

Business Responsibility & Sustainability Reporting

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Company	L65910MH1995PLC220793
2	Name of the Company	Nippon Life India Asset Management Limited
3	Year of incorporation	February 24, 1995
4	Registered office address	4 th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg, Lower Parel (W), Mumbai – 400 013
5	Corporate address	4 th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg, Lower Parel (W), Mumbai – 400 013
6	E-mail	investorrelation@nipponindiaim.com
7	Telephone	+91 22 68087000
8	Website	https://mf.nipponindiaim.com/
9	Financial year for which reporting is being done	2022-23
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited and BSE Limited.
11	Paid-up Capital	₹ 623.18 Crore 62,31,75,443 shares of ₹ 10 each
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. Arash Arethna Lead – Investor Relations Telephone No: 9029457678 E-mail: arash.arethna@nipponindiaim.com
13	Reporting boundary	Standalone basis

II. Products/services

14. 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	Finance and Insurance Services	Fund Management Services	100%

15. 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	The Company provides investment management services across various asset classes to Nippon India Mutual Fund investors along with providing portfolio management and advisory services to customers	65991	100%

III. Operations

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

Location	Number of plants*	Number of offices	Total
National	NA	193	193
International	NA	2	2

*NAM India operates in the financial services sector and doesn't undertake any manufacturing activity

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	27
International (No. of Countries)	2

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

This question is not applicable since NAM India does not export any products or services.

c. A brief on types of customers

NAM India offers a comprehensive bouquet of products across its mutual fund, Portfolio Management Service (PMS), Alternative Investment Funds (AIF) and Offshore businesses cater to various investor segments namely retail, high net worth individuals and corporate customers. The Company also provides Non-Discretionary PMS to Postal Life Insurance and Rural Postal Life Insurance customers.

IV. Employees**18. 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)
EMPLOYEES						
1.	Permanent (D)	1,007	816	81.03%	191	18.97%
2.	Other than Permanent (E)	0	0	-	0	-
3.	Total employees (D + E)	1,007	816	81.03%	191	18.97%

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1	Permanent (D)	0	0	0	0	0
2	Other than Permanent (E)	NA	NA	NA	NA	NA
3	Total differently abled employees (D + E)	0	0	0	0	0

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.50%
Key Management Personnel	4	1	25.00%

20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2022-23			FY 2021-22			FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	22.88%	20.73%	22.49%	20.53%	22.96%	20.94%	13.24%	9.82%	12.69%

V. Holding, Subsidiary and Associate Companies (including joint ventures)**21. (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	Nippon Life Insurance Company	Holding	73.66%	No – As an independent company, it may undertake its own initiatives
2	Nippon Life India AIF Management Limited	Subsidiary	100%	Yes
3	Nippon Life India Asset Management (Singapore) Pte. Limited	Subsidiary	100%	Yes
4	Reliance Capital Pension Fund Limited	Associate	49%	No – As an independent company, it may undertake its own initiatives

VI. CSR Details

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

(ii) **Turnover** (in ₹): 1,259.21 Crore

(iii) **Net worth** (in ₹): 3,029.01 Crore

VII. Transparency and Disclosures Compliances

23. **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 2022-23		Remarks	FY 2021-22		Remarks
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	
Local Communities	No	0	0		0	0	
Investors (other than shareholders)	Yes https://mf.nipponindiaim.com/investor-service/customer-service/grievance-redressal-process	1,039	5		1,016	7	
Shareholders	Yes Investor Information (nipponindiaim.com)	2	0		4	0	
Employees and workers	Yes https://mf.nipponindiaim.com/InvestorServices/ESGDocuments/Employee-Code-of-Conduct.pdf	0	0		0	0	
Customers	Yes https://mf.nipponindiaim.com/investor-service/customer-service/grievance-redressal-process	1,039	5		1,016	7	
Value Chain Partners	Yes https://mf.nipponindiaim.com/investor-service/customer-service/grievance-redressal-process	0	0		0	0	
Other (please specify)	NA						

24. 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. identified	Material issue	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	Corporate Governance	R	Strong corporate governance is essential in assessing and managing risks related to the organisation. Neglecting of any stakeholder relationship, compliance or monitoring can lead to financial as well as reputational damage thereby affecting business continuity.	- Instituted Board level committees and a robust governance structure to ensure NAM India's performance is aligned to the stakeholders' expectations - Implemented control systems to ensure appropriate oversight	Negative
2	Responsible Investing	O	Making investors' money matter and generate responsible outcomes will enable the business to gain confidence in the market. This in turn will attract more investors and gain market share.		Positive
3	Business Ethics	R	Focusing on Business Ethics is vital as it can have serious repercussions. Well defined monitoring and regular reviewing systems should be in place to prevent financial and reputational challenges.	- Implemented an effective whistle blower and grievance redressal mechanism - Set up internal controls to ensure compliance to the Code of Conduct - Conducted awareness programmes on the ethical practices and CoC for internal stakeholders	Negative
4	Diversity and Inclusion	O	Having a diverse and inclusive environment will bring in new perspectives, creativity, and ideas into the organisation, thus, increasing employee engagement and performance and aiding in easier access to new markets		Positive
5	Climate Action	O	Having a climate action in place will ensure that the company analyses and takes strategic steps to mitigate any impact on the business. It will also help the Company to devise new products and services for its customers thus generating more revenue. Contributing to the need of the hour responsibly will showcase the organisation's effort and awareness to its stakeholders.		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
Policy and Management Processes										
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	N	Y	Y	Y	Y	N	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	-	Y	Y	Y	Y	-	Y	Y
	c. Web Link of the Policies, if available	Investor Policies (nipponindiaim.com) ESG Documents (nipponindiaim.com) *								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Y	N	Y	Y	Y	Y	N	Y	Y
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	N	Y	N	Y	Y	N	Y	Y
4	Name of the national and international codes/certifications/ labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Not Applicable								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	45% reduction in the overall Net CO2 emission by 2030 70% reduction in the overall Net CO2 emission by 2050 Achieve Net zero by 2070 The targets mentioned above are to be achieved considering the base year to be FY 2019-20								
6	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	20,27,119 units of electricity consumed 887 litres of petrol consumed by vehicles ₹ 2,71,288/- (Diesel) which is approximately 2,700 litres consumed through DG sets								

*Some policies are internal to the company and not available on the website

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)	
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Sundeep Sikka - Executive Director and CEO
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the ESG and CSR Committees provide the necessary guidance and oversight for decision making

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																		
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances																		
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	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Y	-	Y	Y	Y	Y	-	Y	Y									

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)	-	Y	-	-	-	-	Y	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	NA	-	-	-	-	NA	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	NA	-	-	-	-	NA	-	-
It is planned to be done in the next financial year (Yes/No)	-	NA	-	-	-	-	Y	-	-
Any other reason (please specify)	-	NA	-	-	-	-	NA	-	-

List of Policies

BRSR Principles	
Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable	Employee Code of Conduct, Code of conduct for Board and Senior Management, Ombudsperson and Whistleblower Policy, Policy on Conflict of Interest, Anti-Money Laundering Policy, Group Tax Policy, Human Rights Policy, Supplier Code of Conduct, Claw back Policy, Dividend Distribution Policy, Preservation of Documents and Archival Policy, Code of conduct for fair disclosure of UPSI, Related Party Transaction Policy, Responsible Investment Policy Equity, Responsible Investment Policy Fixed Income, ESG Policy Framework and Policy for Determination of Material Subsidiary
Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe	Not Applicable
Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains	Employee Code of Conduct, ESG Policy Framework, Policy on Sexual Harassment of Women at Workplace, ESG Policy Framework and Supplier Code of Conduct
Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders	Stakeholder Engagement Policy, Responsible Investment Policy Equity, Responsible Investment Policy Fixed Income, ESG Policy Framework and Stewardship Policy, Code of conduct for fair disclosure of UPSI, Related Party Transaction Policy, Policy for determination and disclosure of materiality of events and information, Board Diversity Policy, Code of Conduct for Board and Senior Management, Dividend Distribution Policy, CSR Policy
Principle 5: Businesses should respect and promote human rights	Human Rights Policy, Supplier Code of Conduct and Employee Code of Conduct
Principle 6: Businesses should respect and make efforts to protect and restore the environment	Employee Code of Conduct, Environmental Policy, ESG Policy Framework and Supplier Code of Conduct
Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	Not Applicable
Principle 8: Businesses should promote inclusive growth and equitable development	Employee Code of Conduct, ESG Policy Framework and CSR Policy
Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner	Information Cyber Security and Cyber Resilience Policy, ESG Policy Framework and Supplier Code of Conduct

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	%age of persons in respective category covered by the awareness programmes
Board of Directors	8	Industry overview and Business model of the Company and the regulatory framework in which the Company operates, Operations and Systems overview, Financial Performance and Budget and Control Processes, Familiarisation on statutory compliances as a Board Member and Familiarisation on Risk Management Framework.	98.44%
Key Managerial Personnel	1	Highly curated simulation-based workshop for next in line leaders to prepare them for enhanced leadership qualities	10%
Employees other than BoD and KMPs	7	Skill based training to enhance the ability to engage better with clients, soft skill trainings for employees to develop essential competencies and deliver better business results	70%

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Nil	Nil	0	Nil	Nil
Settlement	Nil	Nil	0	Nil	Nil
Compounding fee	Nil	Nil	0	Nil	Nil
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Nil	Nil	0	Nil	Nil
Punishment	Nil	Nil	0	Nil	Nil

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

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

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 Policy has been developed in line with the SEBI AML guidelines incorporating salient aspects of the measures and obligations of Mutual Funds under the Prevention of Money Laundering Act, 2002 (PMLA). It aims to combat money laundering and specifies NAM India's approach to customer identification procedures, customer profiling based on the risk perception and monitoring of transactions on an ongoing basis, to facilitate suspicious transaction detection and fraud prevention measures which NAM India takes, to protect itself and its bona-fide customers from losses. This policy is applicable to all branches/offices of NAM India and its Service Providers. The objective of the policy is to also take necessary steps to ensure that the concerned staff of NAM India are made aware of the anti-money laundering policies and procedures and are adequately trained in KYC/AML Procedures so as to help them to understand the money laundering risks involved in Mutual Fund business.

Additionally, anti-bribery forms a part of the employee code of conduct wherein instructions are provided to refrain from bribery.

[Anti-Money-Laundering-Policy.pdf \(nipponindiaim.com\)](#)

[Nippon Employee Policy Handbook - II.cdr \(nipponindiaim.com\)](#)

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 2022-23	FY 2021-22
Directors	0	0
KMPs	0	0
Employees	0	0

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

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

No action taken by Securities and Exchange Board of India (SEBI) and Registrar of Companies (ROC).

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
NAM India has instituted a Supplier Code of Conduct. The Company conducts regular trainings for its distributors on its products and services.		

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 Board members of the Company on an Annual basis affirm compliance with the Code of Conduct for Board and Senior Management. The code has certain parameters, one of which includes ethical handling of conflict of interest situations. The Company has also formulated a policy on related party transactions for providing guidelines in relation to identification of related parties and dealing with related parties. All related party transactions are placed before the Audit Committee for approval and are considered approved only on approval by Independent Directors of the Audit Committee. We also have Conflict of Interest policy, which is intended to be a statement of principles through which NAM India seeks to identify and avoid, or to deal with or manage, actual or potential conflicts of interest in line with the SEBI guidelines and good governance standards.

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 2022-23	FY 2021-22	Details of improvements in environmental and social impacts
R&D	The Company is primarily into financial services, hence the relevance of the above is largely restricted to capital expenditure towards information technology. The Company constantly acts on opportunities that may arise to reduce its impact on the environment and society. It continues to invest in technology and build a robust digital environment across the organisation.		
Capex			

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

Yes, the Company has instituted a supplier code of conduct whereby each of its suppliers are expected to integrate ESG into their systems and processes. This supplier code of conduct is built on NAM's values of honesty, integrity, respect fairness, purposefulness, trust, responsibility, citizenship and caring and every supplier is expected to endeavour to adhere to the same. This Code focuses

on four pillars of Human Rights, Diversity and Inclusion, Environmental Stewardship and Ethics and Anti-Corruption.

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

As a service provider, NAM India's direct consumption of consumables and input material is limited. It ensures to procure majority of its materials from local vendors.

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.

To dispose its e-waste, the Company has an Asset disposal policy that lays down the process for disposal of information system assets. The Company also has tie-ups with third party vendors who assist in disposing of the IT assets. NAM India ensures all technology equipment identified as scrap is being disposed-off as per the guidelines of this policy. Air Conditioner and Inverter Batteries are sold to dealers. The copper and metal parts are recycled and used as spares or in smelting units to generate metal.

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.

Not Applicable

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?

Not Applicable

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

Not Applicable

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

Not Applicable

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:

Not Applicable

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

Not Applicable

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	816	816	100%	816	100%	-	-	816	100%	-	-
Female	191	191	100%	191	100%	191	100%	-	-	191	100%
Total	1,007	1,007	100%	1,007	100%	191	18.97%	816	81.03%	191	18.97%

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

Benefits	FY 2022-23			FY 2021-22		
	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	NA	Y	100	NA	Y
Gratuity	100	NA	Y	100	NA	Y
ESI	NA	NA	NA	NA	NA	NA
Others – please specify	NA	NA	NA	NA	NA	NA

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.

NAM has ensured all its offices and premises are accessible to differently abled employees, workers, and visitors.

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, NAM instituted a Human Rights Policy that entails equal opportunities as one of its components.

[Human-Rights-Policy.pdf \(nipponindiaim.com\)](#)

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

	Permanent employees	
	Return to work rate	Retention rate
Gender		
Male	100%	95.65%
Female	100%	100%
Total	100%	100%

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Employees	Yes, any grievances related to violations can be reported on rajesh.derhgawen@nipponindiaim.com . NAM India has also setup an ombudsperson network and a whistleblower mechanism. In addition, NAM India has a grievance redressal mechanism to address concerns of NAM India's stakeholders.

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

Not Applicable

8. Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health and Safety Measures*		On Skills upgradation		Total (D)	On Health and Safety Measures*		On Skills upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
	Employees									
Male	816	248	30.39%	816	100%	801	245	30.58%	382	47.16%
Female	191	92	48.16%	191	100%	166	75	45.18%	58	34.94%
Total	1,007	340	33.76%	1,007	100%	976	320	32.79%	440	45.08%

*These trainings are only conducted across their corporate offices and headquarters.

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	No. (C)	Total (D)	% (C/A)
Employees						
Male	819	819	100%	801	801	100%
Female	191	191	100%	166	166	100%
Total	1,007	1,007	100%	967	967	100%

10. Health and safety management system:

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

Yes, NAM India has implemented an occupational health and safety management system which forms a part of the employee handbook. The policy covers all employees, products, processes and infrastructure within NAM India Nippon Life Asset Management Co. Ltd. and its subsidiaries and affiliates.

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

Yes, NAM India has established processes used to identify work-related hazards and assess risks on a routine and non-routine basis.

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

Yes, NAM India has implemented processes for its employees to report the work-related hazard and to remove themselves from such risks.

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

Yes, NAM India offers its employees with access to non-occupational medical and healthcare services.

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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
Total recordable work-related injuries	Employees	0	0
No. of fatalities	Employees	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0

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

NAM India's Employee Handbook (also known as the Employee Code of Conduct) contains clauses, definitions and measures for Corruption and bribery, Discrimination, Confidentiality of information, Conflicts of interest, Anti-trust/Anti-competitive practices, Insider trading (these are separate policies), Health, Safety and Environment, Whistle Blowing and Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (POSH). The Company has a formal compliance management system and a Board approved Compliance manual to ensure its practices are in accordance with the laws and regulations of the land. Additionally, health and well-being of NAM India's employees are also covered in the ESG policy.

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0		0	0	
Health & Safety	0	0		0	0	

14. Assessments for the year:

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

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.

Not Applicable

Leadership Indicators

- 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).

(A) Employees: Y

All the employees of NAM India are covered by a life insurance policy and are provided family support-in case of demise.

(B) Workers: Not Applicable

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

Not Applicable

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

Not Applicable

- 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, NAM India plans to conduct transition assistance programmes in the near future.

- Details on assessment of value chain partners:

NAM India does not conduct any assessments for its value chain partners.

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

Not Applicable

PRINCIPLE 4: Businesses should respect the interests of, and be responsive to all its stakeholders**Essential Indicators****1. Describe the processes for identifying key stakeholder groups of the entity.**

The Company engages with its stakeholders regularly to understand their needs and expectations as well as gain valuable feedback. The inputs received from the stakeholders are always kept at the forefront while taking decisions with respect to risk management, strategy formulation, business planning or execution. The Company uses multiple formal and informal channels to conduct its engagements and to meet the unique needs of each stakeholder group. NAM India has identified the following as key stakeholders for the business.

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

Stakeholder group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisement, Community meetings, Notices Board, Website)	Frequency of engagement (Annually/ Half yearly/ Quarterly/others)- Please specify	Purpose and scope of engagement including key topics and concerns raised during such engagements
Shareholders	No	Quarterly earnings calls, Audio recording of earnings call, Investor presentation, Annual General Meeting, Intimation to stock exchanges, annual or quarterly financials and investor meetings or conferences, press release, annual reports, email, SMS, newspaper, advertisement, notices, website, and transcripts.	Quarterly basis and on a need basis	To keep shareholders updated on the latest developments at the Company, Company and sector performance and address concerns if any.
Employees	No	One-on-one or group meetings, emails, town halls, team meetings, engagement surveys, grievance redressal platform	Ongoing and Need basis	Annual performance review, benefits offered, trainings and career growth, health, and wellness
Customers	Yes, based on demographics	Emails, advertisements, website, newspaper and digital platforms, helpline forums, customer satisfaction surveys, branch visits	Ongoing and Need basis	Information on products and services offered, various platforms available for customers to reach out in case of any grievance, services being offered for ease of doing business, provide excellent customer service throughout the life cycle
Vendors, Distributors, Bankers, Custodians, and others in value chain	No	Emails and in-person meetings	Quarterly and on ad-hoc basis	Custodian - For safekeeping on all securities or Trade Settlement or Corporate Action Management. Bankers - Maintenance of scheme accounts to facilitate an ease of transaction ecosystem for investors. Vendors (Depositories) - Facilitate transaction and unit settlement on investors and other allied activities
Communities/ NGOs	Yes	Emails, meetings, website, and other digital platforms	Need based	Impact of the CSR initiatives and grievances
Regulatory Bodies	No	Emails, upload on SEBI's portal and physical filings	Need based	Regulatory requirements, and ESG Initiatives and performance
AMFI	No	Emails, upload on AMFI portal and physical filing	Need based	Regulatory requirements and any ad hoc requirements raised by AMFI
Registrar and Transfer Agent	No	Emails, physical and digital meeting	Daily, Monthly	Engagement to have seamless operations, Data Integrity, and Compliance
Media	No	Emails, SMS, press release, newspapers, pamphlets, advertisement, annual reports, website, transcripts, conference, and other meetings	Need based	Stay abreast on the development of the Company and its offerings

Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The Company encourages constant and proactive engagement with its stakeholders. In the Annual General Meeting of the Company, the shareholders are given an opportunity to interact and ask questions to the Board and Management. Further, the Company organises the earnings conference calls on financial results with analyst and investors. The Company also has a separate designated e-mail id for stakeholders' group where they can provide any suggestions or ask for any query. The Board also inter-alia constituted two Committees viz. an ESG Committee of executives and Corporate Social Responsibility (CSR) Committee of the Board that assist the Board in fulfilling its oversight responsibilities with regard to, including but not limited to environmental, health and safety, CSR, Sustainability, philanthropy, corporate governance etc. The ESG and CSR Committee meets at regular intervals, to ensure seamless implementation of responsible business practices. The discussions held in the committee meetings are communicated to the Board through minutes placed in the meeting.

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, at NAM India Group, the approach is to interweave social responsibility into the Company's mainstream business functions through translating ESG commitments into policies, which not only drive all employees but influence and mobilise stakeholders, especially partners and suppliers, to embrace responsible business practices in their respective spheres of action.

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

The details of the Company's CSR initiatives, projects or programmes and activities are provided in Annexure of the Annual report. The CSR Policy of the Company is uploaded on its website and can be viewed at [CSRPolicy.pdf \(nipponindiaim.com\)](#).

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 2022-23			FY 2021-22		
	Total (A)	No. employees / workers covered (B)	% (B / A)	Total (C)	No. employees / workers covered (D)	% (D/C)
Employees						
Permanent	1,007	1,007	100%	967	967	100%
Other permanent	0	0	0	0	0	0
Total Employees	1,007	1,007	100%	967	967	100%

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

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	1,007	0	0	1,007	100%	967	0	0	967	100%
Male	816	0	0	816	100%	801	0	0	801	100%
Female	191	0	0	191	100%	166	0	0	166	100%

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	7	4,20,78,173	1	Cannot be derived
Key Managerial Personnel	3	1,26,00,000	1	42,00,000
Employees other than BoD and KMP	813	10,00,000	190	10,00,000

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, and defined as per the human Rights policy as well as the laid-out grievance redressal mechanism.

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

Any grievances related to violations of human rights can be reported on a dedicated email id. NAM India has setup an ombudsperson network and a whistleblower mechanism. In addition, NAM India has a grievance redressal mechanism to address concerns of NAM India's stakeholders.

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

	FY 2022-23			FY 2021-22		
	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
Sexual Harassment	0	0		0	0	
Discrimination at workplace	0	0		0	0	
Child Labour	NA	NA		NA	NA	
Forced Labour/Involuntary Labour	NA	NA		NA	NA	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

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

The Company has an internal grievance redressal mechanism available for its employees to report any Human Rights violations. In addition, to ensure the well-being of all its employees, the Company conducts trainings on Prevention of Sexual Harassment (POSH) as a part of its induction for employees and has a POSH policy, that forms a part of the Employee Handbook.

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

(Yes/No)

Yes, NAM India includes human rights requirements as a part of its Supplier Code of Conduct.

9. Assessments for the year:

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

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

Not Applicable

Leadership Indicators

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

No human rights complaints were raised.

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

NAM India does not conduct human rights due diligence as we have formal policy in place and all employees have access to the redressal mechanism in the event of any such issues faced or identified and raised.

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, all NAM India's offices are accessible to differently abled visitors as per the requirements of the Rights of Persons with Disabilities Act, 2016.

4. Details on assessment of value chain partners .

NAM India does not conduct human rights assessments for its value chain partners.

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

Not Applicable

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment**Essential Indicators****1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	FY 2022-23	FY 2021-22
Total electricity consumption (A)	7,297.63 MJ	9,347.76 MJ
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
Total energy consumption (A+B+C)	7,297.63 MJ	9,347.76 MJ
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees)	0.51 MJ/₹ million	0.65 MJ/₹ million
Energy intensity (optional) – the relevant metric may be selected by the entity	2.01 MWh/FTE	2.69 MWh/FTE

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.

Not Applicable

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

Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	545.2	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	545.2	NA
Total volume of water consumption (in kilolitres)	545.2	NA
Water intensity per rupee of turnover (Water consumed / turnover)	0.04 kl/₹ million	NA
Water intensity (optional) – the relevant metric may be selected by the entity	0.54 KL/FTE	NA

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. Not Applicable

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

NAM India has not implemented any mechanism for Zero Liquid Discharge.

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

Since NAM India offers financial services air emissions is not material as it does not manufacture goods.

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

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	52.20	3.13
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	1,439.25	2,051
Total Scope 1 and Scope 2 emissions per rupee of turnover	tCO ₂ e/₹ of turnover	0.10 tCO₂e/₹ million	0.14 tCO ₂ e/₹ million
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	tCO ₂ e/FTE	1.48	2.12

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

Yes, the Company has installed energy efficient equipment across its offices such as LED lights and energy star appliances for air conditioning to reduce its energy consumption. To reduce desktop energy consumption, NAM India has instituted a policy for refreshing end user devices with newer energy-optimised devices. Motion-based sensors have also been installed at its corporate office to help with energy savings. This helps in the reduction of its Scope 2 emissions.

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

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

Parameter	FY 2022-23	FY 2021-22
Total Waste generated (in metric tonnes)		
Plastic waste (A)	NA	NA
E-waste (B)	3.79	0.96
Bio-medical waste (C)	NA	NA
Construction and demolition waste (D)	NA	NA
Battery waste (E)	1.87	0.27
Radioactive waste (F)	NA	NA
Other Hazardous waste. Please specify, if any. (G)	NA	NA
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) \	NA	NA
Total (A+B + C + D + E + F + G + H)	5.66	1.23
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	NA	NA
(ii) Re-used	5.66	1.23
(iii) Other recovery operations	NA	NA
Total	5.66	1.23
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	NA	NA
(ii) Landfilling	NA	NA
(iii) Other disposal operations	NA	NA
Total	NA	NA

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

9. 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.

All offices of NAM India have a maintenance team which segregates the office waste into dry waste and wet waste and then hands it to the local municipal corporation for end disposal.

NAM India has put in place systems for wastewater treatment and responsible disposal of e-waste. To dispose its e-waste, the Company has an Asset disposal policy that lays down the process for disposal of information system assets. The Company has tie-ups with third party vendors who assist in disposing off the IT assets. NAM India ensures all technology equipment identified as scrap is being disposed-off as per the guidelines of the policy.

10. 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.

Not Applicable

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

Not Applicable

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

NAM India is complaint 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.

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2022-23	FY 2021-22
From renewable sources		
Total electricity consumption (A)	NA	NA
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
Total energy consumed from renewable sources (A+B+C)	NA	NA
From non-renewable sources		
Total electricity consumption (D)	7,297.63 MJ	9,347.76 MJ
Total fuel consumption (E)	NA	NA
Energy consumption through other sources (F)	NA	NA
Total energy consumed from non-renewable sources (D+E+F)	7,297.63 MJ	9,347.76 MJ

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. Provide the following details related to water discharged:

Not Applicable as NAM India's offices are housed within office spaces that form a part of a larger commercial structure therefore the water discharged from clear sources and borings is discharged through the central drainage and sewage lines.

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. Not Applicable

3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

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

- Name of the area
- Nature of operations
- Water withdrawal, consumption and discharge in the following format:

Not Applicable as NAM India's offices are housed within office spaces that form a part of a larger commercial structure. The water consumed is municipal water which is common to all offices housed within these commercial buildings.

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. Not Applicable

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	355.89	NA
Total Scope 3 emissions per rupee of turnover		0.12 tCO₂e/₹ million	NA
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO ₂ equivalent/ FTE	0.35	NA

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

Not Applicable

6. 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.	Installation of energy efficient equipment	Installation of LED lights and star rated air conditioning	NAM does not track this information
2.	Installation of water efficient fixtures	Installation of sensor-based taps	

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

The Company has a robust business continuity plan which is tested on a periodic basis to ensure business is not interrupted. NAM India understands that human capital development and succession is very critical for the long-term sustenance of the business as it ensures business continuity, preserves corporate culture, enhances knowledge capital, and fuels the ambitions of the Company's talent leading to better retention.

The Risk Management Committee of the Board (RMC) formulate a detailed risk management policy which includes – a framework for identification of internal and external risks faced by NAM India (including financial, operational, sectoral, sustainability (particularly ESG related risks), information and cyber security, etc.), measures for risk mitigation including systems and processes for internal controls of identified risks and business continuity plan.

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.

NAM India has not identified any significant adverse impact it causes to the environment due to its value chain partners.

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

NAM India do not assess its value chain partners for environmental impact although it has instituted a Suppliers Code of Conduct.

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-5

- 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	Association of Mutual Fund Industry (AMFI)	National
2	Confederation of Indian Industry (CII)	National
3	Bombay Chamber of Commerce and Industry (BCCI)	State

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

No instances related to anti-competitive conduct were reported.

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others- please specify)	Web Link, if available
1	NAM India is a member of the Association of Mutual Funds of India (AMFI). AMFI is dedicated to developing an ethical Industry that enhances and maintains the standards across all areas. It also endeavours to protect and promote the interests of mutual funds and their unit holders.	The Company's Leadership team actively participates in the various committees of AMFI. These activities are focused towards promoting financial inclusion and investor literacy and awareness.	Yes	Ongoing and need basis	Mutual Funds India Investment Plans Tax Saving Mutual Funds Nav (amfiindia.com)
2	NAM India is a member of Association of Portfolio Managers in India (APMI). This is a trade body aimed at drawing the expertise already available with the members and supplement it with industry level research initiatives to guide decisions.	The Company's Leadership team actively participates across various forums.	Yes	Ongoing and Need basis	APMI (apmiindia.org)

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.

Not Applicable

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

Not Applicable

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

Given the nature of the business, this is not applicable. Also, the Company carries its CSR activities through various implementing agencies.

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

	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers		
Sourced directly from within the district and neighbouring districts		Not Applicable

Leadership Indicators

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

Details of negative social impact identified	Corrective Action Taken
	Not Applicable

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

S. no	State	Aspirational District	Amount spent (in ₹)
1	Odisha	Koraput	1,08,00,000

3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised /vulnerable groups? (Yes/No)
 - b. From which marginalised /vulnerable groups do you procure?
 - c. What percentage of total procurement (by value) does it constitute?
- As NAM India belongs to the service sector, the quantity of procurement is not material to the Company although it endeavours to purchase from local vendors to support the local communities.

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.

Not Applicable

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

Name of authority	Brief of the Case	Corrective action taken
	Not Applicable	

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	Integrated rural development for creation of cluster of dream villages	744	92%
2	Olympic Gold Quest and Sports Science Support to Athletes Supported by Foundation for Promotion of Sports and Games	502	NA
3	Pragati-Integrated Rural Health and Development Project (IRHDP)	1,899	100%
4	Integrated development of Schools and Community for Environment Sustainability and Social Development	10,500	67%
5	Rashtriya Netra Yagna	3263	100%
6	SAFAL-Sustainable Livelihood Initiative in South Odisha	17,648	100%

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.

In the ordinary course of business, customers may have disputes with the Company regarding deficiency in services or product performance, which could result in a civil suit, or a consumer complaint. Most of NAM India's businesses are linked to the capital markets and thus, prone to short-term fluctuations. The Company regularly engages with its stakeholders to appropriately address their concerns; however, in some cases, legal resolutions may also be pursued.

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 parameters relevant to the product	
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	

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

	FY 2022-23			FY 2021-22		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	NA	NA	NA	0	NA	NA
Advertising	NA	NA	NA	0	NA	NA
Cyber-security	0	0		0	0	
Delivery of essential services	NA	NA	NA	NA	NA	NA
Restrictive Trade Practices	NA	NA	NA	NA	NA	NA
Unfair Trade Practices	NA	NA	NA	NA	NA	NA
Other	1,039	5	Pending cases would include cases that came at month end of March	1,016	7	

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

Number	Reasons for recall
Voluntary recalls	
Forced recalls	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, data or information privacy forms a part of NAM India's cyber security policy.

[Information-Cyber-Security-and-Cyber-Resilience-Policy.pdf \(nipponindiaim.com\)](#)

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.

No corrective actions were taken or are underway by SEBI for FY 2022-23 with respect to advertising.

Leadership Indicators

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

NAM India publishes information related to its products and services on its website. The link for the same is mentioned below.

[Nippon India Mutual Fund | Mutual Funds Services Online in India - NIMF \(nipponindiaim.com\)](#)

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

NAM India conducts a number of relevant investor education and financial empowerment programmes for its partners, investors, customers, and employees to educate them on its products and services. Further, the NAM ensures that all the eligible and identified employees are appropriately certified through the National Institute of Securities Markets, which is the Association of Mutual Funds in India (AMFI) organised and mandated by SEBI. This ensures that its products are used in a responsible manner.

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

The Company has a robust Disaster Recovery (DR) and Business Continuity Plan (BCP) which covers its critical operations. Additionally, it has communication mechanisms in the event of any local or global disaster. NAM India continued to provide uninterrupted service to its customers during the ongoing pandemic. During this period, the BCP was fully tested, all regulatory deadlines were met, and all critical functions were running without interruption. It also performed BCP tests on an annual basis and DR test twice a year. BCP forms a part of the governance framework, and it will be invoked in case of any local or global disaster. Under the BCP, employees can operate from an alternate location while also ensuring that all critical services can operate independently. The Company has its DR Data Centre set up, in Chennai. To strengthen its BCP and DR plans regular reviews are conducted. This ensures that the Company can continue to support its customers during any exigency.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Yes. the Company complies with disclosure requirements relating to its products and services. The Company shares regular product updates with the investors in the form of following material which are available on the website:

1. Factsheet
2. Product Notes
3. Scheme Performance

Yes, NAM India carries out a customer satisfaction survey for its products and services for the entity as a whole.

5. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along-with impact: 0
- b. Percentage of data breaches involving personally identifiable information of customers: 0%

Annexure

BRSR Principles	
Principle 1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable
Principle 2	Businesses should provide goods and services in a manner that is sustainable and safe
Principle 3	Businesses should respect and promote the well-being of all employees, including those in their value chains
Principle 4	Businesses should respect the interests of and be responsive to all its stakeholders
Principle 5	Businesses should respect and promote human rights
Principle 6	Businesses should respect and make efforts to protect and restore the environment
Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
Principle 8	Businesses should promote inclusive growth and equitable development
Principle 9	Businesses should engage with and provide value to their consumers in a responsible manner