

Dept. of Corporate Services – Corporate Relationship,  
BSE Limited,  
Phiroze Jeejeebhoy Towers, Dalal Street,  
Mumbai 400 001

National Stock Exchange of India Limited,  
Listing Department,  
Exchange Plaza, C-1, Block ‘G’  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

Date	Our Reference No.	Our Contact	Direct Line
15 <sup>th</sup> July, 2025	SEC/07/2025	RAHUL NEOGI	91 22 67680814 <a href="mailto:rahul.neogi@itdcem.co.in">rahul.neogi@itdcem.co.in</a>

Dear Sirs,

**Sub: Submission of Business Responsibility and Sustainability Report for the Financial Year 2024-25 under Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended (SEBI Listing Regulations)**

**Scrip Code: 509496 (BSE) and ITDCEM (NSE)**

Pursuant to Regulation 34(2)(f) of SEBI Listing Regulations, please find enclosed herewith Business Responsibility and Sustainability Report for the Financial Year 2024-25.

The Business Responsibility and Sustainability Report is forming the part of the Annual Report for the Financial Year 2024-25.

The Annual Report 2024-25 are available on the Company's website at <https://www.itdcem.co.in/investors/financial/annual-reports/>.

Please acknowledge and take the same on record.

Thanking you,

Yours faithfully,

For ITD Cementation India Limited

(RAHUL NEOGI)  
COMPANY SECRETARY

Encl: As above

ITD Cementation India Limited

**Registered & Corporate Office** : 9th Floor, Prima Bay,  
Tower - B, Gate No. 5, Saki Vihar Road, Powai, Mumbai - 400 072.  
Tel.: 91-22-66931600 Fax : 91-22-66931628 [www.itdcem.co.in](http://www.itdcem.co.in)  
Corporate Identity Number : L61000MH1978PLC020435



# Business Responsibility and Sustainability Report (2024-25)

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1.	Corporate Identify Number (CIN) of the listed Entity	-	L61000MH1978PLC020435
2.	Name of the listed Entity	-	ITD Cementation India Limited
3.	Year of incorporation	-	1978
4.	Registered office address	-	9th Floor, Prima Bay, Tower-B, Gate No.5 Saki Vihar Road, Powai Mumbai-400072
5.	Corporate address	-	9th Floor, Prima Bay, Tower-B, Gate No.5 Saki Vihar Road, Powai Mumbai-400072
6.	E-mail	-	<a href="mailto:investors.relation@itdcem.co.in">investors.relation@itdcem.co.in</a>
7.	Telephone	-	+ 91 22 66931600/67680600
8.	Website	-	<a href="https://www.itdcem.co.in/">https://www.itdcem.co.in/</a>
9.	Financial year for which reporting is being done	-	01-04-2024 to 31-03-2025
10.	Name of the Stock Exchange(s) where shares are listed	-	BSE Limited and National Stock Exchange of India Limited
11.	Paid-up Capital	-	₹ 171,787,584
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	-	MR. MANISH KUMAR Tel: + 91 22 66931600/67680600 <a href="mailto:investors.relation@itdcem.co.in">investors.relation@itdcem.co.in</a>
13.	Reporting boundary - Are the disclosures under this report made on Standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	-	Standalone basis
14.	Name of assurance provider	-	No
15.	Type of assurance obtained	-	No

### II. Products/Services

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

S. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Engineering and Construction	a) Urban Infrastructure, MRTS and Airports b) Highways, Bridges and Flyovers. c) Maritime Structure d) Industrial Structures and Buildings High - rise Buildings e) Hydro, Dams, Tunnels, Irrigation structure and PSP f) Turnkey projects- Water and wastewater g) Design and execution of foundations of structures, earth retaining structures, diaphragm walls, sheet piles, ground improvement, slope stabilisation, rehabilitation work, shotcreting, guniting, special grouting works	100%



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

S. No	Product/Service	NIC Code	% of total turnover contributed
1.	a) Design and Construction of underground and elevated metros, Airport terminal buildings and airside works	4290	100%
	b) Design and Construction of Highways, Bridges, special span bridges and elevated road corridors.		
	c) Design and Construction of Maritime Structures- ports and harbour, structure for ship building and repairing, breakwaters, dredging, marine structures on turnkey basis, topside liquid cargo pipes, ship unloader etc.		
	d) Construction of Industrial Structures for power plants, petrochemical plants, steel plants etc.		
	e) Construction of structures for Hydel power plants, Dams, Tunnels, Irrigation structure and PSP.		
	f) Turnkey projects for Water and Wastewater treatment		
	g) Geotechnical engineering- Foundation and Specialist works.		

### 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	58	9	67
International	2	3	5

19. Markets served by the entity:

a. Number of locations

Locations	Number
Location (No. of States)	14*
International (No. of Countries)	2

\* Includes thirteen states and one Union Territory (Delhi).

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

7.6%

c. A brief on types of customers

The Company's business is the construction of civil infrastructure. Some of its major clients include State and Central Government departments, Public sector undertakings (PSU), Ministries, local municipal bodies and Private Clients.

#### IV Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1	Permanent (D)	2,739	2,663	97.23	76	2.77
2	Other than Permanent (E)	1,426	1,402	98.32	24	1.68
<b>3</b>	<b>Total employees (D+E)</b>	<b>4,165</b>	<b>4,065</b>	<b>97.60</b>	<b>100</b>	<b>2.40</b>
<b>WORKERS</b>						
4	Permanent (F)	30	30	100	0	0
5	Other than Permanent (G)	26,770	26,770	100	0	0
<b>6</b>	<b>Total workers (F+G)</b>	<b>26,800</b>	<b>26,800</b>	<b>100</b>	<b>0</b>	<b>0</b>

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	1	1	100	0	0
2.	Other than Permanent (E)	0	0	0	0	0
<b>3.</b>	<b>Total differently abled employees (D+E)</b>	<b>1</b>	<b>1</b>	<b>100</b>	<b>0</b>	<b>0</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
<b>6.</b>	<b>Total differently abled workers (F+G)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of females	
		No (B)	% (B/A)
Board of Directors	6*	1	16.67
Key Management Personnel	2	0	0

\*Executive Vice Chairman and Managing Director have been considered KMP and included in the Board of Directors

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2024-25 (Turnover rate in current FY)			FY 2023-24 (Turnover rate in previous FY)			FY 2022-23 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	8.57%	9.74%	8.61%	8.46%	12.72%	8.57%	8.83%	5.33%	8.74%
Permanent Workers	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL



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

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

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/Subsidiary/Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	ITD Cementation Projects India Limited	Subsidiary	100.00%	No
2	ITD-ITD Cem JV (Consortium ITD-ITD Cementation)	Joint Venture	40.00%	No
3	ITD Cem-Maytas Consortium	Joint Venture	95.00%	No
4	ITD-ITD Cem JV	Joint Venture	49.00%	No
5	ITD Cem India JV	Joint Venture	80.00%	No
6	CEC-ITD Cem - TPL JV	Joint Venture	60.00%	No
7	ITD Cem - BBJ JV	Joint Venture	51.00%	No
8	ITD Cementation India Limited - Transrail Lighting Limited JV	Joint Venture	72.66%	No

## VI. CSR Details

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

(ii) Turnover (in ₹) - 89,373,692,348.59

(iii) Net worth (in ₹) - 18,334,283,488.36

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received.	Grievance Redressal Mechanism in Place (Yes/No)  (If yes, then provide web-link for grievance redress policy)	FY (2024-25)			FY (2023-24)		
		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, <a href="https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf">https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf</a>	0	0	-	0	0	-
Investors -other than stakeholders	No	0	0	-	0	0	-
Shareholders	Yes, <a href="https://www.itdcem.co.in/investors/investors-grievance/">https://www.itdcem.co.in/investors/investors-grievance/</a>	99	0	-	149	0	-

Stakeholder group from whom complaint is received.	Grievance Redressal Mechanism in Place (Yes/No)  (If yes, then provide web-link for grievance redress policy)	FY (2024-25)			FY (2023-24)		
		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
Employees and workers	Yes, <a href="https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf">https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf</a>	1	0	-	0	0	-
Customers	Yes, <a href="https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf">https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf</a>	0	0	-	0	0	-
Value Chain Partners	Yes, <a href="https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf">https://www.itdcem.co.in/wp-content/uploads/2016/06/FINAL-Whistle_Blower_Policy.pdf</a>	0	0	-	1	0	-
Other (please specify)	-	-	-	-	-	-	-

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

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Carbon Emission	R	Company emits CO2 during construction activities. Emissions from the construction processes release pollutants and greenhouse gases, affecting air and water quality. Non-compliance with emission norms may result in significant long-term environmental and social impact. This may also result in levying of fines and loss of reputation and brand.	<ul style="list-style-type: none"> <li>An initial attempt is made to get grid connection to minimise local pollution and use of less efficient power sources.</li> <li>Additionally, the Company is gradually transitioning to more noteworthy use of renewable energy. For instance, the installation of TOPCon solar panels on the Company owned containers used as site offices. This reduces reliance on non-renewable energy sources and significantly lowers carbon emissions. This initiative demonstrates the Company's commitment to creating a positive environmental impact.</li> </ul>	Negative



S. Material issue No. 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. Occupational Health and Safety performance	O	OHS is a critical aspect for ensuring employee welfare, non-compliance of which could have serious consequences. The Company's robust EHS management system showcases the Company's commitment to its employee welfare initiatives thus ensuring increased productivity and motivation. EHS management system often enables the Company to pre-qualify under certain stringent tender requirements.	<ul style="list-style-type: none"> <li>▪ Periodic Audits and Inspections at Project sites &amp; Depots (Daily/Weekly by sites &amp; Quarterly by Corporate).</li> <li>▪ Reviewing of unsafe acts &amp; working conditions - Preventive Measures taken. (Daily/Weekly by sites &amp; Quarterly by Corporate).</li> <li>▪ Creating awareness amongst staff and workers (Daily TBT, Weekly/Monthly by sites, Quarterly &amp; Yearly by Corporate).</li> <li>▪ Reviewing the Methodology/Risk Assessment. Safety Alerts prepared and circulated to avoid recurrence (after an incident &amp; if there is change in the activity).</li> <li>▪ Training calendar prepared &amp; circulated for implementation.</li> </ul>	Positive
3. Quality Control	O	Adherence to strict quality control measures ensures continual process improvements, thus helping in fulfilling client aspiration and achieving customer satisfaction translating into increased growth opportunities for the Company's business.	<ul style="list-style-type: none"> <li>▪ Follow Project Quality Plan &amp; work methodologies as specified.</li> <li>▪ Conduct trainings for staff &amp; workmen to deliver quality work.</li> <li>▪ Review/Site visits by HO/Divisional Quality Manager to overview practices at project sites, check compliances and provide support for continual improvement.</li> </ul>	Positive
4. Administration: Shortage of Qualified Manpower and high attrition rate of workers	R	Shortfall of skilled workers slowdown the execution process resulting in delays in completion and handing over projects to clients. High attrition rates could additionally lead to lower productivity.	<ul style="list-style-type: none"> <li>▪ Constant motivation &amp; training of manpower are taken up to prevent attrition of skilled personnel so essential for the Company's all round success.</li> <li>▪ HR policies are reviewed &amp; revised periodically. Transparency in appraisal &amp; promotion is maintained.</li> </ul>	Negative
5. Market Competition	O	Competitive risk is inevitable as aggressive competitors abound posing challenges to the existing players in the market. Healthy market competition provides an opportunity to the Company to improve its own set standards of performance and competency.	<ul style="list-style-type: none"> <li>▪ Healthy market competition provides an opportunity to improve the Company's own set-up &amp; performance.</li> </ul>	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Retention of Skilled Manpower	R	By identifying as a risk, the Company is ensuring employee well-being through proper action plan to motivate and retain the employees.	<ul style="list-style-type: none"> <li>For effective retention of skilled manpower HR policies are periodically reviewed to ensure that the employees are kept motivated. To enhance the skills of the manpower, regular training programmes are organised both in-house &amp; externally.</li> </ul>	Negative
7	Water, Waste & Hazardous Materials Management	R	Ensuring appropriate control measures to minimise wastes for protecting the environment which is part of the Company's core principles	<ul style="list-style-type: none"> <li>Compliance with all mandatory &amp; project specifications is ensured at all Company's work sites.</li> <li>Organic waste is treated through use of organic waste composter (OWC) at many of our sites. This produces organic manure.</li> </ul>	Negative
8	Legal & Regulatory Compliance Management	R	Non-compliance may result in environmental and/or social degradation and business disruptions leading to loss of reputation and branding of the Company.	<ul style="list-style-type: none"> <li>The Company has a dedicated team responsible for overseeing and ensuring adherence to all compliance requirements.</li> </ul>	Negative
9	Labour Standards & Working conditions	R	Poor labour standards and practices/working conditions may result in health & safety issues which could reduce employee morale thus impacting productivity and loss of reputation to the Company.	<ul style="list-style-type: none"> <li>Identifying and eliminating risks associated with poor working conditions thereby allowing the Company to proactively address these issues to ensure continued productivity and availability of quality workforce. Any shortcomings noticed are immediately addressed and suitable corrective actions are taken to remedy the situation.</li> </ul>	Negative
10	Human Rights	O	Human rights violation could be viewed seriously by regulatory authorities. Company therefore ensures a fair and safe working environment at all its work places. Human rights are valued and all stakeholders are free to provide feedback on any human rights violation.	<ul style="list-style-type: none"> <li>The Company upholds human rights by promoting equal opportunities, preventing discrimination, and eliminating child and forced labour. Additionally, the Company has a system in place of obtaining declarations from suppliers to ensure that human rights are upheld throughout its value chain.</li> </ul>	Positive



S. Material issue No. 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)
11 Cyber Security	R	<p>Cyber incidents such as data breaches caused through external web/ email attacks and unauthorised use of Company's system privileges could expose the Company to loss of vital database and critical business related data thus raising concerns on data privacy and causing disruption in the smooth operations of the Company's business. It is therefore imperative to have robust risk mitigation measures in place to ensure continuity of business operations in case of cyber-attack</p>	<ul style="list-style-type: none"> <li>▪ Cyber security controls have been implemented across our Corporate Headquarters (Mumbai HO &amp; CO), branch offices, remote project sites, data centres, cloud infrastructure, and for remote workforce access.</li> <li>▪ Our security approach spans both physical and virtual environments.</li> <li>▪ Firewall Protection: Fortinet firewalls are deployed across all locations with capabilities including IPS, web filtering, application control, threat prevention, and network segmentation.</li> <li>▪ Endpoint Protection: TrendMicro EDR/XDR is in place with USB access control and email security. Threat alerts are actively monitored.</li> <li>▪ Multi-Factor Authentication (MFA): Enabled for admin accounts, Office365, supported applications, and network devices.</li> <li>▪ Patch Management: Regular firmware upgrades and patch management are conducted using WSUS for Microsoft OS/software and third-party applications.</li> <li>▪ Physical Security: CCTV surveillance and access control have been deployed at all critical data centre locations (HO, RO).</li> <li>▪ Virtual Security: Secure virtual segmentation and IPSec VPN with Zero Trust Network Access (ZTNA) are fully implemented company-wide.</li> <li>▪ Backup &amp; Recovery: Veritas-based on-premise backup is configured with regular restore validations.</li> <li>▪ High Availability: Redundancy of firewalls and core switches has been implemented at Mumbai HO, RO office, and for more than 250+ users.</li> <li>▪ Ongoing user engagement through monthly "Digital Hero" cybersecurity quizzes, security awareness broadcasts, screensaver campaigns, and training sessions led by external cybersecurity experts.</li> </ul>	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
12	Customer Experience & Satisfaction	O	As a business entity, the Company thrives on customer satisfaction which is considered as an opportunity to help grow the Company's businesses.	▪ The Company takes regular customer feedback and corrective actions as per requirements.	Positive
13	Social engagement & Impact	O	The Company strives to make a difference to the society through its CSR initiatives and contribute its share towards making a positive impact in the lives of the people of the communities by focusing on their local developmental needs across all project sites	▪ The Company strives to provide business/employment opportunities to locals to the extents practicable and takes initiatives through CSR activities which would result in making a positive impact in the society.	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	P1	P2	P3	P4	P5	P6	P7	P8	P9	
<b>Policy and management processes</b>										
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	N	Y	Y	Y	N	Y	Y	Y	Y
c. Web Link of the Policies, if available	<a href="https://www.itdcem.co.in/investors/company-policies/">https://www.itdcem.co.in/investors/company-policies/</a>									
2. Whether the entity has translated the policy into procedures. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	N	N	Y	Y
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	ISO 45001	Indian labour codes	-	ISO 14001	-	-	-	-
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	c, d, e, f, h	c, e, f, h	c, d, h	-	-	c, e, f, h, i, j	-	-	-	-
6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	c, d, e, f, h	c, e, f, h	c, d, h	-	-	c, e, f, h, i, j	-	-	-	-

- a) Sustainable Growth: 20% increase in last year's Revenue
- b) Efficiency Increase: 7.8% Cost to Revenue
- c) Trainings to Employees: 3 Manhours per Staff; 60% coverage in this year



- d) Safe Workplace: Accident Incident Rate 5% less than last year's Target
- e) Use of Fly ash in Concrete Mix: 20% of cement replacement by fly ash in concrete mix
- f) Use of GGBS in Concrete Mix: 35% of cement replacement by GGBS in concrete mix
- g) Concrete Quality Standard: 93% results should fall below SD value 3.5
- h) Customer Satisfaction: Customer Feedback rating Target 86.65% (ref format: SR-10)
- i) Recycling of Bio-degradable Waste by installation Organic Waste Composter (OWC) - Treating Bio-degradable waste generated at project to produce manure (in Kgs).
- j) Replacing non-renewable energy with renewable/clean energy - Installing Roof Top Solar Panels on offices containers.

### 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 lays significant emphasis on improvements in methods and processes in its areas of construction and operations for sustainable business growth. The primary focus of research is to continually refine the frequently used systems at the Company's project sites to derive optimisation, reduction in the breakdowns, improve effectiveness and efficiency of use and hence provide a competitive edge for any project.
- The Company has prioritised aligning its ESG initiatives with its continued commitment to conduct its business operations in a responsible manner through utilised left over/ reclaimed steels components including old steel structural elements and thermo-mechanically treated (TMT) rebars for its operational activities. This initiative reduced dependence on virgin raw materials, conserved natural resources and contributed to lower greenhouse gas emissions associated with steel production. The implementation of these initiatives resulted in a significant reduction of 4,552 Tons of carbon dioxide (CO<sub>2</sub>e) emissions during the year. These efforts reflect the Company's focus on efficient and sustainable use of materials and resources by minimising waste, promoting recycling and reuse, and ensuring that resource allocation supports safety, quality, and long-term sustainability goals. The Company has installed Organic Waste Composters at a few project sites. This system effectively processes biodegradable waste including food waste, plant material and other organic byproducts converting them into high quality, nutrient rich compost. By diverting organic waste from landfills, the company significantly reduce its environmental footprint and support a circular economy. The compost produced were utilised for our own green initiatives and were also distributed amongst the local communities thereby contributing to the overall sustainability goals of the Company. As a result of this initiatives, a total of 7,979 kg of organic manure was generated and the Company achieved an annual reduction of 4.56 Tons of carbon dioxide (CO<sub>2</sub>e) emission

during the year. The Company repurposes leftover concrete to produce articles that could be utilised by local communities. These included items such as quality concrete blocks, road dividers, local access roads etc. This initiative not only reduces the amount of discarded material but also supports sustainable building practices. These initiatives contributed to a reduction of 52 tons of carbon dioxide equivalent emissions. The Company also endeavours to construct projects that are environmentally friendly by using various energy conservation measures such as deployment of fuel-efficient plant and machinery and use of green technologies, optimal use of plant and machinery and increased use of energy efficient lighting systems. The Company continues use of Fly ash/Ground Granulated Blast Furnace Slag (GGBS) as part replacement of ordinary port land cement (OPC) for concrete mixes. This initiative is monitored through Corporate Objective to stay focused and try to increase percentage replacement year by year. Reduction in usage of cement is a significant measure towards energy conservation by reducing the embodied energy in concrete being used at our projects. Such replacement also improves properties of concrete in terms of durability and finishes and contribute towards further reduction in usage of cement and other resources required towards its repairs during the life cycle of the structure. In addition, the Company promoted use of flyash bricks and autoclaved aerated concrete (AAC) blocks. The use of low carbon materials has resulted in a reduction of 76,692 tons of carbon dioxide equivalent (CO<sub>2</sub>e) emissions. In order to enhance renewable energy usage, the Company has implemented initiatives such as the installation of advanced and more efficient TOPCon solar panels. An annual reduction of 126.4 Tons of carbon dioxide equivalent (CO<sub>2</sub>e) emissions was achieved during the financial year. The Company is actively deploying alternate energy solutions such as solar panels and solar lighting across various operational areas including office containers, marine crafts (barges), mooring buoys, long piled approaches, barricades, cement silos, and one of its depot facilities for general lighting purposes. These measures contribute significantly to reducing the reliance on non-renewable energy sources.

- The Company is reporting Scope-1 & Scope-2 emissions and strives to calculate Scope-3 emission in the financial year 2024-25. The Company endeavours to use fly ash/GGBS in concrete mixtures wherever applicable. The Company stays focused on Environment, Safety and Health (ESH) principles. It is a matter of pride to be amongst the few construction companies in India to have been accredited with ISO 9001:2015 for Quality Management Systems, ISO 14001:2015 for Environmental Management Systems and ISO 45001:2018 certificates for Occupational, Health and Safety by TUV-Nord.
- At the Company, employees' health, safety and morale remain the top priorities enabling creation of an inclusive and productive working environment that encourages dialogue and free exchange of ideas. It also goes a long way in facilitating the crafting of a talent management system for engagement across the employment lifecycle. As a strategic enabler and business partner, the Company's HR strongly focusses on organisational development and employee engagement to accelerate the Company's businesses with ability, agility and adaptability.
- Innovation and alignment of HR practices with business needs, total commitment to the highest standards of corporate governance, performance excellence, business ethics, employee engagement, social responsibility and employee satisfaction have led the Company to become an organisation that nurtures empowerment, meritocracy, transparency and ownership. Rigorous training and extensive safety measures like job safety assessment and safe construction techniques at project sites have been undertaken by the Company for employees. The Company has established harmonious industrial relations, initiative-taking and inclusive practices with all employee bodies.
- The CSR Policy initiatives are geared towards identifying areas of CSR activities that would benefit the marginalised sections of society and bring about a positive impact in their lives, including those in and around the local areas where the Company operates. The Company identifies communities that require its intervention through various CSR projects in a bid to empower people and make them self-reliant. The Company also makes contribution towards the physically challenged or differently abled, socially and economically backward groups, under privileged students and provide health care and sanitation facilities through its CSR activities and focusing on community development.
- The Company is committed towards giving a thrust to its sustainability initiatives by balancing its business operations with the need to be responsive to the environment and the society in which it operates.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name: Mr. Jayanta Basu, Designation: Managing Director DIN: 08291114
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.	Yes, the Company's CSR committee of the Board and EHS Teams are responsible for sustainability related issues.

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee	Frequency (Annually/Half yearly/Quarterly/Any other – please specify)																	
		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	Most of the policies of the Company are approved by the Board and reviewed periodically or on a need basis by concerned Committees. During the review, the effectiveness of the policies is evaluated and necessary amendments to policies and procedures are implemented.																		
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Company complies with the extant regulations and principles as are applicable.																		



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.

P1	P2	P3	P4	P5	P6	P7	P8	P9
No	Yes	Yes	Yes	No	Yes	No	No	Yes

Yes. TUV Nord conducts Integrated Management System (ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018) audits for the various processes existing at projects & office locations.

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	-	-	-	-	-	-	-	-	-

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is 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	% of persons in respective category covered by the awareness programmes
Board of Directors	At least 4 times in a year	Business strategy, performance overview, risk management and updation of Laws	100%
Key Managerial Personnel	2	Awareness programmes on Corporate matters	33.33%
Employees other than BoD and KMP's	13	Company policy relating to Code of Conduct	26.59%
Workers	1454	EHS: Working at height, Risk Assessment, Material Handling, permit to work, Waste (Hazardous Waste Management), Resource Conservation, Integrated Management System, Fire Fighting, Emergency Preparedness etc.	100%

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

**Monetary**

	NGRBC Principles	Name of the regulatory/enforcement agencies/judicial institutions	Amount (In "₹")	Brief of the Case	Has an appeal been preferred? (Yes/no)
Penalty/Fine	-	-	-	-	-
Settlement	-	-	-	-	-
Compounding Fee	-	-	-	-	-

**Non-Monetary**

	NGRBC	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	-	-	-
Punishment	-	-	-	-

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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
-	-

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

Yes, the Company has in place Codes of Ethical Conduct for Directors, Senior Management and employees of the Company and a Code of Conduct for Vendors and Suppliers covering anti-corruption and anti-bribery aspects. The objective of these Codes is to serve as a guide for all concerned for ensuing compliance with applicable laws, rules and regulations. They reflect the Company's firm commitment towards maintaining ethical standards of governance and zero tolerance towards any act of dishonesty, corruption or bribery.

<https://www.itdcem.co.in/wp-content/uploads/2016/06/Code-of-Ethical-Conduct-upload-site-final.pdf> and

<https://www.itdcem.co.in/wp-content/uploads/2016/06/Final-ITD-Code-of-Ethical-Conduct-Dirs-n-Employees-approved-9.8.2017-3REV-finaldoc.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:

	FY 2024-25	FY 2023 -24
Directors	-	-
KMPs	-	-
Employees	-	-
Workers	-	-



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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	-	-	-	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	-	-	-	-

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

Not Applicable

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

	FY 2024-25	FY 2023-24
Number of days of accounts payables	82	79

## 9. Open-ness 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:

Parameters	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10% trading houses as % of total purchases from trading houses	Nil	Nil
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	NA	NA
	b. Number of dealers/distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	NA	NA
Share of RPT's in	a. Purchases (Purchases with related parties/Total Purchases)	0.25%	0.46%
	b. Sales (Sales to related parties/Total Sales)	4.17%	0.74%
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	NA	NA
	d. Investments (Investments in related parties/ Total Investments made)	NA	NA

## Leadership Indicators

## 1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programmes held	Topic/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1243	Environment, Health & Safety awareness and training	85.50%

## 2. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same –

Yes, the Company has in place Codes of Ethical Conduct for Directors, Senior Management and Employees of the Company.

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

### Essential indicators

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

	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D	0.00%	100.00%	
Capex	1.22%	0.00%	<ol style="list-style-type: none"> <li>Auto Stirrup Bending M/C 600KG/HR is precision bending and more accurate use of rebar means less scrap material, reducing steel waste. Faster production means less energy consumption per unit of output to manual and semi-auto processes.</li> <li>The adoption of BSVI-compliant 180 kVA and 250 kVA diesel generator (DG) sets significantly reduces environmental impact by lowering nitrogen oxide (NOx) emissions by approximately 89% and particulate matter (PM) emissions by around 95% compared to earlier emission norms. These DG sets also cut carbon monoxide (CO) emissions by about 57% and hydrocarbons (HC) by over 50%. Additionally, they offer a 2–5% improvement in fuel efficiency, leading to a reduction of approximately 1.5 to 3 tons of CO<sub>2</sub> emissions annually depending on usage. Noise levels are also slightly reduced due to advanced engine technologies and improved acoustic designs.</li> <li>The HVS Rotating Laser Machine – 150 Meter provides significant social impact benefits by improving worksite safety through precise levelling and alignment, which reduces human error and accident risks. It also enhances productivity, allowing workers to complete tasks more efficiently, reducing physical strain and long working hours. Additionally, it supports skill development, as operators gain experience with modern surveying technology, promoting technological adoption and workforce upskilling in local communities. These advantages contribute to better job quality, project reliability, and overall well-being for workforce on construction.</li> <li>The Battery-Powered Road Sweeper Machine – 6,000 m<sup>2</sup>/h significantly reduces environmental impact compared to diesel-powered alternatives by producing zero direct tailpipe emissions, eliminating pollutants like nitrogen oxides (NOx), particulate matter (PM), carbon monoxide (CO), and carbon dioxide (CO<sub>2</sub>) during operation. This transition can reduce CO<sub>2</sub> emissions by up to 1–2 tons per year per unit, depending on usage hours. It also contributes to a 50–70% reduction in noise pollution. Furthermore, it helps maintain cleaner air and surfaces by efficiently removing dust and debris, which improves local air quality and reduces the spread of allergens and fine particles.</li> </ol>

- Does the entity have procedures in place for sustainable sourcing? (Yes/No) – Yes
  - If yes, what percentage of inputs were sourced sustainably? -

The company has a procedure for sustainable sourcing where vendors and suppliers are evaluated on environment, health & safety and sustainability parameters before taking them on board and doing business with them.

Top 110 vendors (74.95% of total scale) were analysed for this sustainable sourcing criteria, out of which 66 vendors got qualified and this percentage works out to 60%.



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.

The Company does not have business of such specific products. However, at the project and operation sites, there are systems in place to reuse and dispose the above waste being generated during course of construction and operation in line with the regulatory requirements.

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, the Company has obtained EPR registration. To ensure compliance and strengthen its waste management practices, the Company has enhanced its internal processes, conducted awareness sessions for relevant departments and functions, and onboarded service providers to support compliance efforts.

We have recently obtained EPR registration certificate. We are in the process of preparing EPR plans to be submitted to concerned Pollution Control Boards.

### Leadership Indicators

1. Has the entity conducted Life Cycle Perspective/Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of product/ Service	% of total Turnover contributed	Boundary for which the life Cycle perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link
4290	Batching plant	Not available	Cradle to Gate	No	No

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products/services, as identified in the Life Cycle Perspective/Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of Product/ Service	Description of the risk/concern	Action Taken
Batching Plant	<p>To comprehensively address the environmental impacts associated with concrete production, a Life Cycle Assessment (LCA) of the batching plant is being undertaken to evaluate emissions, and resource consumption across all stages—from raw material sourcing to concrete delivery—enabling informed strategies for sustainability and carbon footprint reduction. The contributing factors are as below.</p> <ol style="list-style-type: none"> <li>Cement consumption accounts for approximately 64% of the total carbon emissions at the batching plant, making it the primary contributor to greenhouse gas emissions. This poses a significant environmental concern and highlights the need for alternative low-carbon materials or optimised mix designs.</li> <li>The transportation of coarse aggregates, river sand, and crusher sand involves long lead distances, resulting in increased fuel consumption and elevated carbon emissions. This contributes to the plant's overall environmental footprint and operational costs.</li> <li>The batching plant has a low dependency on recycled materials and relies heavily on virgin resources. This not only increases environmental degradation but also limits opportunities for sustainable resource management and cost savings.</li> </ol>	<ol style="list-style-type: none"> <li>Incorporate ground granulated blast furnace slag (GGBS), or silica fume as a partial replacement for cement to reduce 13,313 MTCO<sub>2</sub>e.</li> <li>Identified and utilise nearby sources of coarse aggregate and sand to reduce transportation distances.</li> <li>Optimised truck loads, route planning, and consider using fuel-efficient to lower emissions.</li> <li>Encourage use of M-sand produced from nearby crushing units to replace river sand and reduce lead distance.</li> <li>Install systems to recycle leftover concrete and wash water (sedimentation tank) within the batching plant.</li> </ol>

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24
Fly-ash, GGBS & Portland Slag Cement	1.67%	1.73%
Manufactured sand, Stone Dust, GSB	0.83%	0.00%

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

	FY 2024-25			FY 2023-24		
	Re-used	Recycled	Safely disposed	Re-used	Recycled	Safely disposed
Plastic (Including packaging)	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
E-waste	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Hazardous waste	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Other waste (Concrete waste)	130	N.A.	N.A.	1,430.8	N.A.	N.A.

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	N.A.

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

#### Essential Indicators

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

Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Permanent Employees</b>											
Male	2,663	2,663	100	2,663	100	-	-	-	-	-	-
Female	76	76	100	76	100	1	1.32	-	-	-	-
<b>Total</b>	<b>2,739</b>	<b>2,739</b>	<b>100</b>	<b>2,739</b>	<b>100</b>	<b>1</b>	<b>0.04</b>	-	-	-	-
<b>Other than Permanent Employees</b>											
Male	1,402	192	13.69	1,402	100	-	-	-	-	-	-
Female	24	9	37.50	24	100	-	-	-	-	-	-
<b>Total</b>	<b>1,426</b>	<b>201</b>	<b>14.10</b>	<b>1,426</b>	<b>100</b>	-	-	-	-	-	-

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Permanent Workers</b>											
Male	30	-	-	30	100	-	-	-	-	-	-
Female	0	-	-	0	-	-	-	-	-	-	-
<b>Total</b>	<b>30</b>	-	-	<b>30</b>	<b>100</b>	-	-	-	-	-	-



Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Other than Permanent workers</b>											
Male	26,770	-	-	26,770	100	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>26,770</b>	<b>-</b>	<b>-</b>	<b>26,770</b>	<b>100</b>	<b>-</b>	<b>-</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 –

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the company	0.04%	0.05%

2. Details of retirements benefits, for current financial year and previous financial year.

Benefits	FY 2024-25			FY 2023-24		
	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	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	0	1	Yes	0	2	Yes
Others-please specify	0	0	N.A.	0	0	N.A.

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, all the offices, depots and project sites 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, the Company has an equal opportunity policy.

[www.itdcem.co.in/wp-content/uploads/2016/06/Policy\\_On\\_Equal\\_Opportunity\\_r1.pdf](http://www.itdcem.co.in/wp-content/uploads/2016/06/Policy_On_Equal_Opportunity_r1.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	-	-	-	-
Total	-	-	-	-

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

	<b>Yes/no (If Yes, then give details of the mechanism in brief)</b>
Permanent workers	Yes, the Company has a Grievance Redressal Policy explaining how employees can voice their concern faced at the workplace in a constructive way to ensure that their point of view is heard, and the issues are effectively resolved through appropriate action following due process.
Other than Permanent workers	
Permanent Employees	
Other than Permanent Employees	

The grievance redressal mechanism is as follows: -

**Step 1:** The aggrieved employee can register his/her grievance by reaching out to [grievance\\_cell@itdcem.co.in](mailto:grievance_cell@itdcem.co.in)

**Step 2:** The complaint is forwarded to the Grievance Redressal Committee which, in turn, works with the respective leadership team and HR on the next steps.

**Step 3:** The Grievance Redressal Committee initiates the enquiry for further fact-finding.

**Step 4:** The Committee ensures that the entire enquiry is done in a fair, neutral and unbiased manner. Wherever possible, sincere efforts shall be made to establish a dialogue between the concerned parties and/or enable a mediation process. The relevant stakeholders shall be kept informed throughout the process.

**Step 5:** The entire enquiry is to be concluded within 60 days' time from the date of lodging of complaint and the response to be communicated to the aggrieved party. The timeline can also be mutually agreed upon between the aggrieved party and the Committee. It should not, however, go beyond 120 days. The Grievance Redressal Committee shall maintain accurate records.

**Step 6:** If found guilty, the party in question shall be subjected to disciplinary proceedings based on the severity of the complaint. The decision of the Committee is final and binding on both the parties.

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

Category	FY 2024-25			FY 2023-24		
	Total employees/ workers in respective category (A)	No. of employees/ workers respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in respective category (C)	No. of employees/ workers respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	2,739	0	0	2,598	0	0
Male	2,663	0	0	2,532	0	0
Female	76	0	0	66	0	0
Total permanent workers	30	30	100	34	34	100
Male	30	30	100	34	34	100
Female	0	0	0	0	0	0



## 8. Details of training given to employees and workers

Category	FY 2024-25					FY 2023-24				
	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	2,663	2,663	100	670	25	2,532	2,532	100	691	27
Female	76	76	100	27	36	66	66	100	54	81
<b>Total</b>	<b>2,739</b>	<b>2,739</b>	<b>100</b>	<b>697</b>	<b>25</b>	<b>2,598</b>	<b>2,598</b>	<b>100</b>	<b>745</b>	<b>29</b>
<b>Workers</b>										
Male	26,800	26,800	100	5957	22	23,094	23,094	100	5,911	25.60
Female	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>26,800</b>	<b>26,800</b>	<b>100</b>	<b>5957</b>	<b>22</b>	<b>23,094</b>	<b>23,094</b>	<b>100</b>	<b>5,911</b>	<b>25.60</b>

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	2,663	2,663	100	2,532	2,060	81.36
Female	76	76	100	66	49	74.24
<b>Total</b>	<b>2,739</b>	<b>2,739</b>	<b>100</b>	<b>2,598</b>	<b>2,109</b>	<b>81.17</b>
<b>Workers</b>						
Male	26,800	30	0.11	23,094	34	0.15
Female	-	-	-	-	-	-
<b>Total</b>	<b>26,800</b>	<b>30</b>	<b>0.11</b>	<b>23,094</b>	<b>34</b>	<b>0.15</b>

## 10. Health and safety management system:

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

Yes, the company is certified for ISO 45001: 2018 which is an internationally well recognised and accepted Occupational Health and safety (OHS) Management system Standard, implemented at all our projects and depots. These certified locations constitute 100% of office footprint and 100% of people footprint operating from all our projects and depots. The company has a well-defined occupational health and safety management system which includes IMS Policy and supporting processes to ensure well-beings of its employees and workers.

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

**1. Procedure P22 (Occupational Safety & Risk Assessment) – This procedure is being followed for Safety (OH&S) Risk & Opportunities Assessment to:**

- Identify hazards associated with all routine/non-routine activities and arising out of potential emergencies.
- Assess risks, (OH & S and other risks) to personnel, equipment, material and property arising out of identified hazards and
- Decide appropriate control measures to reduce risk to acceptable levels.

**2. Procedure P3 Environmental Aspects - This procedure is being followed for Environmental Risk Assessment (ERA) involving:**

- Identification of the environmental aspects of the Company's activities that interact or can interact with the environment.
- Determination of aspects which have or can have significant impact on the environment

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

Yes, the Company has Safety and Health Operating Control Procedures (SHOP 26) - Stop Work Program (SWP). It is developed to support operational controls required as part of the EHS implementation. It is designed to provide the employees and workers with the responsibility and obligation to stop work when perceived unsafe condition or behaviour is observed.

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

Yes, The Company recognises that overall physical and mental well-being of its employees are integral to its success and growth aspirations. The Company has a people focused approach by involving, consulting and training employees and workers on physical health, mental health and well-being. The Company takes a holistic approach to well-being of its employees and workers. The employees have various health benefits including medical insurance, free doctor consultation which ensures their physical and mental well-being. Regular health campaigns/awareness sessions are conducted in worker camps by qualified doctors. Regular medical check-ups for workers are organised. The Company has implemented "Alcohol and Drug Abuse Policy" at all its projects and depots.

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

Safety Incident/Number	Category*	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.09	0.12
Total recordable work-related injuries	Employees	0	0
	Workers	6	6
No. of fatalities	Employees	0	0
	Workers	1	2
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	7	9

\* including in the contract workforce

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

Hazard identification and risk assessment process is conducted to identify each risk and ensure that proper mitigation measures are put in place to create a healthy and safe work environment. A similar approach for hazard identification is followed at our projects and depots where commonly encountered OHS risks include:

- Fall of person/Material
- Working at height.
- Manual and Mechanical material handling.
- Electrical and Mechanical hazards
- Fire
- Collapse of Soil/Scaffolding/structure.
- Failure of equipment/machinery.
- Slip and trip
- Exposure to dust being generated
- Noise pollution
- Inadequate illumination etc.

Mitigation measures include:

- Enhancing awareness through induction and OHS trainings
- Deployment of competent work force.
- Implementation of preventive measures as per HIRA for each activity



- Adopting safe work methods
- Adopting zero tolerance to OHS violations
- Implementation of disciplinary and reward programme etc.
- Mock drill for fire, medical emergencies and natural calamities.
- Conducting periodic inspections and audits.
- Monitoring of air quality at project sites at the Company level as well as through external agencies to ensure emission within permissible limits.
- Regular training on occupational health & safety matters to sensitise employees on OHS aspects and to inculcate a culture of safety.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working Conditions	1	-	-	-	-	-
Health & Safety	-	-	-	-	-	-

14. Assessments for the year

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Health and safety practices	100% of heavy plants, equipment and lifting tools & Tackles
Working Conditions	100%

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

The Company's Corporate EHS team and Senior Management undertakes a joint investigation and review of any incident that has occurred and suggest control measures based on the data gathered through respective Project Site Management. EHS site inspection visits and EHS Audits help to provide relevant data on unsafe conditions/unsafe behaviours. The data received enables identification of any hazard involved and assess key areas of involved risks that guide projects and depots to proactively manage and have proper controls to avoid any untoward incident.

Various steps have been taken including:

- Implementation of EHS Audit Rating through checklist (SCL-12).
- Developing EHS training modules based on high-risk activities, as per Safety Walk About (SWA) analysis.
- Safety Alerts prepared on critical incidents and communicated to project sites and depots to create awareness and implement lessons learnt to prevent any harm to man and material.
- Creation of safety awareness through technical training by external faculty.
- Periodic site visits and mentoring project site management team by Senior Management, follow EHS requirements and enhance safety culture.
- Preparation of action plans to enhance safety culture with higher degree of EHS awareness. This helps upgrade skill set of employees to achieve EHS excellence in their respective workplace by aligning their actions accordingly.

For instance, against a reportable incident at one of our Tunnelling sites on 25 Jul 2024, following corrective actions were taken:

- 1) Provision of gate with lock and key & Auto cutoff switch.
- 2) Lock Out Tag Out (LOTO) system implemented.
- 3) Work permit system strengthened.

- 4) Training provided to all concerns.
- 5) Periodical cleaning of the area.

### Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N). –

Yes, the Company extends life insurance benefits and/or compensation package in the event of death of Employees and Workers.

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

Sub-contractors are required to submit valid PF and ESIC registration and copies of attendance & wage registers, Workmen Compensation Policy and challans as a proof of payment of statutory dues on an ongoing basis.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	0	0	0	0
Workers	7	8	6	6

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	66% (based on top 500 value chain partners)
Working Conditions	66% (based on top 500 value chain partners)

6. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from assessments of health and safety practices and working conditions of value chain partners. – N.A.

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

### Essential Indicators

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

The business of the company is primarily EPC (Engineering, Procurement and Construction) and civil construction work. Hence, in line with its business models, the company has identified the following as key stakeholder groups:

Stakeholder	Basis of identification
Suppliers/ Contractors	EPC and civil construction have significant dependence on supply chain partners for <ol style="list-style-type: none"> <li>i) Sourcing of key raw materials e.g., fuel, cement, aggregates, steel and other materials for construction projects, and high-grade metals, subcomponents, and other inputs for construction business.</li> <li>ii) Outsourcing of business activities e.g., low-end civil works in construction projects, and certain specialised activities. To maintain sustainable growth, designers, consultants, suppliers/contractors are key elements in meeting the desired product and cost objectives for various contracts.</li> </ol>



Stakeholder	Basis of identification
Government	Government (central and state) orders contribute ~52% of the current orderbook. Additionally, orders from Government owned enterprises (PSU's) contribute 8% of the orderbook. Combined they are the largest customers for the Company and play a crucial role in the future growth plans of the Company.
Customers	Private sector currently contributes 40% of the total orderbook. Company has strong brand recall amongst its diversified customer base and act as partners in developing new solutions or business offerings.
Employees and Workforce	Construction is a labour-intensive activity, and ITD Cementation employs 26800 workers in addition to 4,165 of its own employees (including Project sites, Depots, and offices). Hence, company plays important role in their skills development, health and well-being, for the Company's ongoing and future operations.
Regulatory bodies	Various business units of the Company operate in variety of sectors, each of which are governed by specific regulatory bodies. ITD Cementation understands requirements of these agencies and ensures that they are complied with to maintain desired compliance levels.
Shareholders and investors	Shareholders and investors play both direct and indirect role in company's operations, providing finance, governance and controlling various aspects of a business. ITD Cementation actively engages with them for the smooth conduct of business operations.
Media	Media is one of the important communication channels for the Company to showcase its business performance, visibility, responsible changes for the benefit of society, environment and bridge the communication gap if any amongst its stakeholders.
Communities	ITD Cementation helps catalyse socio-economic development of communities around its Premises at various locations across the country. Focus is on under-privileged and marginalised sections to enable them to bring them on-par with others.

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

Sl. No.	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
1	Shareholders and investors	No	Press Releases, Quarterly Results, Annual Reports, Newspaper publications, Analyst/Investor meet and Conferences, Investor presentation, Concall, audio link and transcripts, Stock Exchange filings, General Meetings, E-mail communication and Company's website as per Law and Regulations.	Periodically and event based	To provide update on Company's financial and operational performance addressing investor queries and any event-based announcement filed with the stock exchanges
2	Media	No	Press Releases, Investor Presentation, General Meetings and Media interactions	Periodically and event based	To provide update on Company's financial and operational performance and any event-based announcement filed with the stock exchanges

Sl. No.	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
3	Customers	No	Business interactions, client satisfaction surveys	At convenient intervals	Customer satisfaction and feedback. Project delivery, timeline, challenges that are faced during execution.
4	Government	No	Press Releases, Quarterly Results, Annual Reports, Sustainability Reports, Stock Exchange filings, subject specific meetings, representations	As and when required	Reporting requirement, other requirement (specified by client/ employer), statutory compliance, support from authority and resolution of issues.
5	Employees	No	<ul style="list-style-type: none"> <li>▪ Circular and messages from corporate and line management</li> <li>▪ Corporate social initiatives</li> </ul>	As and when required	Employees' growth and benefits, their expectations, career growth, professional development, leadership skills and team building, Interpersonal Relationship, communication and presentation skills and continuing education and training, etc.
6	Suppliers/ Contractors	No	Regular supplier and dealer meet. Business interactions	As and when required	Identifying need and expectation, schedule, supply chain issue, creating awareness and imparting other training, their regulatory compliance, EHS performance etc.
7	Community	No	Direct contribution through implementing agencies for CSR activities nearby company's Projects sites	As and when required	To help the marginalised sections of the society and to support government approved CSR activities.

### Leadership Indicators

- Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board –  
 The Company's Internal audit process covers environmental, economic and social topics and the critical findings of each audit cycle get presented to the Board in quarterly meetings.



2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes/No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, the company continuously engages with its stakeholders to boost relationship, thus enabling the Company to be informed of their expectations, as well as opportunities for value creation. A structured approach and system are in place to engage with the stakeholders at different levels for identifying, prioritising and addressing their needs and concerns in a consistent and systematic manner.

Employees - The management believes in effective two-way communication process: top-down and bottom-up. In this regard, there are structured systems for employee communication, based on which the following actions were initiated:

1. Bus facility is provided to employees in order to avoid travelling by personal vehicles, thus, reducing the pollution and contributing their bit to promote a cleaner and greener environment.
  2. For employees above General Manager category, the company provides facility of an annual medical checkup which help them to maintain good health and stay medically fit and alert in their personal and professional walk-to life.
  3. The Company organises annual sports and get-together for recreation and well-being of its employees. This helps in creating a conducive environment that fosters team work and co-operation amongst the employees across the organisation.
  4. Plantation of 22284 nos. of sapling was completed based on suggestion by own company employees. This will benefit the local communities for extended period of time.
  5. Medical camp, Blood donation was undertaken, 395 nos. of employees/ workers donated, 138.25-litres of blood.
3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalised stakeholder groups.

The Company engages with marginalised stakeholder group through its various CSR initiatives by providing support in various areas such as education and health care services, eradication of poverty, hunger and malnutrition etc. aimed to provide improved living condition to the vulnerable sections of the society focusing on their accelerated development and overall well-being.

## PRINCIPLE 5 Businesses should respect and promote human rights

### Essential Indicators

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	2,739	302	11.03	2,598	294	11.32
Other than permanent	1,426	65	4.56	1,470	43	2.93
<b>Total Employees</b>	<b>4,165</b>	<b>367</b>	<b>8.81</b>	<b>4,068</b>	<b>337</b>	<b>8.28</b>
<b>Workers</b>						
Permanent	30	0	0	34	0	0
Other than permanent	26,770	0	0	23,060	0	0
<b>Total workers</b>	<b>26,800</b>	<b>0</b>	<b>0</b>	<b>23,094</b>	<b>0</b>	<b>0</b>

Note: Training on various issues related to human rights are covered under new employee induction, EHS training, POSH and Code of Conduct.

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to minimum wage		More than minimum wages		Total (D)	Equal to minimum wages		More than minimum wages	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
<b>Permanent</b>	2,739	0	0	2,739	100	2,598	0	0	2,598	100
Male	2,663	0	0	2,663	100	2,532	0	0	2,532	100
Female	76	0	0	76	100	66	0	0	66	100
<b>Other than permanent</b>	1,426	0	0	1,426	100	1,470	0	0	1,470	100
Male	1,402	0	0	1,402	100	1,445	0	0	1,445	100
Female	24	0	0	24	100	25	0	0	25	100
<b>Workers</b>										
<b>Permanent</b>	30	0	0	30	100	34	0	0	34	100
Male	30	0	0	30	100	34	0	0	34	100
Female	0	0	0	0	0	0	0	0	0	0
<b>Other than permanent</b>	26,770	26,770	100	0	0	23,060	23,060	100	0	0
Male	26,770	26,770	100	0	0	23,060	23,060	100	0	0
Female	0	0	0	0	0	0	0	0	0	0

3. Details of remuneration/salary/wages

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)	2*	57,844,000	0	0
Key Managerial Personnel	2**	14,748,774	0	0
Employees other than BoD and KMP	2,661	1,090,396	76	941,520
Workers	30	521,453	0	0

Note: \*BOD – Median considered for Executive Directors only.

\*\*KMP – Median not considered for Executive Directors.

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

	FY 2024-25	FY 2023-24
Gross wages paid to female as % of total wages	2.49%	2.34%

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, Head of the Human Resources is responsible for addressing any issues regarding human rights.

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

All grievances are addressed as and when received by the respective project manager/functional head through IR/Admin in co-ordination with HR. All grievances are duly investigated and appropriate actions are taken to resolve them.



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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	0	0	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labour	0	0	-	0	0	-
Forced Labour/Involuntary Labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other Human rights related issues	0	0	-	0	0	-

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

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

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

The Company has the following policies to address and prevent adverse consequences to the complainant in discrimination and harassment cases:

- Whistle Blower Policy
- Codes of Ethical Conduct
- Prevention of Sexual Harassment Policy
- Grievance Redressal Policy
- Code of Conduct for Vendors and Suppliers.
- Child Labour Policy
- Anti-bribery and Anti-corruption policy

## 9. Do human rights requirements form part of your business agreements and contracts?

(Yes/No) – Yes

## 10. Assessments for the year:

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

Note: The Company undertook internal assessment through its EHS, HR and IR Function.

11. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 10 above. – None

#### Leadership Indicators

1. Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints – None
2. Details of the scope and coverage of any Human rights due-diligence conducted. - None
3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016? - Yes
4. Details on assessment of value chain partners:

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual Harassment	100%
Discrimination at workplace	100%
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Wages	100%
Other-please specify	-

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

### 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:

<b>Parameter</b>	<b>FY 2024-25</b>	<b>FY 2023-24</b>
<b>For renewable sources</b>		
Total electricity consumption (A)	625.94 GJ	206.48 GJ
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>625.94 GJ</b>	<b>206.48 GJ</b>
<b>For non-renewable sources</b>		
Total electricity consumption (D)	170,029.00 GJ	109,808.23 GJ
Total fuel consumption (E)	107,630.49 GJ	838,374.23 GJ
Energy consumption through other sources (F)	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>277,659.49 GJ</b>	<b>948,182.46 GJ</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>278,285.43 GJ</b>	<b>948,388.94 GJ</b>
Energy intensity per rupee of turnover (Total energy consumed/Revenue from operations)	0.000003114	0.000012642
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed/Revenue from operations adjusted for PPP)	0.000069748	0.000283191
<b>Energy intensity in terms of physical Output</b>	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. – No.



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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in Kiloliters)</b>		
(i) Surface water	1,234,919.60	3,141,517.24
(ii) Groundwater	57,844.18	45,859.32
(iii) Third party water	18,239,996.20	12,093,137.91
(iv) Seawater/desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)</b>	<b>19,532,759.98</b>	<b>15,280,514.47</b>
<b>Total volume of water consumption (in kiloliters)</b>	<b>19,532,759.98</b>	<b>15,280,514.47</b>
<b>Water intensity per rupee of turnover</b> (Total water consumption/Revenue from operations)	0.000218552	0.000203696
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption/Revenue from operations adjusted for PPP)	0.004895555	0.0045628
<b>Water intensity in terms of physical Output</b>	-	-
<b>Water 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

4. Provide the following details related to water discharged:

Parameter	FY 2024-25	FY 2023-24
<b>Water Discharge by destination and level of treatment (in kiloliters)</b>		
(i) To Surface water		
No treatment	-	-
With treatment – please specify level of Treatment	-	-
(ii) To Groundwater		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) To Seawater		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties		
No treatment	-	-
With treatment – please specify level of Treatment	-	-
(v) Others		
No treatment	-	-
With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kiloliters)</b>	<b>-</b>	<b>-</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.

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

Yes, the Company is working on Zero Liquid Discharge philosophy in batching plant operations where it re-uses generated wastewater for dust suppression and tyre washing activity. Re-use of wastewater is made possible through constructed sedimentation/settling tank. The quantity of recycled water was 295944.6 m<sup>3</sup> in FY 2024-25 and in 38749.4 m<sup>3</sup> FY 2023-24.

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

Parameter	Please specify unit	FY 2024-25	FY 2023-24
NO <sub>x</sub>	mg/m <sub>3</sub>	0.017	0.025
SO <sub>x</sub>	mg/m <sub>3</sub>	0.008	0.015
Particulate matter (PM)	mg/m <sub>3</sub>	0.025	0.086
Persistent organic pollutants (POP)		-	-
Volatile organic compounds (VOC)		-	-
Hazardous air pollutants (HAP)		-	-
Others – please Specify		-	-

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. - No

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

Parameter	Unit	FY 2024-25	FY 2023-24
<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)	Metric tonnes of CO <sub>2</sub> Equivalent	74,279.82	65,161.20
<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)	Metric tonnes of CO <sub>2</sub> Equivalent	34,336.49	25,103.4
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	Metric tonnes CO <sub>2</sub> Equivalent/₹	0.0000012153	0.0000012032
<b>Total Scope 1 and Scope 2 emission intensity 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)	Metric tonnes CO <sub>2</sub> Equivalent/₹	0.0000272228	0.0000269532
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>		-	-
<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

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

Yes, the Company has undertaken several initiatives to reduce greenhouse gas (GHG) emissions from its operational activities. These include the installation of Topcon solar panels at site container offices and solar street lights at project sites, which have significantly contributed to GHG emission reduction. In FY 2024–25, the company consumed 173,871.72 kWh of electricity generated from solar panels.

To further reduce its environmental impact, the company prioritises the procurement of reused materials for operational activities, thereby minimising reliance on virgin materials and reducing associated emissions. Additionally, an Organic Waste Converter (OWC) plant has been installed at project sites to minimise waste generation and avoid landfill disposal, further contributing to emission reduction.



Another key initiative involves repurposing leftover concrete to produce concrete blocks using molds designed for creating sleepers, effectively turning waste into usable construction material. The company also incorporates low-carbon materials such as Ground Granulated Blast Furnace Slag (GGBS), fly ash, Portland slag cement, autoclaved aerated concrete (AAC) blocks, and fly ash bricks in its construction processes. These sustainable alternatives significantly contribute to lowering GHG emissions across projects.

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

Parameter	FY 2024-25	FY 2023-24
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste (A)	180.6	73.25
E-waste (B)	9.35	4.74
Bio-medical waste (C)	0.46	0.35
Construction and demolition waste (D)	11,475.61	42,690.93
Battery waste (E)	0.45	1.83
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any (G)	292.23	95.52
Other non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e by materials relevant to the sector)	93.99	134.81
<b>Total (A+B+C+D+E+F+G+H)</b>	<b>12,053</b>	<b>43,001.44</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated/Revenue from operations)	0.000000135	0.000000573166
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated/Revenue from operations adjusted for PPP)	0.00000302	0.00001283892
<b>Waste intensity in terms of physical output</b>		
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity	-	-
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	6,584.32	28,019.55
(ii) Re-used	5,373.85	14,746.46
(iii) other recovery operations	-	-
<b>Total</b>	<b>11,958.17</b>	<b>42,766.01</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	0.46	0.35
(ii) Landfilling	94.38	230.34
(iii) Other disposal operations	-	-
<b>Total</b>	<b>94.84</b>	<b>230.69</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

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.

The Company is ISO14001:2015 certified organisation and has adopted a robust waste management system considering 3R principles, circular economy and safe and lawful disposal of waste. The Company segregates waste as per its category in store in diverse types of colored waste bins. The Company stores waste in well managed inhouse storage facilities as prescribed in the waste management rules. Disposal of the same is being done according to different rules of waste management under "The Environment Protection Act-1986".

The Company uses hazardous chemicals in very less quantity, except oil/engine oil waste which it stores as per the Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016, as amended. Generation of Hazardous material waste is less and there is no toxic waste generated. The Company has skilled workforce to manage such waste after taking required precautions. They compulsorily undergo Control of Substances Hazardous to Health (COSHH) training before being engaged to manage hazardous waste. The waste oil and other hazardous materials are handed over to authorised vendors approved by respective Pollution Control Boards at required frequency. Records of the same are maintained through Manifest system.

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

S. No	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
			The Company gets the projects through bidding system, where client floats the tender after getting all required clearances from government agencies before starting any project.  Required permission from different environmental institution/government bodies, are taken by the client themselves during tendering period itself. The company is involved in subsequent execution of such project.

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 projects	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant web link
N.A.					

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). Yes

If not, provide details of all such non-compliances, in the following format:

S. No.	Specify the law/regulation/guideline which was not complied with	Provide the 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
N.A.				

### Leadership Indicators

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

For each facility/plant located in areas of water stress, provide the following information:

- (i) Name of the area: Chennai, Bangalore, Ahmedabad, Delhi, Surat, Mundra  
 (ii) Nature of operations: Construction of Metros, Micro Tunnel, Piling & Building  
 (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	-	-
(ii) Ground water	-	-
(iii) Third party water	5,493,266.30	88,576.48
(iv) Seawater/desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters)</b>	<b>5,493,266.30</b>	<b>88,576.48</b>
<b>Total volume of water consumption (in kiloliters)</b>	<b>5,493,266.30</b>	<b>88,576.48</b>



Parameter	FY 2024-25	FY 2023-24
<b>Water intensity per rupees of turnover</b> (water consumed/turnover)	0.000061464	0.0000011807
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	-	-
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into Surface water		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(ii) Into Groundwater		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) Into seawater		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties		
No treatment	-	-
With treatment – please specify level of treatment	-	-
(v) Others		
No treatment	-	-
With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kiloliters)</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

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

Parameter	Unit	FY 2024-25	FY 2023-24
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFC <sub>s</sub> , PFC <sub>s</sub> , SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	807382.34	1762349.54
<b>Total Scope 3 emissions per rupee of turnover</b>	Metric tonnes of CO <sub>2</sub> equivalent/₹	0.0000090338	0.0000234929
<b>Total Scope 3 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

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities. – N.A.
4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions/effluent discharge/waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
1.	Increased reliance on renewable source of electricity consumption	To enhance its renewable energy usage, the company has implemented initiatives such as the installation of advanced TopCon solar panels.	An annual reduction of 126.4 tonnes of carbon dioxide equivalent (CO <sub>2</sub> e) emissions was achieved by the company

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
2.	Comprehensive treatment system for batching plant waste water.	The Company began sourcing treated water from the waste water of the batching plant by installing sedimentation tanks. This water is utilised for dust suppression across the sites. This helps to reduce freshwater demand	Helped reduce freshwater demand by 295944.6 KI
3.	Promote the use of reused materials to minimise dependence on virgin raw materials.	To minimise environmental impact and support sustainable construction practices, the company actively procures reclaimed steel components—including old steel structures, ISMB (Indian Standard Medium Beams), and TMT (Thermo-Mechanically Treated) rebars for its operational activities. This initiative reduces dependence on virgin raw materials, conserves natural resources, and contributes to lower greenhouse gas emissions associated with steel production	The implementation of these initiatives resulted in a significant reduction of 4,551.62 tonnes of carbon dioxide equivalent CO <sub>2</sub> e emissions.
4.	The company has procured a bar straightening machine to reuse rebars recovered from construction waste	As part of its ongoing commitment to sustainable construction practices and resource efficiency, the company has procured a bar straightening machine designed to recover and repurpose steel rebars from construction waste. These rebars, often discarded due to bends or deformation during demolition or excess cutting, are processed through the machine to restore their usability. This initiative not only reduces the amount of construction waste sent to landfills but also minimises the need for procuring new, virgin steel materials. By extending the lifecycle of steel components through in-house processing, the company contributes to circular economy principles and significantly lowers the embodied carbon footprint associated with new material production.	This effort contributed to lowering the company's carbon emissions by 63.5 tonnes of carbon dioxide equivalent CO <sub>2</sub> e emissions.
5.	To enhance waste management practices, the company has installed an Organic Waste Composter at the project site for processing biodegradable waste	In its commitment to advancing sustainable waste management practices, the company has installed an Organic Waste Composter at the project site. This system effectively processes biodegradable waste, including food scraps, plant materials, and other organic by-products, converting them into high-quality, nutrient-rich compost. By diverting organic waste from landfills, the company significantly reduces its environmental footprint and supports a circular economy. The compost produced can be utilised for landscaping, soil enhancement, or other ecological initiatives, thereby contributing to the overall sustainability goals of the project	As a result of these initiatives, a total of 7,979 kg of manure was generated, contributing to waste reduction and soil enhancement. Additionally, the company achieved an annual reduction of 4.56 metric tonnes of carbon dioxide equivalent (CO <sub>2</sub> e) emissions, further supporting its sustainability goals.
6.	Repurposing leftover concrete to create concrete blocks	The company repurposes leftover concrete from construction activities to produce durable concrete blocks, minimising waste and promoting resource efficiency. This initiative not only reduces the amount of discarded material but also supports sustainable building practices by reusing existing resources in the production of new construction materials	The outcome of these initiatives contributed to a reduction of 52.46 tonnes of carbon dioxide equivalent (CO <sub>2</sub> e) emissions.



Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
7.	Use low-carbon materials like GGBS, fly ash, Portland slag cement, AAC blocks, and fly ash bricks in our construction activities	To minimise the environmental impact of our construction activities, we incorporate low-carbon materials such as Ground Granulated Blast Furnace Slag (GGBS), fly ash, Portland slag cement, autoclaved aerated concrete (AAC) blocks, and fly ash bricks. These sustainable materials reduce the carbon footprint of our projects by replacing traditional high-carbon alternatives, promoting resource efficiency, and contributing to a more sustainable built environment	The use of low-carbon materials has resulted in a reduction of 76691.57 tonnes of carbon dioxide equivalent (CO <sub>2</sub> e) emissions.

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

The Company has established emergency preparedness and response plans at each project site to deal with the emergency situations. It also provides response procedures for preventing and mitigating the hazard & risk and environmental impacts arising from emergency situations including the provision for first aid. In the event of any occurrence of an emergency, the same shall be investigated and appropriate preventive measures would be initiated to avoid recurrence in future. Relevant information and training related to emergency preparedness and response shall be provided to the interested parties. The duties and responsibilities of all staff and workers are being communicated periodically.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard -

No significant adverse impact reported from any value chain partner. A separate Code of Conduct for Vendors and Suppliers which covers the need for compliance with environmental regulations, health and safety, labour practices, human rights aspects, minimum wages, freedom of association, prohibition of child labour and forced and compulsory labour, ethical behaviour, transparency in business processes and environment conservation. All new vendors/service providers need to sign the aforesaid Code as part of the initial empanelment process. Timely internal environmental management system audit for ISO 14001:2015 and external audits are conducted to evaluate compliance of Environment Management System which also includes the Company's value chain partners.

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

All supply chain partners are required to sign a COC which covers the need for compliance including environmental regulations. In FY 2024-25, 66% of the top 500 value chain partners were assessed for environmental impact.

8. How many Green Credits have been generated or procured:

a. By the listed entity - 0

b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners - 0

## **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.

Five

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

S. No	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	Construction Federation of India	National
2	National Safety Council	National
3	Bombay Chambers of Commerce & Industry	National
4	Project export Promotion Council of India	National
5	Deep Foundation Institute of India	National

2. Provide details of corrective action taken or underway on any issue 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
	Nil	

### Leadership Indicators

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

S. No	Public policy covered	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of review by Board (Annually/Half yearly/ Quarterly/Other-Please specify)	Web link, if available
					N.A.

## 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
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Social Impact Assessment (SIA) is typically done by the owners/owners' representatives at the onset of projects. The Company's involvement with the projects is at a much later stage and hence SIA is not applicable to the entity.

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

S. No	Name of Project for which R&R is ongoing	State	District	No. of project Affected Families (PAFs)	% of PAFs covered by R&R	Amount paid to PAFs in the FY (In ₹)
						N.A.

Not applicable. No rehabilitation and resettlement were undertaken by the Company during this reporting period.

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

The complaints or grievances received from the community are addressed by the site management involving the industrial and administration departments and the clients, as applicable. Any issue which is unresolved or needs management intervention is escalated to the respective business heads. Any community member can raise complaint through E-mail address provided at the Company's website which is monitored and addressed as per the Company's Whistle Blower Policy.

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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/small producers	23.67%	19.01%
Directly from within India	92.36%	96.24%

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

Location	FY 2024-25	FY 2023-24
Rural	33.11	29.22
Semi-urban	6.39	8.74
Urban	15.11	19.61
Metropolitan	45.39	42.43



## Leadership Indicators

1. Provide details of action taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
N.A. - Social Impact Assessment (SIA) is typically done by the owners/owners' representatives at the onset of projects. The Company's involvement with the projects is at a much later stage and hence SIA is not applicable to the entity.	

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

S. No.	State	Aspirational District	Amount Spent (In ₹)

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised/vulnerable groups? No  
 (b) From which marginalised/vulnerable groups do you procure? MSME  
 (c) What percentage of total procurement (by value) does it constitute? 23.67%
4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No	Intellectual Property based on traditional knowledge	Owned/Acquired (Yes/No)	Benefit Shared (Yes/No)	Basis of calculating benefit share
				Not applicable as the Company does not have any intellectual property owned or acquired by the entity (in the current financial year), based on traditional knowledge.

5. Details of corrective action taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the case	Corrective action taken
-	-	-

6. Details of beneficiaries of CSR projects:

S. No	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups.
1.	Providing financial contribution to Rescue and Relief Foundation, Kolkata, for rehabilitation of girl children affected by sexual harassment and trafficking and provide vocational training, women empowerment, setting up homes and hostels for women and orphans.	25	100%
2.	Financial contribution to Studeasy Foundation, Navi Mumbai, Maharashtra, to provide quality education to 50 Government schools.	8438	100% of beneficiaries from vulnerable and marginalised groups
3.	Financial contribution to Utkarsh Foundation, Mumbai, for providing food/medical/diagnosis expenses etc. to stray animals.	Not applicable	Not applicable
4.	Financial contribution to Shri Chaitanya Health & Care Trust towards medical treatment like open heart Surgery, Coronary Angioplasty and cancer surgery for rural and tribal population in Thane, Palghar and Mumbai districts of Maharashtra.	58	87% of the beneficiaries were from vulnerable and marginalised groups

S. No	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups.
5.	Financial contribution to Swakshatra Trust, Bengaluru, for Children's Home programme towards education, food, medical expenses, vocational training and allied maintenance.	22	91 % of beneficiaries from vulnerable and marginalised groups
6.	Financial contribution to Bhoomika, Bhubaneswar, Odisha for conducting eye screening camps for 3000 beneficiaries, about 500 cataract surgeries, providing post-surgery glasses, medicines, etc in Bhubaneswar and Khordha district of Odisha Medinipur district.	507	100 % of beneficiaries from vulnerable and marginalised groups
7.	Financial contribution to SANGYA, Kolkata to provide for:		
	Increase of Day Care Unit capacity to accommodate an increased number of specially abled children.	6	80 % of beneficiaries from vulnerable and marginalised groups
	Enhancement of facilities to include specialised equipments and resources for different required therapies and education.	80	65% of beneficiaries from vulnerable and marginalised groups
	Women empowerment through higher education/Economic upliftment	15	40% of beneficiaries from vulnerable and marginalised groups
	Imparting vocational training to specially abled children/their parents.	9	45% of beneficiaries from vulnerable and marginalised groups
	Running awareness program in schools, colleges and slum areas for early intervention and prevention of disability.	1000	50% of beneficiaries from vulnerable and marginalised groups
8.	Financial contribution to The United Educational & Social Welfare Trust, Coimbatore for food support for orphans with multiple disabilities and destitute senior citizens.	110	100% of beneficiaries from vulnerable and marginalised groups
9.	Financial contribution to Relearn Foundation (RELF), West Bengal for continuation and expansion of Sahaaj Pathshala and Sahaaj Poshan at Aspirational Districts of Bihar and Jharkhand and other districts of West Bengal, providing Digital Educational Aids for Tutors and Senior students and tutorship training.	2280	95% of beneficiaries from vulnerable and marginalised groups
10.	Financial contribution to BHABNA, Kolkata in Paschim Bardhaman District in West Bengal for construction of the Girls Hostel Block. It will make a significant difference in the lives of those girls with autism and the community as a whole.	6	100% of beneficiaries from vulnerable and marginalised groups
11.	Financial contribution to Harshini Social Welfare Foundation, Bhopal for purchase of proper furniture in computer Lab, computers alongwith peripherals and also installation of solar panel and for misc. expenses in this regard.	56	100% of beneficiaries from vulnerable and marginalised groups



S. No	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups.
12.	Construction of two classrooms in Laxman Narayan Bhoir shaisharik, Kala, Krida, Sanskrit, Samagik and Arogya Sanstha at Navin Sheva, Uran, Raigad, New Mumbai for under privilege and poor pupils.	120	100% of beneficiaries from vulnerable and marginalised groups
13.	Construction of building for kitchen and dining space in LVLP Govt. School at Mukolla, Mulloor, Trivandrum, Kerala.	160	100% of beneficiaries from vulnerable and marginalised groups
14.	Installation of water purifier for under privilege Kanakprasad Govt. Primary School at at Kanakprasad Govt. Primary School, Kanakprasad, Kaikhshola, Dhamara, Chandabali, Bhadrak, near By Dhamra Port site, Dhamra.	200	100% of beneficiaries from vulnerable and marginalised groups
15.	Financial contribution to SNRF Foundation at Kelwad, Rahata Tehsil, Maharashtra to provide computer education and digital literacy programme in five villages at Kelwad, Rahata Tehsil, Ahmednagar.	300	75% of Beneficiaries from Vulnerable and Marginalised Groups
16.	Financial Contribution to Gurudas Gupta Foundation for Computer Education, Sewing Machine and purchase of Medical Instruments for their Medical Centre, Kolkata.	205	95% of beneficiaries from vulnerable and marginalised groups
17.	Financial Contribution to SOS Children's Village India, Kolkata, West Bengal, for Livelihood creation, Education, Health Camp, Nutrition Support in Kolkata and Latur.	1434	100% of beneficiaries from vulnerable and marginalised groups
18.	Providing Interactive Panels (15 nos.), Classroom Furniture for Secondary and Sr. Secondary Classes (150 Benches and Desks) and High quality Sports Equipment for Primary and Secondary Classes to HQ Project Seabird, Naval Headquarters, Ministry of Defence, Delhi Cantt for Navy Children School, Naval Base, P.O. Arga, Karwar.	300	75% of beneficiaries from vulnerable and marginalised groups

## 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. -

As a part of the Company's Integrated Management System, customer feedback (Format no. SR-10) survey is after conducted on a quarterly basis and its analysis is done by the Company. Customers evaluate the performance on below mentioned parameters on a scale of 1 to 10:

- Project Management for Timely Completion
- Quality Control Supervision
- Response to Observations/Suggestions
- Housekeeping
- Waste Management
- Control of Dust and Noise
- Implementation of Safety Precautionary Measures
- Use of PPE
- Safety Awareness
- Overall Impression

Customer's perception always plays a significant role in the improvement process and the Company has a mechanism in place to receive and respond to consumer complaints and feedback.

Areas of improvement are identified based on quarterly monitoring and action plans are prepared and implemented.

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

As a percentage to total turnover	
Environmental and social parameter relevant to the product	Not applicable, as the company does not have any specific consumer product.
Safe and responsible usage	
Recycling and/or safe disposal	

3. Number of consumer complaint in respect of the following

	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Date privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair trade Practices	0	0	-	0	0	-
Other	0	0	-	0	0	-

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

	Number	Reason for recall
Voluntary recalls	Not Applicable	Not Applicable
Forced recalls	Not Applicable	Not Applicable

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

<https://www.itdcem.co.in/about-us/privacy-policy>  
<https://www.itdcem.co.in/about-us/terms-condition/>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty/action taken by regulatory authorities on safety of products/services - None



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 - Nil
  - c. Impact, if any, of the data breaches- Nil

#### Leadership Indicators

1. Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available). - Company Website ([www.itdcem.co.in](http://www.itdcem.co.in))
2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.-  
Our products are made as per the specifications drawn by our client/consumer/his representative and results of compliance of the same are always shared during the course of execution of the project.
3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services. -  
Anticipated disruption/discontinuation of essential services are planned and permission is taken from concerned authorities prior to taking up any work. If required, action plan is drawn and implemented to minimize the effect of disruption.
4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) - Not applicable for the operations of the Company.  
If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No) - Yes, the average customer satisfaction score achieved during FY 2024-25 was 90%.