

31<sup>st</sup> May, 2025

To,

The Manager (Listing), The BSE Ltd. Mumbai	The Manager (Listing), National Stock Exchange of India Ltd. Mumbai
Company's Scrip Code: 505700	Company's Scrip Code: ELECON

**Sub. : Business Responsibility and Sustainability Report (BRSR) of the Company for the Financial Year 2024-25**  
**Ref. : Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Dear Sir/Madam,

In terms of the subject referred Regulation, we hereby submit the Business Responsibility & Sustainability Report (BRSR) of the Company for the Financial Year 2024-25. The same is also available on the website of the Company at [www.elecon.com](http://www.elecon.com).

You are requested to take the same on your record.

Thanking you.

Yours faithfully,  
**For Elecon Engineering Company Limited,**



**Bharti Isarani**  
**Company Secretary & Compliance Officer**

**Encl.:** As above



Cranes



Rubber Industry



Marine Industry



Plastic Industry



Power Industry



Steel Industry



Sugar Industry



Mining



Cement Industry

**Gearing industries. Gearing economies.**

# ANNEXURE - E TO BOARD'S REPORT

## BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

Elecon Engineering Company Limited exemplifies industry leadership and innovation in the Transmission business while offering integrated solutions across the entire value chain of material handling systems. In alignment with the evolving standards of our peers, we are committed to fostering a culture of transparency, accountability, and collaboration with our stakeholders to drive sustainable development that benefits all.

Recognising the growing importance of Environmental, Social, and Governance (ESG) factors within our industry, we have embedded these principles deeply into our corporate strategy. By aligning our practices with global benchmarks and industry leaders, we aim to minimise our environmental footprint, contribute positively to society, and uphold the highest standards of governance. This commitment reflects our dedication to creating long-term value for all stakeholders while addressing the broader impact of our operations on society and the environment.

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L29100GJ1960PLC001082
2.	Name of the Listed Entity	Elecon Engineering Company Limited
3.	Year of incorporation	1960
4.	Registered office address	Anand-Sojitra Road, Vallabh Vidyanagar 388 120, Dist. Anand, Gujarat, India.
5.	Corporate address	Anand-Sojitra Road, Vallabh Vidyanagar - 388 120, Dist. Anand, Gujarat, India.
6.	E-mail id	<a href="mailto:investor.relations@elecon.com">investor.relations@elecon.com</a>
7.	Telephone	+91-2692-238701
8.	Website	<a href="http://www.elecon.com">www.elecon.com</a>
9.	Financial year for which reporting is being done	2024-25
10.	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited and BSE Limited
11.	Paid-up Capital	₹ 2,244.00 Lakhs
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mrs. Bharti L. Isarani, Company Secretary & Compliance Officer +91-2692-238701 <a href="mailto:investor.relations@elecon.com">investor.relations@elecon.com</a>
13.	Reporting boundary	Standalone Basis
14.	Name of Assurance provider	CNK & Associates LLP
15.	Type of Assurance obtained	Reasonable Assurance – BRSR Core KPIs Limited Assurance – Essential Indicators

#### II. Products/services

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

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing, Repairs & Maintenance	Electrical equipment, General purpose and Special purpose Machinery & Equipment, Transport equipment	100%

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### 17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

Sr. no.	Product/Service	NIC Code	% of total Turnover contributed
1	Gears (Reduction gears)	29131	70.16%
2	Bulk Material Handling Equipment	29151	27.37%
3	Repair and maintenance of bearings, gears, gearing and driving element	29138	1.27%
4	Repair and maintenance of lifting and handling equipment	29158	1.20%

### III. Operations

#### 18. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	2	13	15
International*	-	-	-

\* However, Elecon has 4 manufacturing & assembly centres and 10 sales offices through its foreign subsidiaries.

#### 19. Markets served by the entity:

##### a. Number of locations

Locations	Number
National (No. of States)	29
International (No. of Countries)	31

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

Exports constitute 8.60% of the total turnover of the entity.

##### c. A brief on types of customers

We are engaged in manufacturing of Industrial Gears and Material Handling Equipment. We cater to the following industries:

- Steel Industries
- Cement Manufacturing Industries
- Power Generation & Transmission Industries
- Sugar Manufacturing Industries
- Material Handling Equipment Industries
- Defense Industries
- Mining Industries
- Fertiliser Industries

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IV. Employees

20. Details at the end of Financial Year:

a. Employees and workers (including differently abled)

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	740	718	97.03%	22	2.97%
2.	Other than Permanent (E)					
3.	<b>Total employees (D + E)</b>	<b>740</b>	<b>718</b>	<b>97.03%</b>	<b>22</b>	<b>2.97%</b>
<b>WORKERS</b>						
4.	Permanent (F)	1,422	1,419	99.79%	3	0.21%
5.	Other than Permanent (G)					
6.	<b>Total workers (F + G)</b>	<b>1,422</b>	<b>1,419</b>	<b>99.79%</b>	<b>3</b>	<b>0.21%</b>

b. Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	8	7	87.50%	1	12.50%
2.	Other than Permanent (E)					
3.	<b>Total differently abled employees (D + E)</b>	<b>8</b>	<b>7</b>	<b>87.50%</b>	<b>1</b>	<b>12.50%</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
1.	Permanent (F)	-	-	-	-	-
2.	Other than Permanent (G)					
3.	<b>Total differently abled workers (F + G)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

21. Participation/Inclusion/Representation of women:

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.50%
Key Management Personnel*	2	1	50.00%

\*Excluding Key Management Personnel covered under Board of Directors

22. Turnover rate for permanent employees and workers (in %)

Particulars	2024-25 (Turnover rate in Current FY)			2023-24 (Turnover rate in Previous FY)			2022-23 (Turnover rate in the year prior to Previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	9.30	4.55	9.15	9.82	11.54	9.88	9.12	11.11	9.17
Permanent Workers	8.00	-	8.00	38.10	-	38.10	32.36	-	32.36

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

23. (a) Names of Holding / Subsidiary / Associate Companies / Joint Ventures

Sr. No.	Name of the Holding / Subsidiary / Associate Companies / Joint Ventures (A)	Indicate whether Holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Radicon Transmission UK Limited	Subsidiary	100	No
2	Elecon Singapore PTE. Limited	Subsidiary	100	No
3	Elecon Middle East FZCO	Subsidiary	100	No
4	Benzlers Systems AB	Step Down Subsidiary	100	No
5	AB Benzlers	Step Down Subsidiary	100	No
6	Radicon Drive Systems Inc.	Step Down Subsidiary	100	No
7	Benzlers Transmission A.S.	Step Down Subsidiary	100	No
8	Benzlers Antriebstechnik G.m.b.h	Step Down Subsidiary	100	No
9	Benzlers TBA B.V.	Step Down Subsidiary	100	No
10	OY Benzlers AB	Step Down Subsidiary	100	No
11	Benzlers Italia s.r.l.	Step Down Subsidiary	100	No
12	Elecon Radicon Africa (Pty) Limited	Step Down Subsidiary	100	No
13	Eimco Elecon (India) Limited	Associate	16.62%	No

VI. CSR Details

24. (i) Whether CSR is applicable as per Section 135 of the Companies Act, 2013: (Yes/No) Yes
- (ii) Turnover (in ₹) - ₹ 1,87,112 Lakhs (2024-25)
- (iii) Net worth (in ₹) - ₹ 1,65,327 Lakhs (2024-25)

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**VII. Transparency and Disclosures Compliances**

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	-	-	NA	-	-	NA
Investors (other than shareholder)	Yes	-	-	NA	-	-	NA
Shareholders	Yes	11	-	NA	9	-	NA
Employees and workers	Yes	-	-	NA	-	-	NA
Consumers	Yes	583	23	NA	359	15	NA
Value Chain Partners	Yes	-	-	NA	-	-	NA
Other (please specify)	-	-	-	NA	-	-	NA

**Links:** <https://www.elecon.com/investors/policies>

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code%20of%20Conduct-new-2023.pdf>

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Human%20Rights%20Policy-new-2023.pdf>

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Supplier%20Code%20of%20Conduct-2023.pdf>

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Customer%20Relationship%20Policy-2023.pdf>

**26. Overview of the entity’s material responsible business conduct issues**

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Sustainable Product	Opportunity	Our R&D team is dedicated to enhance our product range to minimise electricity and oil consumption during operation. Both our existing and upcoming products are focused on use of recyclable materials.	-	Positive

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Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Renewable Energy	Opportunity	In our commitment to renewable energy, we have transitioned to solar and wind power, significantly expanding our renewable energy footprint. This shift not only benefits the environment but also helps to reduce our energy costs. Currently, we have an installed capacity of 5.5 MW in solar and 13.25 MW in wind farms. Our efforts are ongoing as we work towards commissioning 4 MW of solar and 3 MW of wind renewable energy capacity. These initiatives reflect our dedication to sustainability and our proactive approach to adopting clean energy solutions.	-	Positive
3	Sustainable supply chain	Opportunity	The Company values long-term relationships with suppliers, viewing them as essential partners in growth. We regularly organise Strategic Partner Meetings to strengthen these bonds, promote open communication, and foster collaboration. This approach ensures mutual success, aligns strategic goals, and drives sustainable growth through shared innovation and partnership.	-	Positive
4	Occupational Health & Safety	Risk	Neglecting health and safety can disrupt smooth operations, reduce workforce availability and potentially result in legal action. Ensuring robust health and safety measures is crucial to maintaining operational efficiency, protecting employee well-being, and avoiding costly litigation. This proactive approach safeguards the Company's productivity and reputation.	We are enhancing our safe work practices/ procedures by automating most of our machinery and working procedures. In addition, we are working towards increasing the frequency and coverage of our training and awareness programs.	Negative

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Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Training and Skill Development	Opportunity	Our skill enhancement and training programs boost efficiency and help retain our highly skilled workforce. By investing in continuous learning and professional development, we ensure our employees remain competent and engaged, leading to improved performance and long-term retention of specialised talent.  This commitment to growth drives our overall success and competitiveness.	-	Positive
6	Stakeholder Engagement	Opportunity	As we strive to become a more sustainable business, including diverse stakeholders in our growth journey is essential. We incorporate their feedback into our strategic planning and regularly engage with employees, investors, suppliers, and customers. Through initiatives like employee engagement programs, investor meetings, and vendor conferences, we ensure ongoing collaboration and alignment with our sustainability goals.	-	Positive
7	Ethical Behavior	Opportunity	Adhering to ethical behavior, as outlined in our Code of Conduct, promotes good governance and ensures compliance with regulatory standards. Our Company places significant emphasis on ethical conduct and compliance, and it is one of our core values. This commitment fosters a positive organisational culture, upholding integrity, accountability, and responsible business practices.	-	Positive

**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

**Disclosure Questions**

Policy and management processes		P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	a. Whether your entity’s policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	<a href="https://www.elecon.com/investors/policies">https://www.elecon.com/investors/policies</a>								

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Policy and management processes	P1	P2	P3	P4	P5	P6	P7	P8	P9
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 14001 (2015), ISO 45001 (2018), Authorised Economic Operator certification, Great Place to Work certification, ISO 9001 (2015), API standards as per requirement, National Accreditation Board for Testing & Calibration Laboratories (NABL) certificate, CE/ATEX certification for certain products.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p><b>Sustainability Commitments:</b></p> <ul style="list-style-type: none"> <li>● <b>Renewable Energy Investments:</b> Strategic projects for enhancement of 3 MW windmill(s) and 4 MW solar farms by next financial year.</li> <li>● <b>SBTi Goals:</b> The Company has committed to reduce absolute scope 1 and 2 GHG emissions 54.6% by FY 2033. The Company has also committed that 81.4% of its suppliers by emissions covering purchase of goods and services, and up and downstream transportation and distribution, by FY 2028.</li> <li>● <b>Environmental Stewardship:</b> Enhancing rainwater recharge wells by next financial year.</li> <li>● <b>Adoption of EVs:</b> Usage of electric vehicles / equipment into operations to reduce fossil fuel consumption resulting into minimisation of carbon emissions.</li> <li>● <b>Inclusivity &amp; Awareness:</b> Conducting sustainability-focused ongoing training and awareness programs for value chain partners.</li> </ul>								
6. Performance of the entity against specific commitments, goals and targets along-with reasons in case the same are not met.	<p>We installed a 1 MW solar roof top in the Company premises. The balanced committed 3 MW solar farm increased to 4 MW solar farm, which will be commissioned in the next financial year.</p> <p>Additionally, our wind farm generates electricity supplied to the grid, with unit credits offsetting our electricity bill. Our total capacity includes 5.5 MW in solar and 13.25 MW in windfarms.</p>								

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**Governance, leadership and oversight**

7. *Statement by Director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)*

The Company stands as a beacon of industry leadership, driven by the visionary efforts of its founders and successors to achieve excellence through a sustainability-focused business strategy. This approach harmonises ecological and social progress with financial growth, reflecting a commitment to creating long-term value for all stakeholders. Inspired by industry best practices, we prioritise customer satisfaction, adopt eco-friendly and energy-efficient manufacturing processes and uphold exemplary standards in workplace safety and employee well-being.

To embed sustainability across our operations, our Board and Committees actively engage in strategic discussions on key ESG issues, guided by a materiality assessment process. Our open and continuous dialogue with employees, suppliers, customers, associations and regulatory authorities ensures a collaborative approach to driving progress in quality, environmental stewardship and workplace safety.

Our innovative solutions empower industries and businesses to reduce their environmental footprint, contributing to a sustainable future. With significant investments in renewable energy, we are transitioning to cleaner energy sources, including the commissioning of an additional 4 MW of solar and 3 MW wind farm capacity this year, complementing our existing 5.5 MW solar and 13.25 MW wind energy assets. These initiatives not only enhance energy efficiency but also deliver cost savings, reinforcing our commitment to operational excellence.

Recognising the evolving ESG landscape, we continuously review and enhance our management systems through rigorous internal and external evaluations. This iterative approach drives improvements in our overall performance, ensuring alignment with global sustainability benchmarks. The strong emphasis on our ESG and Sustainability agenda reflects our dedication to fostering resilience, innovation and shared value creation, positioning us as a leader in sustainable business practices.

- |    |  |  |
|----|--|--|
| 8. | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).   | Our Board has overview on the Business Responsibility Policies. Respective Business Heads are responsible for implementing and driving the policies.   |
| 9. | Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. | No. Our Board, during their meetings, discusses topics on sustainability and takes appropriate decisions as and when required. The respective business heads are responsible for implementation and monitoring of ESG parameters within their scope. |

10. **Details of Review of NGRBCs by the Company:**

Subject For Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	Frequency (Annually /Half yearly/ Quarterly, Any other-Please Specify)
	P1 P2 P3 P4 P5 P6 P7 P8 P9	P1 P2 P3 P4 P5 P6 P7 P8 P9
Performance against above policies and follow up action	As a sustainable practice, our Board reviews the policies on need basis and sustainability initiatives on an annual basis. During review, the effectiveness of the policies is assessed and any necessary changes to policies and procedures are adopted. Department and Business Heads also review our policies and their effectiveness periodically and any update or change is timely presented to the Board for approval, if required.	Our Board reviews the policies on need basis and sustainability initiatives on an annual basis.
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Board of Directors and its Committee	Annual Basis

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<p>11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.</p>	P1	P2	P3	P4	P5	P6	P7	P8	P9	<p>While the Company has not carried out an independent audit of the policies, the policies are periodically reviewed by the Board and its Committees as well as Auditors of respective functions like ISO Auditors, Internal Auditors and Secretarial Auditors, etc. In addition, Elecon is certified for ISO 9001, ISO 14001 and ISO 45001 which are assessments done by external audit agency. They assess the policies and procedures maintained by the organisation as part of the certification process. The Information security policy, privacy policy and risk management policy have been reviewed as part of this process. Elecon has documented management policies reviewed and approved by Management.</p>
<p>12. <b>If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated:</b></p> <p><b>Questions</b></p> <p>The entity does not consider the Principles material to its business (Yes/No)</p> <p>The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)</p> <p>The entity does not have the financial or/human and technical resources available for the task (Yes/No)</p> <p>It is planned to be done in the next financial year (Yes/No)</p> <p>Any other reason (please specify)</p>	P1	P2	P3	P4	P5	P6	P7	P8	P9	<p style="text-align: center;">Not Applicable</p>

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorised as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally, and ethically responsible.

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

**Essential Indicators**

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	Percentage of people in respective category covered by the awareness programmes
Board of Directors	4	Recent Amendment in the SEBI Regulations, SEBI (LODR) Regulations, 2015 and SEBI (Prohibition of Insider Training) Regulations, 2015, Training of code of conduct, ESG Policy	100.00%
Key Managerial Personnel	7	POSH, Skill Enhancement, Health & Safety, Leadership	64.29%

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Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	Percentage of people in respective category covered by the awareness programmes
Employees other than BoD and KMPs	88	POSH, Values, Health & Safety, Human Rights & Culture, Skill Enhancement	100%
Workers	75	Health & Safety, Skill Enhancement, Quality & Manufacturing Circle Awareness	81.08%

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

**Monetary**

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹ Lakhs)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Principle 1	GST State Tax Officer - Adjudication, Coimbatore (Tamil Nadu)	2.07	Penalty was levied regarding Tax Invoice Raised to an Unregistered business place of a Register Taxpayers.	No
Settlement	-	None	-	Not applicable	Not applicable
Compounding fee	-	None	-	Not applicable	Not applicable

**Non - Monetary**

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	None	-	Not applicable	Not applicable
Punishment	-	None	-	Not applicable	Not applicable

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Not Applicable	Not Applicable

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

Yes. It is a part of our Code of Conduct. We ensure all our systems are operated ethically.

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**Web-link to the policy:**

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Elecon-Code-of-Conduct.pdf>,

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code%20of%20Conduct-new-2023.pdf>.

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

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

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

Particulars	2024-25 (Current Financial Year)		2023-24 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	-	Not Applicable	-	Not Applicable
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	-	Not Applicable	-	Not Applicable

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

Not applicable.

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

Particulars	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Number of days of account payables	79	78

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### 9 Open-ness of business:

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	14.45%	17.95%
	b. Number of trading houses where purchases are made from	372	435
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	58.33%	59.41%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	8.90%	9.37%
	b. Number of dealers / distributors to whom sales are made	69	64
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors	59.37%	58.17%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	13.40%	12.14%
	b. Sales (Sales to related parties / Total Sales)	7.23%	8.14%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	-	-
	d. Investments (Investments in related parties / Total Investments made)	21.77%	34.62%

### PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

#### Essential Indicators

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

	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	-	-	<p>Our R&amp;D department is not only focused on upgrading our technology but also focused on making our products more sustainable. To reduce the environment and social impact of our products the department works on projects considering reduction of weight of our product and optimal use of oil in operations, improvising safety features and operational efficiency.</p> <p>Our R&amp;D/Manufacturing department created a process for producing higher quality class gears to reduce meshing losses, which increases gearbox efficiency and reduces power loss. Furthermore, higher quality gears minimise noise levels, which is critical for the environment.</p>

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	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)	Details of improvements in environmental and social impacts
Capex	14.08%	10.15%	<p>Increased renewable energy generation &amp; consumption by adding 1 MW solar roof top system.</p> <p>New auto scrap transfer conveyor system to eliminate human intervention and fatigue as well as increase safety for work force.</p> <p>Installation of Cooling system for human comfort at new workshop and office.</p>

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

Yes

**b. If yes, what percentage of inputs were sourced sustainably?**

Around 80% of inputs were sourced sustainably, the Company has formulated an operating procedure to approve vendors. Materials are procured from approved vendors both, local and international. The quality assurance team of the Company conducts periodic audit of the vendors, especially those who supply key materials and there is very specific focus towards the conservation of energy, water & environment at their end.

**3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

Our product line comprises products predominantly made of metals, accounting for around 99% of the composition. This metal content renders our products highly recyclable. The materials used, including ferrous and non-ferrous elements, contribute to a robust and sustainable life cycle lasting approximately 20-25 years. As a result, direct reclamation of our products for recycling post their life cycle is currently unviable.

Our product manual serves as a tool to raise awareness among customers, advocating for the recycling of used products through designated recyclers. At the end of their life cycle, our products do not generate plastic, e-waste, hazardous waste, or any other form of waste, aligning with our commitment to environmental sustainability.

**4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

Yes, we are disposing the waste in line with the EPR requirement to registered recyclers.

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

**Essential Indicators**

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

**% of employees covered by**

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number	%	Number	%	Number	%	Number	%	Number	%
<b>Permanent Employees and Other than Permanent Employees</b>											
Male	718	718	100%	718	100%	-	-	-	-	-	-
Female	22	22	100%	22	100%	22	100%	-	-	-	-
<b>Total</b>	<b>740</b>	<b>740</b>	<b>100%</b>	<b>740</b>	<b>100%</b>	<b>22</b>	<b>100%</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

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

**% of workers covered by**

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number	%	Number	%	Number	%	Number	%	Number	%
<b>Permanent Employees and Other than Permanent Employees</b>											
Male	1,419	1,419	100%	1,419	100%	-	-	-	-	-	-
Female	3	3	100%	3	100%	3	100%	-	-	-	-
<b>Total</b>	<b>1,422</b>	<b>1,422</b>	<b>100%</b>	<b>1,422</b>	<b>100%</b>	<b>3</b>	<b>0.21%</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

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

Particulars	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Cost incurred on wellbeing measures as a % of total revenue of the Company	0.03%	0.04%

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

Benefits	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI*	NA	NA	NA	NA	NA	NA
<b>Others – Please Specify</b>						
Felicitation Scheme	100%	NA	NA	100%	NA	NA
NPS	5.50%	-	Y	5.68%	-	Y

\* The facilities and branches of the Company are either exempted from or not covered under ESIC Scheme.

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**3. Accessibility of workplaces**

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

Yes, our office and manufacturing unit are accessible to differently abled employees and workers.

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

Yes, we emphasise on treating every individual with dignity and respect inside our organisation and throughout the supply chain. We also ensure that Human Rights Policy is strictly adhered in our premises and also encourages its supply chain partners to comply with our policy.

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Human%20Rights%20Policy-new-2023.pdf>

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-	-	-	-
Female	100%	100%*	-	-
<b>Total</b>	<b>100%</b>	<b>100%*</b>	-	-

\*One female employee went on maternity leave during the 2023-24 financial year and returned in April 2024. Another female employee went on maternity leave in June, 2024 and returned in December, 2024.

**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.**

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Employees	Yes*, we have a grievance redressal mechanism which is elaborated in our Code of Conduct through which Employees & Workers can raise their concerns, and which are addressed at the earliest.
Other than Permanent Employees	
Permanent Workers	Employees & Workers will promptly report to the Management about any actual or possible violation of the Code of Conduct, or any event he or she becomes aware of that could affect the business or reputation of any unit of our Company to the appropriate person(s) as defined in the policy.
Other than Permanent Workers	

\*Detailed redressal mechanism can be viewed in specific policies whose link is <https://www.elecon.com/investors/policies>,

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code%20of%20Conduct-new-2023.pdf>

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Code of Conduct-2023.pdf>,

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Human%20Rights%20Policy-new-2023.pdf>

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

Category	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (C / D)
<b>Total Permanent Employees</b>						
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-
<b>Total Permanent Workers</b>						
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-

8. Details of training given to employees and workers:

Category	2024-25 (Current Financial Year)					2023-24 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Male	718	718	100%	579	81%	665	648	97%	545	82%
Female	22	19	86%	11	50%	22	22	100%	15	68%
Total	740	737	100%	590	80%	687	670	98%	560	82%
<b>Workers</b>										
Male	1,419	959	68%	592	42%	1,286	1,286	100%	349	28%
Female	3	1	33%	-	-	1	1	100%	-	-
Total	1,422	960	68%	592	42%	1,287	1,287	100%	349	28%

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

Category	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	718	694	97%	665	640	96%
Female	22	22	100%	22	20	91%
<b>Total</b>	<b>740</b>	<b>716*</b>	<b>97%</b>	<b>687</b>	<b>660*</b>	<b>96%</b>
<b>Workers</b>						
Male	1,419	-	-	1,286	-	-
Female	3	-	-	1	-	-
<b>Total</b>	<b>1,422</b>	<b>-</b>	<b>-</b>	<b>1,287</b>	<b>-</b>	<b>-</b>

\* Only employees joining before the cut-off date, i.e., December 31, are eligible for performance review.

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**10 Health and safety management system:**

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

Yes, at Elecon, safety is ingrained as a fundamental value rather than just a priority. To mitigate safety incidents and emphasise the importance of well-being, we take proactive and preventive measures. These include safety audits, emergency preparedness plans, fire safety protocols, comprehensive training, and targeted initiatives. Our dedication to preventing injuries and occupational illnesses is reflected in our adherence to ISO 45001:2018 standards and similar guidelines, which we promote throughout our organisation. This comprehensive occupational health and safety management system underscores our commitment to ensuring a safe and healthy work environment for all employees. The detailed policy is available at <https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/EHS%20policy-2023.pdf>.

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

To ensure comprehensive risk management across our offices and manufacturing facility, we have implemented a systematic risk management procedure. This includes active involvement from engineers, production-in-charge personnel, and members of the Environment Health & Safety (EHS) team in conducting risk assessments and managing identified risks. Documentation, approval, and communication of risk mitigation plans to relevant stakeholders are integral steps in our risk management process. Our operations are guided by safety observations, rectification plans, and procedures encompassing Hazard Identification & Risk Assessment for all activities, contractor safety management, and regular external audits to maintain a safe and compliant workplace.

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

Yes, We have a structured risk management approach in place to ensure safety across our offices and manufacturing facility. This involves engineers, production supervisors, and EHS team members actively participating in risk assessments and managing identified risks. Documenting, approving, and communicating risk mitigation plans to stakeholders is crucial. Our operations are guided by safety observations, rectification plans, and procedures covering Hazard Identification & Risk Assessment, contractor safety management, and routine external audits for workplace safety compliance.

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

Yes, all workers, including their dependent family members, have access to an external multispecialty reputed hospital in close proximity to our premises. This hospital is equipped with the latest facilities and infrastructure to provide comprehensive non-occupational medical and healthcare services. Additionally, we conduct awareness programs conducted by experts on various topics such as good health habits, heart attack, varicose veins, orthopedic pain, and more to educate and empower our employees and their families.

Furthermore, all our employees are covered under a group health insurance policy that ensures access to a wide range of non-occupational medical and healthcare services. This coverage reinforces our commitment to supporting the well-being and health needs of our workforce and their loved ones.

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

Safety Incident/Number	Category	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one Million-person hours worked)	Employees	-	-
	Workers	0.18	0.20
Total recordable work-related injuries	Employees	-	-
	Workers	1	1
No. of fatalities	Employees	-	-
	Workers	-	-
High consequences for work-related injury or ill-health (excluding fatalities)	Employees	-	-
	Workers	-	-

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

The entity maintains a safe and healthy workplace through a range of measures. These include routine safety audits, emergency preparedness plans, fire safety measures, and comprehensive training programs. Hazards are promptly identified, and risk levels are mitigated to acceptable standards, with controls regularly reviewed and deviations addressed promptly. Adherence to safety protocols is closely monitored, with a focus on hazard elimination. Additionally, periodic training and awareness sessions reinforce safety practices, fostering a culture of safety across all operations. This holistic approach ensures that the entity prioritises the well-being of its employees and creates a conducive environment for productive and safe work.

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

Category	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	-	-	NA	-	-	NA
Health & Safety	-	-	NA	-	-	NA

14. Assessments for the year:

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

\*Third party assessments are carried out viz. IMS audit. We also undertake external safety audit as per BIS 14489 and approved accredited laboratories carry out workplace condition monitoring on timely basis.

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

Our actions are addressed in form of Kaizens and Poka-yoke based on recommendations received by assessments in order to mitigate the risk & concerns arising at working locations proactively with horizontal deployment.

**PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders**

**Essential Indicators**

**1. Describe the processes for identifying key stakeholder groups of the entity.**

Through our Stakeholder Engagement and Materiality Assessment process, we have identified important internal and external groups of stakeholders. These stakeholders play an important role in activities related to Elecon and can help our company shape a sustainable future.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Direct engagement, Customer satisfaction survey, Customer feedback	As and when required	To ensure product quality and safety, high customer satisfaction
Shareholders	No	Email, SMS, Newspaper advertisement, website	Annually/ Half yearly/ Quarterly	Annual Financial Statements and other related information
Employees	No	Meetings, Email, SMS, Intranet, Posters, Slogans	Monthly/ Quarterly meetings and continuous communications	Engagement Initiatives, Trainings and Policy updates, Occupational Health & Safety and other Department updates
Regulatory & Government	No	Direct engagement	As and when required	To comply with applicable regulations
Communities	No	Direct engagement, CSR partners	As and when required	To have an overview on the implementation and success of the projects
Vendors	No	Regular supplier and contractor meets	As and when required	To resolve supplier and contractor concerns and encourage suppliers to adhere to Elecon’s policies

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**PRINCIPLE 5: Businesses should respect and promote human rights**

**Essential Indicators**

1. **Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

Category	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	740	740	100%	687	687	100%
Other than Permanent						
<b>Total Employee</b>	<b>740</b>	<b>740</b>	<b>100%</b>	<b>687</b>	<b>687</b>	<b>100%</b>
<b>Workers</b>						
Permanent	1,422	1,422	100%	1,287	1,287	100%
Other than Permanent						
<b>Total Workers</b>	<b>1,422</b>	<b>1,422</b>	<b>100%</b>	<b>1,287</b>	<b>1,287</b>	<b>100%</b>

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

Category	2024-25 (Current Financial Year)					2023-24 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees (Permanent and Other than Permanent)</b>										
Male	718	-	-	718	100%	665	-	-	665	100%
Female	22	-	-	22	100%	22	-	-	22	100%
<b>Workers (Permanent and Other than Permanent)</b>										
Male	1,419	62	4%	1,357	96%	1,286	64	5%	1,222	95%
Female	3	-	-	3	100%	1	-	-	1	100%

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

a. **Median remuneration / wages:**

	Male		Female	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	7	15,06,000*	1	15,24,000*
Key Managerial Personnel	1	65,07,588	1	25,84,872
Employees other than BoD and KMP	716	7,50,054	21	8,75,292
Workers	1,419	2,43,852	3	3,20,088

\* It is inclusive of remuneration, sitting fees with commission payable to the Directors for 2024-25.

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

Particulars	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Gross wages paid to females as % of total wages	2.27%	3.30%

The percentage is calculated basis CTC (inclusive of Gratuity) of female Employees (Permanent & Other than Permanent) to that of total CTC of Employees (Permanent & Other than Permanent).

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

Yes. The HR Department and respective Business Heads are responsible for addressing human rights-related issues.

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

Yes. The HR Department is the focal point of contact for any human rights issue. A cross-functional team is formed to verify and investigate if an issue is reported. After identifying and resolving the issue, a report is prepared, and all business heads are made aware of it for precautionary measures. In case of any severe human rights issues, the Board is presented with the report findings and further action to avoid repetition.

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

	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	-	-	NA	-	-	NA
Discrimination at workplace	-	-	NA	-	-	NA
Child Labour	-	-	NA	-	-	NA
Forced Labour/ Involuntary Labour	-	-	NA	-	-	NA
Wages	-	-	NA	-	-	NA
Other human rights related issues	-	-	NA	-	-	NA

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

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

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

We are dedicated towards preventing harassment in the workplace, particularly sexual harassment, and have zero tolerance for such behavior. We support reporting any concerns about harassment and take complaints about it or any unpleasant or uncomfortable behavior seriously. Committee have been established to investigate complaints of sexual harassment and to suggest appropriate action where necessary.

We have a Prevention of Sexual Harassment (POSH) Policy and Human Rights Policy that defines the mechanism of resolving any discrimination and harassment case, which has set guidelines for members of the grievance redressal mechanism.

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

Yes, we encourage our suppliers to adhere with our Supplier Code of Conduct and other policies. Our Supplier Code of Conduct can be viewed at <https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Supplier%20Code%20of%20Conduct-2023.pdf>.

**10. Assessments for the year:**

	% of plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	
Forced/involuntary labor	100%. Our HR team takes a survey by randomly selecting employees and contractors for evaluation. An external auditor verifies and assesses the processes followed by our HR team. Regulatory inspectors also verify the processes being followed in our manufacturing plants.
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**

There were no significant risks / concerns arising from the human rights assessments.

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

**Essential Indicators**

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

Parameter	(In Giga Joules)	
	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>From renewable sources (Giga Joules)</b>		
Total electricity consumption (A)	32,292.25	41,306.60
Total fuel consumption (B)	-	-
Energy consumption through other sources (Renewable Energy) (C)	13,180.57	13,990.20*
Total energy consumption (A+B+C)	45,472.82	55,296.80*
<b>From non-renewable sources (Giga Joules)</b>		
Total electricity consumption (D)	63,760.50	50,751.20
Total fuel consumption (E)	51,287.00	32,161.10
Energy consumption through other sources (F)	-	-
Total energy consumption from nonrenewable sources (D+E+F)	1,15,047.50	82,912.30
Total energy consumption (A+B+C+D+E+F)	1,60,520.32	1,38,209.10
Energy intensity per rupee of turnover (Total energy consumption/ revenue from operations)	0.86	0.86

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(In Giga Joules)

Parameter	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)*** ((GJ/Lakh of adjusted turnover)	17.72	19.35
Energy intensity in terms of physical Output	-	NA**
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

*\*Small part of our solar rooftop electricity generated is supplied to the grid and the same is not included in this calculation as the value is not significant.*

*\*\*Intensity, in terms of physical output, is not applicable due to the diverse range of products manufactured, majority of measured in numbers rather than tonnage, making it challenging to track in standardised units.*

*\*\*\*Purchasing power parity (PPP) conversion factor is 20.66 for the year 2025 as per IMF data available at <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND>.*

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

No such assessment or evaluation is being carried out during the year

2. **Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

Not Applicable, as we do not have any recognised sites/facilities as a Designated Consumer (DC) under Perform, Achieve & Trade scheme.

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

Particulars	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	2,33,855.77	2,02,164.09
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	2,33,855.77	2,02,164.09
<b>Total volume of water consumption (in kilolitres)</b>	2,33,855.77*	2,02,164.09
<b>Water intensity per rupee of turnover (Water consumed / turnover) – KL/INR Lakh</b>	1.25	1.26
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	25.82	28.31
Water intensity in terms of physical output	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

*\*93,807.18 kiloliters consumption of recycled water is not considered in this calculation as per the definition in the regulation.*

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

No such assessment or evaluation is being carried out during the year.

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

Parameter	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) To Ground water (Gardening)		-
- No treatment		-
- With treatment – please specify level of treatment	93,807.18 (Tertiary)	-
(iii) To Sea water		-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties		-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Other		-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharge (in kilolitres)</b>	<b>93,807.18</b>	<b>-</b>

*Our units implement initiatives to conserve freshwater by recycling treated wastewater, ensuring ZLD (Zero Liquid Discharge).*

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

No such assessment or evaluation is being carried out during the year.

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

Yes. Our water stewardship strategy revolves around optimising water usage to minimise intake while maximising efficiency. Across all our company-owned facilities and offices, we prioritise water conservation and recycling efforts, aiming for Zero Liquid Discharge (ZLD). Following treatment, all wastewater is recycled to support the preservation and expansion of our green spaces. Moreover, we’ve implemented rainwater harvesting systems across our extensive industrial site, channeling collected rainwater into designated pits to replenish our groundwater levels.

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

Parameter	Units	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
NOx	MT	15.68	0.17
SOx	MT	0.19	0.16
Particulate matter (PM)*	MT	13.17	19.30
Persistent organic pollutants (POP)	MT	NA	Not Available

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Parameter	Units	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Volatile organic compounds (VOC)	M MT	0.33	Not Available
Hazardous air pollutants (HAP)	MT	NA	Not Available
Others – please specify	NA	NA	Not Available

\* This year we have calculated air emissions for 17 stacks 2024-25 using CPCB Standards.

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

Yes, independent assessment has been carried out by external third-party agency. This agency is National Accreditation Board for Testing and Calibration Laboratories (NABL) accredited, and Ministry of Environment, Forest and Climate Change (MoEF) approved.

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

Parameter	Units	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MtCO <sub>2</sub> e	2,361.24	2,213.45
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MtCO <sub>2</sub> e	12,681.26	10,943.85
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MtCO <sub>2</sub> e/ ₹ Lakh	0.08	0.08
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	MtCO <sub>2</sub> e/ ₹ Lakh	1.66	1.72
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	-	-	NA
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	-	-

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

No such independent assessment is being carried out during the year ending March 31, 2025.

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

Yes, this year we have set up a 2 MW capacity of solar rooftop, significantly contributing to our organisation's sustainability efforts by reducing greenhouse gas emissions. Additionally, to achieve net-zero emissions in our operations, we've established our own wind farm, which generates electricity supplied to the grid. We receive credits for the units contributed, effectively reducing our electricity bills. Our renewable energy infrastructure boasts a total installed capacity of 5.5 MW in solar rooftops and 13.25 MW in windfarms. Through the utilisation of these renewable sources, we've successfully avoided CO<sub>2</sub> emissions.

We are committed to reducing our greenhouse gas emissions in alignment with the Science-Based Targets initiative (SBTi), target validation will get done this year. Our emission reduction target will be established based on identified decarbonisation strategies, including the adoption of renewable energy, enhancing energy efficiency, and implementing fuel-switching measures.

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

Parameter	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>Total Waste Generated (in metric tonnes)</b>		
Plastic waste (A)	11.56	10.99
E Waste (B)	3.71	-
Bio medical waste (C)	-	-
Construction and Demolition Waste (D)	-	-
Battery Waste (E)	4.14	2.41
Radio-active waste (F)	-	-
Hazardous waste. Please specify, if any. (G)	127.43	156.34
Other Non-hazardous waste generated (H) Please specify, if any (Break-up by composition i.e., by materials relevant to the sector)	14,463.59	10,773.12
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>14,610.43</b>	<b>10,942.85</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.08	0.07
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	1.61	1.53
Waste intensity in terms of physical output NA	NA	NA
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-

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**For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)**

Parameter	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>Category of Waste</b>		
(i) Recycled*	7,087.50	4,874.84
(ii) Re-used*	7522.73	6,067.85
(iii) Other recovery operations	-	-
<b>Total</b>	<b>14,610.23</b>	<b>10,942.69</b>

\*Waste recovery is done internally as well as through authorised recyclers.

**For each category of waste generated, total waste disposed of by nature of disposal method (in metric tonnes)**

Parameter	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>Category of Waste</b>		
(i) Incineration	0.20	0.16
(ii) Landfilling	-	-
(iii) Other recovery operations	-	-
<b>Total</b>	<b>0.20</b>	<b>0.16</b>

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

No. During our ISO 14001 external audit, the waste collection procedure and data is verified as a part of the process.

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

We closely monitor waste management techniques. Automated machining of gear parts addresses this issue by minimising the amount of metal scrap generated. We generate a substantial amount of metal scrap, which is then reused in our foundry shop to make castings. Hazardous waste (used oil) contaminated empty containers (carboys, tins, cans, etc.) are disposed of to an approved recycler in accordance with regulatory requirements. Our foundry produces a substantial volume of burnt sand, which is used by recyclers in the infrastructure and building industries.

- 11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:**

Sr. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
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Not Applicable, as our plants/ offices are not situated in ecological sensitive areas where environmental approval/ clearance is required.

ANNEXURE – E TO BOARD’S REPORT (CONTD.)

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
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Environmental impact assessments are not applicable to us, and we have not performed the same during the financial year ending March 31, 2025.

**13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format: We are compliant with.**

Sr. No.	Specify the law/ regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
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Not applicable, as we have not violated any ruled mentioned in the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act for the year ending March 31, 2025.

**PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**

**Essential Indicators**

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

We are associated with 9 trade and Industry chambers/ Associations

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

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry (CII)	National
2	Federation Gujarat Industries (FGI)	State
3	Gujarat Chamber of Commerce & Industry (GCCCI)	State
4	Central Gujarat Chamber of Commerce & Industry (CGCCI)	State
5	Indo-German Chamber of Commerce (IGCC)	National
6	EEPC India	National
7	Vitthal Udyognagar Industries Association	Local
8	Indian Institute of Materials Management	National
9	Quality Circle Federation of India (QCFI)	National

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

Name of Authority	Brief of the Case	Corrective Action Taken
Not applicable, as no such adverse order is received from any authority for which corrective action must be taken by our Company for the year ending March 31, 2025.		

**PRINCIPLE 8: Businesses should promote inclusive growth and equitable development**

**Essential Indicators**

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes/ No)	Relevant Web link
Not Applicable					

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

Sr. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	No. of Project Affected Families (PAFs)	Amounts paid to PAFs in the FY (In INR)
Not Applicable						

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

We have grievance redressal mechanism in our Human Rights Policy. Our Board level CSR Committee is responsible to redresses any community related grievances.

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

	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	52.40%	62.00
Sourced directly from within the district and neighboring districts	46.48%	50.01

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

Location	2024-25 (Current Financial Year)	2023-24 (Previous Financial Year)
<b>Rural</b>	-	-
<b>Semi-Urban</b>	90.55%	86.44%
<b>Urban</b>	2.44%	0.57%
<b>Metropolitan</b>	7.01%	12.99%

The percentage is calculated basis CTC (inclusive of Gratuity) of employees and workers to that of total CTC.

ANNEXURE – E TO BOARD'S REPORT (CONTD.)

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

**Essential Indicators**

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

We have divided our operational geography amongst branches. Each branch is responsible for customers in their respective geography. We have deployed service personnel in each of our geography. Our service personnel are technically sound and are being given regular training.

Our customers can raise issues or complaints in the respective branches or online in our central Customer Resolution Management. These details are made available in our handbook to every customer. After lodging of a complaint, we deploy our competent personnel to resolve the complaint. After resolution, the service personnel shall inform the customer of the preventive action to be taken to avoid further complaints and safe operations of our equipment.

Complaints are reported to all concern HOD's/CEO/Vice President on Monthly basis and a Management Review Meeting (M.R.M.) is carried out every six months.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	71.33%
Safe and responsible usage	100.00
Recycling and/or safe disposal	71.33%

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

	2024-25 (Current Financial Year)			2023-24 (Previous Financial Year)		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data Privacy	-	-	-	-	-	-
Advertising	-	-	-	-	-	-
Cyber-security	-	-	-	-	-	-
Delivery of essential services	-	-	-	-	-	-
Restrictive Trade Practices	-	-	-	-	-	-
Unfair Trade Practices	-	-	-	-	-	-
Other	-	-	-	-	-	-

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

	Number	Reasons for recall
Voluntary recalls		
Forced recalls		Nil

ANNEXURE – E TO BOARD’S REPORT (CONTD.)

**5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.**

Yes, we secure our digital data and maintain privacy through various mechanisms. We have our own internal IT policy which is adhered to.

<https://www.elecon.com/views/templates/admin-uploads/Investors/Policies/Data%20Privacy%20and%20Cyber%20Security%20Policy-2023.pdf>

**6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of Consumers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

Nil

**7. Provide the following information relating to data breaches:**

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

## ANNEXURE – E TO BOARD'S REPORT (CONTD.)

### INDEPENDENT REASONABLE AND LIMITED ASSURANCE REPORT ON BUSINESS RESPONSIBILITY SUSTAINABILITY REPORT OF ELECON ENGINEERING COMPANY LIMITED

To,  
The Board of Directors,  
**Elecon Engineering Company Limited**  
Gujarat, India.

We have undertaken to perform a Reasonable Assurance for Business Responsibility Sustainability Report [hereinafter "BRSR"] 'Core Key Performance Indicators (KPIs)' and Limited Assurance for 'Essential Indicators' for Elecon Engineering Company Limited vide Engagement Letter dated December 27, 2024 in respect of the agreed BRSR in accordance with the criteria stated below. This is included in BRSR of the company for the financial year ended March 31, 2025.

#### Criteria

The criteria used by the Company to prepare the Identified Sustainability Information is as per the guidelines issued by Securities and Exchange Board of India (SEBI) in accordance with the circulars:

- SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023
- SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023 and clarifications issued for the same.

This engagement was conducted by a multidisciplinary team including assurance practitioners, social, governance and environmental experts.

#### Identified Sustainability Information

The identified Sustainability Information for the financial year ended March 31, 2025 is summarised below as per Appendix 1;

The areas for which Reasonable and Limited assurance is undertaken are also given in Appendix 1 to the report; and

Our Reasonable and Limited assurance engagement was with respect to the year ended March 31, 2025 information only unless otherwise stated and we have not performed any procedures with respect to earlier periods or any other elements included in the BRSR and, therefore, do not express any conclusion thereon.

#### Management's Responsibility

The Company's management is responsible for selecting or establishing suitable criteria for preparing the Sustainability Information, considering applicable laws and regulations,

if any, related to reporting on Sustainability Information, Identification of key aspects, engagement with stakeholders, content, preparation and presentation of the Identified Sustainability Information in accordance with the Criteria. This responsibility includes design, implementation and maintenance of internal control relevant to the preparation of BRSR and the measurement of Identified Sustainability Information, which is free from material misstatement, whether due to fraud or error.

#### Inherent Limitations

The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, measures and measurement techniques and can affect comparability between entities.

#### Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of Code of Ethics issued by Institute of Chartered Accountants of India (ICAI) and have the required competencies and experience to conduct this assurance engagement and

The firm applies Standard on Quality Control (SQC) 1, "Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements" issued by the ICAI and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

#### Our Responsibility

Our responsibility is to express a Reasonable and Limited assurance conclusion, as applicable and given in the Appendix 1 to this report on the Identified Sustainability Information based on the procedures we have performed and evidence we have obtained;

We conducted our engagement in accordance with the Standard on Sustainability Assurance Engagements (SSAE) 3000, "Assurance Engagements on Sustainability Information", issued by the ICAI. This standard requires that we plan and perform our engagement to obtain reasonable assurance about whether the Identified Sustainability

## ANNEXURE – E TO BOARD'S REPORT (CONTD.)

Information are prepared, in all material respects, in accordance with the Reporting Criteria. A reasonable assurance engagement involves assessing the risks of material misstatement of the Identified Sustainability Information whether due to fraud or error, responding to the assessed risks as necessary in the circumstances;

For the purpose of limited assurance, this standard requires that we plan and perform our engagement to obtain limited assurance about whether the Identified Sustainability Information is free from material misstatement;

A limited assurance engagement involves assessing the suitability in the circumstances of the Company's use of the Criteria as the basis for the preparation of the Identified Sustainability Information, assessing the risks of material misstatement of the Identified Sustainability Information whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Identified Sustainability Information;

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks; and

The procedures we performed were based on our professional judgment and included inquiries, observation of processes performed, inspection of documents, evaluating the appropriateness of quantification methods and reporting policies, analytical procedures and agreeing or reconciling with underlying records.

### Basis of Opinion:

Given the circumstances of the engagement, in performing the procedures listed above, we:

- Obtained an understanding of the identified sustainability indicators and related disclosures;
- Obtained an understanding of the assessment criteria and their suitability for the evaluation and / or measurements of the identified sustainability indicators;
- Made enquiries of Company's Management, including those responsible for Sustainability, Environment, Social, Governance (ESG), Corporate

Social Responsibility (CSR), etc., and those with responsibility for managing the Company's BRSR;

- Obtained an understanding and performed an evaluation of the design of the key systems, processes and controls for managing, recording and reporting on the Identified Sustainability Indicators including at the sites and corporate office visited;
- Based on that understanding, the risks that the selected information may be materially misstated and determining the nature, timing and extent of further procedures;
- Checked the consolidation for various domestic branch offices, 2 plant sites and corporate office under the reporting boundary (as mentioned in the BRSR) for ensuring the completeness of data being reported except data pertaining to energy, waste, water and emissions domestic branch offices are not included for the purpose of BRSR Core KPIs;
- Based on above understanding and the risks that the identified sustainability indicators may be materially misstated, determined the nature, timing and extent of further procedures;
- Performed substantive testing on a sample basis of the Identified Sustainability Indicators at corporate head office, and 2 plant sites located at Vallabh Vidyanagar, Gujarat to verify that data had been appropriately measured with underlying documents recorded, collated and reported;
- Assessed records and performed testing including recalculation of sample data;
- Reviewed records and performed testing including recalculation of sample data;
- Assessed the level of adherence to the 'Guidance note for BRSR format' issued by SEBI followed by the Company in preparing the BRSR;
- Assessed the BRSR for detecting, on a test basis, any major anomalies between the information reported in the BRSR on performance with respect to agreed indicators and relevant source data/information; and
- Obtained representations from Company's Management.

## ANNEXURE – E TO BOARD'S REPORT (CONTD.)

### Exclusions:

The following and therefore we do not express a conclusion on the same:

- Operations of the Company other than those mentioned in the Scope of Assurance as per the above referred Engagement Letter;
- Aspects of the BRSR and the data/information (qualitative or quantitative) other than the Identified Sustainability Information;
- Data and information outside the defined reporting period i.e., Financial Year 2024-25 and
- The statements that describe expression of opinion, belief, aspiration, expectation, aim, or future intentions provided by the Company.

### Opinion on the Reasonable Assurance

Based on the procedures we have performed and the evidence we have obtained, the Identified Sustainability Information for the financial year ended March 31, 2025 (as stated under "Identified Sustainability Information") are prepared in all material respects, in accordance with the criteria.

### Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Company's

Identified Sustainability Information included in the BRSR for year ended March 31, 2025 are not prepared, in all material respects, in accordance with the Criteria.

### Restriction on use

Our Reasonable Assurance Report and Limited assurance conclusion have been prepared and addressed to the Board of Directors of Elecon Engineering Company Limited at the request of the company solely, to assist company in reporting on Company's sustainability performance and activities. Accordingly, we accept no liability to anyone other than the company. Our Deliverables should not be used for any other purpose or by any person other than the addressees of our Deliverables. The firm neither accepts nor assumes any duty of care or liability for any other purpose or to any other party to whom our Deliverables are shown or into whose hands it may come without our prior consent in writing.

### For C N K & Associates LLP

Chartered Accountants

Firm Registration Number: 101961 W/W – 100036

### Himanshu Kishnadwala

Partner

Membership Number: 037391

Date: April 24, 2025

Place: Mumbai

UDIN: 25037391BMLFTN1851

ANNEXURE – E TO BOARD'S REPORT (CONTD.)

APPENDIX 1:

Sr No.	Indicator Number	Name of Indicator	Type of Assurance
1	Section C - Principle 6 -Q7	Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the given format	Reasonable
2	Section C - Principle 6 -Q3	Provide details of the following disclosures related to water withdrawal, in the given format	Reasonable
3	Section C - Principle 6 -Q4	Provide the following details related to water discharged	Reasonable
4	Section C - Principle 6 -Q1	Details of total energy consumption (in Joules or multiples) and energy intensity, in the given format	Reasonable
5	Section C - Principle 6 -Q9	Provide details related to waste management by the entity, in the given format	Reasonable
6	Section C - Principle 3 - Q1c	Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the given format	Reasonable
7	Section C - Principle 3 - Q11	Details of safety related incidents, in the given format	Reasonable
8	Section C - Principle 5 - Q3b	Gross wages paid to females as % of total wages paid by the entity, in the given format	Reasonable
9	Section C - Principle 5 - Q 7	Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the given format	Reasonable
10	Section C - Principle 8 -Q4	Percentage of input material (inputs to total inputs by value) sourced from suppliers	Reasonable
11	Section C - Principle 8-Q 5	Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the given locations, as % of total wage cost	Reasonable
12	Section C - Principle 9 - Q 7	Provide the following information relating to data breaches: <ol style="list-style-type: none"> <li>a. Number Of instances of data breaches</li> <li>b. Percentage of data breaches involving personally identifiable information of customers</li> <li>c. Impact, if any, of the data breaches</li> </ol>	Reasonable

ANNEXURE – E TO BOARD'S REPORT (CONTD.)

Sr No.	Indicator Number	Name of Indicator	Type of Assurance
13	Section C - Principle 1 - Q 8	Number of days of accounts payables (Accounts Payable * 365) / cost of goods/services procured) in the given format.	Reasonable
14	Section C - Principle 1 - Q 9	Open-ness of business Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances & investments, with related parties, in the given format	Reasonable
15	BRSR Report	<ol style="list-style-type: none"> <li>1. Section A: General Disclosure – 24 indicators</li> <li>2. Section B: Management &amp; Process disclosures – 12 indicators</li> <li>3. Section C: Principle wise performance disclosures – 9 Principles (Essential indicators except the Core KPI's as covered in Sr. No. 1 – 14 above)</li> </ol>	Limited