Business responsibility and sustainability reporting

– the new dimension of ESG reporting



SUCHI GUPTA

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FOREWORD

Over the past few years, sustainability reporting is gaining importance globally as an important communication tool for corporates to display their commitment of being a sustainable and responsible business. The Indian reporting scenario is also rapidly evolving in line with the global trends wherein corporates are expected to maintain transparency and accountability in reporting.

The Securities and Exchange Board of India (SEBI), regulator of capital markets in India, has put in place the Business Responsibility and Sustainability Reporting (BRSR) framework which requires listed companies to disclose information under the nine principles of the National Guidelines on Responsible Business Conduct. The BRSR disclosure is voluntary for FY-2022 and shall become mandatory from FY-2023 onwards for the top 1,000 Indian listed companies by market capitalisation.

Staying strong on our commitment of being a responsible business adopting BRSR framework from FY-2024 was a conscious choice to maintain transparency in sustainability reporting. The BRSR disclosures presented herein are strictly as per the format prescribed by SEBI.

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BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

[As per Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

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SECTION A:

GENERAL DISCLOSURES

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L63020DL1992PLC121695
2.	Name of the Listed Entity	Sindhu Trade Links Limited
3.	Year of incorporation	1992
4.	Registered office address	129, Transport Centre, Rohtak Road, Punjabi Bagh, New Delhi 110035
5.	Corporate address	701, 7th Floor Signature Tower Sector - 30 Gurugram -124003
6.	E-mail	corporatecompliance@sindhutrade.com
7.	Telephone	0124-6913083
8.	Website	www.sindhutrade.com
9.	Financial year for which reporting is being done	April 2023 - March 2024
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited & NSE Limited
11.	Paid-up Capital	₹ 1,54,19,28,780/-
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Ms. Suchi Gupta, Company Secretary and Compliance Officer Contact: 0124-6913083 Email: suchi.gupta@sindhutrade.com
13.	Reporting boundary - Are the disclosures under this report made on a 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

II. Products/services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Financial and insurance Service	Other financial activities	0.25
2.	Transport and storage	Land Transport via Road	82.60
3.	Trade	Retail Trading	6.62
4.	Transport and storage	Services incidental to land, water & air transportation	1.41
5.	Support service to Organizations	Other support services to organizations	9.12

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.	Financial and Related Services	9971	0.25
2.	Freight Transport Services	9965	82.60
3.	Retail Trade Services	9962	6.62
4.	Supporting Transport Service	9967	1.41
5.	Operations & Maintenance Income	9967	9.12

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	9	9	9
International	0	0	0

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	The Company has offices in 04 states
International (No. of Countries)	NIL

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

During FY 2023-2024, the company earned about 0% of revenue from outside India.

c. A brief on types of customers

Sindhu Trade Links Limited offering wide range of services including Transportation and Logistics, Power Generation and Coal Mining. Few of customers are ACB (India) Limited, Mangal Sponge & Steel Pvt Limited, Maruti Clean Coal & Power Ltd, MB Power Limited, Nova Iron & Steel Limited, SAI KRUPA Logistics, South Eastern Coalfield Ltd: NIT-350, Sainik Mining and Allied Services Ltd.

IV. Employees

18. Details as at the end of Financial Year: **March 31, 2024**

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
	EMPLOYEE					
1.	Permanent (D)	540	531	98.5%	9	1.5%
2.	Other than Permanent (E)	0	-	-	-	-
3.	**Total employees (D + E)**	**540**	**531**	**98.5%**	**9**	**1.5%**
	WORKER					
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	715	715	100	0	0
6.	**Total workers (F + G)**	**715**	**715**	**100**	**0**	**0**

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	-	-	-	-
2.	Other than Permanent (E)	0	-	-	-	-
3.	**Total differently abled employees (D + E)**	**0**	**-**	**-**	**-**	**-**
	DIFFERENTLY ABLED WORKERS					
4.	Permanent (F)	0	-	-	-	-
5.	Other than permanent (G)	0	-	-	-	
6.	**Total differently abled workers (F + G)**	**0**	**-**	**-**	**-**	**-**

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	6	2	33.33
Key Management Personnel	3	1	33.33

20. Turnover rate for permanent employees and workers
(Disclose trends for the past 3 years)

	FY -2024 (Turnover rate in current FY)			FY -2023 (Turnover rate in current FY)			FY -2022 Turnover rate in current FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	15.39	0	15.39	17.39	0	17.39	17.89	0	17.89
Permanent Workers	0	0	0	0	0	0	0	0	0

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

Sl. 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	INDUS AUTOMOTIVES PRIVATE LIMITED	Subsidiary	98.1	No
2	SUDHA BIO POWER PRIVATE LIMITED	Subsidiary	100	No
3	PARAM MITRA RESOURCES PTE. LTD	Subsidiary	96.16	No
4	TANDEM COMMERCIAL PVT.LTD.	Associate	50	No
5	INDUS BEST MEGA FOOD PARK PRIVATE LIMITED	Associate	35.63	No
6	SS MINING JV	Joint Venture	--	No

VI. CSR Details

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

(ii) Turnover (in ₹): 490,29,58,273/- (Last Year)

(iii) Net worth (in ₹): 8,09,45,98,044/- (Last Year)

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 2024 Current Financial Year			FY 2023 Previous Financial Year		
		Number of Complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of Complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	-	-	-	-	-	-	-
Investors (Other than shareholders)	-	-	-	-	-	-	-
Shareholders	Yes, Shareholders can register their complaints/ grievances at the Company's following email ids: corporatecompliance@sindhutrade.com	0	Nil/-	Complaints were suitably resolved in a timely manner	No	Nil/-	Complaints were suitably resolved in a timely manner
Employees and workers	Yes, grievance redressal mechanism is available on the intranet to employees.	-	-	-	-	-	-

Customers	Yes, Grievance Redressal Mechanism is in place. Below is the link which can be accessed after logging in to the website. corporatecompliance@sindhutrade.com	-	-	-	-	-	-
Value Chain Partners	Yes, we have the following email id: corporatecompliance@sindhutrade.com on which our value chain partners can reach for any kind of grievances /concerns. They can also reach us at our customer care number.	-	-	-	-	-	-
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:

Sl. 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

1.	Privacy and Data Security	Opportunity & Risk	**Risk**: Privacy and Data Security is becoming a major risk due to increasing digitization and more so in wake of pandemic where the number of digital users grew exponentially. **Opportunity**: Having a robust information security structure (Software, expert manpower and operational practices) helps us reduce cyber threats and ensure privacy, data security for all our stakeholder's privileged information thereby also facilitating business expansion.	The Company has framed policies with respect to information technology/ cyber security risk which set forth limits, mitigation strategies and internal controls. Information Security Management Policy and Cyber Security and Cyber Resilience Policy are in place for protecting the organisation's cyberspace against cyber-attacks, threats and vulnerabilities. The Company has a Personal Data Protection Standard which aims to create a responsible culture of data protection within the organisation Securities and increase employee awareness of data protection, acceptable data handling practices and applicable requirements in relation to Personal Data.	**Positive**: Easier business process automation, increased trust and credibility of stakeholders, improved data management and protected brand reputation. **Negative**: Breach of Privacy and Data Security.
2.	Community and Social Impact	Opportunity	**Opportunity:** Our company's objective is to support meaningful socio-economic sustainable development and enable a larger number of people to participate and benefit in country's economic progress. The Company has articulated its CSR philosophy as supporting the cause of skill-development training for sustainable livelihood, healthcare including preventive healthcare, women empowerment, welfare of senior citizens, and contribution to incubators for promoting a culture of entrepreneurship through incubation of new ventures/start-ups which may create livelihood opportunities, new products/ services and promote financial inclusion.	Not applicable	**Positive**: Supporting the CSR activities helps us to create a meaningful impact for the communities we interact with.

3.	Human Capital	Opportunity & Risk	**Opportunity**: Human Capital is one of the key strategic imperative for the Company and we consistently invest in the growth & development and alignment of employees to the Company growth strategy. **Risk**: Market demand for skilled talent is high and hence continuously investing in skilling newer employees to make them business ready and at the same time automating and streamlining processes is of vital importance.	We have a meritocratic, transparent and equal opportunity culture. We provide growth & development opportunities to high performing employees ahead of time. We have supported our employees and their families during COVID-19 by enabling technology to work from home and facilitating health & vaccination related assistance to ensure their well-being. We have invested in hiring key and critical talent to accelerate digital and fair product & process offerings to our customers. We deeply invest in initiatives to promote learning & development, performance support, career growth, engagement, diversity and inclusion at the workplace. We have a robust grievance redressal mechanism to address employee concerns. We measure employee alignment at regular intervals to take corrective actions if any.	**Positive**: Retention of key talent through various human resources proposition increases productivity. **Negative**: High attrition possibilities lead to wage inflation and loss in continuity.

SECTION B:

MANAGEMENT AND PROCESS DISCLOSURES

The National Guidelines for Responsible Business Conduct (NGRBCs) as prescribed by the Ministry of Corporate Affairs advocates nine principles referred as P1-P9 as given below:

- **P1**: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
- **P2**: Businesses should provide goods and services in a manner that is sustainable and safe.
- **P3**: Businesses should respect and promote the well-being of all employees, including those in their value chains.
- **P4**: Businesses should respect the interests of and be responsive to all its stakeholders.
- **P5**: Businesses should respect and promote human rights.
- **P6**: Businesses should respect and make efforts to protect and restore the environment.
- **P7**: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- **P8**: Businesses should promote inclusive growth and equitable development.
- **P9**: Businesses should engage with and provide value to their consumers in a responsible manner.

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	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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	Y	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	Y
c. Web Link of the Policies, if available	The Corporate policies of the Company can be viewed at weblink: https://sindhutrade.com/								
2. Whether the entity has translated the policy into procedures. (Yes / No)	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	-	Y	Y

5. 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

   The Company is committed to providing a safe, healthy and harassment free work environment to all it's employees. The Company has adopted employee-oriented policies covering areas such as Human Rights Policy, Diversity, Equity and Inclusion Policy, employee benefits and prevention of sexual harassment at workplace, which endeavours to provide an environment of care, nurturance and opportunity to accomplish professional aspirations. The Code of Conduct and Business Ethics ("the code") and other policies of the Company are in line with the general laws and regulations, sound ethical practices and professional standards followed nationally. The Company has Anti Bribery and Anti-Corruption Policy, Policy on Related Party Transactions and the Whistle Blower Policy. The Whistle Blower policy confirms to the requirements as stipulated by the Companies Act, 2013 and the rules thereunder and of the applicable securities laws and regulations.

6. Specific commitments, goals and targets set by the entity with defined timelines, if any.

   We don't have mandated targets, commitments, or evaluation process for all policies. We have procedures in place to track key parameters like customer NPS, shareholder complaints, employee satisfaction surveys, consumption of resources like water, paper, electricity

7. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.

   We track key parameters in policies and record it for learning and development to enhance our policies.

Governance, leadership and oversight

8. Statement by director responsible for the business responsibility related challenges, targets and achievements (listed entity has placement of this disclosure)

Doing business in a responsible and sustainable manner is one of the key imperatives for us. We continuously engage in discussion with all our stakeholders to identify key ESG issues and have identified Ethical Business Conduct, Efficient and Transparent Customer Service, Corporate Governance, Risk Management, Human Capital Development, Engagement with Communities and Environmental Footprint to be some of the most important issues. We have a highly qualified and diversified Board and ESG executive forum which oversees the Company's ESG journey. We instituted practices like Comprehensive Code of Conduct and Business Ethics, sound risk culture, digitisation of business, launching innovative products, investment in emerging areas of cybersecurity and information security, Employee welfare policies, monitoring consumption of resources and taking targets towards reduction in consumption of electricity, fuel and paper and various other practices. Reference should also be made to our Environmental Social and Governance report which carries an exhaustive list of out ESG related challenges, targets and achievements.

9. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).
Board of Directors

10. 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.
CSR Committee looks at community/ social related initiatives, and for sustainability related activities within the organization, Whole Time Directors and CFO are involved. The Company also has in place an Executive level ESG forum comprising of various functional heads to oversee the sustainability related issues.

11. 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)**								
	P	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**	**P**
	1	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**
Performance against Above policies and follow up action	Policies wherever stated have been approved by Board / Committees of Board / Senior Management of the Company. Polices are reviewed at periodic intervals in all aspects including statutory requirements depending on the frequency stated in respective policies or on need basis whichever is earlier and n ecessary updates are made to the policies.																	
Compliance with Statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company has necessary procedures in place to ensure the compliance with all relevant regulations.																	

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.
No, however all policies and processes are subject to audits / reviews done internally in the Company from time to time.

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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 categorized 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*

ESSENTIALS 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 programs held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by awareness program
Board of Directors	Please refer Note (a) below	Please refer Note (a) below	Please refer Note (a) below
Key Managerial Personnel	Please refer Note (b) below	Please refer Note (b) below	Please refer Note (b) below
Employees other than Board of Directors and KMPs	Please refer Note (b) below	Please refer Note (b) below	Please refer Note (b) below

Note:

a) During FY-2024, various updates were made at the Board and Committee meetings. Independent Directors in their capacity as members of various Committees of the Board were informed on developments relating to diverse topics such as regulatory, economic and operating environmental changes, new business initiatives, Corporate Governance, Information Technology and various risk indicators. Strategic presentations were made to the Directors, regularly on Company strategy, performance and growth plans. These presentations covered the entire range of business activities including macro-economic and market review, equity performance, earnings outlook, operational efficiencies, service and product offerings, update on sales performance, digitisation initiatives, customer engagement strategies, risk management framework, fraud prevention, cyber security, CSR initiatives, business sustenance and employee practices.

   Further, updates on performance review, strategy and key regulatory developments are presented at the quarterly board meetings and annual Board strategy meeting. Independent Directors who are members of various Committees are presented with the necessary information to enable them to review and grant approvals as per the terms of reference of the respective Committees.

   The Board and Audit Committee is updated on key compliance, risk and audit observations, impact arising out of the issues along with management action plans.

   A session was organised with the Chairman of the Board who addressed and shared his perspective about the Company, strategy, industry, markets, etc. with all employees of the Company.

   Considering all of the above, approximately 58 hours have been spent during FY-2023 by the Board of Directors on various familiarization programmes during Board/Committee meetings including four one-on-one/group sessions.

b) Every employee of the Company is expected to work with 'Compliance with Conscience' in their work and their interactions with customers and stakeholders. The Company has zero tolerance towards any violation or misconduct on grounds on non-

compliance. Our employee value proposition – PLEDGE also emphasizes on creating an environment which protects against any kind of biases and facilitates professionalism in all engagements.

The Company has a Code of Conduct (Code) which defines the professional and ethical standards that employees and Directors need to adhere to in compliance with all applicable statutory laws, regulations and internal policies. The Code is published on the Company's website https:/www.sindhutrade.com/ . Employees including Whole-time Directors are required to annually confirm that they have read and understood the Code.

All new employees are also required to confirm that they have read and understood the Code at the time of their induction. In addition, the Company has instituted several policies to ensure adherence to existing statutory laws and regulations such as The Whistle Blower (WB) policy, The Prevention of Sexual Harassment (POSH) at the Workplace policy, Framework for managing Conflict of Interest etc. The Company regularly conducts awareness campaigns to familiarise employees with the various policies to ensure adherence to the highest standards of ethical behaviour.

2. Details of fines/penalties /punishment /award /compounding fees/settlement amount paid in proceedings (by the Company or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format.
(Note: The Company shall make disclosures based on materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the Company's website): **No Penalties were paid in the Financial Year 2023-24.**

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.
None

4. Does the Company have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.
Not Applicable

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

Particulars	**FY-2024**	**FY-2023**
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil

6. Details of complaints regarding conflict of interest:

Particulars	**FY-2024**		**FY-2023**	
	Number	Remarks	Number	Remarks
Number of complaints received in	Nil	Nil	Nil	Nil

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	Nil	Nil	Nil	Nil

7. 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

LEADERSHIP INDICATORS

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:
   Not Applicable

2. Company's processes in place to avoid/manage conflict of interests involving members of the Board?
   There is a Board approved 'Framework for managing conflicts of interest' ('the Framework') comprising of the principles and the measures to manage conflicts to conduct its activities in an ethical and transparent manner. The Framework applies to all employees of the Company, Directors of the Company and employees of the subsidiaries of the Company.

   The Company has established a tradition of best practices in managing Conflict of Interest ('COI') through adoption of a strong corporate governance framework. The governance framework adopted by the Company includes independent Board, the separation of the Board's supervisory role from the exclusive management and the constitution of Committees of the Board, generally comprising a majority of Independent Directors and chaired by an Independent Director, to oversee critical areas.

   The Directors, on an annual basis, provide an affirmation that they have complied with the Framework for the financial year and that there were no instances of COI during the year. Further, in terms of the Companies Act, 2013, the Directors do not participate in discussions on agenda items in which they are interested.

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

ESSENTIAL INDICATORS

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the Company, respectively.
   Given the nature of Company's business investments were largely in logistics. Accordingly, investments were made by way of addition to capital assets in the form of Loaders & Tippers, Excavators.

2. (a) Does the Company have procedures in place for sustainable sourcing?
   (b) If yes, what percentage of inputs were sourced sustainably?
   The consumption of resources is limited to running of operations and sourcing of inputs is not relevant to our core activities.

3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life.
   Given the nature of business, there is limited scope for reusing or recycling of products, however we have following practices for below mention waste categories.

a) Plastics (including packaging): All our facilities use 100% biodegradable plastic garbage bags to collect and dispose of dry and wet waste. At our corporate office we have engaged with a vendor partner who collects our Wet and Dry waste to Compost/Recycle it in an eco-friendly manner.

b) E-waste: Our services do not involve producing or disposing E-waste of any kind. Hence this is not applicable.

c) Hazardous waste: Our services do not involve producing or disposing hazardous waste of any kind. Hence this is not applicable.

d) Other waste: There are no other kinds of waste generated in our office other than listed above.

4. Whether Extended Producer Responsibility (EPR) is applicable to the Company'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 Company conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)?
   The Company is engaged in the business of transportation of coal including allied services of Coal Mining and is not involved in manufacturing or selling of tangible products. Life Cycle Perspective / Assessments (LCA) of products is 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).
   Nil.

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:

Particulars	FY-2024			FY-2023		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (Including packaging)	Plastic waste generated from our office premises are minimal as the majority of the plastics used in our office premises including plastic bags are biodegradable in nature. The amount generated is negligible in terms of metric tonnes, hence it isn't relevant to our activities.					
E-waste	Our services do not involve producing or disposing E-waste of any kind. Hence this is not applicable in our industry.					
Hazardous waste	Our services do not involve producing or disposing hazardous waste of any kind. Hence this is not applicable in our industry.					
Other waste	425.20 metric tonnes of waste was generated out of which was entirely recycled.			379.17 metric tonnes of waste was generated out of which was entirely recycled.		

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:

% of employees covered by											
Category	**Total**	**Health Insurance**		**Accident Insurance**		**Maternity benefits**		**Paternity Benefits**		**Day Care facilities**	
	(A)	**Number (B)**	**% (B/A)**	**Number (C)**	**% (C/A)**	**Number (D)**	**% (D/A)**	**Number (E)**	**% (E/A)**	**Number (F)**	**% (F/A)**
Permanent employees:											
Male	531	51	100%	531	100%	-	-	531	100%	Please refer note below	
Female	9	9	100%	9	100%	9	100%	-	-		
Total	**540**	**540**	**100%**	**540**	**100%**	**9**	**100%**	**531**			
Other than Permanent employees (on fixed term contract):											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-	-

Note:
To enable women employees to stay invested in their careers, the Company offers supportive policies that cater to their needs at various life stages. Some of these policies

include maternity leave including sabbatical, adoption leave of three months and medical leave in case of miscarriage / medical termination of pregnancy, any illness arising out of pregnancy and trust based sick leave and paternity leave.

2. Details of retirement benefits, for current and previous Financial Year:

Benefits	FY-2024			FY-2023		
	No. of employees covered as a % of total employee	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 employee	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	100%	NA	Y	100%	NA	Y
Others - Please Specify	NA	NA	NA	NA	NA	NA

3. Accessibility of workplaces: Are the premises/offices of the Company 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 Company in this regard.
   All our Corporate offices have wheelchair friendly elevators which can be accessed from the parking lot, thus making access friendly to our differently abled employees and visitors.

4. Does the Company 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. Link: www.sindhutrade.com

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

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

*Retention rate determines employees who have returned to work after parental leave ended and were still employed 6 months later.

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:

Permanent Workers: Other than Permanent Workers: Permanent Employees: Other than Permanent Employees:	The Company has a culture where employees can freely raise and discuss issues concerning themselves with their Superiors, Business Leaders or Human Resource (HR) Managers. The Company has created several channels through which employees can discuss, have an engagement and seek clarification on their issues. The employees can provide their feedback or complaints to their respective HR managers or register the same on https://sindhutrade.com/

7. Membership of employees and worker in association(s) or Unions recognized by the listed Company.
   Nil.

8. Details of training given to employees and workers:

Category	FY-2024					FY-2023				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (F/D)
Permanent employees:										
Male	1144	1144	100%	994	85%	NA	-	-	-	-
Female	9	9	100%	9	100%	NA	-	-	-	-
Total	**1153**	**1153**	**100%**	**1003**	**96%**					

All the employees have access to relevant learning and development opportunities. The Company has a robust e-learning platform which is coupled with other online and offline interventions. The learning needs are identified by a combination of self, manager and department head and classified under functional, behavioral and organizational needs.

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

Category	FY-2024			FY-2023		
	Total (A)	No. (B)	% (B/A)	Total (A)	No. (B)	% (B/A)
Employees*						
Male	1144	1144	100%	1146	1146	100%
Female	9	9	100%	7	7	100%
Total	**1153**	**1153**	**100%**	**1153**	**1153**	**100%**

All the employees undergo Performance and Career Development Reviews. Discussions are carried out periodically and feedback for development is provided.

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, safety is a core value over which no business objective can have a higher priority. The coverage is 100% and includes all 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?

Company's Safety Management System comprises followings safety processes for identifying Work related hazards and assess risks on routine and non-routine basis:

i. Safety Leadership and accountability with OH&S Objective Planning
ii. Hazard Identification Risk Assessment and Risk Management
iii. Design, Construction, Operational planning and control
iv. People Competency Behaviors
v. Communication, Consultation and Participation
vi. Observation Incident Nonconformity reporting, Investigation and Learning
vii. Change Management Process
viii. Contractor Safety Management
ix. Measurement, monitoring and review
x. Fire Detection Protection System Management

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

Yes, the Company has an established Hazard Identification and Risk Assessment (HIRA) process for both routine and nonroutine jobs and routinely provides HIRA and Job Safety Assessment (JSA) trainings to operation, maintenance and service engineers.

d) Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?

Yes, all the sites have access to non-occupational medical and healthcare services either on-site or through tie-ups with reputed medical entities in close proximity. In addition, personnel are being trained to respond appropriately to medical emergencies on-site.

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

Safety Incident/Number	Category	FY-2024	FY-2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	NIL	NIL
	Workers	NIL	NIL
Total recordable work-related injuries	Employees	NIL	NIL
	Workers	NIL	NIL
No. of fatalities	Employees	NIL	NIL
	Workers	NIL	NIL
High consequence work-related injury or ill-health (excluding fatalities)	Employees	NIL	NIL
	Workers	NIL	NIL

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

i. Hazard identification, Risk Assessment and Management is done in accordance with Hazard Identification and Risk Assessment (HIRA) Procedure and Job Safety Analysis (JSA) Procedure.
ii. Hierarchy of controls is followed for application of risk control measures, Control Plans commensurate to risk are deployed before execution of job. No job is executed until risks are brought to acceptable range.
iii. Safety Committees are in place at various levels to review the adequacy of resources for safety and to provide support for safety management system deployment.
iv. Deployment of Safe and Healthy system of work is assured through periodic safety audits and inspections across sites.

13. Number of Complaints on the Working Conditions and Health and Safety made by employees and workers:

Sindhu Trade Links Limited has not received any complaint on "Health & Safety" and "Working Conditions" in FY-2024 and FY-2023. However, the Company encourages its employees and contractor workers to proactively submit safety observations and report unsafe acts and conditions at workplace as a preventive action.

14. Assessments for the year:

	% of Company's plants and offices that were assessed (by Company or statutory authorities or third parties)
Health and safety practices	No assessment has been done by statutory authorities or third parties.
Working Conditions	No assessment has been done by statutory authorities or third parties.

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 and safety practices and working conditions.

Not applicable.

LEADERSHIP INDICATORS

1. Does the entity extend any life insurance or any compensatory package in the event of death of

A. Employees: Yes
B. Workers: Yes

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

The Company is compliant with deduction of statutory dues of employees towards income tax, provident fund, professional tax, ESIC etc. as applicable from time to time.

Value chain partners (vendors) are equally responsible to comply as per the contract with the Company. The Company has statutory and internal audit policies and procedures to ensure the above.

3. Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities, who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

A. Employees: Nil
B. Workers: Nil

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

The Company during the course of employment provides opportunities for all employees to upskill themselves through domain, skills and leadership trainings. The Company ensured there was no job loss on account of pandemic amongst our workforce.

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	100
Working Conditions	100

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.

All value chain partners who work in our offices have access to the same health and safety resources as the employees and any major risk to their health and safety is managed appropriately within specified timeline.

***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 Company.

The stakeholders are determined based on the significance of their impact on the business and the impact of the business on them.

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

Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community, Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders and Investors	Yes (Affirmative Action)	On site community meetings, SMS	Regular	CSR interventions
Investors (other than Shareholders)	No	Investor meet, email	Annual, periodic	STLL's performance
Shareholders	No	Annual General Meeting, Email	Annual, periodic	STLL's performance
Employees and Workers	No	Sangam portal, Yammer, email, MD communication meet, Business	Regular	Employee engagement
Customers	No	Email, SMS, advertisement, website, social media	Regular	Offers
Value Chain Partners	No	Email, vendor meet	Annual, periodic	Process refresh, Engagement

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.

   Facilitating an environment of regular engagement of the Board with various stakeholders and members of communities, on social topics has been a key factor for deepening our commitments to our social responsibilities. In cases where Board has delegated the consultation, views and feedback of stakeholders are taken in writing and/ or video format and provided to Board.

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

Facilitating an environment of regular engagement with communities, and also providing facilities for the community members engage with each other is key to success of an initiative. For the welfare of Senior Citizens', the Company undertook initiatives to build a model senior citizens' old age home on the concept of 'Active Ageing', wherein the overall wellness of the elderly residents are taken care through providing facilities that promote physical health, mental health and social connections.

***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 Company, in the following format:

Employees	FY-2024			FY-2023		
	Total (A)	**No. of employees workers covered ((B)**	**% (B/A)**	**Total (A)**	**No. of employees workers covered ((B)**	**% (B/A)**
Permanent	1153	1153	100%	1153	1153	100%
Other than permanent	-	-	-	-	-	-
Total	**1153**	**1153**	**100%**	**1153**	**1153**	**100%**

All employees at the time of joining as well as on a yearly basis declare that they have read and understood the Code of conduct and business ethics principles.

2. Details of minimum wages paid to employees:

Salaries paid to employees are much more than minimum rates of wages prescribed by the Govt. Authorities.

Category	FY-2024					FY-2023				
	Total (A)	**Equal to Minimum Wage**		**More than Minimum Wage**		**Total (D)**	**Equal to Minimum Wage**		**More than Minimum Wage**	
		Number (B)	**% (B/A)**	**Number (C)**	**% (C/A)**		**Number (E)**	**% (E/D)**	**Number (F)**	**% (F/D)**
Permanent employees:										
Male	1144	-	-	1144	100%	1146	-	-	1146	100%
Female	9	-	-	9	100%	7	-	-	7	100%
Other than Permanent (on Fixed term Contract)										

Male	0	-	-	-	-	**0**	-	-	**0**	-
Female	0	-	-	-	-	0	-	-	0	-
Total	1153	-	-	1153	100%	1153	-	-	1153	100%

3. Details of remuneration/salary:

Category	FY-2024		FY-2023	
	Number	Median remuneration/ salary/wages of respective category (₹ million)	Number	Median remuneration/ salary/wages of respective category (₹ million)
Board of Directors (BoD)#	0	0	1	8.00
Key Managerial Personnel other than Whole Time Directors##	3	7.86	2	5.59
Employees other than BoD and KMP - Mid to senior management	2	1.94	2	1.78
Employees other than BoD and KMP – Other employees	1147	238.95	1149	222.68
Workers	-	-	-	-

Salary includes basic, allowance and retirals.
Does not include fixed term contract staff.
includes Managing Director and CEO and Executive Director.
includes Chief Financial Officer and Company Secretary.

The Company has 6 Directors including 3 Independent Directors, 3 Non-Executive Directors. Non-Executive Directors do not draw any remuneration from the Company. Independent Directors are paid profit-related commission and sitting fees for attending meetings of the Board and its Committees, along with reimbursement of expenses for attending Board and Committee meetings and official visits.

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).
The Head of Human Resources who is responsible for the human resources function and Chief Risk Officer shall jointly oversee and address any issue arising from any human rights impact or issues caused or contributed to by the business.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.
The Human Rights Policy elaborated on the grievance mechanism. Refer link - www.sindhutrade.com

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

Category	FY-2024			FY-2023		
	Filed during the year	Pending Resolution at the end of year	Remarks	Filed during the year	Pending Resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child Labor	Nil	Nil	Nil	Nil	Nil	Nil
Forced Labor/Involuntary Labor	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil

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

a. The Company provides protection against discrimination to employees who makes disclosure or raises a concern under the whistle blower policy/Grievance Redressal Policy where the employee discloses his/her identity, discloses the information in good faith, believes it to be substantially true, does not act maliciously nor makes false allegations and does not seek any personal or financial gain.

b. The Company strictly prohibits any attempt of retaliation by anyone against any employee who raises a concern under the policy in good faith.

c. Cases related to prevention of sexual harassment at work place are treated with utmost sensitivity and confidentially in line with the guidelines of the Sexual Harassment of Women at Work Place (prevention, prohibition and redressal) Act 2013.

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

Human rights requirements form a part of the Company's business agreements and contracts as and where relevant.

9. Assessments for the year:

	% of your plants and offices that were assessed (by Company or statutory authorities or third parties)
Sexual Harassment	Nil
Discrimination at workplace	Nil
Child Labor	Nil

Forced Labor/Involuntary Labor	Nil
Wages	Nil
Other human rights related issues	Nil
Sexual Harassment	Nil

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.
Not applicable.

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

3. Is the premise/office of the Company accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?
All of our corporate locations feature wheelchairs and elevators that can be reached from the parking lot, making it easier for our differently abled employees, workers, and visitors to get around. At the registered Corporate office, dedicated washrooms are also accessible.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	In all of our dealings, the Company expects its value chain partners to uphold the same values, beliefs, and business ethics as the Company. However, no formal examination of value chain partners has been conducted.
Discrimination at workplace	
Child Labor	
Forced Labor/Involuntary Labor	
Wages	
Other human rights related issues	
Sexual Harassment	

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:

Parameter	FY-2024	FY-2023
Total electricity consumption (Giga Joules) (A)	175430	153365
Total fuel consumption (Giga Joules) (B)	7463493	6897452
Energy consumption through other sources (C)	N/A	N/A
Total energy consumption (A+B+C)	7638923	7050817
Energy intensity per crore rupee of turnover (Total energy consumption (Giga Joules) / turnover in crore rupees)	NA	NA

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?
No.

2. Does the Company 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. Details of disclosures related to water.
The Company's use of water is strictly limited to human consumption. As we are not a manufacturing organisation, the prescribed table does not apply to the Company. We are hence not required to fill out the table in the prescribed format. In the office, efforts have been made to ensure that water is used sparingly. ~~Sensor taps are put in office washrooms in a variety of offices to reduce water consumption.~~

4. Has the Company implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.
Not applicable.

5. Details of air emissions (other than GHG emissions) by the Company.
Not applicable.

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

Parameter	Unit	FY-2023	FY-2022
Total Scope 1 emissions: (Break-up of the GHG into CO2, CH4,	Metric tonnes of CO2 equivalent	N/A	N/A

N2O, HFCs, PFCs, SF6, NF3, if available)			
Total Scope 2 emissions: (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	N/A	N/A
Total Scope 1 and Scope 2 emissions per rupee of Turnover	CO2 per million rupees of turnover	N/A	N/A

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?
No.

7. Does the Company have any project related to reducing Green House Gas emission? If Yes, then provide details.
No.

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

Parameter	FY-2024	FY-2023
Total Waste generated (in metric tonnes)		
Hazardous waste generated	-	NA
Non-hazardous waste generated	426.19	398.17
Total	**426.19**	**398.17**
Waste diverted from disposal		
Category of waste (Hazardous)		
a) Recycled	0	NA
b) Re-used	0	NA
c) Other recovery operations	0	NA
Total	**0**	**NA**
Category of waste (Non-Hazardous)		
a) Recycled	426.19	398.17
b) Re-used	-	
c) Other recovery operations	-	
Total	**426.19**	**398.17**

Indicate if any independent assessment/ evaluation/assurance has been carried out by an 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.

We strive to reduce waste and recycle as much as possible. Our waste primarily comprises of food, waste, paper, plastic and e-waste.

Curbing generation of plastic waste: We have stopped procurement of plastic stationery and encourage our employees to use glass bottles at our offices to reduce the number of plastic bottles being discarded after use.
All our facilities use 100% biodegradable plastic garbage bags to collect and dispose-off dry and wet waste.

Reducing paper and printing consumption: We have implemented strong measures for digitizing processes to reduce the need for paper. Further minimizing the usage of paper across offices is an ongoing activity. Customer accounts have now transitioned to digital opening. The documents required as supporting are also uploaded digitally; accounts are being opened without any paper consumption. Paper based Office stationeries also have now been stopped apart from the mandatory ones.

E-waste management: Our E-waste broadly includes computers, servers, scanners, UPSs, Batteries, Air conditioners etc. All such E-wastes are being disposed of through registered E-waste vendors.

10. If the Company 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 Company based on applicable laws, in the current financial year.
    Not applicable.

12. Is the Company 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.
    Based on the nature of its business, the Company complies with applicable environmental norms.

LEADERSHIP INDICATORS

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

Parameter	FY-2024	FY-2023
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 source (A+B+C)	NA	NA
From non-renewable sources		
Total electricity consumption (D)	175430	153365
Total fuel consumption (E)	7463493	6897452
Energy consumption through other sources (F)	NA	NA
Total energy consumed from non-renewable sources (D+E+F)	7638923	7050817

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?
No.

2. Details related to water discharged.
Not applicable.

3. 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 - NA
(ii) Nature of operations - NA
(iii) Water withdrawal, consumption, and discharge - NA

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

Parameter	Unit	FY-2024	FY-2023
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	NA	NA
Total Scope 3 emissions per rupee of turnover	CO2 per million rupees of turnover	NA	NA

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?
No.

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct and indirect impact of the Company on biodiversity in such areas along-with prevention and remediation activities.
Our Company does not have any significant direct and indirect impact on ecologically sensitive areas.

6. If the Company 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:
   NIL

7. Disclose any significant adverse impact to the environment, arising from the value chain of the Company. What mitigation or adaptation measures have been taken by the Company in this regard?
   NA.

8. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.
   Not applicable.

***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. Number of affiliations with trade and industry chambers/ associations.
   The Company was a member of FICCI trade and industry chambers/ associations during FY2024.

2. Details of corrective action taken or underway on any issues related to anticompetitive conduct by the Company, based on adverse orders from regulatory authorities.
   Not applicable.

LEADERSHIP INDICATORS:

1. Details of public policy positions advocated by the Company.
   Nil.

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

ESSENTIAL INDICATORS:

1. Details of Social Impact Assessments (SIA) of projects undertaken by the Company based on applicable laws, in the current financial year.
   Not applicable.

2. Information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your Company.
   Not applicable.

3. Describe the mechanisms to receive and redress grievances of the community.
   The Company has set up a framework of multiple mechanisms to receive and redress grievances, for the community. The stakeholder shares a proposal with the needs required. The Company then follows below steps:
   a) Need Assessment: At the first stage, the proposal is reviewed to assess the need and the proposed outcome and impact. The implementing agency is reviewed for the fulfilment of regulatory criteria and prior experience in working for a similar cause.
   b) Regular interactions with community: This is done by physical visits, virtual meetings, feedbacks review of outcomes, third party reports, photos, etc redress.
   c) In case there is a grievance and can be resolved by the Company, the proposal accounts for this in scope of work and approvals are taken and action is taken.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers.
   Not applicable, as we are not in manufacturing of goods and sourcing of goods is not a part of our core activities.

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).
   Not applicable.

2. CSR projects undertaken by your Company in designated aspirational districts as identified by government:

Sr. No.	State	Aspirational District	Amount Spent (In ₹)
1.	Education to Rural Kid	Haryana & Chhattisgarh	1,09,77,000/-

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised /vulnerable groups?
   (b) From which marginalised /vulnerable groups do you procure?
   (c) What percentage of total procurement (by value) does it constitute?
   Consumption of resources by the Company is limited to running its operations. The Company believes in equal and Fair opportunity to all vendors including marginalised /vulnerable employees.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your Company (in the current financial year), based on traditional knowledge.
   NIL. The Company is not in the business of inventions, literary, musical and artistic works and symbols, names, images, and designs used in commerce, for which IP owners are granted certain exclusive rights under national IP laws.

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.
   Nil.

6. Details of beneficiaries of CSR Projects:

Sr. No.	CSR Project	No of Persons benefitted from CSR Project (approximate)	% of beneficiaries from vulnerable and marginalised groups
1.	Education	Approx – 5000 Girls	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.

   We receive client queries and complaints through 2 channels i.e. Call / Email. Calls and emails are handled in-house. ~~The FCR is provided wherever possible and in case the call / email is not FCR, the request is been raised and tagged in CRM tool FCRM to ensure close tracking of complaints and queries~~.

   If the client is not satisfied with the resolution provided, we have provided 2nd and 3rd level of Escalation Matrix on our website where they can write to us and a detail investigation is done and resolution provided.

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

   99.3% of the turnover corresponds to Transportation & Logistics and Coal and other related works. The Company educates its customers on environmental parameters and for safe and responsible usage of power.

3. Number of consumer complaints in respect of the Data privacy, Advertising, Cyber-security, Delivery of essential services, Rest1rictive Trade Practices, Unfair Trade Practices, other:

   In FY-24, no complaints were received.

Category	FY-2024			FY-2023		
	Received during the year	Pending Resolution at the end of year	Remarks	Received during the year	Pending Resolution at the end of year	Remarks
Data privacy	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil	Nil	Nil
Delivery of essential services	Nil	Nil	Nil	Nil	Nil	Nil

Restrictive Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Unfair Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Other						

4. Details of instances of product recalls on account of safety issues:
   Not applicable

5. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.
   Not applicable.

LEADERSHIP INDICATORS:

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

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.
   The following steps are taken to inform and educate consumers about safe and responsible usage of products and services:
   a) Information is regularly updated on website,
   b) Regular emailers, SMS and Notifications are sent to consumers.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.
   Consumers are informed of any risk of disruption/ discontinuation of essential services through the below means of communication.
   a) Website
   b) Email and SMS

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)
   Not applicable

5. Provide the following information relating to data breaches:

a) Number of instances of data breaches along-with impact:
   Not applicable as no data breaches occurred

b) Percentage of data breaches involving personally identifiable information of customers:
   Not applicable

SUCHI GUPTA

Digitally signed by SUCHI GUPTA
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