “*The Company is committed to equal opportunity in its employment practices. For Employees, the Company has instituted policies against unlawful discrimination and sexual harassment, Ergonomics & RSI (Repetitive Stress Injury) Consultation Policy, provisions of flexible-work hours and access to counsellor to promote & healthy, safe and productive workplace.*”
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company engages with each of its stakeholders through a variety of forums, including employee engagement initiatives, training programs, feedback process, customer satisfaction surveys and investor meetings.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the policy is applicable to the Company, its subsidiaries and vendors. The commitment to human rights is embedded in the Oracle Code of Ethics and Business Conduct adopted by the Company.

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the

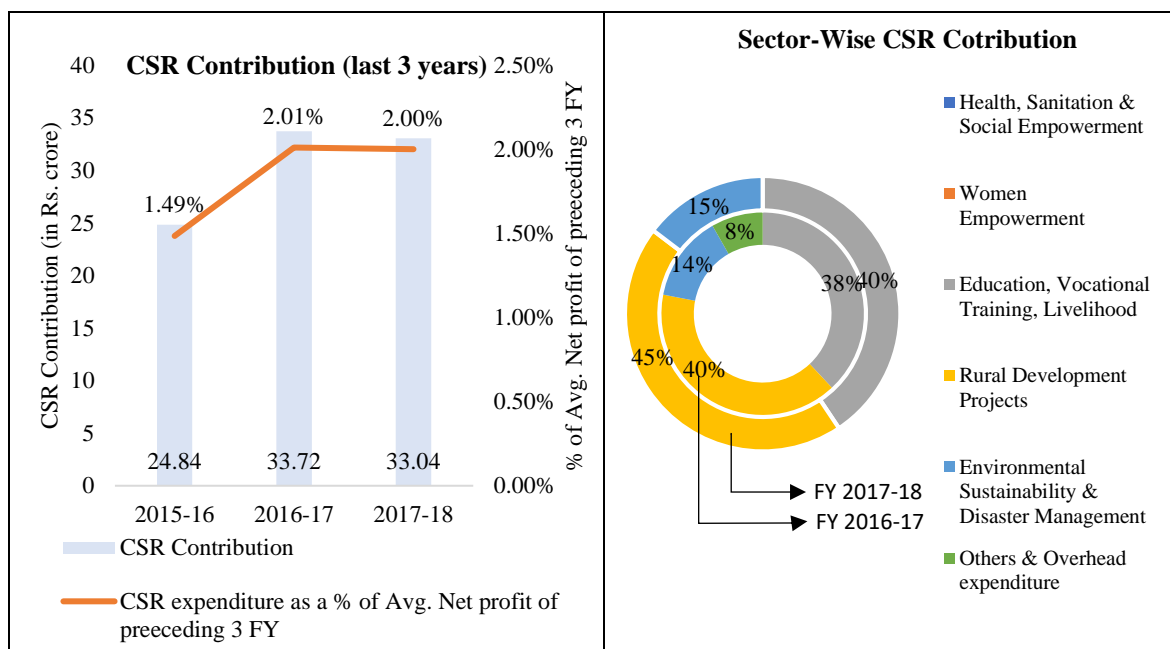
Company’s Global Environment, Health and Safety Policy is applicable to all its employees and subsidiaries. As per the Code of Ethics and Business Conduct, the Company expects its suppliers and partners to be complaint with the Code and with applicable laws and regulations, including environmental laws and regulations.

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emissions and waste generated by the Company are within the permissible limits of Pollution Control Board.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one Independent members. Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through in-house team, donor aided funds and NGOs.



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

- The Company has not disclosed the number complaints received from customer. Although, company stated that “There is one case dating back to 2007 filed by an investor at the consume forum that is pending before the State Commission as on March 31, 2018.”
- The Company conducts satisfaction survey annually for decision makers and influences in the customer organisation.

Substantial change from FY 16-17

FY 2016-17	FY 2017-18

The Company has not provided online link for P4, P5 and P8	The Company has provided online link of all policies.
The Company carried out independent audit/evaluation for 3 policies i.e. P1 and P5.	Independent audit/evaluation carried out for all policies.

Procter & Gamble Hygiene & Health Care Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The World-wide business conduct manual and the Human Rights policy statement apply UN guiding principles on Business & Human Rights								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1	Link2	Link3	Link3	Link3	Link5	Link3	Link4	Link1
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1: https://www.pg.com/en_IN/downloads/investor_relations/pghh/financials/financial_results/pdf/PGHH_Directors_Code_of_Conduct.pdf

Link2: <https://www.pg.co.uk/policies-and-practices/product-safety-and-compliance/>
https://www.pg.com/en_IN/sustainability/environmental_sustainability/operations-and-suppliers.shtml

Link3: https://www.pg.com/en_IN/downloads/investor_relations/pghh/corporate_governance/policies/PGHH-VIGIL-MECHANISM.pdf

<https://www.pg.co.uk/policies-and-practices/human-rights-statement/>

Link4: https://www.pg.com/en_IN/downloads/investor_relations/pghh/corporate_governance/policies/PGHH-CSR-Policy.pdf

Link5: <https://www.pg.co.uk/policies-and-practices/environmental-policies-and-practices/>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company does not have any subsidiary companies or associate companies. The Company has further mentioned that Company's Sustainability Guidelines for 'External Business Partners' set their expectations with their external partners with regard to Social and Environmental Responsibility. It actively seeks business relationships with partners that share these values, and that promote high standards within their own supply chains. Company's risk-based audit program supports this effort by assessing partners through third-party audits and identifying and remediating issues.

Governance Related to BRR

The Company has stated that the Corporate Social Responsibility Committee and the Board of Directors assess the Business responsibility performance annually.

Extracts from Principle wise performance of the Company**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

- The Company has stated that Company being a part of the Procter & Gamble group is guided by a Whistle Blower Policy as laid down in its Worldwide Business Conduct Manual. Any employee or other interested person can call on The Worldwide Business Conduct Helpline, twenty-four hours a day, seven days a week, to report any concerns about violations of the Company's Worldwide Business Conduct Standards.
- The Company further states that in compliance with the requirement under the SEBI Listing Regulations, 2015 and Section 177 of the Companies Act, 2013 and the Rules made thereunder, the Company has adopted the whistle blowing policy as the vigilance mechanism for Directors and employees to report genuine concerns or grievances such as unethical behaviour, actual or suspected fraud or violation of the Company's code of conduct or ethics policy.
- During the FY 2017-18, 9 stakeholders' complaints were received by the Company and same were dealt with in accordance with the Worldwide Business Conduct Manual.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that it ensures that Company's products, packaging and operations are safe for employees, consumers and the environment. It ensures this with a focus on technologies, processes and improvements that matter for the environment. The Company expects its suppliers to assure the quality and safety of the products and services they provide to the Company.
- The Company has not disclosed the percentage of recycling of products and waste. It has just mentioned that the Company is focused on creating efficiencies in energy, water, waste, and emissions.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company under Section E of the BR Report under Principle 3 has mentioned that the Company respects every employee's right to choose to join or not to join a trade union, or to have recognized employee representation in accordance with applicable law. However, it has not disclosed any specific information on the recognised employee association, if any.
- Approx. 19.50% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	N.A.	N.A.
Discriminatory employment	Nil	Nil	Nil	Nil	N.A.	N.A.

- All the employees and persons engaged on temporary / contractual basis were given safety & skill up-gradation training.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mentioned that it actively engages with various internal & external stakeholders, which include, employees, consumers, customers, shareholders, external business partners and the government.
- The Company has further mentioned that it believes that only way to build a sustainable business is to improve lives.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company engages with disadvantaged, vulnerable and marginalized stakeholders through its Corporate Social Responsibility initiatives, which include P&G Shiksha and Timely Disaster Relief.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has mentioned that its Human Rights Policy statement extends to all the employees and all stakeholders associated with the Company.

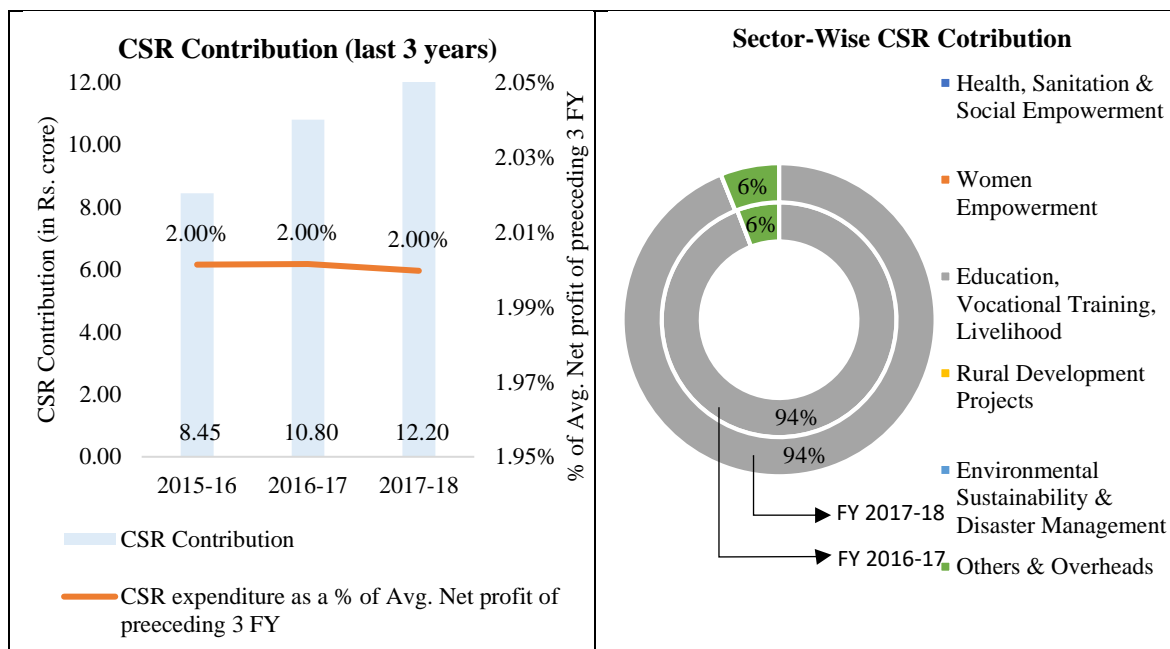
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has mentioned that environment sustainability guidelines of the Company cover both the Company and other people associated with the Company.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed information relating to whether the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the FY 2017-18. However, the Company has disclosed various achievements and goals relating to reduction in emissions or waste generation. Example: Company's Head Office at Mumbai reduced its annual energy consumption by over 23.5% over the last 15 years. Company's Goa plant is a 'zero waste to landfill' site which means that there is no manufacturing discharge into the environment.

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 1 is Independent member including the Chairman. The Company mainly undertakes CSR Activities either directly or through trust’s, foundation’s, NGO’s and government structures.



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

- The Company has not disclosed the number of complaints it received from customers in FY 2017-18.
- The Company has mentioned that it conducts hundreds of consumer research studies each year to understand what people need and want, in order to create superior value and product experience every day.

Petronet LNG Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1		Link 3			Note		Link 2	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: Code of Conduct:

<https://www.petronetlng.com/code-conduct.php>

Link 2: CSR Policy: https://www.petronetlng.com/PDF/CSR_Policy_27042015.pdf

Link3: <https://www.petronetlng.com/PDF/Vigil-Mechanism-02092014.pdf>

Note: Policy is not available in public domain. Policy is available on Company's internal intranet portal and can be accessed by company employees.

Reasons disclosed by the Company for not formulating policies adhering to principle 2,4,5,7 and 9 is as follows:

P2, P4 & P9: PLL is in the niche business of transportation, storage and regasification of LNG, and supplies its product to a few select customers including GAIL, IOCL and BPCL. Considering the nature of Company's business, these aspects are not as critical for us as probably for certain other sectors and industries. Hence, Company does not have dedicated policies regarding these aspects. However, PLL does

not take these aspects lightly, and has sufficient focus on these aspects. The Company is taking appropriate actions as and when required to address them comprehensively.

P9: PLL has processes in place for customer engagement and grievance redressal. Further, the Company gives the highest priority to responsibility towards its customers.

P5: PLL strictly adheres to all applicable labour laws and other statutory requirement in order to uphold human rights within its organizational boundary. Further, the Company has also formulated Sexual Harassment Policy under Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

P7: The Company undertakes need-based advocacy on certain industry specific issues. The Company currently does not have a stated policy. However, it will continue to assess the evolving business and regulatory environment in future in this regard.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

Petronet LNG Foundation (PLF) incorporated as Wholly Owned Subsidiary on 31st March, 2017. The Company has stated that *“none of the entity / entities with whom Company does business participates in the BR initiatives of the company. Company releases its own dedicated BR report and our Company’s principle promoters and off-takers of gas i.e. GAIL, ONGC, IOCL and BPCL, are required to and undertake BR activities and release their own BR reports.”*

Governance Related to BRR

The Company has stated that Board reviews Company’s sustainability performance on continual basis, at least once annually.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“Company’s commitment to ethical and transparent corporate governance practices are highlights of the Code of Conduct and Business Ethics policies which are laid out for Board members and Senior Management personnel. The company, as a responsible corporate citizen, believes that the role of reporting genuine concerns is not just restricted to employees, in fact any of the stakeholder which also includes suppliers, customers, civil society members etc. have the right to point out any unethical behaviour, actual or suspected fraud or violation of Company’s code of conduct.”*
- The Company received 1,147 shareholder complaints during the FY 2017-18, while 1 complaint was pending from previous financial year. All 1,148 complaints were successfully resolved during the year while no complaints were pending as on 31st March 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The Company does not have dedicated procedures for sustainable sourcing, however PLL is taking efforts to promote sustainable practices across various functions of the Company.”*

- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“All this generated waste is properly collected, stored and disposed through authorized agencies on regular intervals. Also, it is significant to mention here that while carrying out our operations, there is no waste water generation. Some amount of reject condensate water generated from our air-heaters is used for gardening purposes, and also as back up source for fire emergencies. Both our terminal sites are zero water discharge.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have any recognised employee association.
- Approx. 6.38% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

Note: Disclosure in BR Report and Annual report are different in terms of reported cases related to Sexual Harassment. In Annual Report 2017-18 Pg 19, the Company has stated that *“During the financial year 2017-18, there was **one** cases filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the same was also resolved on 5th May, 2018”*. While in BR Report the Company has stated that there was no instance of sexual harassment during the year.

- No of employees who were given safety and skill upgradation training in the last year is as follows:

Category	Safety (No of Employees)	Skill upgradation (No of Employees)
Permanent employees	365	438
Permanent women employees	07	13
Casual / Temporary /Contractual employees	5,159	Currently not being tracked
Employees with disabilities	NA	NA

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its key internal and external stakeholders and employs various mechanism and practices to facilitate effective dialogues with them for a fruitful and continued relationship.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Company’s collaborative partnerships with the communities aimed at uplifting disadvantaged,

vulnerable and marginalised stakeholders has led to identification and initiation of various CSR projects.

- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company, having identified the needs and priorities of the stakeholders in and around the location of its operations, is running education, healthcare, community infrastructure development and skill and livelihood development projects. Under the Company's education and empowerment initiatives, PLL promoted skill development of below poverty line youth. Catering to the healthcare needs of the communities, PLL organized free medical check-up and consultation camps under healthcare drive and contributed towards construction of healthcare infrastructure facilities. Further, PLL has constructed and renovated toilets at local schools under sanitation drives. Furthermore, during financial year, PLL developed roads, culverts, storm water drains, solar lights, constructed community and school toilets, etc. under infrastructure development initiatives.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that As a socially responsible organisation, PLL believes in equality of all human beings irrespective of their nationality, place of residence, sex, national ethnic origin, colour, religion, language and any other status. Currently, there is no policy explicitly on human rights, however the Company respects and complies with internationally recognized human rights, at all locations and is committed to making certain that it is not complicit in human rights abuse.

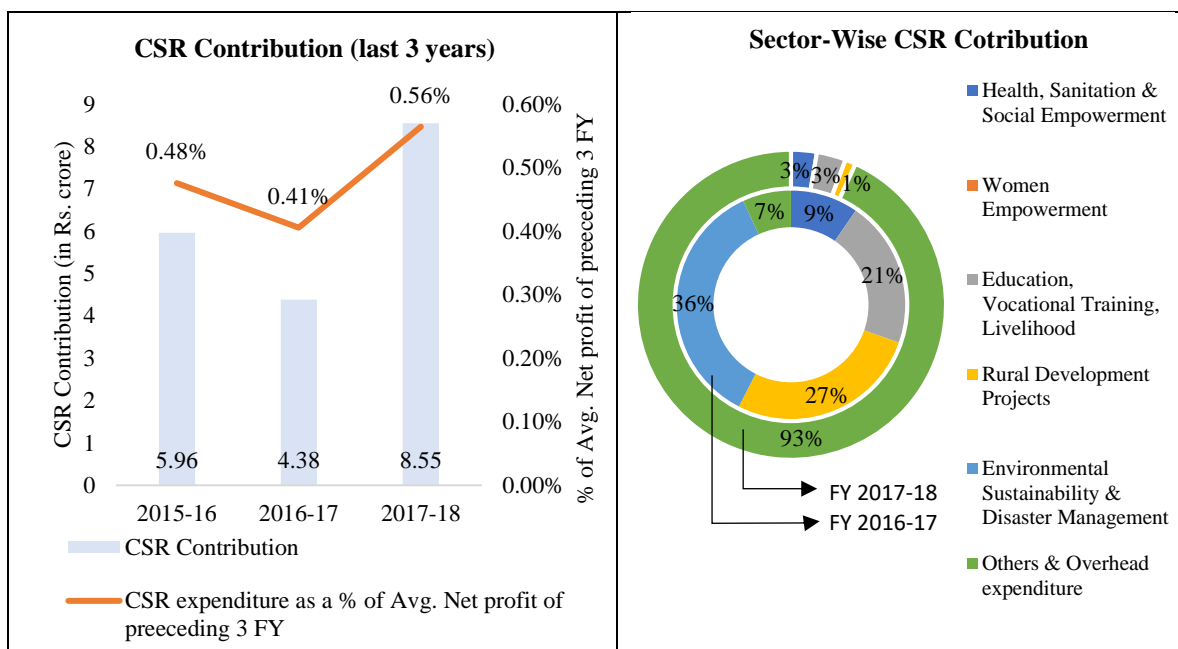
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The policies related to Principle 6 cover only to the Company and do not extend to the entity/entities with whom PLL does business.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, all of company's emissions/waste generated during the reporting period was within the regulatory defined limits.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which 1 are Independent members. Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house team, trust, NGO, government agencies. The Company conducts impact assessment of its CSR initiatives.



Reasons provided by the Company for not spending the full prescribed amount on its CSR activities:

“In terms of provisions of Companies Act 2013 the amount of Rs. 30.29 Crore is required to be spent on CSR activities in Financial Year 2017-18. The Competent Authority has approved/ committed new Projects of Rs. 23.46 Crore in FY 2017-18 out of which Rs. 8.55 Crore was spent on CSR activities including Rs. 0.96 Crore incurred as Administrative Overheads. In some projects, disbursement of fund is linked to achieving deliverable targets and due to dynamic implementation environment targets have not been achieved. Nevertheless, your Company has been making constant efforts to reach optimum level of CSR expenditure resulting in tangible positive impact on society and has made significant improvements over the previous years in terms of both spending as well as number of projects taken up.

The Company is implementing short-term, medium-term and long-term strategies to channelize the resources in a manner so as to derive maximum socio-economic impact from targeted approach. In line with its social goals as envisioned in the CSR policy, the Company has already identified several projects in the areas of Healthcare, Education, Skill Development, Environment, Sports, Agriculture, Swachh Bharat etc. where your Company will spend the annual CSR budget in a progressive and sustainable manner.”

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

- The company has not mentioned the number of customer complaints/cases received but has disclosed that no complaints/cases were pending at year end.
- The Company states that they interact and engage with the customers on regular basis.

Pidilite Industries Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies are aligned to the legal requirements and are as per ISO and Occupational Health and Safety Assessment System.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The implementation and adherence to the Code of Conduct for employees is overseen by the human resource department. The Corporate Social Responsibility Policy is administered by the CSR Committee in line with requirements of the Companies Act, 2013. The Director- Operations is responsible for the implementation of EHS policy								
6	Indicate the link for the policy to be viewed online*	Link1				Link1			Link2	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Internal/ External audits have been carried out for the policies, as applicable.								

*Policies which are internal to the Company are available on the intranet of the Company. Other policies are on the website of the Company: www.pidilite.com.

Link1: <http://www.pidilite.com/wp-content/uploads/2016/12/Whistle-Blower-Policy.pdf>

Link2: <http://www.pidilite.com/wp-content/uploads/2016/12/csr-policy.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 26 subsidiaries both direct and indirect as on 31st March 2018. 9 of these subsidiaries are in India and 17 of them are located abroad.

The Company has stated that, the Business Responsibility policies of the subsidiaries are in line with the local requirements.

The company has not disclosed percentage of the suppliers/vendors who participate in BR initiative of the Company however, the Company has stated that the Company encourages participation of its suppliers and distributors and other stakeholders in the Business Responsibility initiatives like Shram Daan Divas where contractors give one day's labour for the benefit of needy children

Governance Related to BRR

The Company has stated that the Business Responsibility Report is reviewed periodically.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. The Company, in order to maintain these standards has adopted the ‘Code of Conduct’, which lays down the principles and standards that should govern the actions of the employees in the course of conduct of business of the Company. Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company. There is a Code for each of our subsidiaries in line with the local requirements prevailing in the country of operation.”*
- The Company has not disclosed whether the said policy extends to Subsidiaries or not.
- The Company received 18 complaints from shareholders and all of them were resolved satisfactorily.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that in designing the product, the Company has ensured that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Consumption of water has reduced from 2.65 kl/ton to 2.36 kl/ton. Rain water harvesting systems have been installed in 8 manufacturing units.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has no recognised employee association.
- Approx. 6.48% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 65% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has not disclosed whether it has mapped its internal and external stakeholders.
- Further the Company has mentioned that, *“The Company continues to build on its unique initiative. ‘WAGALE’ (Wanchan-Ganan-Lekhan) which has helped students with lesser learning abilities with training sessions through practical methods, visual representations and interactions with the academically better students.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Under WAGALE initiative, assistance is provided to deserving and qualified students through scholarships for pursuing higher education

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has disclosed that all aspects of human rights are included and covered in the Code of Conduct and it is applicable to all the employees of the group.

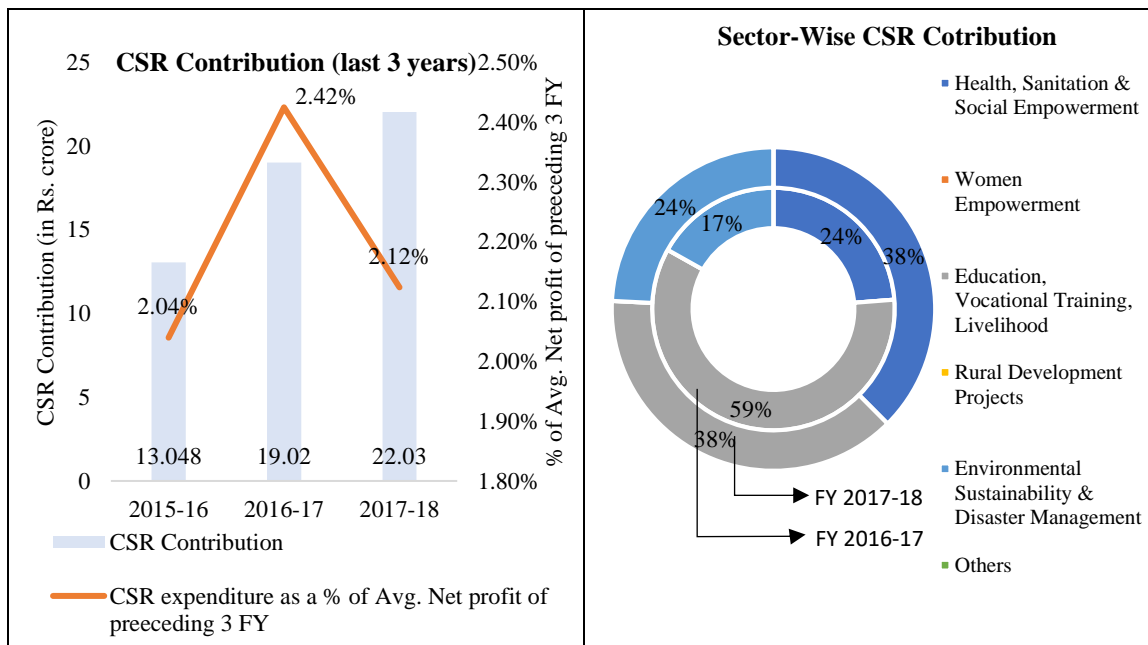
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has mentioned that, *“Based on the EHS Policy of the Company, processes have been deployed to continually improve the environment performance. All manufacturing units meet the requirements of ISO 14000 and OSHAS 18000 standards. An integrated EHS management system was deployed at all manufacturing units.”* The Company has not disclosed whether this policy extends to Group / Joint Ventures / Suppliers / Contractors / NGOs / others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed whether the emissions are within the prescribed limit of SPCB/CPCB. The company has mentioned that, *“The Company also has active programs to continually reduce hazardous wastes, emissions, effluent generation and effluent discharge in its manufacturing units.”*

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 2 are Independent members. Further for the chairman of the committee the Company has mentioned that, “Members elect Chairman at each meeting. Smt. Savithri Parekh acts as Secretary to the Committee”. The Company mainly undertakes CSR Activities through External Agencies.



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

- A total of 12 consumer cases are pending as at the end of financial year FY 2017-18.
- No Customer Satisfaction Survey has been carried out by the Company.

Piramal Enterprises Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	All the policies have been formulated in consultation with the Management of the Company.								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies are in line with the applicable national and international standards and compliant with the principles of the National Voluntary Guidelines (NVG)								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	All the policies have been approved by the Board and have been signed by the Executive Director responsible for implementation of BR policies								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	PEL has appointed an Executive Director who is responsible for implementation of BR policies and a BR head to oversee the BR performance.								
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6		Link 7	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	The queries regarding BR polices can be sent to bharat.londhe@piramal.com								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1:

http://www.piramal.com/assets/pdf/corporate_governance/policies_code_compliance/PEL_code_of_conduct_for_board_adobe.pdf

Link 2: http://www.piramal.com/assets/pdf/corporate_governance/policies_code_compliance/PEL-Sustainable-Development-Policy.pdf

Link 3: http://www.piramal.com/assets/pdf/corporate_governance/policies_code_compliance/PEL_Vigil_Mechanism-adobe.pdf

Link 4: <http://www.piramal.com/investor/corporate-governance/policies-code-compliances>

Link 5: http://www.piramal.com/assets/pdf/corporate_governance/policies_code_compliance/PEL-Sustainable-Development-Policy.pdf

Link 6: http://www.piramal.com/assets/pdf/corporate_governance/policies_code_compliance/PEL-Environment-Health-Safety-Policy.pdf

Link 7: http://www.piramal.com/assets/pdf/corporate_governance/policies_code_compliance/PEL_CSR_Policy_adobe.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that “*Subsidiary companies of PEL conduct their standalone BR initiatives*”. The Company has disclosed that less than 30% of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The Company has stated that BR performance is reviewed annually by the Board of Directors.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “*coverage of the policies on ethics, bribery and corruption is not limited to the Company. The PEL Code of Conduct for Board of Directors, PEL Code of Conduct for Senior Management as well as the PEL Vigil Mechanism and Whistle Blower Policy ensure that highest standards of personal and professional integrity are maintained within the organisation. The Business Code for Contractors is a mechanism to ensure that all vendors and sub-vendors associated with PEL comply with the norms of the Company.*”
- The Company received 2 cases pertaining to conflict of interest which were raised. These matters were related to Vendors associated with PEL. The cases were investigated thoroughly and resolved. No complaints under PEL Vigil Mechanism were received during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that “*sustainability at PEL extends to our supply chain partners and we encourage them to implement practices that optimise operations. The vendor evaluation process is a comprehensive exercise that assesses design, materials, manufacturing process, production, logistics, service delivery, operations, maintenance, recycling and disposal. Upto 60% of our materials are sourced sustainably.*”
- The Company has stated that “*PEL has a mechanism to recycle wastes generated. Being in the pharmaceutical sectors, recycled products cannot be used in production as only virgin materials can be used for production. About 20% of all wastes are recycled.*”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 16% of permanent employees are members of recognized employee associations
- Approx. 8.27% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18	2016-17	2015-16
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	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	During the FY 2015-16 the Business Responsibility Report is not applicable under the law	
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil		
Discriminatory employment	Nil	Nil	Nil	Nil		

- The safety and skill upgradation training in the last year was as follow:

Employee category	% Employees that were given safety training	% Employees that were given skill upgradation training
Permanent employees	100%	95%
Number of Temporary/ contractual/casual Employees	100%	70%
Number of permanent women employees	100%	100%
Number of employees with disabilities	100%	100%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder.
- The Company has identified disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company's CSR programmes cover the vulnerable sections of the local community as part of the overall scope.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** Yes, the Code of Conduct at PEL incorporates clauses on human rights as part of the annexure which is applicable to all group companies/suppliers/vendors/NGOs associated with PEL.

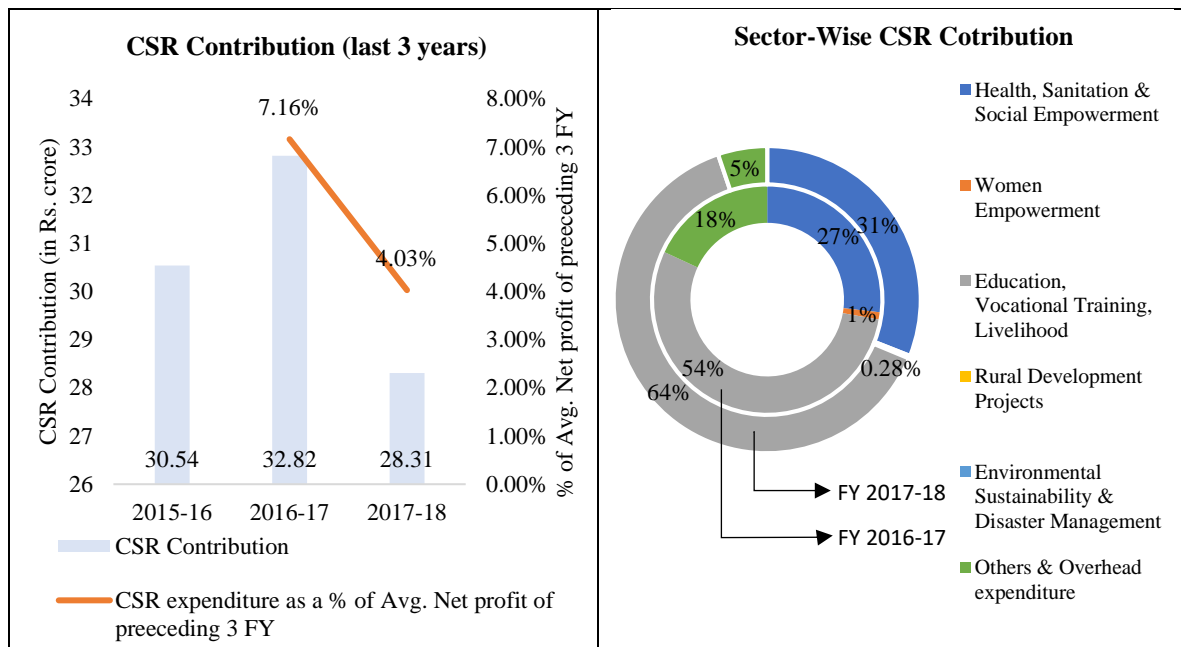
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** PEL strives to preserve environmental sustainability at all levels of operations – in its own practice and as a participant in the community. These policies are applicable to all employees including full-time, partial and contractual employees as well as our suppliers and vendors.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, Piramal Enterprises Limited(PEL) always monitors its waste generation limits and ensures that waste generation is within the permissible limits given by Central Pollution Control Board (CPCB)/State Pollution Control Board (SPCB).

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is Independent members and the Chairman of the committee. The Company mainly undertakes CSR Activities through its in-house team, Company’s Foundation i.e. Piramal Foundation, PFEL, Piramal Udgam and Piramal Swasthya and with the association with External NGO & Government bodies. The Company conducts impact assessment of its CSR initiatives by third party.



Note: During the FY 2015-16 Company incurred average Loss of ₹ 3.85 Crores for last three financial years. However, the Company has voluntarily spent on CSR activity.

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

- o Less than 1% of the complaints/cases are pending as on the end of FY – 2017-18
- o A Customer Satisfaction Survey is carried out by the Company every year.

Substantial Change from FY 16-17

FY 2016-17	FY 2017-18
The Board of Company has approved only 3 policies i.e. P1, P4 and P8.	All the policies have been approved by the Board.
The Company has provided online link for P1, P4 and P8.	The Company has provided online link of all policies.
Only 3 policies i.e. P1, P4 and P8 has been formally communicated to relevant internal & external stakeholders	All the policies has been formally communicated to relevant internal & external stakeholders.
The Company carried out independent audit/evaluation for 3 policies i.e. P1, P4 and P8.	Independent audit/evaluation carried out for all policies.

Power Finance Corporation Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1			**				Link 2	**
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

** Policy not found on the website of the Company.

Link1:

http://www.pfcindia.com/Default/ViewFile/?id=1472556128687_Code%20of%20Conduct%2017042015.pdf&path=Page&Name=Code%20of%20Conduct%20for%20Board%20of%20Directors%20and%20Senior%20Management%20Personnel

Link 2: http://www.pfcindia.com/DocumentRepository/ckfinder/files/CSR/PFC_CSR_Policy_02042018.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 2,5,6 and 7 is as follows:

P2: PFC being an NBFC, this principle has limited applicability.

P5: This policy is embedded in the company's HR policies and practices.

P6 & P7: This policy is embedded in the company's various policies and practices.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has subsidiary companies, but the subsidiary companies do not participate in the BR activities of the parent company. Also, any entity/entities (eg: suppliers, distributors etc) that the company does business with do not participate in BR activities of the company.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has also adopted an Anti-Fraud policy so as to provide a system of detection and prevention of fraud in the Company. It aims to promote consistent legal and ethical organizational behaviour by assigning responsibility for the development of controls and providing guidelines for reporting of fraud/suspected fraud and conduct of investigation of suspected fraudulent behaviour. The scope of the policy extends to reporting and investigation the fraud or suspected fraud in the company involving employees (including contractual employees) as well as shareholders, consultants, vendors, suppliers, service providers, contractors, lenders, borrowers, outside agencies and other parties having business relation with the company. It also covers the subsidiaries.
- The company received 3,485 complaints from shareholders and bondholders of the company in addition to 1 complaint at the beginning of the year. Out of which 3,480 were resolved by 31st March, 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Procedures for sustainable sourcing (including transportation) does not apply to the company.
- The Company, being a financial institution has limited applicability of mechanism to recycle products and waste. However, the company has installed an Organic Composting machine in the office premises for recycling of organic waste generated on routine basis and the compost produced by the machine is being used in the plants in the PFC complex.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company whether has constituted an Internal Complaints Committee to address concerns of sexual harassment is not disclosed.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association and 100% of permanent employees are members of recognized employee associations.
- Approx. 20.28% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- % of the permanent employees were given safety and skill upgradation training in the last year is as follows:

Category	%
Permanent Employees	48
Permanent Women Employees	43
Casual/Temporary/Contractual Employees	Nil
Employees with Disabilities	36

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. All reserved category employees (SC/ST/OBC/PWD & Minorities) are identified as disadvantaged, vulnerable & marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** All Govt. of India directives are followed for engagement at various levels of career progression for these people (all reserved category employees(SC/ST/OBC/PWD & Minorities). Various infrastructure arrangements were made for the benefit of PWD persons. Meritorious awards are being given to children of these categories along with other children by giving special relaxation in percentage of marks. Separate Liaison officers are in place to look after the welfare of the employees in the ambit of this category. It is ensured that a person of the reserved category of appropriate level is nominated as member in various selection and promotion committees to look into the interest of the employees of reserved categories.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that it does not have any specific policy on human rights. However, it is embedded in the company's various HR policies and practices.

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

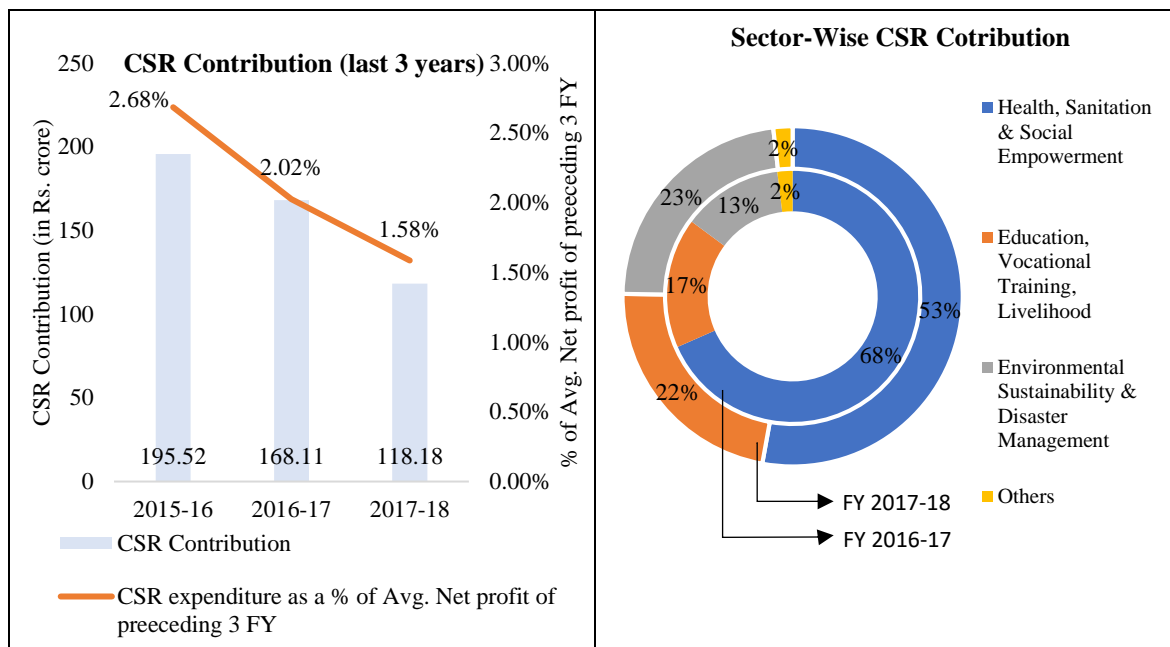
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the policy is embedded in company's various policies and practices and covers the company as whole.

- Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported? Not Applicable.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is an Independent director being the Chairman. The Company mainly undertakes CSR Activities through Govt./Semi Govt/Quasi -Govt implementing agencies and other reputed organisations. The Company conducts impact assessment of its CSR initiatives.



Reason provided by the Company for not spending the prescribed amount:

- The Company has stated that the project sanctioned in a year are completed in subsequent years and there is milestone linked payment to various stages of completion of the project.
- As per the DPE guidelines, the CSR budget is non- lapsable, and any unspent amount is carried forward to the next year for utilization for the purpose for which it was allocated.

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

- A Total of 43 complaints were received from customers/consumers during the FY 17-18 in addition to 3 complaints pending at the beginning of the year. Out of which 44 were resolved by March31,2018 and 2 were pending.

Substantial change from FY 16-17

For 16-17 in case of Principle 9 (Customer Relations) the company has stated that the policy is embedded in the company’s various policies and practices and for FY 17-18, the company has mentioned “Y” for the same principle.

Power Grid Corporation Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Company has published Sustainability Report for FY 2015-17 as per GRI G4 guidelines and the same has been found on the website ([weblink](#)). **The Sustainability Report has been independently assured by accredited assurance provider M/s Intertek India Private Limited.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?*									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).*						#			
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1		Link 2					Link 3	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* Conforms to / are updated / reviewed in accordance with, the National Standards including GOI/ CVC/ DPE Guidelines, applicable laws etc.

Powergrid's Environmental and social policy & Procedures (ESPP) based on principles of Avoidance, Minimization, Mitigation in that order of preference and Restoration wherever needed is accepted by The World Bank and Asian Development Bank under their policy of "Use of Country System" (UCS) and "Country Safeguard System" (CSS) in 2009 & 2017 respectively.

Link1:

https://www.powergridindia.com/sites/default/files/Investor_Relation/Reports_Filings/Code_of_Conduct_Policies/07_POWERGRIDs%20Code%20of%20Conduct%20for%20Board%20Member.pdf

Link2:

[https://www.powergridindia.com/sites/default/files/Investor_Relation/Reports_Filings/Code_of_Conduct_Policies/10_Whistle%20Blower%20and%20Fraud%20Prevention%20Policy-Estt\(Nish\).pdf](https://www.powergridindia.com/sites/default/files/Investor_Relation/Reports_Filings/Code_of_Conduct_Policies/10_Whistle%20Blower%20and%20Fraud%20Prevention%20Policy-Estt(Nish).pdf)

Link 3: http://www.powergridindia.com/sites/default/files/CSR_Policy_2015_0.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: POWERGRID is a member of various industrial and trade bodies and participates in these forums on issues and policy matters that impact the interest of stakeholders. Keeping in view the significant interest of POWERGRID in the Transmission sector, a separate Regulatory Cell is in place to undertake POWERGRID's endeavour of a pro-active approach as part of policy advocacy with the stakeholders and CERC. Wherever felt necessary the Company give its comments on various approach papers, consultation papers, draft regulations etc issued by CERC, TRAI, other authorities.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that, it has 12 wholly owned Subsidiaries. The BR initiatives of POWERGRID generally apply to its subsidiaries also. The Company has further disclosed that, the Environmental and Social Policy & Procedures (ESPP) of POWERGRID encompass the company, its Joint Venture Company – Powerlinks Transmission Limited, subsidiaries in general and relative aspects pertaining to Vendors / Suppliers / Contractors through contract conditions. Vendors/Suppliers/ Contractors are required to comply with the provisions of the labour laws, environmental laws & effectual safety plans through stipulations in the Conditions of Contract. The percentage of such Vendors' /Suppliers'/ Contractors' are more than 60%.

Governance Related to BRR

The Company has stated that it meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“POWERGRID has laid down two separate Code of Business Ethics & Conduct – one for Board Members and another for Senior Management Personnel (including those deputed in Subsidiaries/ Joint Ventures) in alignment with Company's Vision & Mission and aims at enhancing ethical and transparent process in managing the affairs of the Company.”*
- During the FY 2017-18, 87 no of complaints were received. About 66.92% of complaints have been disposed of during the year and remaining are under due process.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that, *“Sustainability in sourcing is enforced through the Environmental and Social Policy & Procedures (ESPP) of POWERGRID which extends to Suppliers/Contractors/Vendors through contract conditions. Vendors/ Suppliers/Contractors are required to comply with ESPP, Labour laws, Environmental laws & effectual Safety plans through stipulations in the Conditions of Contract. Contracts provide penalties to be imposed on the Vendors/ suppliers / contractors in the event of breach of the said provisions.”*
- The Company has stated that *“Due to nature of the company's business there is no process waste generated and the waste is restricted primarily to metal scraps, used batteries, used transumer oil, e-waste etc. however, Company has put in place systems for reuse/recycling of these waste materials. The waste such as used transfer oil, used batteries & e-waste are deposited either to govt. authorised*

re-cycling/re-processors or channelized back to manufactures for recycling as per the applicable rules/regulations which takes care of 100% recycling of such waste.”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Employees under the ‘Workmen’ category are represented through Trade Unions and the organization has recognized workmen-management forum. Further, the Company has disclosed that, *“All employees under the ‘Workmen’ category are members of Trade Union. Workmen represent about 26.30% of the employee strength in POWERGRID.”*
- Approximately 7.02% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	2	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 81.75% of the permanent employees and 83.04% of the permanent women employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable & marginalized stakeholders and are broadly divided into two categories viz. Internal Stakeholders (Employees – Persons with Disabilities (PWD) / SC/ ST/ Women) and External Stakeholders {Project Affected Persons / Families (PAPs / PAFs) : Widow women headed families, SC/ST/ Persons with Disabilities (PWD) }.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has disclosed various initiatives taken by it for its Internal Stakeholders (viz. Employees- Persons with Disabilities (PWD)/ SC/ ST/ Women) and External Stakeholders {viz. Projects Affected Persons / Families (PAPs / PAFs)- Widow women headed families, SC/ST/ Physically Handicap}.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“Human Rights issues are incorporated under related policies & practices of POWERGRID which*

extend to the employees including those deputed in Subsidiaries/ Joint Ventures and relative aspects pertaining to Vendors/ Suppliers/Contractors through contract condition.”

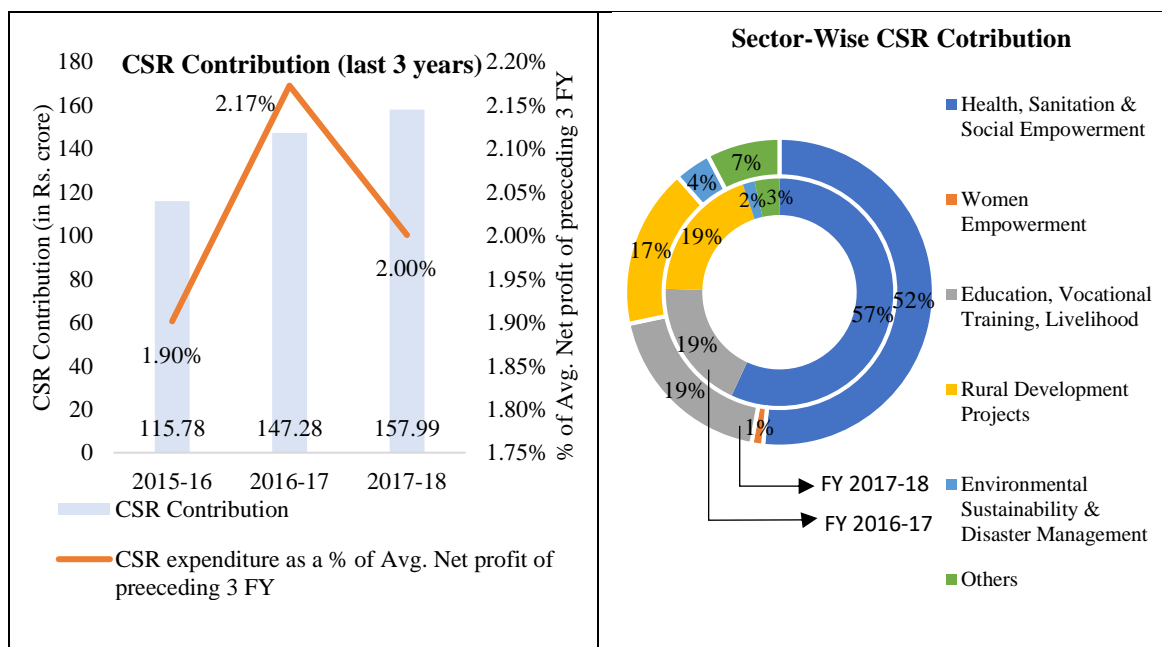
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, *“the Environmental and Social Policy & Procedures (ESPP) of POWERGRID encompass the company, its Joint Venture – Powerlinks Transmission Limited, subsidiaries in general and relative aspects pertaining to Vendors/ Suppliers/Contractors through contract condition.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that, *“Power transmission project activities do not involve any direct emission/waste to environment. The only emission that can be attributed due to our activities is from operation of DG sets used intermittently as power backup. However, regular maintenance of DG sets are ensured to maintained their emission level well within the permissible limits prescribed by Pollution Control Board.”*

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 7 members out of which 2 are Independent members. The Chairman of committee is not an Independent Director. The Company mainly undertakes CSR Activities through its in-house teams as well as through Govt./ Semi Govt. agencies/ agencies of International and National repute, etc. The Company conducts impact assessment of its CSR initiatives.



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

- The Company has stated that no customer complaints/ consumer cases are pending as on the end of financial year.
- The Company has mentioned that, *“it engage with our customers on an ongoing basis and generally hold meetings on a regular basis. The objective of said meetings inter-alia includes identification of process improvement areas and understanding concerns of customers. Based on feedback, Company takes measures for system improvement, wherever, required.”*

Punjab National Bank (2017-18)

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and as per National Voluntary (NVGs) guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Bank have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	www.pnbindia.in *								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Bank have an in-house structure to implement the policy / policies?									
9	Does the Bank have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Bank carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

*The Bank has disclosed that policies are available on the website of the Bank, but Bank has not indicated which policy cover's which principle/s. Therefore, the cells are indicated in red colour.

Participation of Bank, Subsidiaries and other entities in BR Initiatives:

The Bank has stated that none of the subsidiaries participated in the BR initiatives of the Bank. The Bank has further disclosed that, none of the other entity / entities (e.g. suppliers, distributors etc) that the Bank does business with, participate in the BR initiatives of the Bank.

Governance Related to BRR

The Bank has stated that Board of Directors meets Annually to assess the BR performance of the Bank.

Extracts from Principle wise performance of the Bank

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank has stated that *“The Bank has a whistle blower policy in place and has also listed certain guiding principles regarding ethical code of conduct to prevent bribery and corruption in the organization. This code sets forth the principles on which the Bank shall operate and conduct its business with its stakeholders, government agencies, the regulators, media and other concerned parties.*
- *The Bank expects all its Directors and employees to exercise sound and fair judgment in order to safeguard the interests and welfare of its customers, employees and other stakeholders by maintaining a cooperative, efficient, harmonious, motivated and productive work environment in the organization.”*
- Total Complaints received from shareholders during the financial year 2017-18 were 8 and they were resolved on a priority basis.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Bank has disclosed that question regarding sustainable sourcing is not applicable.
- The Bank has stated regarding recycling that *“Although the Bank is not required Because it is a financial service provider therefore recycling of products doesn’t apply to it. However, the Bank has an e-waste policy which includes purchase of various items such as Paper, stationery products, toilet paper, refuse sacks, glass, cans and plastics made from recycled material to the maximum possible extent. Disposal of the waste is also being done methodically.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bank has not constituted an Internal Complaints Committee to address concerns of sexual harassment.
- Bank has a recognised employee association i.e. All India PNB Employees Federation and All India PNB Officers’ Association. Further, the Bank has disclosed that approximately 83.34% of permanent employees are members of recognized employee associations
- Approx. 21.48% of the permanent employees are women

Number of Complaints received: As disclosed by the Bank in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	5	0	5	2	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 79.1% of the permanent employees were given safety and skill upgradation training in the last year.

S.No	% of employees were given safety & skill up-gradation training	%
1	Permanent Employees	79.1%
2	Permanent Women Employees	79.9%
3	Casual/Temporary/Contractual Employees	NIL
4	Employees with Disabilities	81.1%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has stated that “*Yes, the Bank has identified its key stakeholders, both internal and external and they include shareholders and investors, customers, employees, Government, regulatory agencies and the society. They are further segregated into various subsets for an enhanced focus*”.
- *The Government and RBI have prescribed guidelines and targets regarding Financial Inclusion, Priority Sector Lending and lending to marginalized sections. The Bank, accordingly, has identified the disadvantaged, vulnerable and marginalized stakeholders. The Bank places a high value on “Diversity at Workplace”. The Bank has created developmental cells for Women, Differently-abled and SC/ST employees in order to enable them to reach their full potential.*
- **Special initiatives taken by the Bank to engage with the disadvantaged, vulnerable and marginalized stakeholders:** *Giving back to the Society” is our prime motto behind the CSR activities. The Bank assumes a sense of responsibility towards all its stakeholders especially the disadvantaged, vulnerable and marginalized ones. Loans at subsidized rates are given to small/marginal farmers, micro/small enterprises, Self Help Groups, weaker sections, minority communities and women beneficiaries etc.*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Bank on human rights cover only the Bank or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank has stated that “*it includes relevant clauses regarding human rights in its agreements with various vendors, which covers their adherence to labour laws and employee rights*”.

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

- **Does the policy pertaining to Principle 6 cover only the Bank or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that its Banking Environment Policy covers the Bank only.
- **Are the Emissions/Waste generated by the Bank within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Bank Being a service Industry does not generate any toxic/hazardous pollutants.

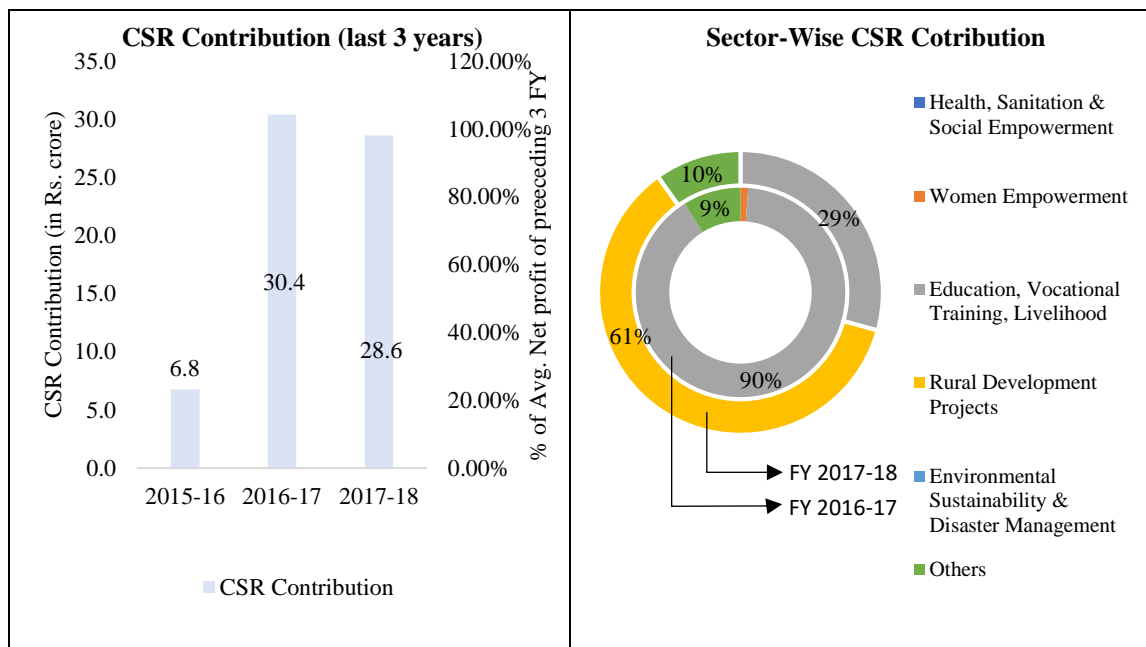
Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Bank**

PNB is a public-sector bank. Public-Sector Bank is not a Company as per the Definition of ‘Bank’ as stated in Companies Act, 2013, and it is not registered as a Company under the Companies Act, 2013. Therefore, Bank is not required to form a Corporate Social Responsibility Committee as per

Section 135 of the Companies Act 2013. Further, it is not mandatory for the Bank to spend 2% of its net average profit of last 3 financial year on CSR expenditure. However, the Bank has voluntarily spent on CSR initiatives. The Bank’s CSR expenditure is voluntarily but not mandatory.

The Bank undertakes periodic reviews of the various projects and regularly assesses their outcomes and performance. Bank has an internal team dedicated for this purpose, in partnership/association with NGOs and Government institutes for making the programs a success.



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

- A total number of 53,331 complaints were registered and 315 complaints were outstanding as on 1st Apr -2017, all the complaints were redressed to the satisfaction of the complainants. The number of complaints pending as on 31st Mar 2018 was 1862 which have since been resolved.
- The Bank, as an ongoing process, measures the satisfaction levels of its customers transacting across various touch points. There is also an online Central Grievance Redressal Management System (CGRMS).

Reliance Industries Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines for FY 2017-18. The Company has also published sustainability report ([weblink](#)) as per GRI Standards. Sustainability Report is also assured by KPMG.

The Company has prepared the Annual Report for FY 17-18 as per IIRC Integrated Reporting format and provided mapping of BRR disclosures under Section E with the Integrated Report. The Company has also provided mapping of the Annual Report with GRI standard Disclosures. The Integrated Report has been independent assured by KPMG India.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Please refer (*) below for web links.								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been communicated to RIL's key internal stakeholders. The BR policies are communicated through this report. Besides, the Company continues to explore other formal channels to communicate more with relevant stakeholders.								
8	Does the Company have an in-house structure to implement the policy / policies?	Yes, the CSR&G Committee of the Board of Directors is responsible for the implementation of RIL's policies.								
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes, any grievance or feedback related to the policies can be sent to investor.relations@ril.com. CSR&G Committee of the Board of Directors is responsible for addressing stakeholder concerns related to BR policies.								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The BR policy is evaluated internally. Policies pertaining to health, safety and environment have been audited externally by DNV.								

* The Link of the policies disclosed as under:

Link 1 – Environment Policy <http://www.ril.com/Sustainability/HealthSafety.aspx>

Link 2 – Health, Safety and Environment Policy <http://www.ril.com/Sustainability/HealthSafety.aspx>

Link 3 - Corporate Social Responsibility Policy <http://www.ril.com/DownloadFiles/IRStatutory/CSR-Policy.pdf>

Link 4 – Our Code <http://www.ril.com/DownloadFiles/IRStatutory/ourcode.pdf>

Link 5 – Code of Conduct <http://www.ril.com/DownloadFiles/IRStatutory/Code-of-Conduct.pdf>

Link 6 – Values & Behaviours <http://www.ril.com/getattachment/04fad041-a37a-42f8-85f8-6ed19be58602/Values-and-Behaviours.aspx>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that they have 81 subsidiaries as on 31st March, 2018. The Company has stated that *“The Company collaborates with all relevant stakeholders as part of its BR initiatives. Considering the Spread of RIL’s value chain, at present, the number of entities which directly participate in the BR initiative would be more than 60%.”*

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“the Company’s Code of Conduct ensures that all its employees, suppliers and vendors respect human rights not only among themselves, but also within communities in which they operate. Reliance has instituted a set of policies, codes and guidelines to govern its employees. This mechanism includes directors, senior executives, officers, employees and third parties including suppliers and business partners associated with RIL”*
- RIL received 456 investor grievance from its shareholders during FY 2017-8, which were promptly resolved. No complaint was outstanding, as on 31st March 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company has adopted sustainable sourcing practices such as local vendor engagement, digital invoicing, contractor care and supplier query redressal. RIL’s determination to reinforce local manufacturing, will help bridge the gap between robust domestic consumption and constrained supply, thereby leading India to become self-sufficient.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company ensures that all waste is sent only to Government-authorized disposal agencies. Effluents generated are treated to meet the most stringent state and central regulatory requirements. RIL has undertaken initiatives to ensure waste generated is converted to useful ‘bio-manure’ using vermicomposting. The Company has invested technologies to extract value from waste and create new products, thereby reducing its waste footprint”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- Company has a recognised employee association. Further, the Company has disclosed that almost 100% of non-supervisory permanent employees are members of recognized employee associations. (page no 121)

- Approx 5.15% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Details of given safety and skill upgradation training in the last year disclosed as under.

Sr. No.	Category	Safety and Skill up-gradation training
1	Permanent Employees	71.92%
2	Women Employees	70.22%
3	Employees with Disabilities	37.14%
4	RIL ensures that 100% employees' participation in safety and mock fire drills	

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders and stated that “*RIL Has identified with key stakeholders- Investors, Shareholders, Employees, Customer Suppliers, Trade unions, Governmental and Regulatory Authorities, Local community and NGOs*”
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has mentioned that its initiatives focus on various social challenges, all aimed at providing a better quality of life and livelihoods for a stronger and inclusive India. More details on initiative can be found under CSR section in the Annual Report. (page 166 onwards)

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the Company’s “*Code of Conduct ensures that all its employees, suppliers and vendors respect human rights not only among themselves, but also within communities in which they operate.*”

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

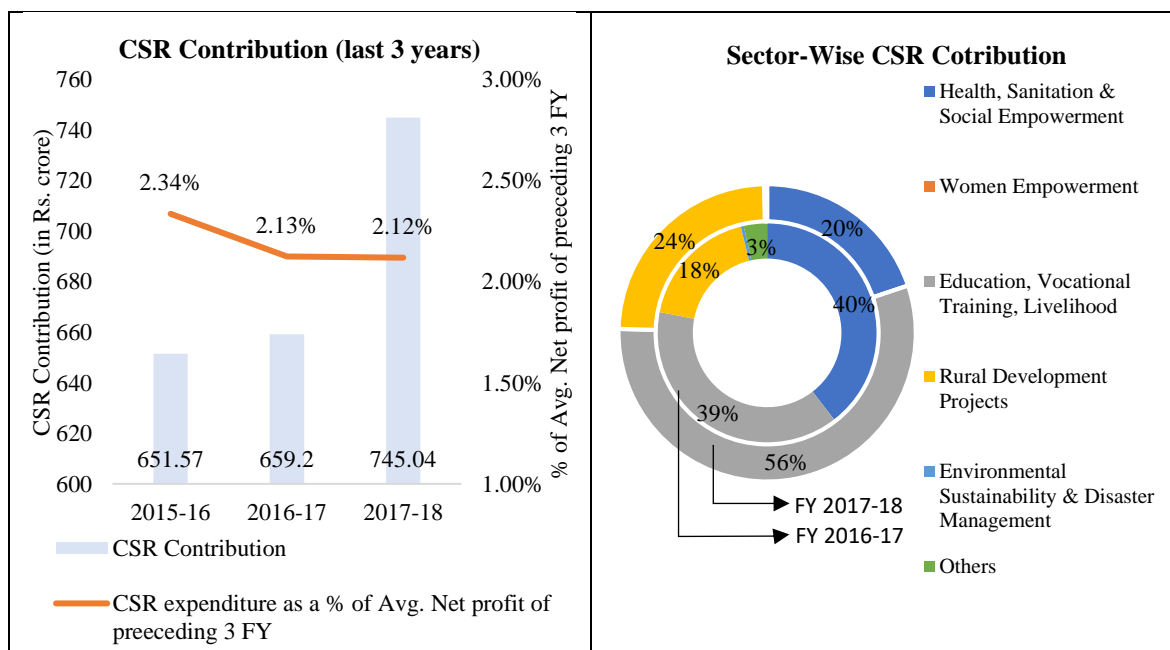
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** Reliance has formulated the ‘Environmental Policy’, which states that protection of the environment is of prime concern. The Policy addresses issues related to the employees, contractors, suppliers and customer.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Company has stated that “*The Company has installed Continuous Emission and Effluent Monitoring System (CEMS) for monitoring emissions and discharges at the refinery and petrochemical units and this is continuously reported*

to Central Pollution Control Board (CPCB). There are no pending or unresolved show cause/ legal notices.”

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its own foundation ‘Reliance Foundation’. The Company conducts impact assessment of its CSR initiatives.



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

- o During FY 2017-18, 2,183 Customer Complaints were received, out of which 2,080 have been successfully resolved. As a protocol followed at RIL, all the complaints received are resolved within 90 days. Subsequently, most of the remaining complaints have been resolved.
- o Company has not disclosed if customer survey or customer feedback was carried out.

Rural Electrification Corporation Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2		Link 2	Link 1			Link 2	Link 3
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1 Code of Business Conduct and Ethics - http://www.recindia.nic.in/uploads/files/Code_Business_Conduct_Ethics.pdf

Link 2 Corporate Social Responsibility and Sustainability Policy - <https://www.recindia.nic.in/uploads/files/CSR-Policy-Wef110717-UpldDt300518.pdf>

Link 3 Fair Practices Code and Grievance Redressal - <http://www.recindia.nic.in/uploads/files/fairpracticecode.pdf>

Policy for Prevention of Fraud - http://www.recindia.nic.in/uploads/files/prevention_fraud_policy.pdf

Whistle Blower Policy - http://recindia.nic.in/images/pdf-files/Whistle_Blower_Policy.pdf

These policies can be viewed physically or online only by the employees of the organization.

Reasons disclosed by the Company for not formulating policies adhering to principle 6 and 7 is as follows:

P6: The aspects outlined under this Principle are not relevant to the nature of business of the Company. The Company complies with applicable environmental regulations in respect of its premises and operations.

Further, the Company participates in initiatives towards addressing environmental issues. The Company also requires the borrowers of project loans to comply with the various national environmental standards/requirements.

P7: While there is no specific policy outlined for this principle, the Company is working with the State Governments and other organizations to promote initiatives in the field of Skill Development, Education, Health Care, Rural Development and Environmental Sustainability Projects.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that, the company encourages all its subsidiary companies to participate in its Business Responsibility (BR) initiatives on a wide range of topics. During the financial year 2017-18, two subsidiary companies viz. RECPDCL and RECTPCL participated in the BR initiatives of REC.

The Company has not disclosed the % of other entities that the Company does business with, participate in the BR initiatives of the Company. However, the Company has stated that, *“REC encourages its business partners to participate in its BR initiatives. REC provides finance at concessional rates for Clean & Renewable Energy projects. Further, the Company also engages its Joint Venture Company i.e. Energy Efficiency Services Limited (EESL) in taking up sustainability projects under its CSR initiatives.”*

Governance Related to BRR

The Company has stated that it meets quarterly & annual basis to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“the policy relating to ethics, bribery and corruption covers the employees of the Company as well as shareholders, consultants, vendors, lenders, borrowers, contractors, outside agencies doing business with REC, employees of such agencies, and/or any other parties which has business relationship with REC.”*
- During the financial year 2017-18, the Company did not receive any complaint under the Whistle Blower Policy and Fair Practices Code. Further, 17 general complaints (other than anonymous/pseudonymous complaints) were received out of which 9 complaints (i.e. 52.94%) were resolved during the financial year 2017-18 and the remaining complaints are under review. Further, the Company received 2,523 complaints in respect of equity & listed debt securities and 7,187 complaints in respect of un-listed debt securities. All the complaints of the equity shareholders and bond-holders received during the financial year 2017-18 have been satisfactorily resolved as on the date of this Report.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company being a Financial Institution, is relatively less resource intensive in terms of material inputs. Our major material requirements are office, communications and IT related equipment. Despite the limited scope of our procurement needs, we continue to take*

initiatives to ensure responsible sourcing in our supply chain. We have detailed procurement guidelines prescribing the procedure for our major procurements.”

- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company, being a Financial Institution, has limited applicability of mechanism to recycle products and waste. However, the Company has outsourced the mechanism to collect waste papers from the premises of the Company for recycling of the same. Further, we are following e-Waste (Management and Handling) Rules, 2011 as notified by the Ministry of Environment & Forests (MoEF), Government of India with the specific aim of minimizing e-waste and responsible disposal of the entire quantum of e-waste only through Government/Pollution Control Board registered e-waste recyclers.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has recognized the Union of its non-supervisory permanent employees and the Association of the Executives. Further, the Company has disclosed that, *“Regular employees of the Company are members of either Employees’ Union or Executives’ Association.”*
- Approx. 16.86% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 36% permanent employees, 65% permanent women employees and 29% permanent employees with disabilities received technical skill up-gradation, spiritual, health and attitudinal training.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders. The internal stakeholders include the employees of the Company. The external stakeholders include the equity shareholders, bondholders, creditors, State Governments, State Electricity Boards, State Power Utilities and other Borrowers, Reserve Bank of India, SEBI and other regulatory bodies.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Company extends certain facilities to Micro, Small & Medium Enterprises (MSME) registered with National Small Industries Corporation such as issue of tender sets free of cost, exemption from payment of earnest money, waiver of security deposit up to monetary limit for which unit is registered and opportunities for MSMEs owned by SC/ST.

- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders** *The Company regularly undertakes initiatives to engage with its internal and external disadvantaged, vulnerable and marginalized stakeholders. REC also broadly follows the principles of “The UN Global Compact” in the areas of human rights, labour, environment and anti-corruption, which enjoy universal consensus. Further, in order to encourage participation by MSMEs including Micro and Small enterprises owned by SC/ST, all the directives mentioned in the Public Procurement Policy Order, 2012 have been included in REC Procurement Guidelines.*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“Considering the nature of business of the Company, human rights cover only the Company and its subsidiary companies. Further, to protect the human rights of employees, REC has adopted employee oriented policies, in line with the general laws and regulations and sound ethical practices followed nationally, covering areas such as employee benefits and prevention of sexual harassment at workplace, which endeavour to provide an environment of care, nurturing and opportunity to accomplish professional aspirations.”*

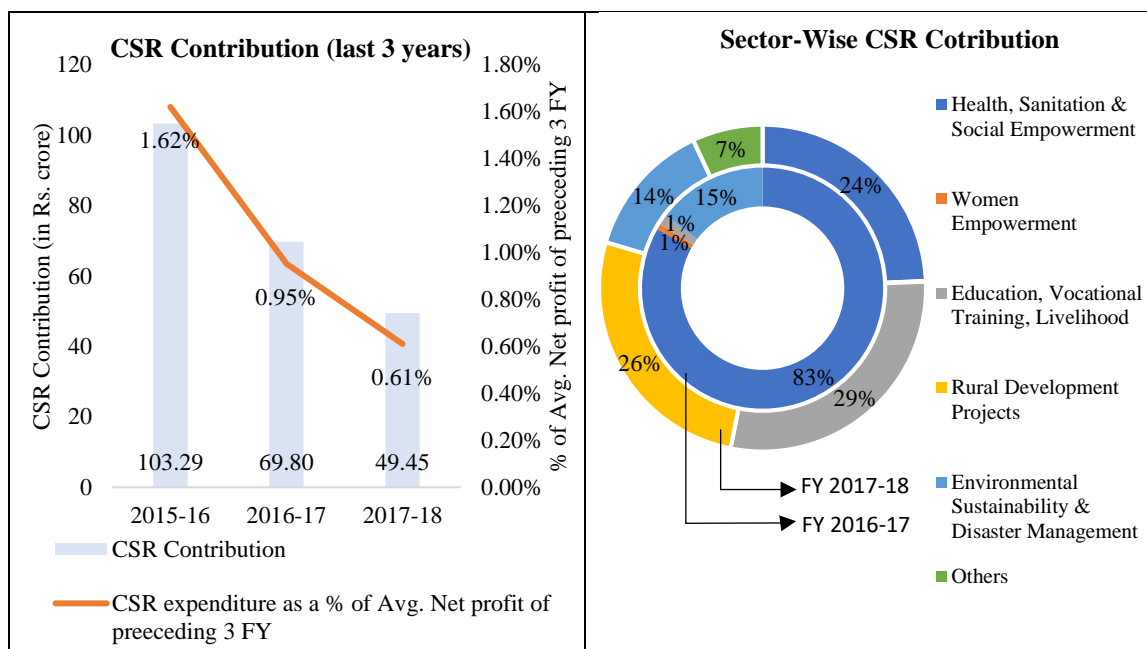
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, *“it encourages its Group/Joint Ventures/Suppliers/Contractors/NGOs/ others to participate in initiatives focused on environment protection and sustainability and as such, the policy of the Company pertaining to environmental protection is applicable to all our group companies.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that, *“The above question has limited relevance to the Company as it is not a manufacturing Company. However, the Company complies with applicable environmental regulations in respect of the premises and operations.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 3 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, foundation viz. REC Foundation, specialized agencies and having past work experience with Government/ Semi-Government/PSU/Autonomous Organizations for similar works. The Company conducts impact assessment of its CSR initiatives.



Reasons disclosed by the Company for not fully spending the prescribed amount on CSR initiatives is as follows:

“The Company has sanctioned total CSR projects with aggregated amount of Rs.167.24 crore during the financial year 2017-18. The disbursement under the CSR projects sanctioned till March 31, 2018 are linked with achievement of predefined milestones as per sanction terms which are required to be completed in the time span extended up to 36 months. Since implementing agencies could not submit the physical progress and claims as per the milestones committed for the projects, the disbursement could not be made. The undisbursed amount of Rs.112.50 crore shall be released in subsequent years as per milestones.”

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

- All the complaints received from various stakeholders in the reporting period have been satisfactorily resolved. Further, as on March 31, 2018, there were two cases relating to investors in bonds pending in various consumer courts, which will be resolved in the best interest of the investors.
- The Company, through M/s Administrative Staff College of India, Hyderabad, has conducted Customer Satisfaction Survey of its esteemed Customers across the Country comprising Central and State Government Power entities and Private Power Entities. The overall Customer Satisfaction Index (CSI) score of the Survey was 85.7, which by average American Customer Satisfaction Index (ACSI) is among the best in Banking Services.

Shree Cement Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines. **The Sustainability Report ([weblink](#)) has been independently assured by Thinkthrough Consulting Pvt. Ltd. (TTC).**

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	<p>Company has adopted various standards specified by the International Organisation for Standardization (ISO). These are-</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 for quality management systems. 2. ISO 14001:2015 for environment management systems. 3. SA 8000:2014 for Social Accountability. 4. OHSAS 18001 for Occupational Health and Safety. 5. ISO 50001 energy management systems. <p>Apart from these, other standards which company is complying with are:</p> <ol style="list-style-type: none"> 1. ILO Guidelines. 2. UN Global Compact and International Finance Corporation guidelines for specific aspects of cement sector. 3. National voluntary Guidelines (NVG) given by Ministry of Corporate Affairs for Social, Environment and Economic responsibility of business. 4. Global Reporting initiative GRI standards. 5. Cement Sustainability initiative (CSI) <p>All policies on the principles mentioned above are in compliance with these standards. Other than these, our policies are based on the generally accepted practices for the respective principles.</p>								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	<p>Yes. The Board has formed a Corporate Social and Business Responsibility (CSSR) Committee consisting of 6 directors which is responsible for overseeing implementation of various policies adopted by the Company. There is also an Environment Social and Governance (ESG) Committee consisting of Senior Executives of the Company, which carries out continuous monitoring and implementation of policies at the operational level</p>								
6	Indicate the link for the policy to be viewed online	Link1								

7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Communication is an on-going process. For this purpose, the policies have been posted on the Company's website for information of all stakeholders. For internal stakeholders, appropriate communication means such as notice boards, placards, company magazines. etc. are used.							
8	Does the Company have an in-house structure to implement the policy / policies?								
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	As part of compliance with the ISO standards adopted by the Company, an external agency evaluates the implementation of the ISO standards on an annual basis. Apart from this, Company also has a system of undertaking regular audit/ review of the implementation of various standards. An external consultant also gives an assurance that our Corporate Sustainability Report (which <i>inter alia</i> contains compliances with policies and frameworks adopted by the Company) is in line with the Internationally accepted GRI Standards.							

Link1: <http://www.shreecement.in/pages/policies.php>

Sustainability Report for FY 2017-18: https://www.shreecement.com/pdf/corporate_sustainability_report2017-18.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that the Company has 1 subsidiary. The Company further states that the “*subsidiary has no business operations and does not participate in the BR initiatives of the parent company. Other entities do participate but their participation cannot be measured and expressed in terms of percentage.*”

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “*the policy relating to ethics, bribery and corruption is inclusive in the code of conduct which is to be followed by employees and directors of the company. There are no group/joint ventures of the company, though it has a subsidiary but due to its non-operating nature it does not attract applicability of the policy. However, the company as far as possible encourages all the associate parties including vendors, suppliers and contractors to follow the principles envisaged in the policy*”.
- The Company received 10 investor complaints during the FY 2017-18 and all these complaints were properly attended and necessary actions were taken.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has not disclosed the percentage of the sustainable sourcing.

- The Company has disclosed that “*Company’s products i.e. cement and power are not meant for recycling as cement is used in building and construction which typically have high life span and power is consumed immediately. Fly-ash, a solid waste, generated from power plants operation is utilised in Portland Pozzolane Cement (PPC) production. Used oil is the only hazardous waste being generated and is sold to recyclers authorised by CPCB. The Domestic waste water generated is 100% recycled through sewage treatment plants.*”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. The Company has further disclosed that approximately 7.23% of permanent employees are members of recognized employee associations
- Approx. 0.50% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- % of the permanent employees who were given safety and skill upgradation training in the last year is as follows:

Category	Total Employees (31 st March 2018)	Training imparted to persons during the year	% Training
Permanent Employees	5,837	4,139	71%
Permanent Women Employees	29	19	66%
Casual/Temporary/Contractual Employees	10,216	9,312	91%
Employees with disabilities	4	4	100%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has stated that “*the Company identifies the communities in connection with its manufacturing units and its contractors/workers as disadvantaged, vulnerable and marginalized stakeholder of the Company.*”
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that “*the Company for the betterment of its*

disadvantaged, vulnerable and marginalized stakeholders have taken initiatives in the areas of corporate social responsibility that are mainly targeted to bring meaningful differences in the lives of its associated stakeholders by facilitating healthcare, education and infrastructure support for integrated and sustainable rural development and by providing access to proper sanitation and safe drinking water. Several initiatives towards creation of sustainable livelihood, women empowerment, etc. have also been taken by the Company during the year.”

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“the policy on human rights covers the company only. There is no group structure or joint venture of the Company. The subsidiary of the Company has no operations at present. Company encourages parties associated with its value chain like vendors, suppliers, contractors, etc. to follow the principles envisaged in the policy.”*

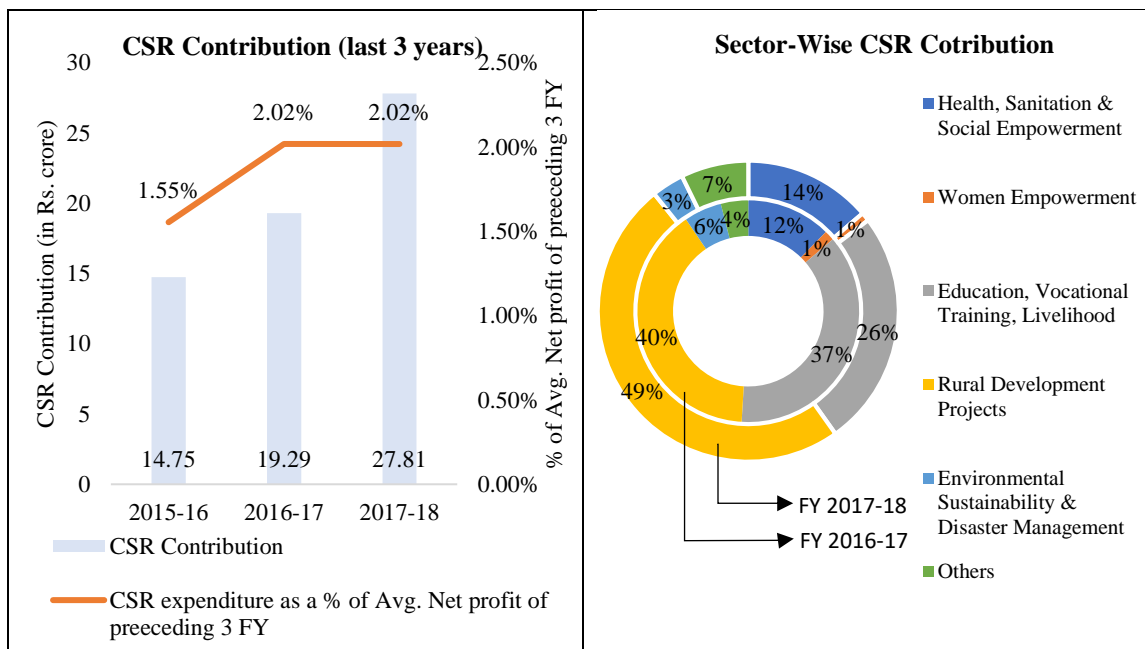
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the policy on environment is applicable and admissible within the Company to the maximum extent possible.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, emissions/waste generated by the company were within the permissible limits set by CPCB/SPCB for the relevant financial year.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 6 members out of which 4 are Independent directors. Chairman of the committee is an independent director. The Company mainly undertakes CSR Activities through internal as well as external agencies like NGO and government institutions. The Company conducts impact assessment of its CSR initiatives.



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

- The Company has stated that there were 18 consumer complaints filed against the company and which were pending as on 31st March 2018.
- Consumer Satisfaction survey is carried out by the company every year.

Shriram Transport Finance Co. Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	*					Link 2	*	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1 – Code of Conduct <http://www.stfc.in/pdf/codeofconduct.pdf>, Whistle Blower Policy/ Vigil Mechanism <http://www.stfc.in/pdf/Whistle-Blower-Policy-Vigil-Mechanism.pdf>, Fair practice code of the Company <http://www.stfc.in/Fair-Practice-Code.pdf>

Link 2 – Corporate Social Responsibility Policy <http://www.stfc.in/pdf/Corporate-Social-Responsibility-Policy.pdf>

*The remaining policies of the Company are internal documents and are not accessible to the public.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that they do not have subsidiaries. Further, against ‘% of other entities of the Company that are participating in the BR initiatives of the Company’ the Company has responded as NA.

Governance Related to BRR

The Company has stated that its Business Responsibility Performance is being monitored by CSR Committee on periodical basis.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that policy relating to ethics, bribery and corruption cover only the company.
- The Company has not received any complaints from stakeholders during FY 2017-18.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has not disclosed the percentage of inputs that were sourced sustainably. The Company has stated that *“We are engaged in the business of financing of commercial vehicles. Our focus is on financing pre-owned commercial vehicle generally up to 10 years old. In this process we check authorization /certificates for safety, fitness and emission of the vehicle. Our various initiatives are aimed at influencing our customers for creating awareness about environment protection, reducing impact of emissions from on-road vehicles on the environment.”*
- The Company has not disclosed the percentage of recycling of products and waste because the being a finance company it has stated that it’s not applicable for them.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have a recognised employee association.
- Approx. 4.33% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 48% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“We had already developed “MY STFC” app for enabling customers to pay through various payment gateways. We also supplied POS machines to all the branches for enabling debit card swiping. Our Fair Practice Code provides mechanism for redressal of customer complaints. Our policy is to treat all customers in fair manner. Our entire recovery and collection operation are administered in-house and we do not outsource loan recovery and collection operations. We have relationship-based recovery procedures well-suited to our target market in the commercial vehicle financing industry.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the Human Rights policy extends only the Company.

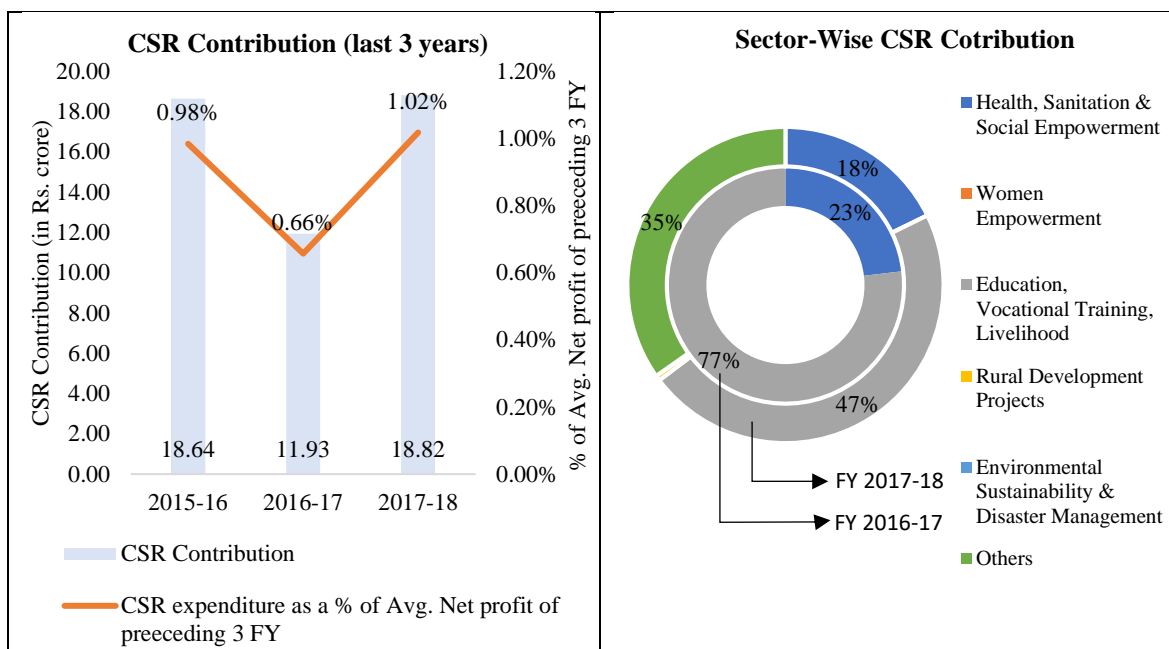
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated policy extends only to the Company.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that being a finance the company has stated that it’s not applicable for them.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 5 members out of which 3 are Independent members. Chairman of the committee is Executive Managing Director. The Company mainly undertakes CSR Activities through coordination and collaboration between in-house team and external NGOs



Reasons disclosed by the Company for not fully spending the prescribed amount on CSR initiatives is as follows:

“The budgets for Driver Training and Mobile Medical Unit and Health Clinic projects accounted for 61% of the total CSR budget approved by the Board of Directors for the Financial Year 2017-18. The objective of Drivers’ training project is imparting training and skills for safe driving, educating on road safety to reduce road accidents, encouraging soft skill learning and creating health consciousness. This project facilitates issue of driving license to candidates completing the training, creating employment opportunities for unemployed youths from backward and urban areas, thereby addressing the shortage of drivers in the country which is estimated at 22%. However, the performance of the implementing agency engaged on this project was far below the company’s expectations necessitating search for multiple competent implementation agencies whose identification and shortlisting process took longer time than expected. The Company has entered into memorandum of understanding with multiple new implementing agencies to replace existing implementing agency in the last quarter of the financial year. The new implementing agencies have good potential to meet company’s expectation to achieve targeted spend.”

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

- The company has not disclosed the total number of complaints that were received from customers (end-consumers), however the 1.55 % were pending as on 31st March 2017-18.
- No Customer Satisfaction Survey was carried out by the Company during the FY 2017-18.

Siemens Ltd (2017)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines for FY 2017 ([weblink](#)). **The Sustainability Report has been independently assured by Ernst & Young.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies are in line with international standards and practices such as ISO 14001, BS OHSAS 18001, UNGC Guidelines, UN Human Rights Declaration and European Human Rights Convention; ILO Principles, OECD Guidelines for Multinational Enterprises, UN Convention against Corruption; IFRS as issued by the IASB.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Significant policies are formulated at Siemens Group level in Germany. The policies are adopted by Siemens Limited in India with Board level undertaking to the Group on implementation of key policies in India. The policies pertaining to local legislations and systems are approved and signed by relevant senior management personnel.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Siemens Ltd. has a well-established internal governance structure to ensure the implementation of various policies, internal regulations and procedures. We have internally mapped all policies, internal regulations and procedures to business functions responsible for implementation. Our MD/CEO has the ultimate responsibility to oversee implementation of all policies. We review the implementation of policies through our internal audit and risk management process.								
6	Indicate the link for the policy to be viewed online	Link 1	Link 2				Link 3		Link 4	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes. All the policies communicated to internal stakeholders are available on the internal network. Policies communicated to external stakeholders are available on the Siemens website								
8	Does the Company have an in-house structure to implement the policy / policies?	Yes. There is an in-house structure with clearly defined roles and responsibilities that are periodically reviewed under the Internal Risk Management Framework.								
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Yes. The Company's stakeholder grievance is covered by the Code of Conduct for Suppliers and Business Conduct Guidelines. In order to ensure integrity and transparency of business processes, there is a system in place to identify any noncompliance and violations of the Siemens Business Conduct Guidelines. The tool, "tell us", can be used for whistle blowing and redressal of other grievances by employees, customers, suppliers and other stakeholders 24/7 worldwide either online or by telephone, and in any of the 150 languages. All the concerns reported on "tell us" are addressed through proper channels and if found to have merit, disciplinary								

		action is taken. There is also an ombudsman in place where grievance can be raised.
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Yes. The Company's policies and procedures are supported by internal risk controls. These risk controls are continually evaluated for their efficacy through internal audit mechanism and are also subject to external audits.

* The Company has disclosed the links as under:

Link 1 – Business Conduct Guidelines: http://www.siemens.co.in/pool/investor_relations/board-of-directors/business_conduct_guidelines_e.pdf

<https://w5.siemens.com/cms/supply-chain-management/en/sustainability/expectations/principles/Pages/code-of-conduct.aspx>

Link 2 – Compliance policy <http://www.siemens.co.in/en/index/investor/compliance/helpdesk.htm>

Link 3 – Safety, Health and Environment Policy: <http://www.siemens.co.in/about-us/sustainability/corporate-citizenship/education/siemens-scholarship.htm>

Link 4 – CSR policy <http://www.siemens.co.in/about-us/sustainability.htm>

All other policies are available on the Company's internal network.

Link for Sustainability Report:

https://www.siemens.com/investor/pool/en/investor_relations/siemens_sustainability_information2017.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that one subsidiary Siemens Rail and Automation Pvt Ltd participate in BR initiatives. The Company has not disclosed that entities participate in BR initiatives. However, the Company has stated that *“The Company has a Business Conduct Guidelines which contains the basic principles and rules for conduct which is extended to its external partners.”*

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“Siemens has adopted the Business Conduct Guidelines (BCG), which details the minimum acceptable ethical and responsible business practices for employees, channel partners, suppliers, vendors, NGOs and contractors. The Company is committed to transparency and best practices are also extended to suppliers through the Code of Conduct for suppliers.”*
- The Company received 22 complaints under the ethics, bribery and corruption, out of which 18% were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“Siemens sources its materials through suppliers and vendors who are compliant with Siemens Code of Conduct and Business Code of Conduct. Supplier selection, assessment and evaluation process includes elements of sustainability. This includes self-assessments by suppliers, risk assessments by Siemens Ltd. and external audits by third party.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The Company is committed to increasing waste efficiency through the ISO*

14001 certification for all plants. Waste is segregated into hazardous and non-hazardous waste and managed through a robust waste management system.”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. The Company has not disclosed the % of permanent employees are members of recognized employee associations. However, the Company has stated that *“Siemens believes in collective bargaining as an important mechanism to engage with employee associations. Through continual dialogue with these associations, the Company strives to maintain cordial relationships with employees and work towards their welfare. The Company currently does not track them separately in the headcount.”*
- Approx. 8.81% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017		2016		2015	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	Nil	1	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed the percentage of the permanent employees who were given safety and skill upgradation training in the last year. However, the Company has stated that *“During the year, the Company conducted 43,318 hours of training out of which 22624 Hrs. were for permanent employees and 20,694 hours for contractors.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped the internal and external stakeholders in a structured way and carries out engagements with its investors, employees, customers, suppliers, business partners, civil society organizations, etc.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Company has stated that *“Siemens strongly believes that working with economically weaker sections of society supports growth and development. Siemens identifies marginalized and disadvantaged groups through need assessment and engagement with local communities under the corporate citizenship framework.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“The Company considers it as its economic, environmental and social responsibility to foster sustainable local development as well as add value to the local economy in which it operates. The Company derives its sustainability initiatives*

from these challenges. These initiatives, generally known as Corporate Social Responsibility (CSR), are referred to as Corporate Citizenship in Siemens. The Corporate Citizenship strategy is in line with the Company's goal to address the three dimensions of Sustainability i.e. Economic, Environment and Social. Hence, the strategy focuses on: Education & Science, Social, and Environment. The strategy aims to address the challenges and needs that communities face by leveraging the Company's competencies and solutions. It is oriented towards the National development agenda, UN Sustainable Development Goals and UN Global Compact principles. The details are available in the Annual CSR Report 2016-17."

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *"the policy on Human Rights is applicable to Siemens implementing partners: NGOs & Organization. Siemens conducts a due diligence of Siemens Corporate Citizenship's implementing partners. Due diligence also covers the implementing partners' outlook on inclusive community development and citizen's rights and duties of their beneficiaries which is an important essentials of becoming implementing partner. Implementing partners also sign the Siemens' Business Conduct Guidelines which respects human rights, European Human Rights Convention as well as ILO Principles"*.

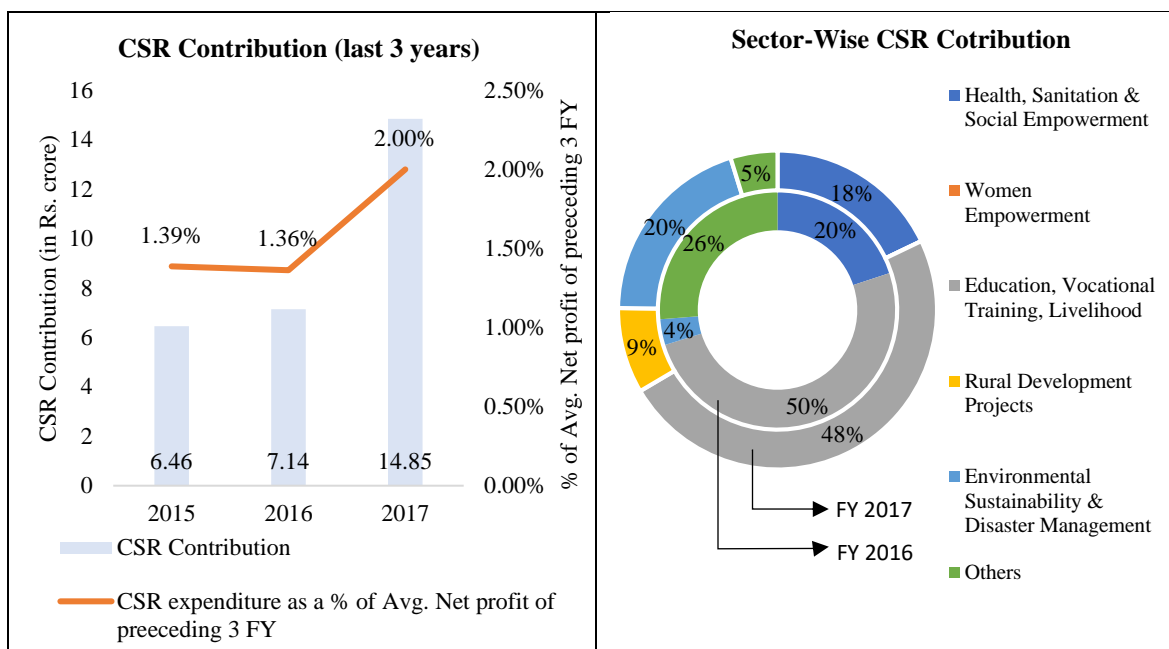
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *"The Company has well laid down policies, principles and standards that all plants and facilities in India must adhere to. Our EHS Policy also specifies the EHS requirements to be extended to the Contractors. The contractors/suppliers are communicated about the EHS requirements during the bid-phase and order finalization. Periodic EHS workshops for contractors/suppliers are conducted at various Business divisions."*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Company has stated that *"The Company is in compliance with the applicable environmental laws and regulation. The Company's emissions, effluents waste are within Central and State Pollution Control Boards permissible limits."*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which one Independent member. Chairman of the committee is Independent Director. The Company mainly undertakes CSR Activities through its in-house team Corporate Citizenship Team, NGOs and Government Organizations. The Company conducts impact assessment of its CSR initiatives.



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

- The Company disclosed number customer complaints and resolved. However, the company has stated that “*There were no consumer cases in district consumer forum.*”
- In addition to the Annual Corporate Survey, customer feedback is gathered at the end of key customer interactions, during project management as well as service delivery.

State Bank of India (2017-18)

The Bank has disclosed a Business Responsibility Report. Further, the Bank has provided a Sustainability Report as per GRI Standard guidelines for FY 2017-18. ([weblink](#)) The Bank has mapped the sustainability Report with the BRR as per SEBI format. **The Sustainability Report has not been independently assured.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	SBI's Business Responsibility Policy is based on National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business as released by Ministry of Corporate Affairs, Government of India, in July 2011.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Yes, the BR policy has been approved by the Board of Directors								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Yes (CSR Committee chaired by Managing Director)								
6	Indicate the link for the policy to be viewed online	https://www.sbi.co.in or under the link Corporate Governance / Sustainability and BR Policy - Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The working of the BR policy is evaluated internally. Further, the Sustainability Report published for FY 2017-18 discloses information on the Bank's economic, environmental and social performance for the reporting period and has been reviewed and collated in a comprehensive manner								

Sustainability and Business Responsibility Policy: <https://www.sbi.co.in/portal/documents/41076/60023/Sust.+Policy+for+Upload.pdf/1d48f9f7-dc82-49cc-afd5-4e2fe2ffec62>

Sustainability Report of FY 2017-18: https://www.sbi.co.in/webfiles/uploads/files/SR_2017_2018.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Bank has disclosed that SBI's BR policies are extended to all its Associates and Subsidiaries, who actively support the BR initiatives undertaken by the Corporate Centre. The Bank has not disclosed whether other entity / entities (e.g. suppliers, distributors etc) that the Bank does business with, participate in the BR

initiatives of the Company. It has been mentioned that, *“With respect to its supply chain, SBI expects and encourages its suppliers, vendors and other business partners to conduct their business in a responsible manner.”*

Governance Related to BRR

The Bank has not disclosed that who assesses the BR performance of the Company and in how much intervals.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank has stated that *“A Code of Conduct (CoC) has been established by SBI that is applicable to all of its employees. The COC sets forth principles on which the Bank will conduct business with its stakeholders.”*
- The Bank received 603 shareholder complaints during the FY 2016-17 and all were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The disclosure regarding sustainable sourcing is not applicable to the Bank.
- Although, the disclosure regarding recycling of waste is not applicable to the Bank, it has stated that *“The other types of waste generated by SBI is classified into wet, dry and e-waste. Canteens are the major source of wet waste, and awareness drives are conducted to reduce wastage of food in canteens. The wet waste is transferred into bio-digesters for decomposition and the resulting compost is used at the headquarters and the residential quarters of the Bank. The canteens also display the amount of food waste being generated on a daily basis to sensitise employees. The dry waste generated is given to vendors who recycle the waste paper and the e-waste generated is disposed through authorised vendors only.”*
- Bank has stated that, approximately 94 percent of the waste generated was recycled and reused.

Principle 3: Businesses should promote the well-being of all employees

- The Bank has not disclosed that, the Bank has constituted an Internal Complaints Committee. However, the Bank has put in place a policy for prevention of Sexual Harassment at work place and stated that *“The Bank has various grievance redressal channels for complaints related to human rights issues such as discrimination and sexual harassment.”*
- Bank has a recognised employee association. Further, the Bank has not disclosed the percentage of permanent employees are members of recognized employee associations.
- Approx. 24% of the permanent employees are women

Number of Complaints received: As disclosed by the Bank in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	18	7	21	6	27	4
Child labour /forced labour/ involuntary labour	Not Disclosed*		NA	NA	NA	NA
Discriminatory employment	Not Disclosed*		NA	NA	NA	NA

*Although the Bank has not disclosed if any complaints of Child labour /forced labour/ involuntary labour or Discriminatory employment were reported, the Bank has disclosed that “SBI respects the human rights and dignity of all its employees and the stakeholders associated with the Bank. The guidelines on human rights cover the Bank's entire value chain which comprises of employees, suppliers, clients, communities and countries in which it operates. It is in compliance with the internationally proclaimed human rights policies and is strictly intolerant to any kind of human rights violations at workplace. The Bank has various grievance redressal channels for complaints related to human rights issues such as discrimination and sexual harassment”

- The Bank has not disclosed the percentage of the permanent employees which were given safety and skill upgradation training in the last year. However, it has stated that “SBI has identified sector-specific risks that can pose a threat to the Bank's reputation, employees as well as customer relations. Hence, the safety of life and safety of resources is given paramount importance across all operational locations. It is vital to ensure the safety of customers, employees and any other key stakeholders visiting any of the Bank's offices or branches. The Bank entrusts this crucial responsibility to its security personnel and equips them with necessary tools and trainings to fulfil their duties.”

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its internal and external stakeholders. The Bank has stated that “SBI has identified internal and external stakeholder groups viz. employees, urban customers, rural customers, investors, suppliers, industry associations, regulatory bodies and NGOs.”
- The Bank has not disclosed that it has identified the disadvantaged, vulnerable and marginalized stakeholders. However, the activities done by the Bank with respect to this principle have been disclosed by them in the sustainability report.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Bank has stated that “While conducting the stakeholder engagement process, the Bank simultaneously conducted a materiality assessment. To determine the material topics for FY 2017-18, SBI developed a scoring methodology for an exhaustive list of topics relevant to the banking sector. The identified stakeholders ranked the material topics in terms of importance (from not applicable – very high) as per their perception. The responses were collated and analysed, based on which, the material topics were prioritised. The prioritised topics were further validated and approved by the Central Management Committee (CENMAC).”

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank has stated that “SBI

respects the human rights and dignity of all its employees and the stakeholders associated with the Bank. The guidelines on human rights cover the Bank's entire value chain which comprises of employees, suppliers, clients, communities and countries in which it operates. It is in compliance with the internationally proclaimed human rights policies and is strictly intolerant to any kind of human rights violations at workplace."

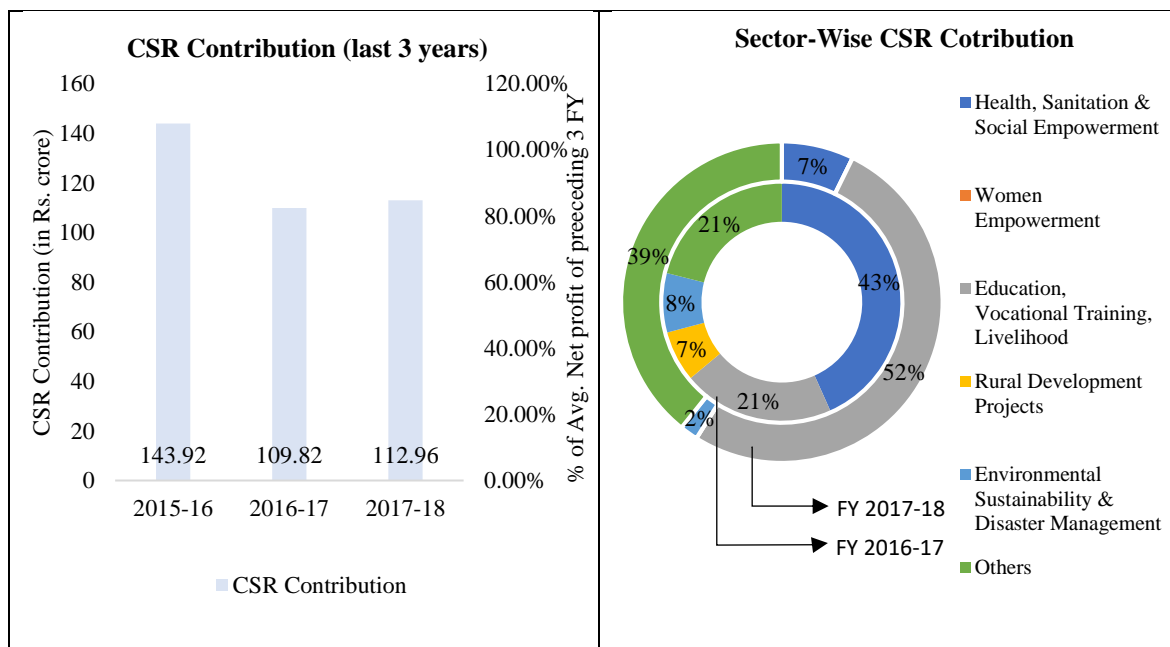
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that *"SBI is the first among the public sector banks to develop a sustainability roadmap for its operations across India. The Bank has committed to minimising the direct and indirect environmental impacts of its operations."*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not applicable to the Bank.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Bank's CSR committee consists of 7 members out of which 5 are Independent members. Chairman of the Committee is Executive Managing Director. The Bank mainly undertakes CSR Activities through SBI Foundation with reputed NGOs.



Bank of India is a public-sector bank. Public-Sector Bank is not a Company as per the Definition of 'Company' as stated in Companies Act, 2013, and it is not registered as a Company under the Companies Act, 2013. Therefore, it is not mandatory for the Bank to spend 2% of its net average profit of last 3 financial year on CSR expenditure. However, the Bank has voluntarily spent on CSR initiatives.

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

- A total of 21,59,700 (46,282 complaints pending at the beginning of the year) complaints were received from customers (end-consumers) in 2018, out of which 79,259 complaints were pending as on March 31, 2018.
- The Bank has stated that “*SBI undertakes a Customer Service Feedback Survey biennially at select CEEP branches to assess the impact of the CEEP initiative on the quality of customer service. The feedback received is used to improve customer service.*”

Steel Authority of India Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines for FY 2017-18. ([weblink](#)) The Company has mentioned that Sustainability Report has not got External assurance.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle		*		**					
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online				Link 1		Link 2		Link 1	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* The Company has Quality and Environment policies which ensure production of safe and sustainable products.

** This is included in Company's Code of Conduct, HR policies and various other HR practices.

Link 1: <https://sail.co.in/sites/default/files/sail-pages/company/csrapolicy.pdf>

Link 2: https://sail.co.in/sites/default/files/plants/other-units/Salient_pts_of_report-1.pdf

Sustainability Report for FY 2017-18: https://sail.co.in/sites/default/files/Sustainability_Report_1718.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 7 and 9 is as follows:

P7: The Company has leadership position in the steel sector and has a record of pioneering achievements which has benefitted Steel Industry of the Country at large by having dialogue with MOS, GOI. Therefore, need for formal policy has not been felt.

P9: The Company has systems and procedures to assess customer needs and addressing them. The Customer Satisfaction Index is calculated based on the feedback from customers on a regular basis and system for customer complaint redressal is also in vogue.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that BR initiatives of the parent company are applicable on Subsidiary Companies. None of the other entities participate in BR initiatives.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The policies implemented by SAIL, in these regards covers employees of the Company as well as suppliers/ contractors/ bidders, etc. The Company has put in place Conduct, Discipline and Appeal (CDA) Rules which prescribe the code of conduct as applicable mostly to the executives of the Company whereas the non executive workmen are covered under the code of conduct /misconduct as mentioned in the Standing Orders for respective Plants/Units of SAIL.”*
- A total of 776 complaints from various sources including those referred by Central Vigilance Commission, Ministry of Steel were received in SAIL Vigilance during 2017-18, out of which 100% complaints were satisfactorily resolved as per procedure in vogue.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“In addition to regular supplies from captive mines of SAIL, certain key input materials like iron ore, coal, fluxes (limestone, dolomite), etc. are sourced either through competitive buying or long term arrangement with established suppliers. There are continuous efforts to minimize impact of carbon footprint. Transportation of all raw materials from mines and ports to Plants is carried through rail.”*
- The Company has disclosed that 30% of solid waste were re-cycled internally out of 83% of solid waste utilisation.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that almost all permanent employees of SAIL are members of recognized employee associations.
- Approx. 5.74% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	5	Nil	5	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 49.08% of the permanent employees were given safety and skill upgradation training in the last year. Although, the Company has also disclosed that 100% of contractual workers are given safety awareness training which is mandatory for issuing gate pass to plant premise.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has not clearly disclosed that whether it has identified the disadvantaged, vulnerable and marginalized stakeholders or not. However, the Company has stated that *“There has never been any discrimination in the treatment and rights available to stakeholders.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has taken special initiatives to promote Water Supply and Sanitation, Education, etc.

Principle 5: Business should respect and promote human rights

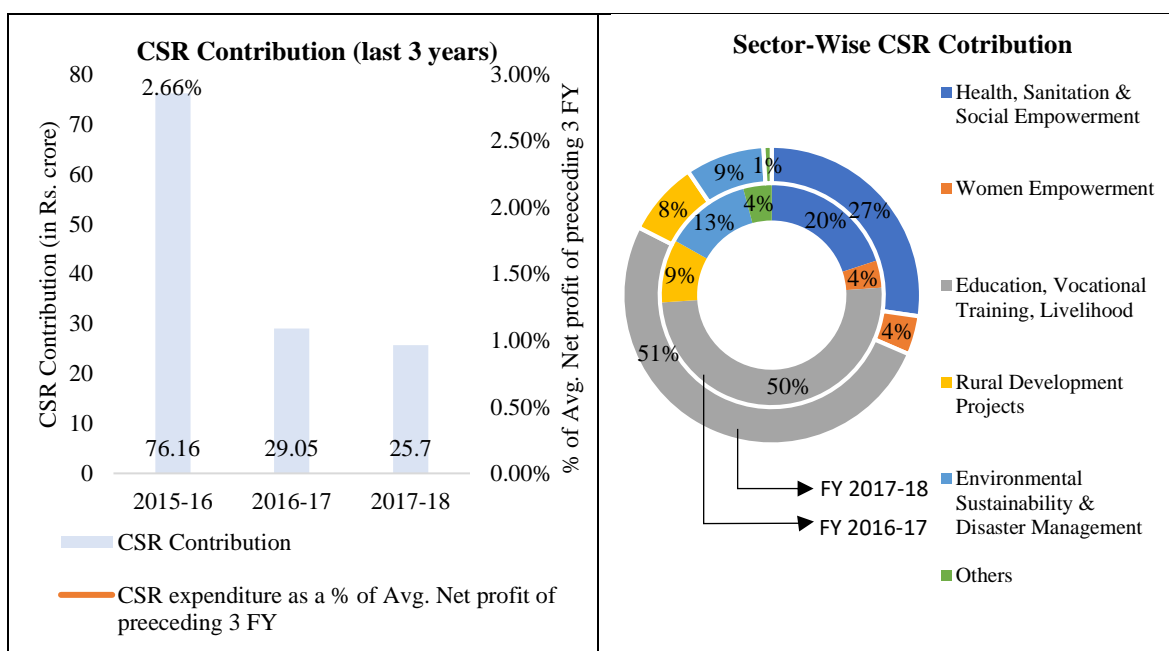
- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company does not have a stated Human Rights Policy. However, most of the aspects are covered in the Company's Code of Business Conduct and Ethics as well in various human resource policies and practices.

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has not disclosed anything about the same. Although, the Company has stated that *“the policies on Human Resource, Occupational Health and Safety, Communication, Maintenance, Township, Energy Management and Social Accountability etc. at the plant level also promote concept of Sustainable Development.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that *“The "Consent to Operate" certificates are issued to SAIL Plants and Mines by the respective State Pollution Control Boards (SPCBs). As per the conditions stipulated in the "Consent to Operate", the respective norms for air emission and discharge quality are mostly complied with. In addition, various wastes generated are handled and disposed in environment-friendly manner as per the existing set of guidelines/ rules. These are also reported by the Company to the CPCB/SPCB on regular basis.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**
- The Company’s CSR committee consists of 7 members out of which 4 are Independent members including the Chairman. Under the guidance of the Board level CSR Committee, the CSR activities/projects listed in the approved Annual Plan of SAIL, are implemented using internally or through an identified suitable agency or through providing financial assistance to NGOs/ specialized/ agencies/ institutions/ societies, as per the provisions of Companies Act, 2013, CSR Rules and CSR Policy of the Company.
- In SAIL, every Plant / Unit is having a high-level Committee headed by senior EDs/ GMs, which recommends the CSR projects to be taken up by the respective Plant / Unit. The same Committee monitors the progress and execution of these projects as well as undertakes audit of social benefits achieved from CSR initiatives undertaken. The Board Sub-Committee on CSR reviews/ monitors CSR & Sustainability activities on regular basis.



The Company has incurred losses since FY 2015-16 and its average net profit for 3 years is negative, hence, it is not required for the Company to spend on CSR activities. However, the Company has voluntarily spent ₹ 25.7 crores for FY 2017-18.

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

- During FY 2017-18, a total of 1,146 complaints were received from various customers. All these complaints were satisfactorily settled within the year and no complaint was pending.
- A Customer satisfaction is measured in the form of Customer Satisfaction Index (CSI) for Key Accounts which is computed every month based on the feedback collected from identified Key Customers on parameters pertaining to Product Quality, Service and Price. Key customers are identified at Branch level as well as national level, and the lists are updated on a yearly basis.

Sun Pharmaceutical Industries Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	All the policies have been formulated in consultation with the Management of the Company and is approved by the Board.								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	All the policies are compliant with respective principles of NVG guidelines.								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	All the policies have been approved by the Board and have been signed by the Managing Director.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The Board has appointed Mr. Sudhir Valia, Whole-time Director - Sun Pharma, to oversee policy implementation.								
6	Indicate the link for the policy to be viewed online	Copies will be made available on receipt of written request from shareholders.								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been formally communicated to internal stakeholders. The external stakeholders will be communicated in due course.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	It will be done in due course.								

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has subsidiary company, but there is no direct participation of the subsidiary company in the BR initiatives of the company. The Company has further stated that "*the Company has not instituted any process to monitor/verify whether any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company*".

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that comprehensive policies and processes are in place to ensure transparency and accountability. This has resulted in a culture of ethics and integrity, which is evident across hierarchies in the organisation.
- The Company received 3 stakeholder complaints during the year, which were resolved satisfactorily.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has not disclosed the % of the sustainable sourcing.

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or not.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has stated that “we continue to support a management-recognised employee association, which covers approximately 5% of our employee membership.
- Approx. 5.15 % of the employees are women. However, the Company has disclosed that number of total employees included permanent, temporary and contractual employees. The Company has not specifically disclosed number of permanent women employees.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	1	0	NIL	NIL	NIL	NIL
Child labour /forced labour/ involuntary labour	NIL	NIL	NIL	NIL	NIL	NIL
Discriminatory employment	NIL	NIL	NIL	NIL	NIL	NIL

- 67% of employees, including 58% of women employees were given safety and skill upgradation training.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has stated that “*whether minor or major, internal or external, we have identified them and engage with them in a fair and transparent manner.*”
- Although, the Company has not mentioned the disadvantaged, vulnerable and marginalized shareholders, however, the Company has stated that “*Some stakeholders effect our choices, while others are affected by them. Some may need more investment, while the others may need more time from us. Each stakeholder is different, and so is their need. Equitable growth is when every*

stakeholder grows with us. So as a responsible organisation, we have to balance our initiatives in such a way that we can collaborate with all stakeholders.”

- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“We implemented various healthcare programmes with the objective of offering up-gradation in health infrastructure to benefit the community on a sustained basis and in priority areas”*.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that it is a firm believer of the principle of human rights and adheres to it in letter and spirit.

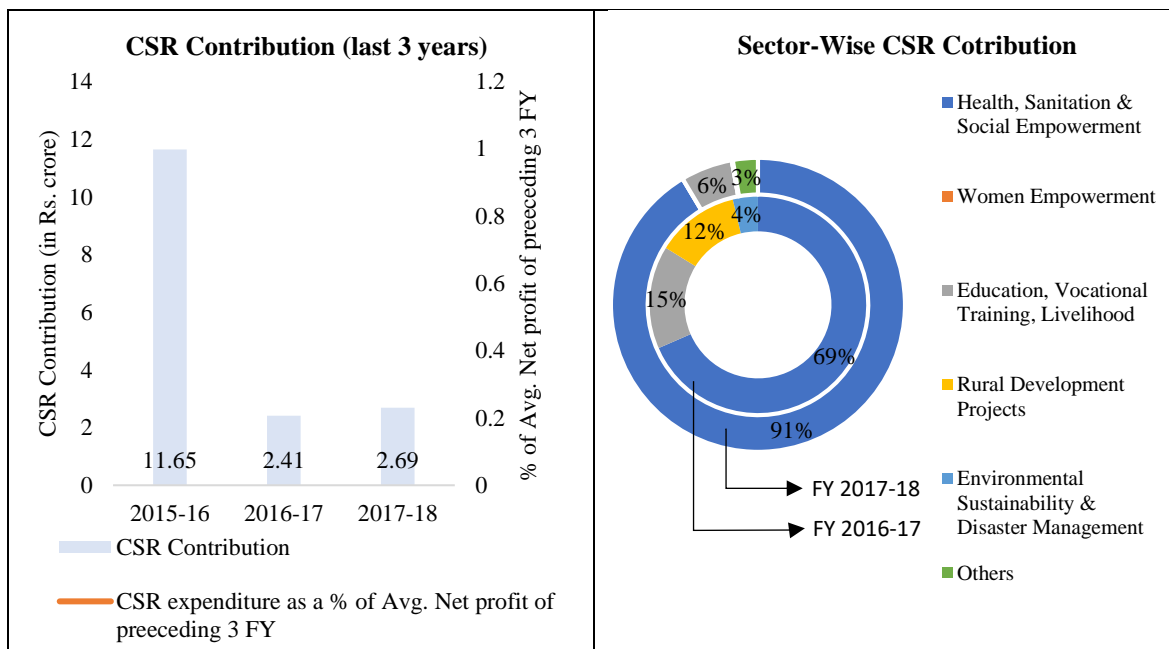
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“Care for the environment is one of our core corporate values and as a part of this commitment, we have a robust Environment, Health & Safety (EHS) policy which etches out our concerns as well as the roadmap to resolve them.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has not disclosed whether the Emissions generated by the Company are within the limits given by CPCB/SPCB or not. Although, the Company has stated that there were no pending notices from pollution control boards.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is an Independent director. Chairman of the committee is not an independent director. The Company mainly undertakes CSR Activities through directly or with the help of NGOs.



Note: The average net profits of the Company for the last three financial years was negative, due to loss incurred in last preceding three years. Since, the average net profit of the Company for the last three financial years was negative, the Company was not required to spend on CSR activities during the previous year. However, the Company has voluntarily spent on CSR activities.

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

- The Company has disclosed that in the reporting year, although no formal survey was carried out, our medical representatives continued to seek suggestions in person, from doctors and pharmacists. Our ‘Customer Centricity Policy’ also directs our employees to be receptive towards customer’s needs and concerns.
- There is no material case filed by any stakeholder against Sun Pharma, regarding dishonest trade practices or irresponsible advertising, during the last nine years.

Sun TV Network Ltd. (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Note	Note	Note	Link 1	Note	Note	Link 2	Note
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note: Most of the relevant policies are disseminated and uploaded for information of relevant stakeholders and employees either on Company's intranet site or on Company's website.

Link 1: Code of Conduct: <http://www.suntv.in/codeofconduct.html>

Link 2: Policies: <http://www.suntv.in/whistleblower.html>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has 2 direct subsidiaries, however the BR initiatives of the parent company are not applicable to the subsidiary company. Further the Company has stated that none of the other entity / entities with whom Company does business participates in the BR initiatives of the company.

Governance Related to BRR

The Company has stated that the Managing Director along with the Senior Management of the Company regularly reviews and assesses the BR performance.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Code of Conduct for Corporate Governance adopted by the Board of Directors is applicable to the Board of Directors and Senior Management. The HR policy applicable to the Company prohibits accepting or giving bribery in any form. Though, at present there is no formal written policy on corruption and bribery covering external stakeholders, controls are in place installed at every level to prevent bribery and corruption.”*
- The Company received 18 investor complaints during FY 2017-18 and all the complaints were resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“The unique business model adopted by the Company adequately motivates the content providers to stay with the Company.”*
- The Company does not have mechanism to recycle products and waste as the Company has stated it is not applicable for the Company.

Principle 3: Businesses should promote the well-being of all employees

- The Company has zero tolerance for sexual harassment at workplace and has adopted an Anti-Sexual Harassment policy in line with the provisions of the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder. However, the Company has not disclosed whether it constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, the Company does not have a recognised employee association.
- Approx. 11.83% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed what percent of employees were given safety training and skill up gradation, however, the Company has stated that *“The Company periodically organizes training sessions on safety and it also sponsors its employees to skill up gradation programs conducted by various professional bodies.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that as a part of regular functioning encourages talents among various sections of the Society, it also gives opportunity to them in new and innovative programs.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the policy of the Company on human rights largely applies to the Company and extends to the major stakeholders to the extent applicable.

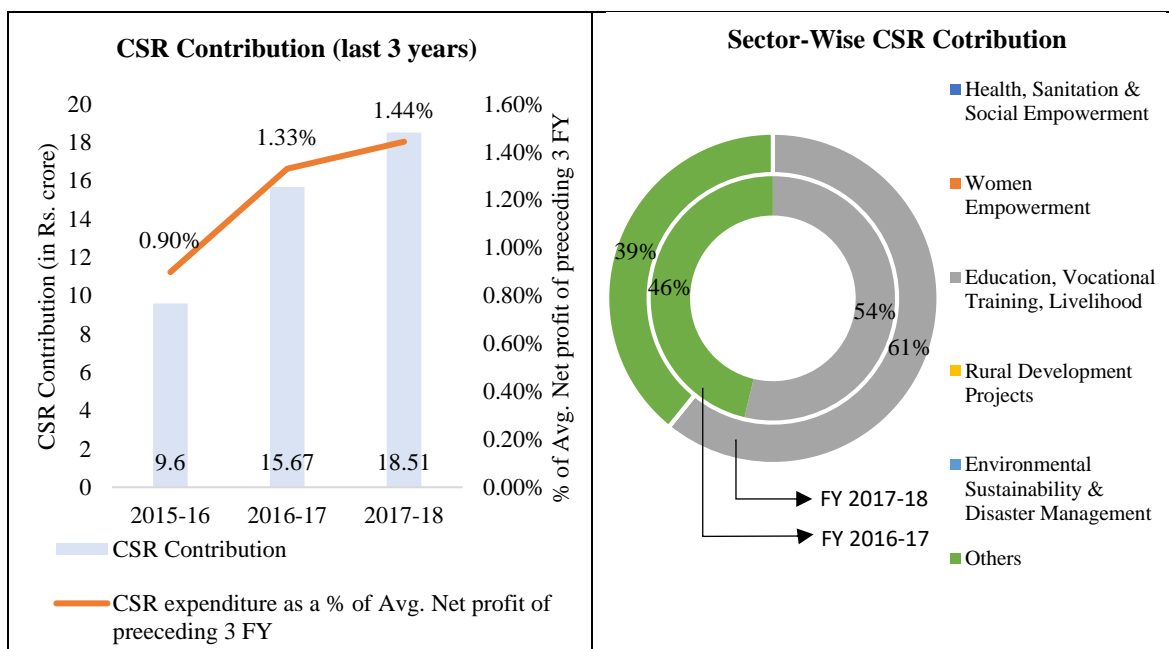
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“As a responsible business entity we feel the importance of protecting and safeguarding the environment. The Company implemented new, modern and scientific green initiatives at its newly built registered office.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not applicable. The Company is engaged in broadcasting activity.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is an Independent director. Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its own foundation.



Reasons provided by the Company for not spending the prescribed amount:

“The Company has expended major portion of 2% of its average net profits made during the immediately three preceding financial years as per section 135(5) of Companies Act, 2013 in pursuance of its corporate social responsibility policy since the company is yet to identify suitable projects. The Company in order to ensure that the funds paid out are not only put to good end use, but also ensure that we partner recipients that are of proven integrity has adopted a cautious approach in spending the CSR money as the amounts involved are substantial.”

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

- The Company has stated that no material consumer / customer complaints were outstanding as at the end of the financial year.
- No customer survey was carried out by the company, The Company has stated that *“The Company has subscribed to BARC (Broadcast Audience Research Council). BARC provides periodical television popularity and viewership reports which the Senior Management reviews and acts upon.”*

Tata Consultancy Services Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines For FY 17-18. The Sustainability Report has been independently assured by KPMG. ([weblink](#)).

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1	Link2	Link3	Link3	Link4	Link5	Link1	Link6	Link1
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link1: https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/about-us/TCS_Directors_Policy.pdf

Link2: <https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/corporate-sustainability/TCS-Green-Procurement-Policy-0614-1.pdf>

Link3: <https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/corporate-sustainability/Occupational-Health-and-Safety-Policy.pdf>

Link4: <https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/investor-relations/faq/TCS-Global-Policy-Whistle-Blower-Ver-5.pdf>

Link5: <https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/corporate-sustainability/Environmental-Policy.pdf>

Link6: <https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/corporate-sustainability/TCS-Global-Policy-Corporate-Social-Responsibility.pdf>

Sustainability Report for FY 2017-18: <https://www.tcs.com/content/dam/tcs/pdf/discover-tcs/investor-relations/corporate-sustainability/GRI-Sustainability-Report-2017-2018.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has subsidiary companies and 31 subsidiaries company participated in the BR initiatives of the parent company. However, the entity/entities with whom the company does business with did not participate in the BR initiatives of the parent company.

Governance Related to BRR

The Company has stated that 6 board meetings were held during the FY 2017-18 and the gap between two meetings did not exceed 120 days.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that the policy on ethics, bribery and corruption not only covers the company but also extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/ Others.
- The Company has received 138 ethics concerns from various stakeholders in the year FY 2018. 125 (91%) of these were satisfactorily resolved as on March 31, 2018. The remaining concerns are under review.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of the inputs that were sourced sustainably, however the Company has stated that, *“Our suppliers sign the Supplier Code of Conduct and the Tata Code of Conduct. Our policy on supply chain sustainability can be found here (<https://on.tcs.com/2HNZUdI>)”*.
- The Company states that all their new campuses are built for 50% higher water efficiency, 100% treatment and recycling of sewage, and rainwater harvesting, paper is sent for recycling. Further the Company has mentioned that, *“waste paper is sent to NGOs, which supply stationery items such as notepads and files made from recycled paper back to TCS. TCS continues to achieve 100% recycling of its paper waste.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment is not disclosed.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. and approximately 0.02% of permanent employees are members of recognized employee associations
- Approx. 35.31 % of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	62	4	65	4	34	1
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- % of the permanent employees were given safety and skill upgradation training in the last year is as follows:

Category	Training Provided (%)
Permanent Employees	93 %
Permanent Women Employees	92 %
Casual/Temporary/Contractual Employees	74 %
Employees with Disabilities	91%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Yes, the Company has several programmes designed to benefit marginalised stakeholders and has been explained in detail in Corporate Sustainability section in the Annual report for FY 2017-18.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that the policy is applicable to the company, its subsidiaries and vendors.

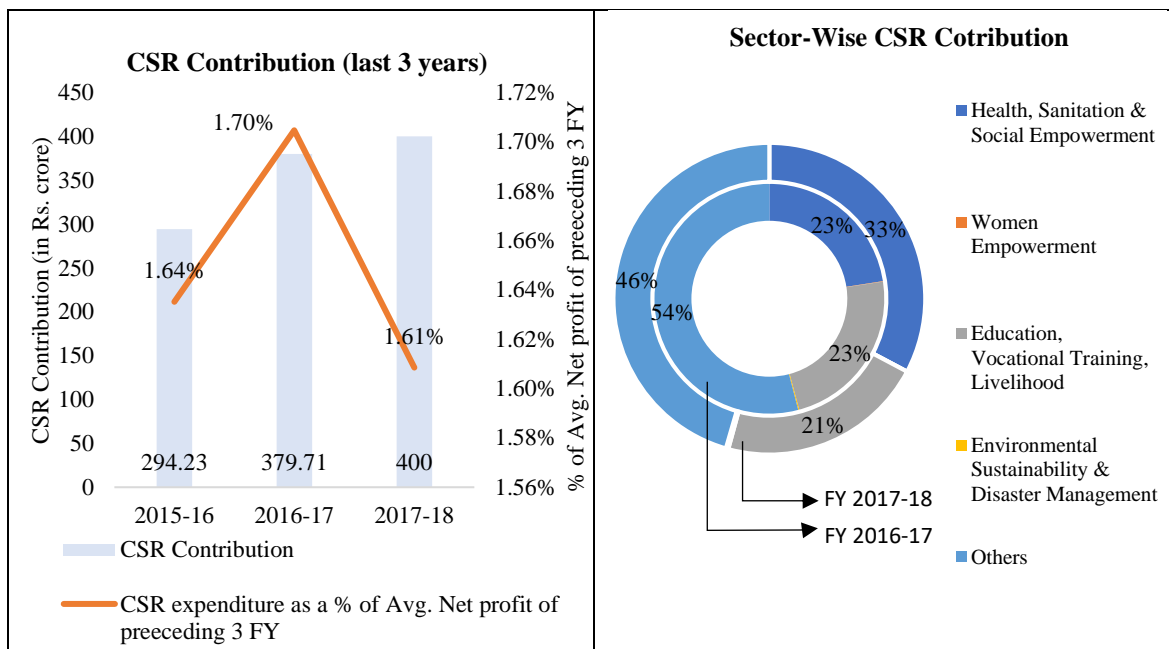
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that the policy is applicable to the company, its subsidiaries and vendors.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which 1 is an Independent director. The Chairman of the committee is Non-Executive Director. The Company mainly undertakes CSR Activities through its in-house team, own foundation, external NGO, government structures, and any other organization. The Company conducts impact assessment of its CSR initiatives.



Reason provided by the Company for not spending the prescribed amount is as follows:

- The Company has stated that “Some of the large programmes in the areas of healthcare, education and promoting employability are multiyear projects.”

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

- Although the company has not disclosed number of complaints received during the year however, the Company has stated that 5.66% of the complaints received are pending as on March 31, 2018.
- A Consumer Survey is carried out by the Company.

Tata Motors Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines ([weblink](#)). The Sustainability Report has been independently assured by TUV India Private Limited.

The Company has prepared the Annual Report for FY 2017-18 as per IIRC Integrated Reporting format. The Company has stated that “*Tata Motors Limited has adopted the Integrated Reporting framework prescribed by the International Reporting Council*”

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Note 1								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link1	Link2 Link3 Link8	Link4 Link8	Link5 Link6 Link8	Link1 Link7 Link8	Link2 Link8 Link9	Link7	Link5 Link8	Link3 Link7
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been communicated to all internal stakeholders. TCoC and other policies are communicated to suppliers, vendors, dealers and channel partners based on their relevance.								
8	Does the Company have an in-house structure to implement the policy / policies?	The Company has established in-house structures to implement these policies.								
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	The whistle blower mechanism provides employees to report any concerns or grievances pertaining to any potential or actual violation of TCoC, which covers all aspects of BRR. An Investor grievance mechanism is in place to respond to investor grievances. The Customer Complaints Mechanism records the grievances of customers on product and service quality and other issues of interest to them. The supplier, vendor, dealer and channel partner forums and ongoing communication captures their concerns and grievances. The continual community engagement, needs assessments, impact assessments serve as means for communities to represent their concerns and grievances.								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The implementation of TCoC and other policies are reviewed through internal audit function/ethics counsellor. External assessment of Tata Business Excellence Model (TBEM) covers the review of implementation of all Company policies. The Quality,								

	Safety & Health and Environmental policies are subject to internal and external audits as part of certification process.
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Note1: All the policies are signed by the Managing Director or an Executive Director. All the policies in Tata Motors are carved from its Guiding Principles and Core Values.

Link 1: Whistle Blower Policy <http://investors.tatamotors.com/pdf/whistle-blower-policy.pdf>

Link 2: Environment Policy: <http://investors.tatamotors.com/pdf/Enviro-Procure-Policy.pdf>

Link 3: Quality Policy: <http://www.tatamotors.com/about-us/corporate-governance/policies/>

Link 4: Safety Policy: <http://www.tatamotors.com/about-us/corporate-governance/policies/>

Link 5: CSR Policy <http://investors.tatamotors.com/pdf/csr-policy.pdf>

Link 6: Tata Affirmative Action policy <https://www.tatabex.com/assessment/taap-assessment>

Link 7: Tata Code of Conduct <http://corp-content.tatamotors.com.s3-ap-southeast-1.amazonaws.com/wp-content/uploads/2015/10/tata-code-of-conduct.pdf>

Link 8: Sustainability Policy <http://www.tatasustainability.com/tataSustainabilityPolicy.aspx>

Link9: climate change policy <http://investors.tatamotors.com/pdf/Climate-Policy-Eng.pdf>

Sustainability Report for FY 2017-18: <https://www.tatamotors.com/wp-content/uploads/2018/09/05090438/sustainability-report-2017-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that, it has 96 direct and indirect subsidiaries in India and abroad as year ended March 31, 2018. The Company positively influences and encourages its subsidiaries to adopt Business Responsibility (BR) initiatives. The Company has further disclosed that, “Currently less than 30% of value chain entities participate in the Company’s BR initiatives and there is a constant effort by the Company to extend these initiatives to larger value chain base.”

Governance Related to BRR

The Company has stated that, “Executive Committee (ExCom) reviews and assesses the various aspects of BR performance of the Company. The frequency of ExCom meetings for BR Review is 3-6 months.”

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, “The Company has adopted the TCoC to remain consistently vigilant and ensure ethical conduct of its operations. All internal and external stakeholders of the Tata Group are expected to work within boundaries of the TCoC.”
- The Company received 57 complaints, out of which 51 were resolved and remaining are pending at the end of the financial year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that, “The Company continually works with its vendors and suppliers to reduce the environmental impacts of sourcing. The Company has an Environment Procurement Policy and Sustainability Policy to engage with its value chain partners on environmental sustainability.”
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that, “The Company ongoing endeavor to have a mechanism to recycle its products and limit the waste arising out of production of vehicles. The Company has initiated well

defined program 'Prolife'. The objective is to reduce the waste and to minimize the need of raw materials to produce a brand new item. In Fiscal 2018, total of 26,993 components were reconditioned. The re-conditioned long blocks are also being exported to international markets. Hazardous waste is disposed as per regulatory requirements through the Common Hazardous Waste Treatment, Storage & Disposal Facilities (CHWTSDF), authorized re-cyclers and co-processing in cement plants."

Principle 3: Businesses should promote the well-being of all employees

- The Company has zero tolerance for sexual harassment at workplace and has adopted a Policy on Prevention, Prohibition and Redressal of sexual harassment at workplace in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder for prevention and redressal of complaints of sexual harassment at workplace. However, the Company has not disclosed whether Internal Complaints Committee has been enacted to address concerns relating to this matter.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that, *"Around 94% of the operative employees at Jamshedpur, Pune, Lucknow, Pantnagar & Sanand plants are members of these employee unions. These employees represent around 52% of the total permanent employees at these five plants. The Company do not have an Employees Union at our Dharwad Plant presently."*
- Approx. 1.30% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	13	1	4	Nil	7	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company stated that, *"All employees of the Company are provided with safety training as part of the induction programme."*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders. The Company's AA policy is specially designed to address the socially disadvantaged sections of the society, Scheduled Castes and Tribes.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** *The Company's CSR programmes and projects are aimed at serving the needy, deserving, socio-economically backward and disadvantaged communities aimed at improving the quality of their lives. Under TAAP, the Company continues to serve the SC and ST communities in inter alia Education, Employability and Entrepreneurship.*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“The Company respects human rights and has established a Policy on Human Rights. The policy details the Company’s approach towards human rights and sets the Company’s expectations of its Channel Partners and Contractors to adhere to principles of human rights.”*

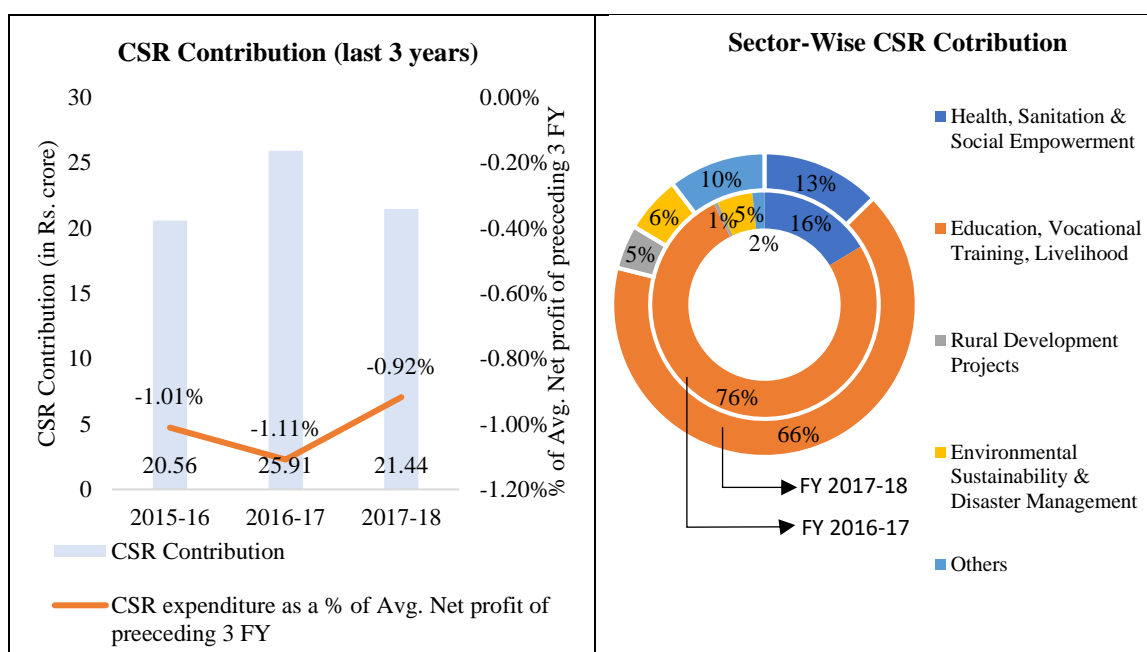
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, *“The Company also has Environmental Procurement Policy which is applicable to all its vendors, contractors and service providers.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, The Company has stated that, *“The Company is in compliance within the prescribed permissible limits as per CPCB/SPCB for air emissions, effluent quality and discharge, solid and hazardous waste generation and disposal.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its own company-promoted societies/NGOS; partnering with govt. and collaborating with reputed, external non-profit organizations under different models. The Company conducts impact assessment of its CSR initiatives. The Company has adopted ‘Tata CS Protocol’ to assess the impact of the various community interventions.



Note: The Company had Loss for the past three financial. However, the Company had voluntarily spent on the CSR Activities.

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

- The Company has not disclosed how many complaints were received from customers however it has disclosed that 0.21% complaints were pending as at 31st March 2018
- The Company has stated that, “*Regular customer satisfaction surveys are conducted to assess customer satisfaction levels and benchmark the Company’s performance with industry peers.*”

Tata Power Company Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) for FY 2016-2018 as per GRI guidelines. The Company has followed integrated reporting guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Tata Power policies are based on the NVG principles and conform to the international standards like ISO 9000, 14000, OHSAS 18000, UNGC principles, ILO principles and Sustainable Development Goals (SDGs).								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	The policies have been developed as per the need and are duly signed by the CEO & Managing Director.								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	The policies at the Company strengthen internal governance structures on compliance and beyond compliance efforts. All the policies are mapped to the respective business functions and their implementation is based on the commitment framework. The Company has set various processes to monitor the effectiveness of these policies.								
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Yes, policies are reviewed periodically for their implementation based on the commitment framework and related risk controls are set in place. Policies related to workforce benefits and wellbeing are co-created through the Srijan initiative in which employees' inputs are taken and incorporated in the policy building process. These inputs along with internal and external benchmarking, form the pillars of policy formation and ensure that employee feedback, industry norms and legal norms were not only met but exceeded.								

Link - <https://www.tatapower.com/corporate/policies.aspx>

Link for Sustainability Report: https://www.tatapower.com/pdf/sustainability/sustainability_report-2018.pdf

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 53 subsidiaries as on 31st March 2018. The subsidiaries have their own BR plans which are influenced by the Company. The Company encourages its subsidiary companies to participate in group wide sustainability initiatives. All subsidiaries are aligned to the CSR Policy and CSR strategy and implement activities under the seven thrust areas. The Company has further disclosed that, *“It collaborates with all relevant stakeholders for sustainability initiatives. The suppliers/vendors are sensitized on Sustainability with the help of Responsible Supply Chain Management (RSCM) policy which covers Health & Safety, Environment, Human Rights and Ethics & Compliance. The suppliers/vendors are required to ensure conformance to the RSCM parameters in addition to the Tata Code of Conduct (TCoC).”*

Governance Related to BRR

The Company has stated that, *“Tata Power’s Sustainability performance has been a Board level agenda and the same is monitored by the Board CSR Committee and Sustainability Advisory Council (SAC). The frequency of CSR Committee and SAC meetings is quarterly, and the management enacts on the inputs provided by them.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, the Company abides by the Tata Code of Conduct (TCoC), which was first formally articulated in 1998, refreshed in 2015 and unveiled by the Group Chairman in July 2015 for adoption by the Group companies. The TCoC is a comprehensive document with an ethical road map for Tata employees, companies, including third parties dealing with the Company, thus covering 100% of its operations through trainings and modules. TCoC consists of 10 sections and 59 sub clauses, that covers Financial Reporting, National Interests, Political Non-Alignment, Health, Safety and Environment, Corporate Citizenship, Ethical Conduct, Anti-Corruption etc.
- The Company received 83 complaints under various categories like, out of which 98% of Employees, 100% of Vendor, 96% of Investor and 100% of Society complaints were resolved and the company has not disclosed about the balance complaints.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that, *“The Company conforms to responsible sourcing with respect to emissions, safety, human rights and ethics, apart from the economic considerations as part of the sourcing procedure. The procurement process during bid evaluation gives due weightage to various parameters for sustainable sourcing.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that, *“The ash generated from thermal power stations is the major waste. The Company’s endeavour is to utilize 100% Fly Ash at all locations and initiatives are in place to utilize the bottom ash as well. The waste/used oil which comes under the Hazardous waste category and e-waste is disposed off through authorised recyclers. Other wastes such as such as scrap steel and wood are reused internally.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that 32% are union employees (914) out of 2871 of the total permanent employees of the Company are members of employee union.
- Approx. 8.50% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	4	Nil	1	Nil	2	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed the percentage of the permanent employees who were given safety and skill upgradation training in the last year.

Permanent Employees (includes women employees and employees with disabilities)	
Safety Induction Training	904 Manhours
Safety Capability Training	1,07,182 Manhours
Technical Training	Nil
Casual/Temporary/Contractual Employees	
Safety Induction Training	1,05,624 Manhours
Safety Capability Training	1,09,160 Manhours

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- Yes, “the Company conducted a comprehensive Stakeholder engagement exercise in 2015 which mapped internal and external stakeholders in a structured manner. The Company is carrying out engagements with investors, employees, customers, suppliers, community etc. with a periodic frequency.”
- Yes, “The Company has identified SC/ST Communities under its Affirmative Action Policy across all its neighbourhood and beyond. Besides this, the Company is also working with women and marginalized children with the purpose of mainstreaming them.”
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company worked with the marginalized and disadvantaged communities which include, tribal villages, vulnerable children who are in great need of care,

protection and improvement in quality of life. The initiatives focus on 5Es - Education, Employability, Employment, Entrepreneurship & Essential amenities. The initiatives are in addition to the initiatives under the 7 thrust areas of CR program.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“The Company respects Human Rights and has a dedicated Policy on Human Rights. This policy is aligned with the UN Human Rights Declaration, International Labour Organisation (ILO) fundamental conventions and other fundamental labour principles. Through the policy, the Company ensures conformance to fundamental labour principles including the prohibition of child labour, forced labour, freedom of association and protection from discrimination in all its operations by imparting relevant training and aligning the conduct of its employees.”*

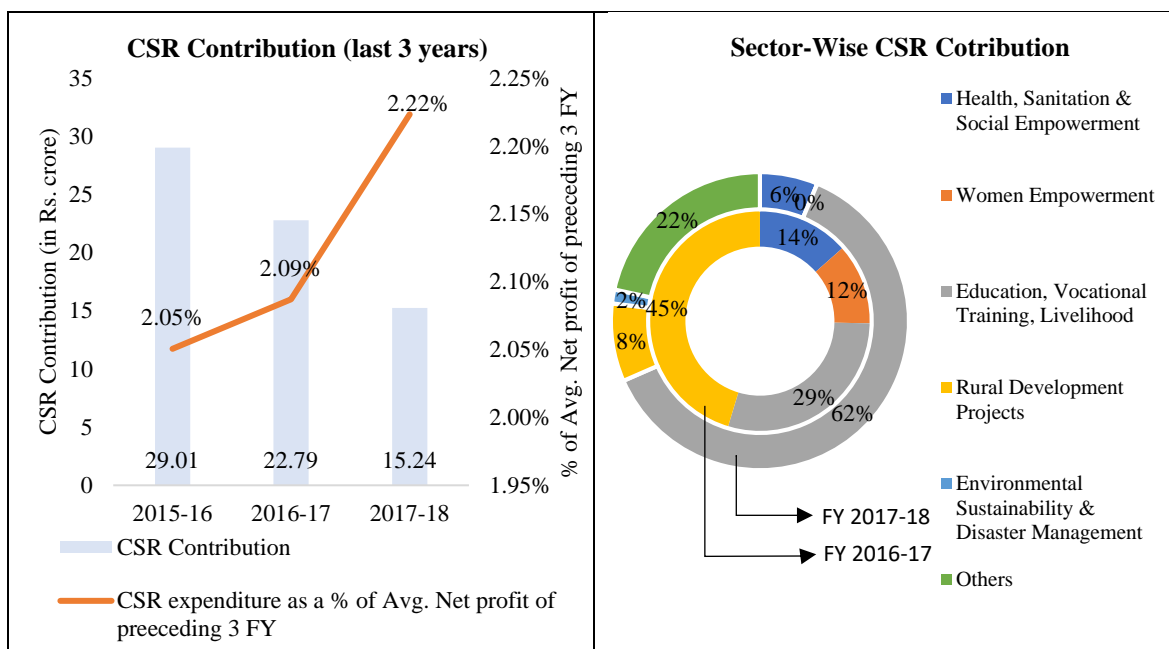
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, *“The Company has a dedicated Environment policy along with policies on energy conservation, sustainability, e-waste management etc. The Environment policy encourages the Company to conserve resources, reduce environmental impact and seeks to enhance the awareness among employees and make business decision aiding sustainability. The division/joint ventures have developed their own policies taking essence from the Company policy. However, the policy on Responsible Supply Chain Management has environment protection as one of its criteria applicable to all the vendors, contractors and service providers.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Company is in compliance with the prescribed permissible limits as per Central Pollution Control Board (CPCB) /State Pollution Control Board (SPCB) for air emissions, effluent quality and discharge, solid and hazardous waste generation and disposal. Compliance reports/statements are submitted to SPCB as well as Regional office, Ministry of Environment, Forest & Climate Change (MoEF & CC) regularly, as applicable.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 2 are Independent directors. Chairman of the committee is an independent director. The Company has a CR division dedicated for CSR activities at the corporate level and at each station level dedicated CR teams are in place to plan, implement, and monitor and review various community development initiatives/programs. Further, Tata Power Community Development Trust (TPCDT), a registered trust implements projects related to energy and water. The Company partners with NGOs and Government organizations to leverage synergies in delivering community development initiatives. The Company conducts impact assessment of its CSR initiatives.



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

- As on 31st March 2018, 0.003% of the customer complaints/ consumer cases beyond turnaround time (TAT) are pending.
- The Company has stated that, “The surveys are conducted annually across all segments i.e. commercial, industrial and residential consumers and are face to face interaction with 5-point rating scale. The findings of the report guide us to understand the key improvement areas which are shared with the concerned departments and accordingly, the necessary action is taken based on the key findings.”

Tata Steel Ltd (2017-18)

The Company has disclosed the sustainability report as per the GRI and International Integrated Reporting Council (IIRC). ([weblink](#)) The Company has provided a mapping of the principles with GRI format ([weblink](#)). **The sustainability report of the Company has been independently assured by KPMG India.**

Integrated Report for FY 2017-18: <https://www.tatasteel.com/media/7064/ir-fy-2017-18.pdf>

Mapping of the principles with GRI format: <https://www.tatasteel.com/media/7118/ir-fy-18-mapping.pdf>

Principle wise BR Policy/ Policies

The Company has not provided response to question 2(a) of section D as per the SEBI format. However, the Company has provided mapping of BRR and questions under various principles. Further, the Company has stated that all the policies of the Company are available at ([Link](#)).

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that each subsidiary company located at India has its own CSR activities in its respective area of operations. The Company has further stated that *“Some of the entities in the value chain including suppliers and channel partners participate in its BR initiatives but the percentage of such entities is less than 30%.”*

Governance Related to BRR

The Company has stated that *“the performance related to various sustainability aspects is reviewed at the Corporate as well as the Board levels.”* Further, the Company has stated that *“at the Corporate level, various committees review the sustainability and governance initiatives.”*

In the Corporate Governance report the Company has disclosed that CSR committee met 4 times during the year and Safety, Health and Environment Committee met 3 times during the year.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Company has adopted the Tata Code of Conduct (‘TCoC’) which is driven by five core values – Unity, Integrity, Responsibility, Understanding and Excellence. The Company also has a Vigil Mechanism that provides a formal mechanism for all Directors, employees and vendors to approach the Ethics Counselor/Chairman of the Audit Committee and make protective disclosures about the unethical behaviour, actual or suspected fraud or violation of the TCoC.”*
- The Company further stated that *“TSL has also instituted a supplier code of conduct and takes a formal acceptance from them for abiding by the TCoC during the vendor registration process. The Ethics Counsellor interacts with business associates in various forums such as vendor meets, dialogues for business associates (suppliers / vendors, distributors, channel partners and customers), etc.”*
- The Company received 372 whistle-blower complaints of which 316 were resolved. Further, the Company received 229 investor complaints during FY 2018 and 10 complaints were pending of

complaints from FY 2016-17. Out of which 218 were resolved and the balance 21 complaints were pending as on 31st March 2018.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“We are committed to reducing the impact of our operations on the environment and reducing our carbon footprint. We have partnered with various organisations to work for the upliftment of our communities and will continue to put in efforts to bring about their sustainable development. Our strategic themes objectives and enablers are balanced across all stakeholders in the entire value chain, resulting in long-term sustainability for the organisation”*
- The Company has stated that *“Recycled 98% of process-generated waste in the ironmaking process. Over the last decade, several initiatives have been taken at TSJ, including infrastructure upgradation for increasing water recycling and reuse and augmentation of rainwater harvesting within and beyond the fence.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has not disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association.
- Approx. 6.11% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	24	8	26	7	18	4
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 7,289 (almost 21.39%) employees were given training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its key internal and external stakeholders through active stakeholder engagement mechanisms.
- The Company has identified disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The project intends to implement Right to Education by increasing the access of children to school, by improving the quality of primary education in Government schools

as well as ensuring better governance through School Management Committees (SMCs). The initiative reached out to around 2,00,000 children across 2,800 habitations in Odisha and Jharkhand by the end of FY 2017-18. 1,165 habitations have been made child labour free zones by the end of FY 2017-18. In Odisha, school functioning has improved, with up to 90% attendance in some schools, regular PTA meetings, quality mid-day meals and active libraries, school projects, Bal Panchayats and children's festivals.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“Safety, ethics and human rights are the main decisive factors for us to enter into business with suppliers. We ensure the implementation of Human Rights throughout the supply chain.”*

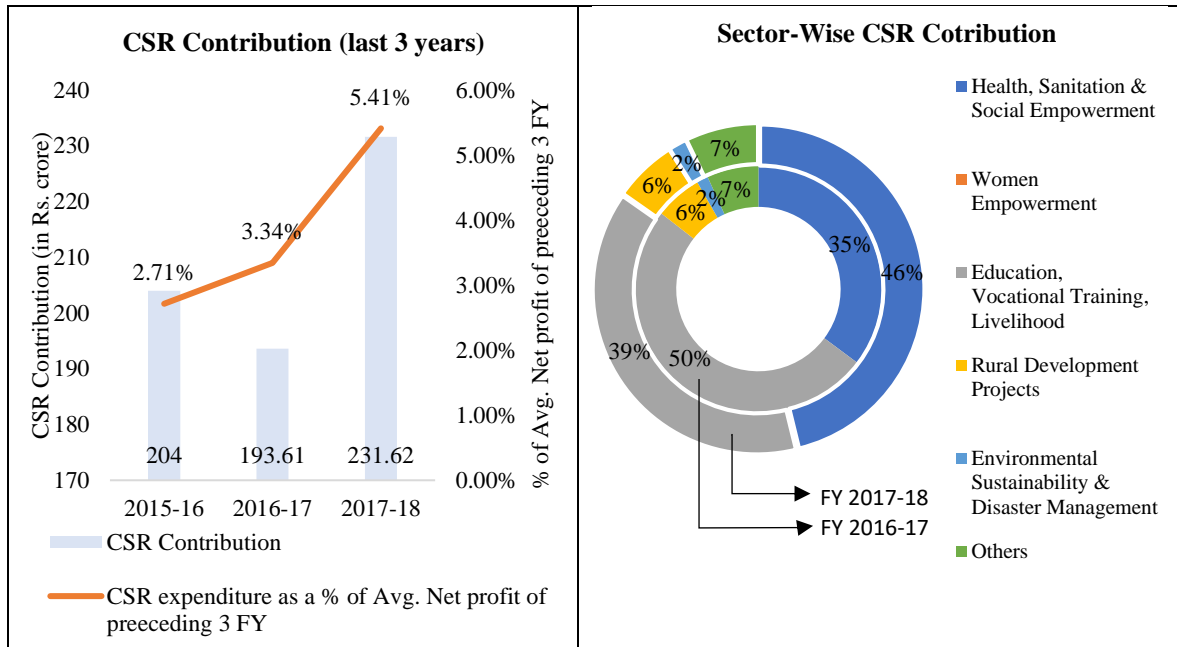
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has disclosed it on website [link](#) that it has Environment Policy and has committed to preserve the environment. The Company is also state that *“With consumer consciousness and community expectations growing in the area of environmental performance, we have begun to focus more on product stewardship and environmental declarations for our products.*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that *“The Company pursues responsible advocacy on policy and regulatory issues by being the member of World Steel Association Environment Policy Committee, Central Pollution Control Board’s National Taskforce, Indian Steel Association and various other organisations. During the year, the Company engaged with Government of India to address environmental issues such as actions to surpass National Development Council’s commitments, international bilateral initiatives, showcasing achievements on climate response and pursuing growth under blue sky to realise aspirations under ‘Make in India’.”*

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through its in-house team, State Governments of Jharkhand and Odisha and with various national and international organisations such as American India Foundation, The Hans Foundation, Timken Foundation, NABARD, Welt Hunger Hilfe and Tata Trusts amongst others. The Company conducts impact assessment of its CSR initiatives.



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

- The Company has disclosed that 606 PPM complaints received. However, the Company has not disclosed the resolved and pending number of Complaints.
- The Company stated that customer satisfaction index during the FY 2017-18 is 81%.

Tech Mahindra Ltd(2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines for FY 2017-18. ([weblink](#)) **The Sustainability Report has been independently assured by DNV GL.**

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle							Note 1		
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Note 2								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Note 3 & Business Responsibility Policy Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Note 1: There is no distinct policy on public advocacy. However, the company is aligned to the Mahindra philosophy on policy advocacy.

Note 2: As per the approval matrix of the company, policies are approved by the concerned Unit Heads.

All Tech Mahindra policies are uploaded on the BMS site on the Tech Mahindra intranet for the information and implementation by the internal stakeholders. They are also available on the Tech Mahindra website.

Note 3: https://www.techmahindra.com/investors/corporate_governance.aspx

Note 3: <https://www.techmahindra.com/company/Sustainability.aspx>;

Note 3: <https://www.techmahindra.com/en-US/www/Company/Documents/Tech-Mahindra-BR-Policy.pdf>

CSR Policy of the Company: <http://techmahindrafoundation.org/csr-policy/>

Link for Business Responsibility Policy: <https://www.techmahindra.com/en-US/www/Company/Documents/Tech-Mahindra-BR-Policy.pdf>

Sustainability Report for FY 2017-18: <https://www.techmahindra.com/en-US/www/Company/Documents/Tech-Mahindra-Sustainability-Report-2017-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that the Company has 170 subsidiary companies. The Company has further stated “that Our policies on Code of Conduct and Corporate Governance are followed across all Tech Mahindra Limited entities including the 29 direct wholly owned subsidiaries of Tech Mahindra Ltd.”

Governance Related to BRR

The Company has stated that it meets every 3 to 6 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “The policy relating to ethics, bribery and corruption covers not only Tech Mahindra Limited, but extends beyond the company to our stakeholders too.”
- The Company has well-defined policies on Anti-corruption and bribery as well as Code of Conduct which extends to all stakeholders of the Company (internal and external) and cover all issues relating to ethics, bribery and corruption. Tech Mahindra also has a separate Supplier Code of Conduct policy for all our suppliers, vendors, and Companies who provide us with products and services.
- The Company received 359 CEBC Whistle blower complaints received during FY 2017-18. All whistle blows were redressed for investigation and suitable action taken wherever necessary.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Tech Mahindra prefers suppliers with sustainable practices and ability to deliver on key strategic growth initiatives. 90% of inputs are sourced sustainably.
- The Company has stated that recycling of products and waste > 10%. The company has further stated that “the Company has a mechanism to recycle wastes, but we don’t deal with product recycling as we do not manufacture products.”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or not.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, it does not have any recognised employee association.
- Approx. 30.17% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	28*	Nil	28	Nil	26	1

Child labour /forced labour/ involuntary labour	Nil	Nil	ND	ND	Nil	Nil
Discriminatory employment	1	Nil	ND	ND	ND	ND

*The Company has stated in corporate governance section of Annual Report 2017-18 that during the year under there were no cases were reported related to sexual harassment while in BR report the Company has stated that 28 cases of sexual harassment were reported during the year.

- 90% of the permanent employees were given safety and skill upgradation training in the last year.

S no	Employee Categories	%
1	Permanent Employees	90
2	Casual/Temporary/Contractual Employees	59
3	Employees with Disabilities	93

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The overarching goal of Tech Mahindra Foundation (TMF) is ‘Empowerment through Education’. Under this broad theme, TMF works with the disadvantaged community in each area of work including education and employability. The Foundation’s SMART (Skills for Market Training) employability programme is our flagship programme that trains & educates young men & women to become India’s true strength. The Foundation supports 100 SMART centres across 11 cities of India, training more than 20,000 youth annually and successfully plugging the demand and supply gap in multiple manufacturing and service industries. TMF works with Government Primary Schools by supporting initiatives that lead to sustainable transformation. The Education programme works with schools, teachers and the community to impart quality education to children from disadvantaged communities, with a focus on improving learning outcomes.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Tech Mahindra has stated that “Policies on Human Rights, including the Code of Ethical Business Conduct, Prevention of Sexual Harassment and the Whistle-blower policies along with the group Business Responsibility Policy cover all aspects on Human Rights for the Company and also extend to all stakeholders of Company”.

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

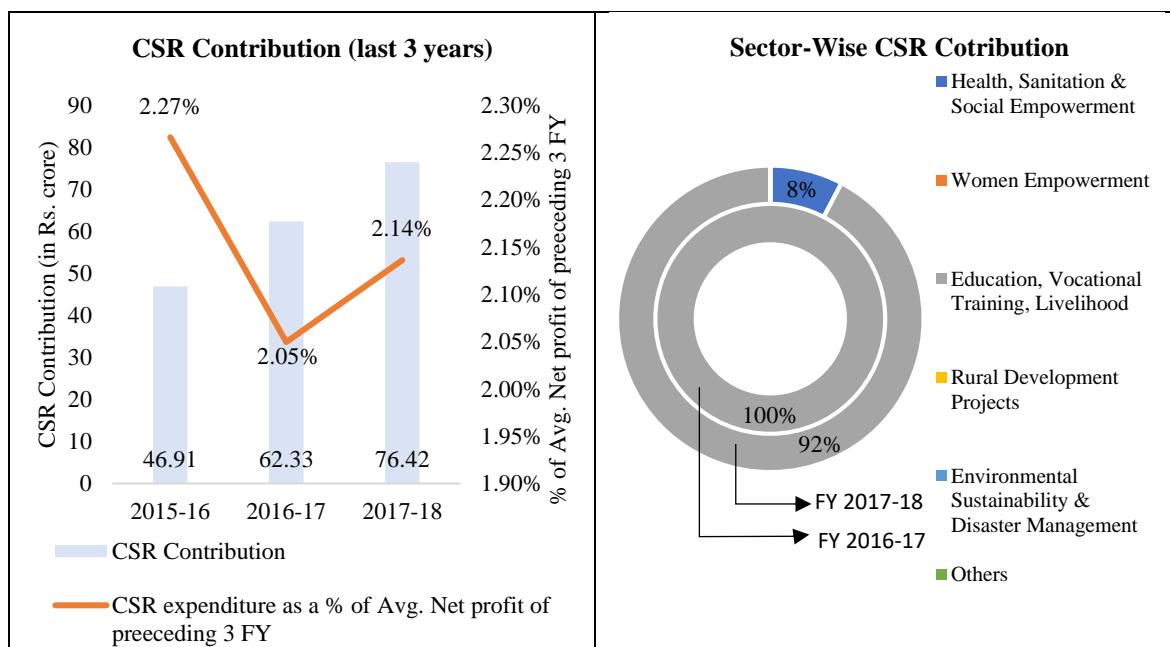
- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The company has various policies related to environmental protection
 - Supply Chain Management policy
 - Green procurement policy

- Environment policy
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members and one director is an independent director. Chairman of the committee is non-executive director. The Company mainly undertakes CSR Activities through the Tech Mahindra Foundation, NGOs. Independent Third Party Assessments are also conducted for major CSR initiatives of TML at regular intervals.



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

- For FY–2017-18, we have addressed all customer complaints and there are no major customer grievances pending.
- A customer survey known as NPS (Net Promoter Score) or CaPS (Customer as Promoter score) via a third party. The Company also run the P-Sat (Project Satisfaction Survey) for all our projects.

Titan Company Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. Further, the Company has disclosed that “we have introduced key content elements of Integrated Reporting aligned to the Integrated Reporting Council Framework (IIRC) and as per SEBI’s circular dated 6 February 2017. We will add more IR content elements over the years as we move towards a complete.”

Principle wise BR Policy/ Policies:

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle	1	2	3	4	5	6			7
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	8								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1 & 1		Link 2		Link 1 & 1		Link 3		Link 1 & 1
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	9								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	10								

¹ The Company has a policy on ethics and has adopted the Tata Code of Conduct (TCOC), and also separate governing policies on ethical conduct covering ethics, transparency and accountability. The policy covers all employees, and extends to business associates, suppliers and other stakeholders as applicable. The TCOC can be accessed at www.titan.co.in

² The Company has a policy on sustainability. The Company is committed to integrate environmental, social and ethical principles into its Business Vision of “creating elevating experience for the people we touch and significantly impact the world we work in”. The Company is committed to provide goods and services to customers that are safe and contribute to sustainability throughout their life cycle.

³ The company has well defined policies to promote the well-being of all its employees, that not only support employee welfare but also enable his / her enhanced engagement with the Company. All the locations of the Company are certified under OHSAS standards. Most divisions are also certified under QMS and EMS management system standards. Policies on compensation, sexual harassment, training and retraining of employees are well entrenched. The Company has formal grievance redressal mechanisms for its employees.

⁴ Towards serving the needs of the community, the Company has a CSR policy in line with the Companies Act, 2013. A policy on Affirmative Action is also defined and in place with various programs driven as part of its CSR activities. The key sustainability stakeholders are primary customers who are the Company’s business associates, end consumers, government and regulatory bodies, employees, supply chain partners, communities, investors and shareholders. The primary customers include franchisees, distributors and clearing and forwarding (C&F) agents. Through its well thought out business principles, the Company aims to

balance all its stakeholder requirements in an equitable manner. There are multiple modes of engagement with each of these stakeholders resulting in them embracing responsible citizenship behaviour.

⁵ The Company has policies against employing child, forced, and compulsory labour and ensures that all employees, including contract and franchisees' employees are above the age of 18 years. The Company has also adopted the Whistleblower Policy and Policy on Prevention of Sexual Harassment. Integrity and Trust being the pillars of the TATA group, the Company has carried forward the torch and is striving to uphold the values to the highest order in its 30th year of operation. With changing times, new approaches to business and communication have been adopted. As an organization that spans the value chain from manufacturing to retail, Titan Company is largely dependent on a complex supply chain, and therefore recognizes the impact on the larger ecosystem covering every supplier, vendor, business partner and contractor, who are expected to adhere to the TCOC. The Company incorporates reference to the TCOC in its contracts with business partners.

⁶ Besides the Sustainability Policy, the Company also has EMS and OHSAS policies

⁷ Besides adhering to the broad guidelines in the Tata Code of Conduct and the Company's environmental policies also address these aspects

⁸ Indian Accounting Standards for financial reporting, internal procedures and disclosures, ISO 9000 for Quality Management systems, ISO 14001 for Environment Management systems, OSHAS 18001 for safety and occupational health. Our watches division is certified under ISO 50001 Energy Management system. Our new corporate office is in the process of getting LEED certified.

⁹ Analysts and investors provide regular feedback through media, interviews and ratings. There is a separate stakeholders relationship committee for shareholders. Employees have various forums to express concerns and grievances. The suppliers and vendors have multiple channels such as vendor feedback surveys, annual vendor meets, etc., where they can provide feedback directly to the Company's procurement function, senior management, Customers have multiple channels of giving feedback

¹⁰ Management systems and policies are evaluated through regular process of formal internal and external audits.

Link 1: Code of conduct- https://www.titancompany.in/sites/default/files/TCoC%20English_10Aug2018.pdf, https://www.titancompany.in/sites/default/files/TCOC_Booklet_Cover_P001_P036%20Final.pdf

Link 2: CSR Policy available at https://www.titancompany.in/sites/default/files/CSR%20Policy%20-%20Titan%20Company%20Limited_n.pdf

Link 3: Sustainability Policy - <https://www.titancompany.in/content/sustainability-policy>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has Subsidiaries but has stated that subsidiaries do not participate in the BR initiatives of the parent Company. The Company has further disclosed that less than 30% of the other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company.

Governance Related to BRR

The CSR Committee of the Board met thrice in financial year 2017-18 to review the Sustainability and CSR performance of the Company and the Board on an annual basis.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “policy extends to group/JV/Suppliers/Contractors/ NGO's etc”
- The Company has stated that “It has a policy on ethics and has adopted the Tata Code of Conduct (TCOC), and also separate governing policies on ethical conduct covering ethics, transparency and accountability. The policy covers all employees, and extends to business associates, suppliers and other stakeholders as applicable.”
- During the financial year 2017-18, the Company had received 14 complaints and 93% of the complaints have been resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“the business responsibility extends to the supply chain partners – the people from where the products are sourced from and the people to whom key processes are outsourced. Vendors are a part of the Titan family and their relationship with the Company is a reflection of the same. To support sustainable sourcing, there is a tie up with vendors to leverage their skills for specialized operations.”*
- The Company has disclosed that more than 10% of recycling of products and waste done by it, the Company has also stated that *“Titan company has adopted focused strategy towards waste management through waste minimization and conservation of resources. Gold is recycled at the jewellery plant and silver is recovered from old batteries, brass is sent to the supplier for recycling and 758 tonnes of brass were processed about 82% were recycled into raw materials.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has not disclosed that whether it has constituted an Internal Complaints Committee to address concerns of sexual harassment or not.
- Company has a recognised employee association. Further, the Company has disclosed that 100% of employees at plant location are members of recognized employee associations.
- Approx. 26.11% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	11	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	7	Nil	ND	ND	ND	ND
Discriminatory employment	2	Nil	ND	ND	ND	ND

- Regarding safety and skill upgradation training in the Company has stated that *“All employees who join the Company irrespective of any category given above are covered under safety and OH training as part of its OHSAS implementation. During the year the Company has covered over 16204 employees (all categories) under safety training and invested in about 42239 man-hours of training.”* And *“A formal training program and curriculum for all categories is in place for both competency and skill enhancement. These cover leadership development, behavioural and managerial and functional development programs.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its stakeholders as a part of its stakeholder engagement strategy development process.

- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders & stated that *“Our CSR and Affirmative action policies and programs cover these in detail. The company has also been a strong advocate of diversity and inclusion through its practices. The Company has also won the President’s award for the employment of Persons with Disability for four times.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** *The Company has been a pioneer in ensuring an inclusive and diverse workforce across its operations. The Company’s CSR focus is driven by broad themes such as upliftment of the underprivileged girl child, skill development (for the underprivileged) and support for Indian Arts, Crafts and Indian Heritage.*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?**

The Company has stated that *“As an organization that spans the value chain from manufacturing to retail, Titan Company is largely dependent on a complex supply chain, and therefore recognizes the impact on the larger ecosystem covering every supplier, vendor, business partner and contractor, who are expected to adhere to the TCOC. The Company incorporates reference to the TCOC in its contracts with business partners.”* Further the Company has stated that the TATA CODE OF CONDUCT that is communicated to all stakeholders.

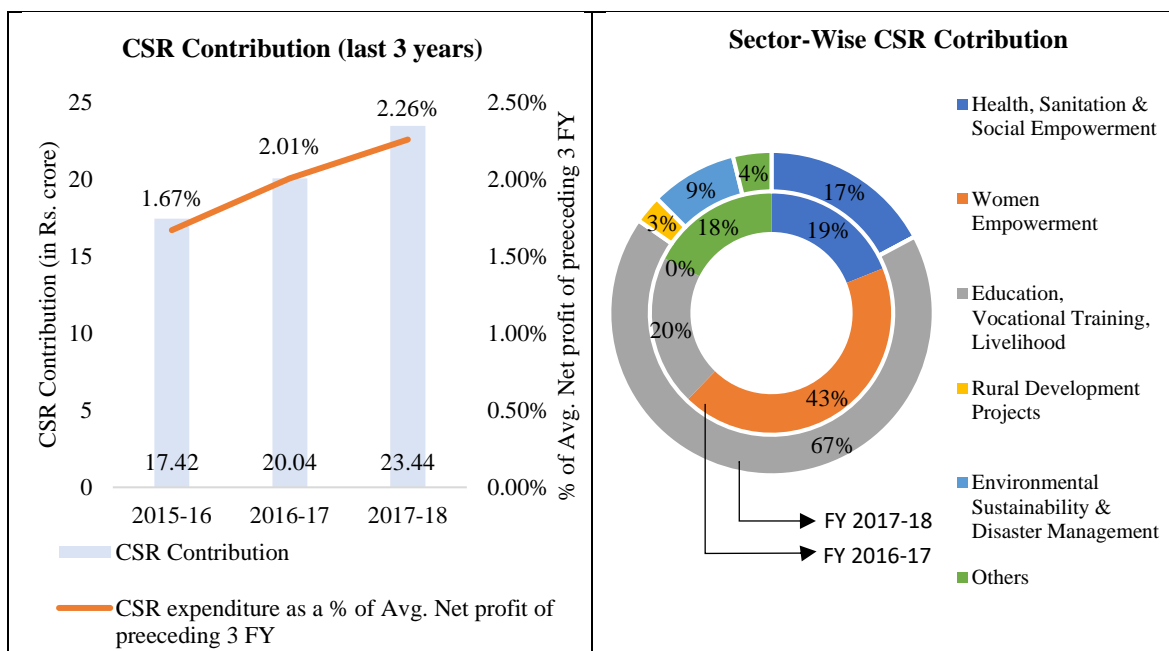
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company’s policy related to principle 6 cover not only company but also it extends to the Group/JV/Suppliers /Contractors/NGO’s / others.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the Emissions/Waste generated by the company is within the permissible limits given by CPCB/SPCB for the Financial Year being reported.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 1 is Independent Director and the Chairman is Independent. The Company mainly undertakes CSR Activities through its in-house team, Company’s trust External NGO & Government Structure. The Company has stated that *“All programs of CSR are monitored through regular assessments. On a case to case basis impact studies are being carried out depending on the nature of the project.”*



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

- 53 customer complaints / consumer cases are pending as on the end of financial year 2017-18.
- A Customer Satisfaction Survey is carried out by the Company, which used for internal improvement purposes.

Substantial Changes from FY 2016-17

The Company has not followed the SEBI format for BR Report in FY 16-17. However, in FY 2017-18, the Company has followed the SEBI Format in FY 2017-18.

Torrent Pharmaceuticals Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	Note 1							Note 1	
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online #	Link1				Link2			Link3	
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

#: Policies are available on the website of the Company www.torrentpharma.com and the policies which are internal to the Company are available on the intranet of the Company. Those policies which are available on website are marked as green.

Link1: http://www.torrentpharma.com/pdf/investors/Code_of_Business_Conduct.pdf

Link2: <http://www.torrentpharma.com/pdf/investors/whistleblower.pdf>

Link3: <http://www.torrentpharma.com/pdf/investors/CSRPolicy.pdf>

Note 1 -The policies have been either approved by the Board or senior functional head authorised by the Board in this respect.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that, it has 17 Subsidiaries. All policies / practices to the extent relevant are also applicable to the subsidiaries in conformity with the applicable laws. The Company has further stated that, the Company's contractors and suppliers do participate in the BR initiatives of the Company in terms of compliance with "Suppliers Code of Conduct" and "Conviction for Safety Policy".

Governance Related to BRR

The Company has stated that, *“The Board of Directors / its Committees / Chairman or any authorised officials of the Company, as the case may be, assesses the BR Performance on quarterly, half yearly or annual basis depending upon the type of BR activities.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“The Company firmly believes and adheres to transparent, fair and ethical governance practices to foster professionalism, honesty, integrity and ethical behaviour. The Board of Directors has formulated the Code of Business Conduct, which is applicable to all the employees and Board Members of the Company, and which lays down the important corporate and organisational standards that shape the Company’s business practices and represents cherished values of the Company. The core values embedded in our functioning are Constant Learning, Customer and Family First, Excellence, Integrity, Responsibility and Teamwork.”*
- The Company received 32 complaints from various stakeholders during FY 2017-18, which were promptly resolved except 4 which are under investigation.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that, *“Sustainability in the operations is critically important if the Company is to deliver continued innovation. In the best interests of the patient, the Company endeavour to work with responsible suppliers who adhere to the same quality, social and environmental standards as Torrent. The Company has standard operating procedures for the evaluation and selection of its vendors for sourcing of material. This includes the evaluation of the EHS resources and their compliance by suppliers and vendors for key raw material, intermediates and APIs. The Company has system of identifying or developing alternate vendors where single vendor is considered critical for business continuity.”*
- The Company has stated that, *“The Company promotes recycling and use of alternate materials. The waste generated in the Company’s operation is either recycled or disposed off in environment friendly manner. Important raw materials and all the spent solvents are recovered and recycled to the extent possible. The manufacturing facilities have adequate effluent treatment facilities, which ensures zero discharge of waste water. The Company has installed ETP sludge dryer for reduction in hazardous waste disposal quantity to landfill site.”*
- *“More than 10% waste is recycled through recovery system (solvent recovery system / waste sale for reprocessing and reuse by external approved agency). The waste is also supplied to the cement plants for the purpose of generating alternate energy.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaint redressal Committee to address concerns of sexual harassment.

- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. and approximately 4.20% of permanent employees at manufacturing locations are the members of the employees association.
- Approx. 8.27% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	1	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 91.96% of the permanent employees, 81.91% of Permanent Women Employees, 99.38% of Casual / Temporary / Contractual Employees and 93.18% of Employees with Disabilities were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company works actively to enhance the employment opportunities in the nearby locations whereby it operates, leading to income generation and economic empowerment in the marginalized sections of the communities. Various initiatives have been taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders at locations in and around its operations in the areas of:
 - a. Community Health Care, Sanitation and Hygiene
 - b. Education and Knowledge Enhancement and
 - c. Social Care and Concern

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The policy covers only company's employees and contractual staff. The Company has stated that, "*The Company is committed to promotion of human rights, in spirit and deed. The Company strives to provide a non-discriminatory and harassment-free work place for all its employees and contractual staff.*"

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

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The said policy covers only company. Further, the Company has stated that, "*The Company has health, safety and environment policy covering all its India operations currently. The Company has a conviction for safety policy providing*

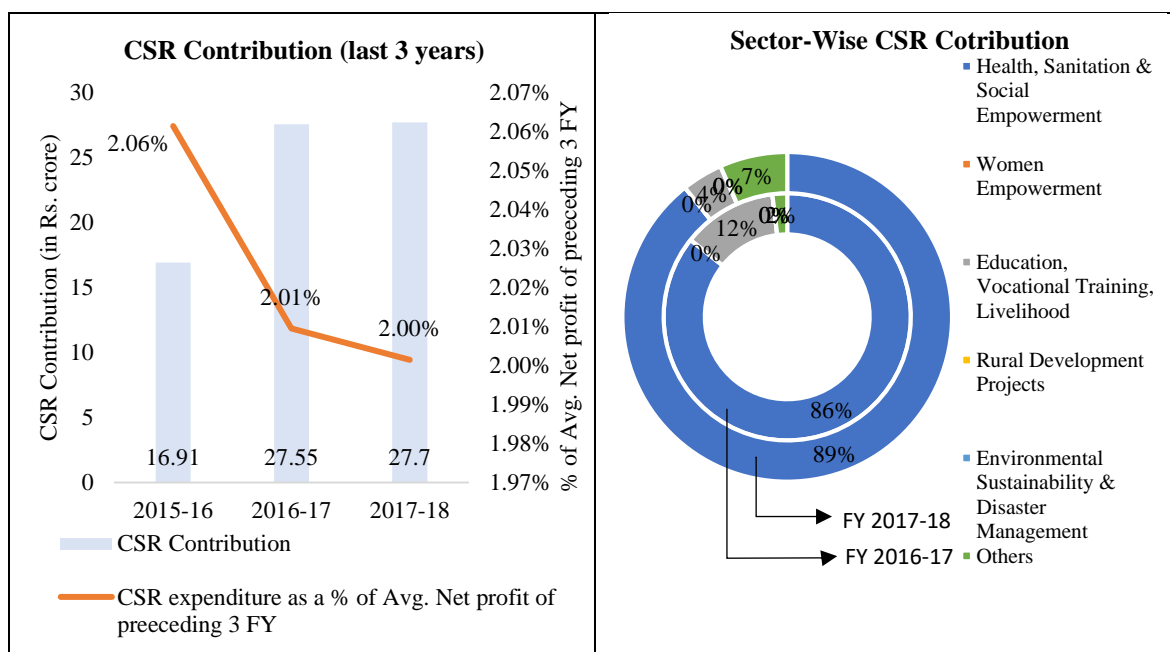
for compensation in case of accidents suffered by its employees and also other people working in the Company premises for Company’s work.”

- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, the emission/waste generated by the company are within the permissible limits.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through directly by the Company itself including through two of its Section 8 companies namely Tornacent Care Institute and UNM Foundation which have been promoted by the Company. And it is also supplementing the efforts of the local institutions / NGOs / local Government / implementing agencies. The Company conducts impact assessment of its CSR initiatives.



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

- Although the company has not disclosed number of complaints received during the year however, the Company has stated that No customer complaints / consumer cases are pending as on the end of financial year.
- The Company has stated that, *“The marketing team of the Company regularly interacts with the Doctors and other Healthcare professionals and takes their feedback on the Company’s products.”*

Ultra Tech Cement Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines. The Sustainability report for FY 17-18 was found on the website ([weblink](#)) as per GRI guidelines. **The Sustainability Report has been independently assured by KPMG.**

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	view restricted to employees								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The policies have been communicated to key internal stakeholders of the Company. The communication is an on-going process to cover all stakeholders.								
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The Company publishes a Sustainability Report which is GRI G4 compliant and covers policies mentioned herein. The Report is assured by an independent certifying agency.								

Link for Sustainability Report: <https://www.ultratechcement.com/common/images/downloads/UltraTech%20SDR%202017-18%20-%20Final%20web%20version%20-%20Feb19.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that it has 8 (eight) subsidiaries - 4 (four) domestic and 4 (four) foreign. The Business Responsibility initiatives of the parent Company apply to its subsidiaries.

The Company has further disclosed that, other entities viz. suppliers, distributors etc with whom the Company does business, do not participate in the Business Responsibility initiatives of the Company.

Governance Related to BRR

The Company has stated that, the Business Responsibility performance of the Company is assessed periodically by the management.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“The Corporate Principles and Code of Conduct cover the Company and its subsidiaries and is applicable to all the employees of the Company and its subsidiaries.”*
- No stakeholder complaints were received during the year.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that, *“Procurement practices and selection criteria by the Company are focused on protection of environment, societal interest and cost effective procurement seeking resources efficiency, improving the quality of products and services and ultimately optimising the cost.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that, *“The cement manufacturing process as such does not involve production of any by-products or waste. However, the flyash generated from the Company’s captive power plant during power generation is utilised in blended cements. The Company also uses alternative materials such as flyash, chemical gypsum, slag etc that are waste materials generated from other industries to substitute the raw material required for cement production.”*

Principle 3: Businesses should promote the well-being of all employees

- The Company has not disclosed if it has constituted an Internal Complaints Committee to address concerns of sexual harassment as required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- Company has a recognised employee association. Further, the Company has disclosed that approximately Around 20.43% of our permanent employees are members of the above-mentioned trade unions.
- Approx. 1.61% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The percentage of permanent employees were given safety and skill upgradation training in the last year.

	Safety	Skill upgradation
Permanent Employees (Management)	67.93%	86.22%
Permanent Women Employees	46.90%	54.87%
Casual / Temporary / Contractual Employees	91.55%	5.30%
Employees with Disabilities	80.65%	32.25%

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal as well as external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalised stakeholder's viz. communities around its manufacturing units and its workers / contractual workers.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that, "*Several initiatives such as health care, education, infrastructure, watershed management, safe drinking water and sanitation, sustainable livelihood, self-help groups and income generation etc. are extended to the Company's contract workers and people living near to the Company's manufacturing units.*"

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, "*the Company has a Human Rights Policy which is also applicable to its subsidiaries.*"

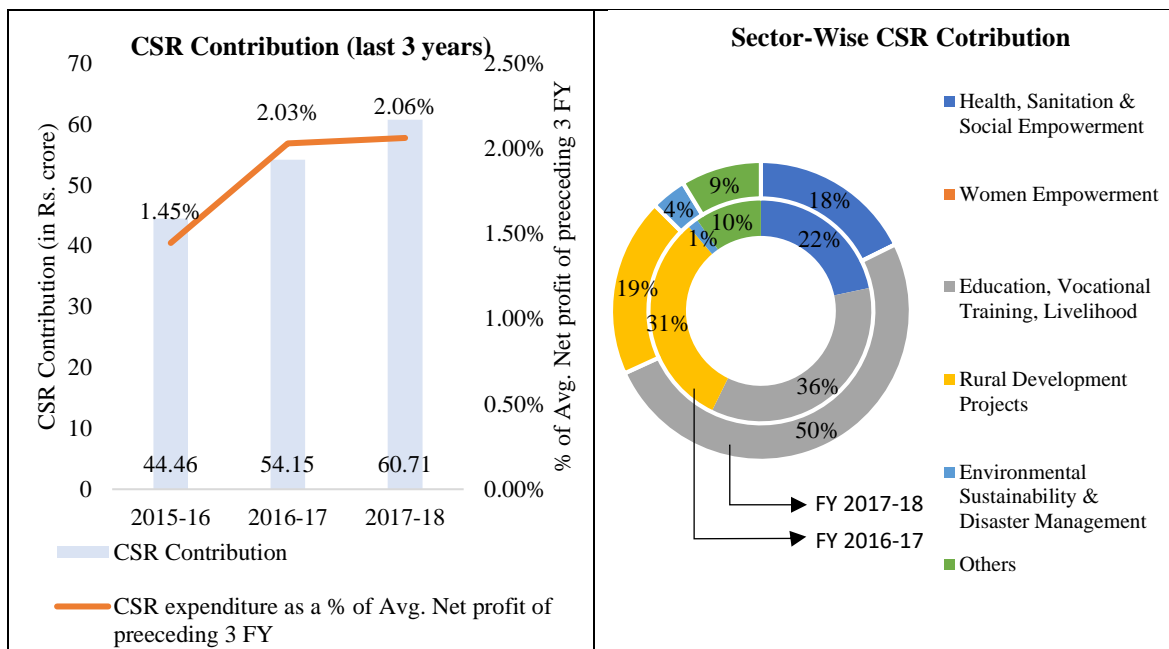
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, "*The Company's policy on Safety, Health and Environment extends to its subsidiaries as well.*"
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The emissions / waste generated by the Company are within the permissible limits given by Central Pollution Control Board / State Pollution Control Board.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 4 members out of which 1 is Independent member. The Chairman of committee is not an Independent Director. The Company's social projects are carried on under the aegis of the Aditya Birla Centre for Community Initiatives and Rural Development. Collaborative partnerships are formed with the government, district authorities, village panchayats, NGOs and like-minded stakeholders. The Company also engages with CII, FICCI in its social activities. It also collaborates with District Authorities, Village Panchayats, NGOs and like-minded stakeholders for its CSR initiatives. To measure the impact of the work done, a social satisfaction survey / audit is carried out by an external agency.



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

- 16 cases of customer complaints / consumer cases were pending as on the end of FY 18.
- *The Company carries out a Brand Health Study regularly (thrice a year). The study is conducted by globally renowned research agency – Nielsen India Pvt. Ltd., for tracking Brand Equity across customer segments. The Company also conducts an extensive Customer Loyalty / Net Promoter Score (NPS) study with research agency IMRB once in 2 years. The most recent NPS study was done in FY 16-17.*

United Spirits Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1 & Link 2								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link 1: <https://www.diageoindia.com/PR1346/aws/media/6270/code-of-conduct.pdf>

Link 2: <https://www.diageoindia.com/PR1346/aws/media/6660/csr-policy.pdf>

Note: The Code of Business Conduct & Ethics (CoBCE), is the key policy governing the compliance and ethics framework of the Company. In addition to CoBCE, it is mandatory for all employees to undergo training in CoBCE and a compliance certification program anchored by policies and procedures, prescribed as per the global standards, covering areas such as anti-bribery & corruption, including guidelines on gifting & entertainment, anti-money laundering and prevention of sexual harassment at workplace, in addition to the Employee Alcohol Policy, as a part of its commitment to responsible drinking.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that 1 Subsidiary “Pioneer Distilleries Limited” participate in the BR initiatives of the Company. The Company has not disclosed the percentage of other entity / entities (e.g. suppliers, distributors etc) that the Company does business with, participate in the BR initiatives of the Company. However, the Company has stated that it is not applicable.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company states that *“The Code of Business Conduct & Ethics (CoBCE) is the key policy governing the compliance and ethics framework of the Company.”*
- The Company received 95 cases which were logged in Speak up, including 24 cases of HR grievances.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“Company has initiated processes addressing the need for sustainable sourcing. In line with Diageo’s global statement of intent on sustainable procurement, your Company is shortly issuing its own guideline on Partnering with Suppliers, covering engaging with vendors on ethical business practices, protection of human rights, health and safety standards as well as reduction of environmental impact.”*
- The Company has states that *“More than 90% of waste water generated in factories, after-treatment, recycled back for use. Also, more than 90% of the solid waste generated in the manufacturing locations are recycled through authorized recyclers. We source significant proportion of sustainable packing for the product packaging, with at least >20% recycled content and plan to increase further in future.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 54% of permanent employees are members of recognized employee associations.
- Approx. 8.20% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	Nil	Nil	1	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 66% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has launched Project S.H.E. (Security-Health-Education) which is a grass roots level community programme designed to improve the lives of people in the communities around its plants with particular emphasis on empowering women. In the first year of the program, five manufacturing site locations have been identified to roll out the program. For FY 2017-18, total water replenished is 300 Km³ which is an integrated program under S.H.E. which reaches out to more than 40,000 beneficiaries at 6 bottling plant locations covering 15 villages.

Rain water recharging system has been installed at 4 locations (Nasik, Aurangabad, Baramati, and Pioneer) during the year. This will reduce annually 300,000 m³ of water extraction for operations (Volume of 120 Olympic sized swimming pools). The rain water recharging system at Pioneer Distillery has a potential to reduce annually ~150,000 m³ of water extraction for operations (Volume of 60 Olympic sized swimming pools). We have achieved a 100% return of waste water from our operations to the environment safely.

The program targets to touch over 40,000 people in the 13 direct intervention villages in the five plant locations. **The program will focus on:**

- **Security:** Improving access and availability of drinking water & basic sanitation through water conservation.
- **Health:** Community preventive care and healthcare for women/young mothers & adolescent girls.
- **Education:** job-oriented skills and entrepreneurship training for women.

Your Company, as part of their CSR activities has taken up two very crucial initiatives relating to road safety - the dangers of drinking and driving & Importance of having a 'sober designated driver'. We have a robust program which helps create awareness on road safety from university students to commercial drivers.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that Code of Business Conduct & Ethics (CoBCE) is the key policy governing the compliance and ethics framework of the Company and extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs.

Additionally, during the year revised CoBCE has been rolled out to other USL subsidiaries, namely, Pioneer Distilleries Limited, Sovereign Distilleries Limited, Tern Distilleries Private Limited, Royal Challenge Sports Private Limited and Four Seasons Wines Limited, through adoption of the policy by the respective Boards and training to the employees of the respective subsidiaries.

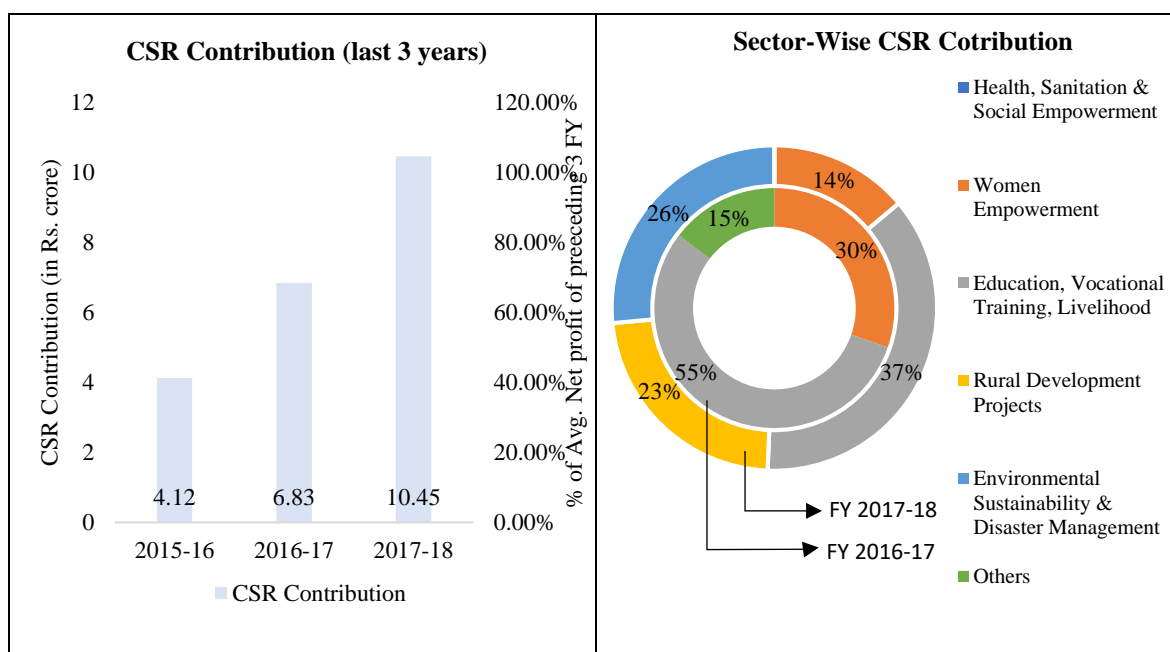
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated the policy is applicable to the Group companies of the company.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 4 members out of which 2 are Independent members including the Chairman. The Company mainly undertakes CSR Activities through NGO partners and relevant organisations. The Company also looks at government partnerships. The Company conducts impact assessment of its CSR initiatives.



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

- A total number of 33 customer complaints were received during the FY 2017-18 and all have been addressed and closed. Further, 17 Consumer cases were registered with the respective Forums, out of which 3 are closed and 14 are still pending.
- The Company conducts consumer survey to track consumer feedback on brand metrics.

UPL Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI Standard guideline.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?	Yes, all the policies have been developed in consultation with the Management of the Company								
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	The policies are formulated as per principles of National Voluntary Guidelines (NVG)								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?	The policies are approved by the board and signed by the heads of the respective department responsible for the implementation of the policies								
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online		*					*	*	*
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* **Link for Policies:** <https://www.uplonline.com/people-environment-compliances-policies>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has stated that it has subsidiaries, but the subsidiaries do not participate in the BR initiatives of the Company. They conduct their BR initiatives independently. Further the company states that all the Supplier/ Vendors who cater to the needs of UPL in terms of good and services as well as who affiliates globally come under the purview of the Company's Supplier Code of Conduct. These entities include the supplier, contractors, contract manufacturers, tollers and joint venture partners who share a contractual and commercial relationship with the company. The policy specifies and lays down expectations from our value chain partners.

Governance Related to BRR

The Company has stated that it meets annually to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The company has stated that it has a code of conduct and that *“Clauses pertaining to anti-bribery, conflict of interest, compliance with Government rules, intellectual property, confidentiality, advertising, fair dealings and equal opportunity are covered in the Code of Conduct. This Code extends to all employees, directors and senior management personnel. The Company’s strict adherence to ethical practices trickles down to our value chain through a separate code of conduct guidance for our suppliers, contractors, contract manufacturers, tollers and joint venture partners.”*
- During the current financial year Company received 1 stakeholder complaint which was resolved.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- The Company has stated that it has a sustainable procurement policy in place which is a guidance to our internal team and for suppliers/vendors before onboarding them. However, the company has not disclosed the percent of inputs that were sourced.
- The company has stated that it has a mechanisms in place to recycle its waste, and most of its plants are *“Zero Liquid Discharge.”* The Company further stated that *“We recycled certain waste by 100%, which includes Ammonium chloride, Ammonium acetate, Methyl chloride, sodium sulfate, ammonium sulphate, calcium chloride, hydrochloric acid, MDC residue, HNO3, etc. Product recoveries are above 95 %, however some products are recovered 100%.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have any recognised employee association.
- Approx. 4.42% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- Details of employees who were given safety and skill upgradation training is as follows:

What are the average hours of training on:	Total Employees		Employees at Management level		Employees at Non-Management level		Temporary Employees		Contractual Employees		Permanent Employees with Disabilities	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
a) Safety	1263	47	103	3	1160	44	2843	243	-	-	23	-
b) Skill Upgradation	934	4	46	2	888	2	-	-	-	-	-	-
c) Others	623	6	87	2	536	4	-	-	-	-	-	-

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** *The Company has taken initiatives to engage with its disadvantaged, vulnerable and marginalized stakeholders through its Corporate Social Responsibility projects. The initiatives are planned and focused to generate livelihoods in a sustainable way for the targeted groups of Small farmers, Unemployed youth and Poor women. The Company focus on three development parameters, which are;*
 1. Agriculture development
 2. Skill development
 3. Entrepreneurship

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that “*the human rights policy is applicable to the contractors associated with UPL limited*”.

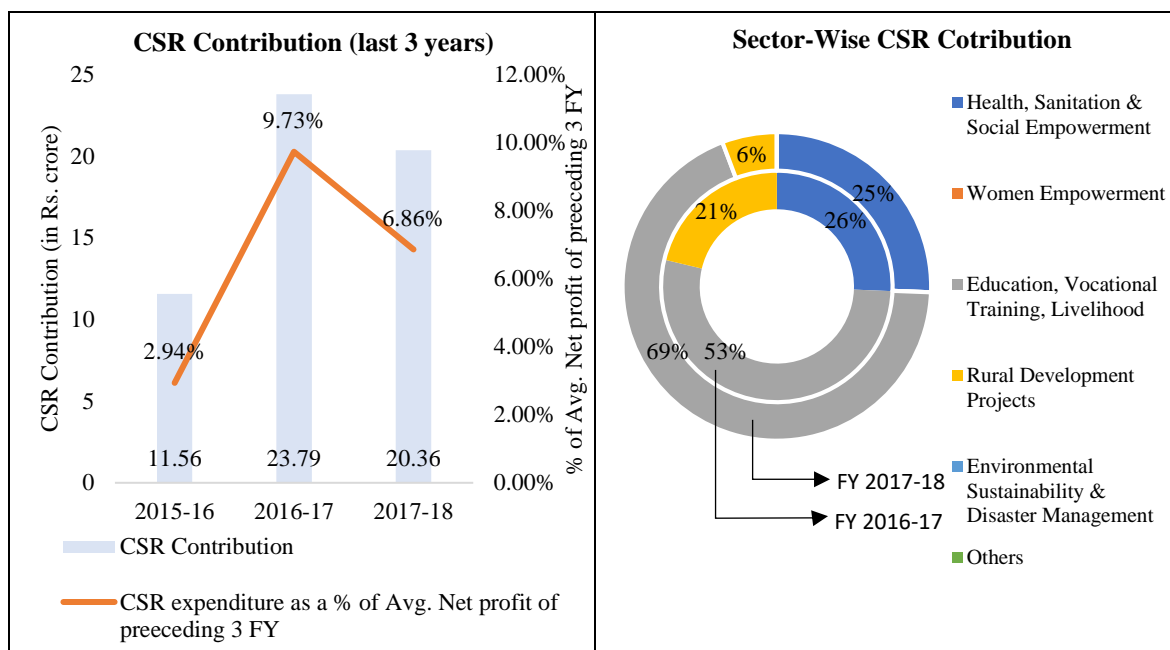
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that “*the environmental policy of the Company is applicable to group, joint venture, vendors & contractors.*”
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that “*Yes, the company always monitors its waste generation limits, this helps the Company to ensure that generated waste is within the limits provided by Central Pollution Control Board (CPCB)/ State Pollution Control Board (SPCB).*”

Principle 8: Businesses should support inclusive growth and equitable development

o Corporate Social Responsibility by the Company

The Company's CSR committee consists of 3 members out of which 1 is an Independent director. The Company mainly undertakes CSR Activities through its in-house team, Company's trust, NGO, Government structure etc. The Company has stated that *"the in-house team performs a need assessment survey before execution of the programmes/ projects."*



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

- o There are no customer complaints /consumers cases pending as on the end of the financial year.
- o The Company has stated that *"The Company has its call centres at various locations in India like Mumbai, Visakhapatnam and Chandigarh under the brand of "Adarsh Kisan Center"(AKC). Our customers can connect with us through a toll free number provided on all product packaging, they can lodge a complaint against any of our products or services as well. All the queries and complaints from customers are taken on priority and resolved."*
- o The Company has further stated that *"The Company uses AKC as a feedback tool to perform feedback surveys for registered customers. The survey is based on various parameters such as availability product in market, usage of the product, market access of harvest and others. These surveys helps the Company to identify the gaps in our systems and resolve them on priority."*

Vedanta Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report ([weblink](#)) as per GRI guidelines.

The Company has stated in Annual Report 2017-18 that “*The non-financial information, value-creation process, strategic framework, material issues and other key content elements of the Report are presented as per the Integrated Reporting framework of the Integrated Reporting Council.*”

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

Link: <https://www.vedantalimited.com/Pages/CorporateGovernance.aspx?type=inv>

Link for Sustainability Report: <https://sd.vedantaresources.com/SustainableDevelopment2017-18/pdf/VedantaSDReport2017-18.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The company has disclosed that it has 8 subsidiaries and all of these subsidiaries contribute towards BR initiatives. Further the company states that the suppliers are not directly involved with the ‘Responsible Business’ initiatives. However, the contracts address areas like HSE, Ethics, and Human Rights that the suppliers are obliged to adhere to strictly.

Governance Related to BRR

The Company has stated that CSR committee meets every 3 months to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that *“Our Business Code of Conduct and Ethics informs our approach to sustainability and how we conduct ourselves day to day – with each other, our customers, our shareholders, our competitors, our employees, our neighbouring communities, our host government and our suppliers and contractors. The Code applies to all directors, officers and employees of the Company and its subsidiaries.”*
- The Company received 38 whistle-blower cases of this 10 were upheld and found correct, leading to appropriate disciplinary actions. Further, about 53 requests and correspondences (including complaints) were received from our shareholders and all of these have been successfully resolved or responded.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has stated that *“Ore transport from the mines to the loading point is carried out through trucks covered with tarpaulin to ensure no spillage and dust generation. At material handling areas for coal and bauxite, dry fog systems are installed with proper water sprinklers, while bag filters installed are at alumina handling division.”*
- The Company has stated that *“In total, 93% of high volume and low potential waste generated was recycled / reused into gainful applications. During 2017-18, 107% of the slag was successfully used rather than being deposited in landfill. Gypsum, from the same operation is also utilised in fertiliser industry and brick manufacturing. At Lanjigarh and Jhasuguda, 111% of fly ash from our operations is recycled.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has disclosed that approximately 69% of permanent employees are members of recognized employee associations
- Approx. 11.19% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	11	Nil	Nil	Nil	2	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil

Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil
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- Safety and skill upgradation training provided to employees is as follows:

Category	Training provided in hours
Employees	2,44,287 hours
Contract Employees	2,57,495 hours
Third Party	8,741 hours

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** Yes, the Company states that they engage with the disadvantaged, vulnerable and marginalised stakeholders through our CSR projects.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** Human Rights policy is aligned to the UN Guiding Principles on Business and Human Rights and is a mandate for all of its group company's employee's. Further it also encompasses all its suppliers, contractors and NGOs etc.

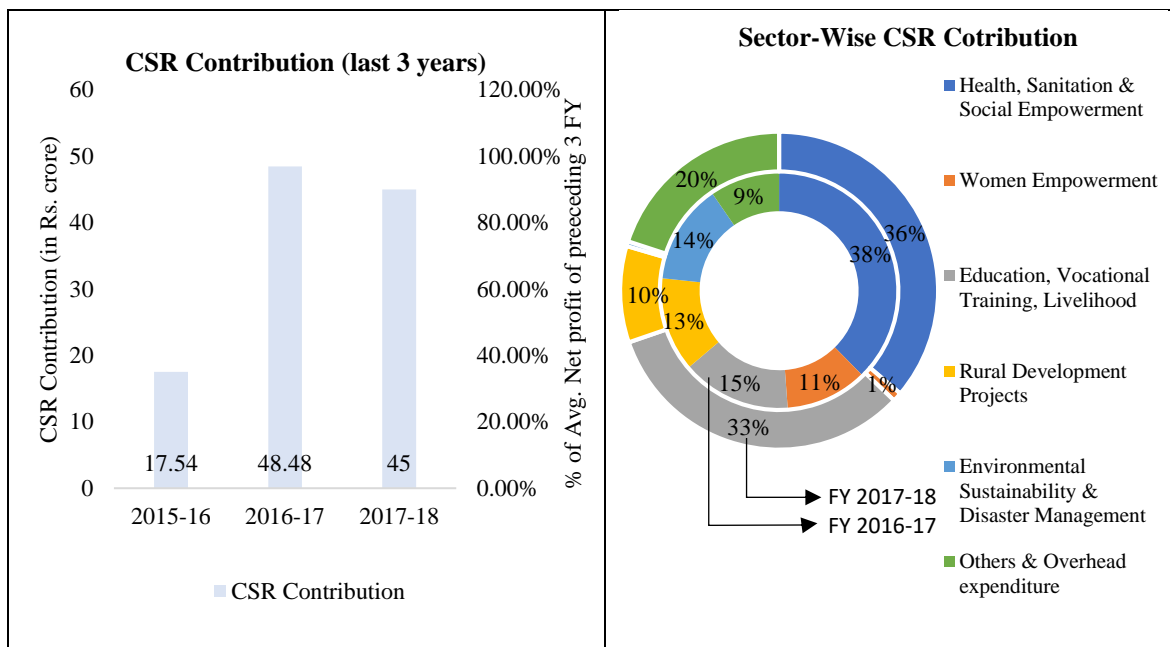
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** All our sustainability policies (HSE, Biodiversity, Energy & Carbon and Water Management) are applicable to Vedanta subsidiaries, operations and managed sites, including new acquisitions, corporate offices and research facilities and to all new and existing employees and contractor employees.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes, emissions/waste generated by the Company is monitored on monthly basis and are within the limits prescribed by CPCB/SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Company's CSR committee consists of 6 members out of which 4 are Independent directors including the Chairman. The Company mainly undertakes CSR Activities through directly through our Corporate Social Responsibility team and in partnership with government and civil society organisations. The Company conducts impact assessment of its CSR initiatives by engaging external agencies at periodic intervals.



Note: During the FY 2015-16 and FY 2016-17 the Company, at an average, has been at loss for the last 3 financial years, however the Company has spent voluntarily on CSR activity.

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

- The Company has disclosed that no complaints were pending at the end of FY 2017-18.
- The Company has not disclosed whether it carries out any survey.

Vodafone Idea Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines and Sustainability Report as per GRI guidelines for the year 2018. ([weblink](#))

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Note 1							Note 1	
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Note 2							Note 2	
6	Indicate the link for the policy to be viewed online	Link								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Note 3							Note 3	
8	Does the Company have an in-house structure to implement the policy / policies?	Note 4							Note 4	
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 5								

Note 1 - Yes, the policies conform to aspects of the nine principles of the National Voluntary Guidelines for Business Responsibilities (NVGs)

Note 2 - Apex Sustainability Committee The Apex Sustainability Committee is a Group level Committee that comprises of senior leadership from all ABG Companies selected by the Chairman. This committee meets at least twice in a year. The Apex Sustainability Committee assists ABG in meeting its responsibilities in relation to sustainability and sustainable development related matters arising out of the operations of the Group and individual businesses with the goal of building sustainable businesses. **Business Sustainability Committee** Idea's Business Level Sustainability Committee is made up of the Company's Executive Committee (EC) chaired by the Managing Director and all top Management (CXOs) representing every Function including the Chief Technical Officer who is the designate Chief Sustainability Officer and Senior VP (Networks) championing Sustainability. Committee members ideate and oversee sustainability governance across the company, own the policies, accelerate progress and streamline the successful adoption of new sustainability related processes. The Management Committee (MC) comprising all Circle Heads are apprised and their inputs taken into consideration before rolling out any program. Cross-functional thematic Sustainability Committees and Sub committees at the Corporate level - Senior and Middle Management

Nominees from all functions assist the EC and MC. The entire process is coordinated by the full time Sustainability Officer/ SME (Subject Matter Expert) who is also the single point of contact (SPOC) with the Group, and working closely with the Group Sustainability Cell. This Cell supports Idea's implementation of all Sustainability Policies, Standards and Processes required by in the Group Sustainability Framework. **Site Sustainability Committee / Working Groups** Idea has identified site level representation to ensure adherence to key identified responsible stewardship focus areas such as tracking all Occupational Health & Safety incidents; tracking NWS and facility level energy consumed and GHG (Green House Gas) emitted; compliance to NWS EMF radiation norms; tracking all Waste (including E Waste) generated and disposed at the site level etc. A Sustainability Evangelist Program is rolled out at the Circle level is also adding value to realize the overall Responsible Stewardship targets being set. The focus is to implement several site level projects towards identifying and achieving the respective business sustainability goals.

Note 3 - Yes, the policies have been communicated to all relevant stakeholders of the Company. The Company's communication with internal and external stakeholders on such matters is a continuous process.

Note 4 - Idea's Sustainable Business Vision is that "Idea Cellular Limited is committed to be the most admired telecom company following sustainable business practices, and creating long term stakeholder value by balancing its economic growth with responsible environmental practices and societal interests." The Sustainability Organogram of Idea includes: l Executive Committee (EC) chaired by MD comprising of all CXOs leading from the front. The EC deliberate and drive sustainability governance of the company and ensure efficient adoption of new sustainability processes and accelerate its progress Chief Technical Officer (CTO) is the designate Chief Sustainability Officer (CSO) with Senior VP (Networks) as the Sustainability Champion. The CSO represents Idea Cellular at the ABG Apex Sustainability Committee, which reports to the Chairman through the Business Review Council (BRC) Quarterly Reviews l Sustainability Officer/ Subject Matter Expert (SME) drives all companywide initiatives with HoD level SPOCs nominated from all Functions l Thematic Cross Functional Teams (CFT) is in place to measure and manage sustainability focus areas across the company

Note 5 - Aditya Birla Group has established a robust Sustainability Framework of Policies, Technical Standards, and Guidance Notes based not just on the local laws but also on leading International standards set by the global bodies of the International Finance Corporation (IFC), the Organisation for Economic Cooperation and Development (OECD), the International Standards Organisation (ISO), Occupational Health and Safety Advisory Services (OHSAS), the Global Reporting Initiative (GRI) and others. The Framework defines the direction and ambition of Idea's Sustainability approach. In order to realize the ambition, Idea has a robust internal review mechanism for its key policies in conformance with the Aditya Birla Group's Sustainability Framework. The company through an ABG initiative has engaged the services of an international agency for implementation of an IT system capable of providing data management across all issues and initiatives. Sustainability Dashboard created and reviewed quarterly with Group level Central Sustainability Cell Office & Reporting to Business Review Council continuing from Q3 FY14. The Company is publishing regular (Bi annual) dedicated Sustainability Reports as per international standards from FY16. Idea's First (FY16) Sustainability Report aligned to GRI G4 Guidelines is already in public domain. For details please refer to <http://www.ideacellular.com/aboutus/sustainability> The subsequent FY18 Idea Sustainability Report as per GRI Standard is in the offing.

Link - <https://www.ideacellular.com/investor-relations/corporate-governance>

Sustainability Report for FY 2018: https://www.ideacellular.com/content/dam/Idea_final_forweb_14march2019.pdf

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: The Company plays a key role in advocating issues of the telecom sector. The senior management of the company actively participates in various industry forums and is involved with various stakeholders for discussions regarding formulating new policies, reviewing and modifying relevant policies (described later in the report). The company currently does not have a stated policy on policy advocacy, however, it continues to monitor and follow the business and regulatory environment.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that one out of 4 Subsidiaries participate in the BR initiatives of the parent Company. The Company has further disclosed that, currently, more than 60% of existing and 100% of all new entities participate in the Company's BR initiatives. Idea Cellular is continuing to encourage more and more entities to participate in future.

Governance Related to BRR

The Company has not disclosed whether it meets to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that, *“Based on the Aditya Birla Group Code, which addresses the aspects of ethics, bribery and corruption, Idea Cellular has adopted its own Code. The five core values Integrity, Commitment, Passion, Seamlessness and Speed – have been adopted across the Aditya Birla Group including the employees of Idea and its subsidiaries. In addition, the Company’s vendor/supplier contracts include clauses on ethical behaviour, bribery and corruption.”*
- The Company has stated that, there are no outstanding complaints received for FY 2017-18.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“A module for vendor on-boarding has been put in place in Oracle, new and exhaustive questionnaire have been added to the on-boarding system with 6 mandatory criteria for screening, including sustainability and healthy business practices. Basic screening rejects the suppliers if they do not comply with the requirements of these questions. Besides, vendor site visits are conducted at the time of on-boarding and follow up visits are also conducted in order to ensure compliances.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“The industry has grown over four generation of technology changes and so has the associated infrastructure. The growing infrastructure has also increased the volume of e-waste generated year on year. In Idea, we have a clear directive of taking the material through stages of screening before declaring any material scrap. This screening process focusses on exploring reusability and recyclability of the material and looking for possible ways to prevent such scrap generation in future. Once a material is declared scrap, a designate team approves for final disposal.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company does not have recognised employee association.
- Approx. 10.61% of the permanent employees are women.

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	2	Nil	5	Nil	2	Nil

Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The company has not clearly mentioned what percentage of the permanent employees were given safety and skill upgradation training in the last year. The Company has provided details of training conducted on the basis of man days.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its key internal and external stakeholders, which include employees, adjudicators, courts, licensors, industry associations, regulators, network operators and subscribers.
- The Company has not stated whether they have identified the disadvantaged, vulnerable and marginalized stakeholders, however, the Company has mentioned that, *“Idea has succeeded in reaching out to 75% of the rural population in India corresponding to 60% of villages in the country. Under the project “Idea Care”, the company is running over 7,742 Company Stores, My Idea Service centres, Idea Points and Idea Service Points. These variant service centers models are spread over approx. 5,040 rural population centers, catering to the sales and service requirements of the Idea rural and peri-urban subscribers.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders** The Company’s efforts towards job creation for women and rural youth are described above, while its unique mobile-based applications for health, education and financial inclusion.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that, *“the Company’s Human Rights Policy is applicable to all employees of Idea and its subsidiaries and suppliers.”*

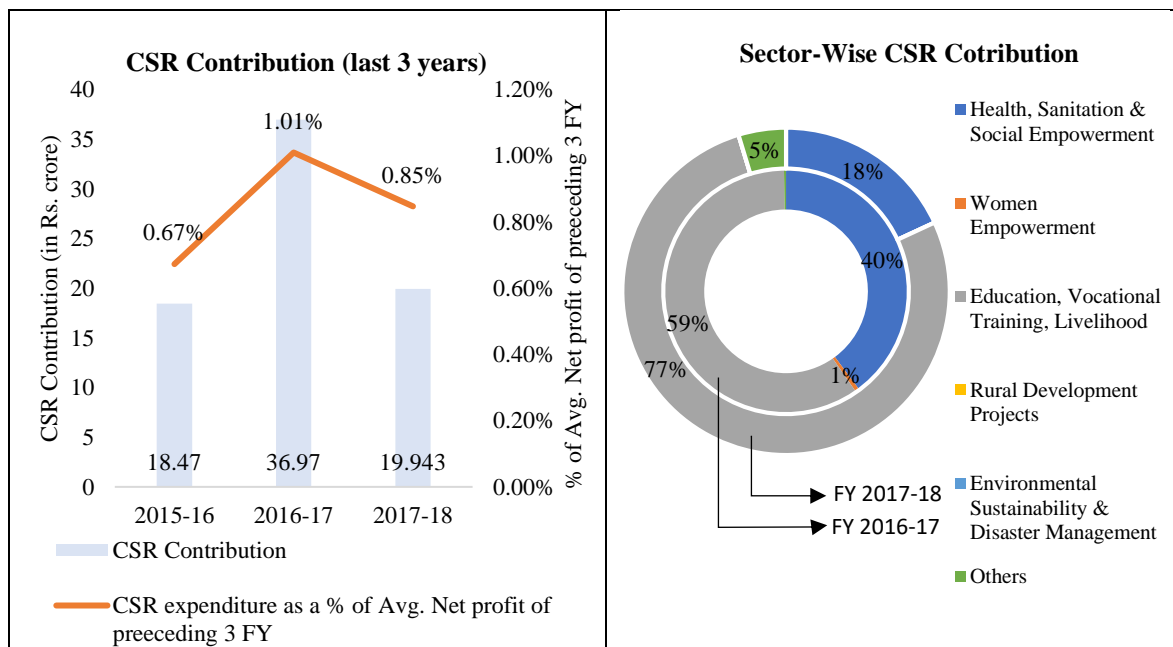
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that, *“the Energy and Carbon Policy extends to the Company and its subsidiaries, as well as to its third party vendors/suppliers.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** The Company has stated that, *“Idea gives greatest importance to the issue of GHG emissions and waste generated from its operations and follows all pertinent Govt. guidelines to be environment friendly. EMF radiation, and its commitment in this regard is evident from the Company’s stringent monitoring systems and financial investment in Emissions testing equipment. All of the Company’s network sites are in compliance with the relevant radiation limits prescribed by the regulatory agency.”*

Principle 8: Businesses should support inclusive growth and equitable development

o **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one is Independent member. The Chairman of the committee is not an Independent Director. The Company mainly undertakes CSR Activities through its house team and some project by NGO/Institution and Government department. The Company conducts impact assessment of its CSR initiatives.



Reasons disclosed by the Bank for not fully spending the prescribed amount on CSR initiatives is as follows:

“During the Financial Year 2017-18, the Company spent ` 199.43 Mn [` 175.99 Mn towards 2017-18 projects and ` 23.44 Mn towards carried over of Financial Year 2016-17 projects] towards CSR activities as mentioned above, which is 0.85% of the average net profits of the last three years. The significant disruption in the telecom industry had an impact on the financial performance of the Company, which has consequently led to decrease in the absolute spending towards CSR activities. During the year around 11 lakh people including children have been beneficiaries across 20 States. This year the Company began a larger program ‘Vidya Har Beti Ka Adhikar’ that addresses the need of KHEL, KITAB and KHANA in government schools with a focus on girl schools. We also supplemented the Government of India initiative to enhance cleanliness across India’s rich heritage sites through Swachh Iconic Place, Somnath temple project.”

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

- o The Company has stated that, 0.85% of the total complaints received during FY 2018 were in an open stage as on March 31, 2018.
- o The Company has stated that, “Idea conducts a C-SAT/NPS survey thrice a year as well as other assessment surveys such as ‘4G Studies’, ‘Customer Life Cycle Journey Experiential Mapping’ and ‘Mystery Audits at Service Centers.’”

Wipro Ltd (2017-18)

The Company has disclosed the Business responsibility report in the format as provided as per the SEBI guidelines for FY 2017-18. In the Annual Report ([weblink](#)) for FY 2017-18, the Company has stated that “the 2017-18 annual report is aligned to GRI* Standards required by Sustainability Reporting Guidelines of Global Reporting Initiative (GRI) and Business Responsibility Report (BRR) requirements.” The Business Responsibility Report and sustainability report have been independently assured by DNV GL.

The Company has further mentioned that this is third annual report aligned to the principles of International Integrated Reporting framework developed by the International Integrated Reporting Council (IIRC). The Company has also disclosed that link for GRI Index and Additional Graph Sheet ([Link](#))

The Company has prepared the Annual Report for FY 2017-18 as per IIRC Integrated Reporting format. The Company has stated that “This is our third annual report aligned to the principles of International Integrated Reporting Framework developed by the International Integrated Reporting Council.”

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Link 1	Link 2	Link 3	Link 4	Link 5	Link 6		Link 7	Link 8
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?									

* The Company disclosed the policies link in their website. Details of links as under:

Link 1 – Code of Business Conduct <https://www.wipro.com/content/dam/nexus/en/investor/corporate-governance/policies-and-guidelines/ethical-guidelines/code-of-business-conduct-and-ethics.pdf>

Link 2 – Ecological Sustainability Policy <https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/ecological-sustainability-policy.pdf>.

Link 3 – Health and Safety Policy http://wiprofoundation.org/files/Health_and_Safety_Policy.pdf

Link 4 – Corporate Social Responsibility Policy <https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/policy-on-corporate-social-responsibility-2015.pdf>

Link 5 – Human Rights Policy <https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/Human-Rights-Policy.pdf>.

Link 6 – Ecological Sustainability Policy <https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/ecological-sustainability-policy.pdf>.

Link 7 – Wipro does not have a separate policy. However, these aspects are covered in the COBC, the Ecological Sustainability Commitment and policy on Corporate Social Responsibility.

Link 8 – Yes. Wipro's COBC covers this.

Reasons disclosed by the Company for not formulating policies adhering to principle 7 is as follows:

P7: There is no distinct policy on public advocacy. However, refer to human capital, natural capital and social capital for our engagements through various organizations on material issues.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has disclosed that the Company has 91 subsidiaries as on March 31, 2018. As the BR Initiatives of the Company are run at global level, all subsidiaries participate in BR Initiatives. Further, the Company has also disclosed that less than 30% other entities participate in BR initiatives.

Governance Related to BRR

The Company has stated that it meets Quarterly to assess the BR performance of the Company.

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that Code of Business Conduct relating to ethics, bribery and corruption cover with company and extends to Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others.
- During the FY 2017-18, the Company had received 2,380 investors complaints, out which all were resolved during the year.
- The Company received 1,526 complaints under the Code of Business Conduct, out of which 1,532 were resolved (including some from previous year).

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“All decisions related to procurement are governed by our procurement policy which addresses social and environmental aspects like green procurement, supplier diversity, equal opportunity in sourcing and accessibility of goods and services for people with disabilities.”*
- Although the Company has not disclosed the percentage of recycling of products and waste, the Company has stated that *“Our goal is to maintain or better our current inhouse recycling rate of 80%. Inorganic Waste: Close to 100% of the waste is recycled through approved partners. 65% of the total mixed solid waste and scrap (7% of total waste generated) is currently recycled and the rest*

sent to landfills. Our target is to improve this to 80% by 2021. Biomedical and hazardous waste is incinerated as per approved methods. All our E-waste is currently recycled by approved vendors. Construction and Demolition (C&D) debris, which amounts to 24% of total waste is currently sent to approved landfills. C&D debris has shown an increase over the last 2 reporting years due to higher number of renovations in older campuses.”

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted a Prevention of Sexual Harassment Committee to address concerns of sexual harassment.
- The Company has disclosed under Section E of the BR Report under Principle 3 that, Company has a recognised employee association. Further, the Company has stated that *“Our employees are represented by formal employee representative groups in certain geographies including Australia, Austria, Brazil, Czech Republic, Finland, France, Germany, Ireland, Italy, Netherlands, Poland, Romania and Sweden which constitute about 2% of our workforce.”*
- Approx. 35% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	101	9	116	14	111	4
Child labour /forced labour/ involuntary labour	Not Disclosed		Not Disclosed		Nil	Nil
Discriminatory employment						Not Disclosed

- 100% of the employees were given safety skill upgradation training during the FY 2017-18.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that *“A primary tenet of our CSR strategy is that we must engage with communities proximate to wherever we have significant operational presence in the world. We choose to work with underprivileged communities in particular. Our work is channeled through Wipro Cares, a unique trust that is based on the operating model of employee contributions matched by Wipro Ltd. Our work spans primary health-care, education, ecology and disaster rehabilitation. Of these, we have already spoken about our work on community education in an earlier section above. We articulate our progress on the other dimensions.”*

Principle 5: Business should respect and promote human rights

- Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others? The Company has stated that Human Rights policy extends to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs etc.

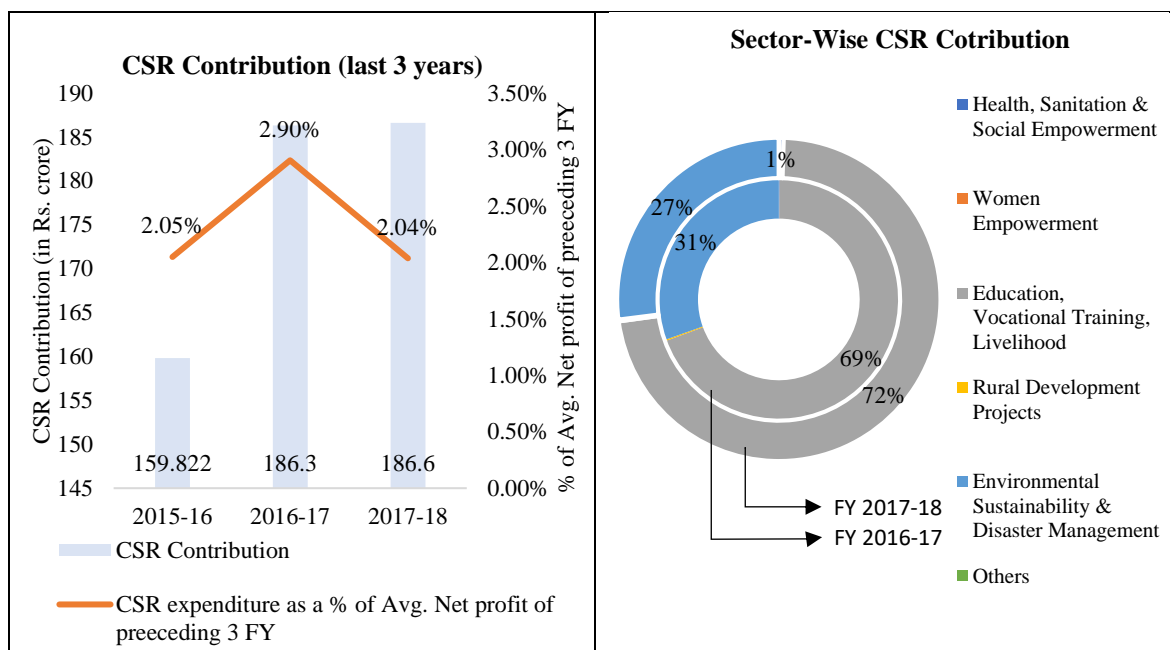
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others? The Company has stated that its Corporate Environment Policy extends to Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Ohters.
- Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported? Yes, the emission/waste generated by the Company within the permissible limits given by CPCB/SPCB.

Principle 8: Businesses should support inclusive growth and equitable development

- Corporate Social Responsibility by the Company

The Company’s CSR committee consists of 3 members all are Independent members including the Chairman. The Company mainly undertakes CSR Activities through Non-governmental organizations. The Company conducts impact assessment of its CSR initiatives.



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

- The Company has not disclosed number of Complaints received during the year from customers. Further, the Company has mentioned that none of the complaints were pending at the end of financial year.

- The Company has stated that *“Engagement is critical to meet and understand the expectations of customers. The key to customer retention is building deep relationships. IT industry, a major driver of efficiency and productivity improvements for most businesses, is undergoing tremendous change in the face of disruptive technologies. The Business Strategy section outlines the drivers and how it informs our business model, offerings and customer engagement approach.”*

Yes Bank Ltd (2017-18)

The Bank has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines for FY 2017-18 and Sustainability Report based on the Global Reporting Initiative (GRI) Standards for sustainability reporting ([weblink](#)). The sustainability report has been Independently assured by KPMG.

The Bank has prepared the Annual Report for FY 2017-18 as per IIRC Integrated Reporting format.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for principle				Note 6				Note 10	Note 1
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).									
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online	Note 1	Note 3	Note 4	Note 6	Note 7	Note 8	Note 9	Note 6	Note 1
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Note 1	Note 3	Note 5		Note 2				
8	Does the Company have an in-house structure to implement the policy / policies?									
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Note 1								
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	Note 2	Note 2			Note 2	Note 2	Note 2		Note 2

Note 1: The Code of Ethics for employees and certain policies, including the Citizen's Charter, Charter of Customer Rights, Grievance Redressal and Banking Practice Code are available on the website at https://www.yesbank.in/regulatory_policies.

Note 2: Yes, for certain policies and procedures.

Note 3: The Bank has in place the Environment & Social Policy, which integrates environmental and social risks into its overall credit risk assessment framework. The summary of the policy is available at <https://www.yesbank.in/beyond-banking/responsiblebanking/responsible-banking/facilitating-responsibleinvestments/environmental-and-social>. The Bank has an Environmental Management Policy which focuses on achieving greater environmental sustainability within the Bank's operations. The Policy is accessible at https://www.yesbank.in/regulatory_policies.

Note 4 - Employee focused policies are accessible only by employees and are not shared in the public domain.

Note 5 - The Bank's Human Capital Management practices and activities can be accessed at <https://www.yesbank.in/work-with-us>.

Note 6 - YES BANK views the unbanked and under-banked population in rural and urban India as a primary stakeholder for financial inclusion. Through its products and services focused at the Bottom of the Pyramid, the Bank aims to positively impact this marginalized and disadvantaged stakeholder group. The Bank has policies in place, and adheres to regulatory guidelines, to drive its business practices. The Bank has a Code of Commitment to the MSME Sector, which is accessible at https://www.yesbank.in/regulatory_policies.

Note 7: The Bank has several policies and guidelines in place for ensuring all stakeholder rights and the regulatory laws are adhered to in its operations. Through its policies on environmental and social risk assessment, the Bank ensures compliance of all pertinent regulations in its lending portfolio as well. Similarly, the Bank ensures that all regulations are adhered to in its CSR activities.

Note 8: The Bank's Environmental Management Policy is available on the Bank's website at <https://www.yesbank.in/pdf/emp>. The Bank's CSR Policy is accessible at https://www.yesbank.in/pdf/ybl_corporate_social_responsibility_policy.

The Bank's complete response to its environmental priorities and commitments, through business activities, CSR, and other activities, is available in its Sustainability Report, accessible at <https://www.yesbank.in/about-us/investor-relations/yes-banksustainability-report>.

Note 9: The Bank aims to take a leadership position in influencing public policy and discourse by hosting and participating in thought leadership platforms and through knowledge research. The Bank's knowledge banking focus is driven under the umbrella of YES Institute, the practicing think tank at the Bank. Its details can be accessed at <https://www.yesbank.in/research-and-initiatives/yes-institute>. For additional details, please refer to the responses to Principle 7 in this ABRR.

Note 10: In addition to the Bank's business activities focusing on inclusive growth, and equitable and sustainable development, highlighted in Point 5 above, the Bank creates a positive impact through its CSR activities. The activities and impact are included in the Sustainability Disclosures that is a part of this Annual Report.

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Bank has disclosed that it has 3 Subsidiaries and it participates in the BR initiatives of the parent Bank. The Bank has further disclosed that none of the other entity / entities (e.g. suppliers, distributors etc) that the Bank does business with participate in the BR initiatives of the Bank.

Governance Related to BRR

Although the bank has not disclosed the frequency of the meeting held to review BR performance, however the Bank has stated that, "The Bank has a CSR Committee of the Board, which meets at least twice in a year. The Bank has an internal system in place for reviewing the BR performance, headed by the Managing Director & CEO with the Group President & Global Head, Climate Strategy & Responsible Banking. The Group President & Global Head, Climate Strategy & Responsible Banking is also a part of a five-member internal CSR Management Committee which is represented at meetings of the Board of Directors."

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Bank has stated that The Bank has a separate Vendor Management Policy that covers the pertinent issues related to ethics, bribery and corruption. The Bank also has in place a Supplier Code of Conduct in line with the Ten Principles of the UN Global Compact for its strategic suppliers.
- The Bank has received 84,580 Customer Complaints, out of which 84,516 complaints resolved during FY 2017-18.
- Further, the Bank received 899 investors complaints, out of which 897 complaints resolved during FY 2017-18.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Bank has not disclosed the percentage of inputs that were sourced sustainably, the Bank has disclosed that *“Given that the Banking sector’s primary product offering is financial services, the Bank does not have any raw material requirements. The primary resources consumed for its day-to-day operations are paper, grid electricity, water from municipal sources, and diesel for DG sets in locations with erratic availability of electricity. Through a centralized procurement process, led by the Central Procurement Unit, the Bank strives to achieve greater transparency, compliance and adoption of environmental and labour best practices.”*
- Although the Bank has not disclosed the percentage of recycling of products and waste, the Bank has stated that *“As the Banking sector’s primary product offering is financial services, its waste is related to paper, municipal waste, and electronic waste. The Bank has strong policies and practices in place for responsible disposal of all such waste through authorized third-party vendors. For waste paper disposal, the Bank has local authorized vendors to ensure near 100% recycling of waste paper and has partnered with a vendor which provides stationary from recycled paper, in return for the paper disposal. For e-waste handling, the Bank has a national authorized vendor for centralized collection and handling of e-waste to ensure near 100% of e-waste management.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Bank has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Bank has disclosed that it does not have a recognised employee association.
- Approx. 18.06% of the permanent employees are women
- The Bank has not disclosed the number of employees with disabilities. Further, the Bank has stated that *“The Bank, being an Equal Opportunity Employer, makes no distinction between employees on the basis of disabilities.”*

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	9	1	10	3	6	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- 85% of the permanent employees were given safety and skill upgradation training in the last year.

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Bank has mapped its Internal and External stakeholders.

- The Bank has not clearly stated that whether it has identified the disadvantaged, vulnerable and marginalized stakeholders. However, the Bank has stated that *“The under-banked and unbanked population in rural and urban India, which is still not entirely integrated into India’s mainstream economy, can be vulnerable to socio-economic exploitation. The Bank focuses on financial inclusion as a key business priority to positively impact this stakeholder group.”*
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** In 2018, The Bank engages with such stakeholders in multiple ways. Through its focused business units such as Inclusive and Social Banking, Digital Banking, Agri Product Banking and Rural Retail Banking, the Bank offers financial products and services to diverse stakeholders in rural and urban India.

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Bank has stated that it has in place policies and processes that cover various aspects of Human Rights, specific to employees, and external stakeholders such as its CSR partners, supply chain and corporate customers. In addition, its corporate whistle blower program covers all its internal and external stakeholders.

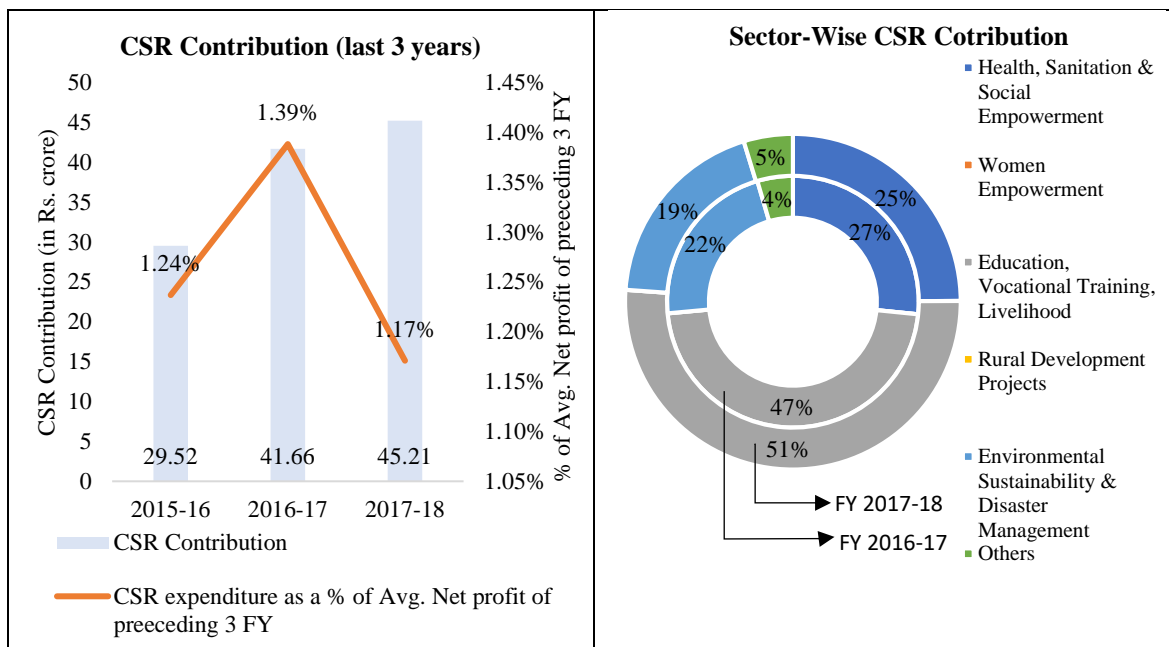
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Bank has stated that it has multiple policies that directly and indirectly communicate its support and adherence of Principle 6 such as Environment & Social Policy (ESP), Environment Management Policy and CSR Policy. The Bank also has in place a Supplier Code of Conduct that promotes ESG best practices among its supplier base.
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Yes. The Bank’s primary wastes – paper and electronic waste, are recycled to the maximum extent possible through third party vendors. The Bank’s emissions and waste are within permissible limits of the laws applicable. At the branches where the Bank uses Diesel generator sets due to erratic electricity supply, it ensures it only uses low noise and low emission sets with proper procedures in place to handle the used oil.

Principle 8: Businesses should support inclusive growth and equitable development

- **Corporate Social Responsibility by the Company**

The Bank’s CSR committee consists of 3 members out of which 2 are Independent members including the Chairman. The Bank mainly undertakes CSR Activities through its in-house YES Foundation, Charitable Trust and NGOs. The Bank conducts impact assessment of its CSR initiatives.



Reasons disclosed by the Bank for not fully spending the prescribed amount on CSR initiatives is as follows:

- The Bank has stated that, “In Financial Year 2017-18, the Bank had budgeted to spend `77.22 crore (2% of the average net profits made during the 3 preceding financial years, i.e. 2014-15, 2015-16 and 2016-17) on livelihood and water security, environmental sustainability and, arts and culture, under its CSR activities. Its actual spend was `45.21 crore (1.17%); an increase of 8.5% over last year’s spend of `41.66 crore in Financial Year 2016-17. The lower spend vis-à-vis the budget was mainly on the account of natural calamities like cyclone Ockhi in project areas, lack of ability of implementation partners to get timely approvals for infrastructure setup and multi-year nature of certain projects. Investment of significant time and resources to consolidate its projects under reliable implementation partners, has also resulted in prudent fund allocation through the year. This has ensured maximum impact, transparency and good governance.”

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

- The Bank has received 84,580 Customer Complaints, out of which 84,516 complaints resolved during FY 2017-18.
- The Bank conducts periodic customer satisfaction surveys, and in addition, there are strong systems in place for internal checks of branch quality and physical safety.

Zee Entertainment Enterprises Ltd (2017-18)

The Company has disclosed the Business Responsibility Report in the format prescribed in the SEBI guidelines for FY 2017-18.

Principle wise BR Policy/ Policies

	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy / policies for principle									
2	Has the policy been formulated in consultation with the relevant stakeholders?									
3	Does the policy conform to any national / international standards? If yes, specify (50 words).	Policies are prepared ensuring adherence to applicable regulatory requirements and Industry standards								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?									
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?									
6	Indicate the link for the policy to be viewed online *	Link1	*						Link2	*
7	Has the policy been formally communicated to all relevant internal and external stakeholders?									
8	Does the Company have an in-house structure to implement the policy / policies?	All Corporate Policies including Policies forming part of Business Responsibility Reporting are engrained in all day-to-day business operations of the Company and are implemented at all Management levels and monitored by the Managing Director & CEO from time to time								
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?									
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	No. Policies are evaluated regularly by the CEO and/or respective Senior Executives								

* Most of the relevant policies are disseminated and uploaded for information of relevant stakeholders and employees either on Company's intranet site or on corporate website

Links for specific principles as under (Links not disclosed by the Company):

Link 1: Whistle Blower & Vigil Mechanism policy: https://www.zeeentertainment.com/investor-relations/pdfs/code-of-conduct-directorssr-mgmt_new.pdf

Link 2: Corporate Social Responsibility Report

<https://www.zeeentertainment.com/investor-relations/pdfs/csrpolicyfinal05122014-b9e2942ea60d822.pdf>

Participation of Company, Subsidiaries and other entities in BR Initiatives:

The Company has 29 subsidiaries, including 8 domestic and 21 overseas direct and indirect subsidiaries. The Company has disclosed that BR Policies / initiatives adopted by the Company are implemented across all Indian and Overseas subsidiaries subject to compliance of local laws for subsidiaries in overseas territories. The Company has also disclosed that though Company's BR Policies / initiatives does not apply

to vendors / suppliers, the Company follows zero tolerance on any acts of bribery, corruption etc by such agencies during their dealings with the Company and/or with any of its employees

Governance Related to BRR

Although the company has not disclosed the frequency of meeting to review BR performance however, the Company has stated that *“The assessment of BR performance is done on an ongoing basis by the Managing Director and Senior Management of the Company.”*

Extracts from Principle wise performance of the Company

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The Company has stated that “the policies are applicable to the employees at all levels, including subsidiaries.
- Further the Company has stated that, *“Though the Company’s policies do not apply to external stakeholders including suppliers, contractors, NGOs etc, the Company follows zero tolerance on any acts of bribery, corruption etc by such agencies during their dealings with the Company and or with any of its employees.”*
- The Company has received 19 complaints, out of which 19 were resolved and on an ongoing basis, the complaints/grievances/views from viewers and other stakeholders are dealt with by respective functions within the Company.

Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

- Although, the Company has not disclosed the percentage of inputs that were sourced sustainably, the Company has disclosed that *“The Company maintains a healthy relationship with its content providers, vendors and other suppliers and the business policies of the Company include them in its growth. The process of vendor registration lays emphasis on conformity of safe working conditions, prevention of child labour, business ethics and general housekeeping by the vendor. Further various events / programs broadcast on Company’s television channels are designed to offer opportunities to talents from all strata of society.”*
- Further, for recycling of waste the Company has stated that *“As the Company is a service provider, it does not discharge any effluent or waste. However mindful of the need for recycling products and waste, the Company has been directing its efforts in reducing use of plastic bottles, recycling used plastic bottles and has been using rechargeable batteries / other products.”*

Principle 3: Businesses should promote the well-being of all employees

- As required under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has constituted an Internal Complaints Committee to address concerns of sexual harassment.
- The Company has disclosed that the Company does not have a recognised employee association.
- Approx. 17.51% of the permanent employees are women

Number of Complaints received: As disclosed by the Company in Section E-Principle 3 of BR Report

Category	2017-18		2016-17		2015-16	
	Reported	Pending	Reported	Pending	Reported	Pending
Sexual Harassment	3	Nil	1	Nil	Nil	Nil
Child labour /forced labour/ involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Discriminatory employment	Nil	Nil	Nil	Nil	Nil	Nil

- The Company has not disclosed % of the permanent employees were given safety and skill upgradation training in the last year. However, the Company has stated that *“The Company organizes various training sessions in-house on a regular basis and also sponsors its employees to attend training sessions organized by external professional bodies to facilitate upgradation of skill, of employees handling relevant functions, basic fire and safety training. These trainings are generally attended by majority of employees.”*

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- The Company has mapped its internal and external stakeholders.
- The Company has identified the disadvantaged, vulnerable and marginalized stakeholders.
- **Special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders:** The Company has stated that, *“Apart from providing opportunities to the talents and vendors from all strata of society, the Company’s CSR spends are targeted towards long-term sustainable programs that actively contribute to and support the social and economic development of the society.”*

Principle 5: Business should respect and promote human rights

- **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?** The Company has stated that *“While Company’s policies are not applicable to the vendors, the Company promotes awareness of the importance of human rights within its value chain and discourage instances of any abuse. Such policies and practices apply to the Company and its subsidiaries.”*

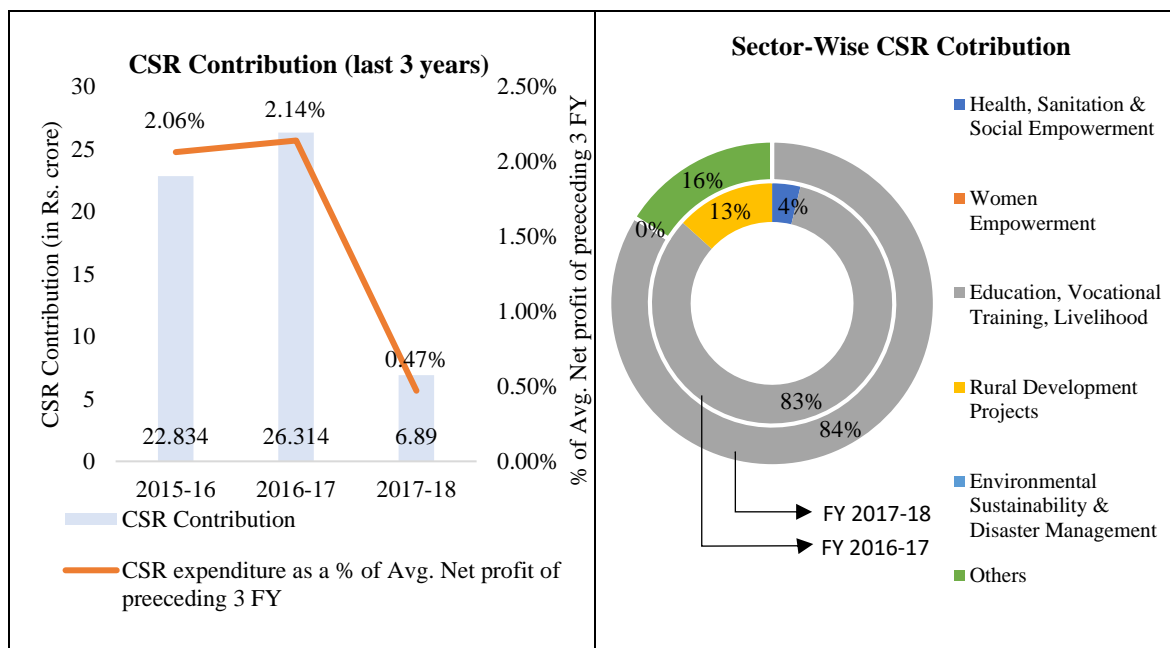
Principle 6: Businesses should respect, protect and make efforts to restore the environment.

- **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?** The Company has stated that *“Nurturing and safeguarding the environment for long term sustainability is of prime importance. The Company, on standalone basis, have been undertaking several green initiatives across all its office locations.”*
- **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the Financial Year being reported?** Not Applicable

Principle 8: Businesses should support inclusive growth and equitable development

○ **Corporate Social Responsibility by the Company**

The Company’s CSR committee consists of 3 members out of which one is Independent. Chairman of the committee is Non-Executive Director. The Company along with Essel group entities undertakes CSR Activities through its Subhash Chandra Foundation. The Company conducts impact assessment of its CSR initiatives through Subhash Chandra Foundation. Subhash Chandra Foundation monitors the CSR projects.



Reason for not spending requisite amount on CSR activities:

“While the CSR Committee had approved commitment of CSR spends aggregating to ` 293.90 Million, in line with the CSR spend required to be made by the Company during FY 2017-18, the said commitment included two long term CSR projects requiring need / milestone-based funding staggered over a period of 2 years. While the need/milestone-based funding during FY 2017-18 were made from time to time, entire amount required to be spent on CSR during FY 17-18 could not be spent.”

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

- Although the Company has not disclosed number of customer complaints pending however it has stated that, *“There are no material consumer cases / customer complaints outstanding as at the end of financial year.”*
- The marketing department on a regular basis carries out surveys (either web-based or otherwise) for identifying consumers viewing behaviour and emerging trends on consumer preferences.

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