



# Sundaram-Clayton Limited

Registered Office:  
"Chaitanya",  
No. 12, Khader Nawaz Khan Road,  
Nungambakkam,  
Chennai – 600006  
PH: 044 28332115

2<sup>nd</sup> July 2026

BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai 400 001  
**Scrip Code: 544066**

National Stock Exchange of India Limited,  
Exchange Plaza, 5<sup>th</sup> Floor,  
Bandra-Kurla Complex,  
Bandra (E), Mumbai 400 051.  
**Scrip code: SUNCLAY**

Dear Sir/Madam,

**Subject : Business Responsibility and Sustainability Report (BRSR)**

Pursuant to Regulation 34(2)(f) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report of the Company for the Financial Year 2025-26.

The copy of the same is also available on the website of the Company viz., [www.sundaram-clayton.com](http://www.sundaram-clayton.com).

This is for your kind information.

Thanking you,

Yours faithfully,  
For **Sundaram-Clayton Limited**

**P D Dev Kishan**  
**Company Secretary**

**Encl.: a/a**

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders**  
**BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT**

**SECTION A: GENERAL DISCLOSURES**

**I. Details of the listed entity**

|     |                                                                                                                                                                                                                                                                    |                                                                                                                      |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| 1.  | Corporate Identity Number (CIN) of the Listed Entity                                                                                                                                                                                                               | L51100TN2017PLC118316                                                                                                |
| 2.  | Name of the Listed Entity                                                                                                                                                                                                                                          | Sundaram-Clayton Limited                                                                                             |
| 3.  | Year of incorporation                                                                                                                                                                                                                                              | 2017                                                                                                                 |
| 4.  | Registered office address                                                                                                                                                                                                                                          | "Chaitanya", No.12, Khader Nawaz Khan Road, Nungambakkam, Chennai - 600 006, Tamil Nadu, India.                      |
| 5.  | Corporate address                                                                                                                                                                                                                                                  | "Chaitanya", No.12, Khader Nawaz Khan Road, Nungambakkam, Chennai - 600 006, Tamil Nadu, India.                      |
| 6.  | E-mail                                                                                                                                                                                                                                                             | <a href="mailto:corpsec@sundaramclayton.com">corpsec@sundaramclayton.com</a>                                         |
| 7.  | Telephone                                                                                                                                                                                                                                                          | 044-28332115                                                                                                         |
| 8.  | Website                                                                                                                                                                                                                                                            | <a href="http://www.sundaram-clayton.com">www.sundaram-clayton.com</a>                                               |
| 9.  | Financial year for which reporting is being done                                                                                                                                                                                                                   | 2025-26                                                                                                              |
| 10. | Name of the Stock Exchange(s) where shares are listed                                                                                                                                                                                                              | BSE Limited (BSE)<br>National Stock Exchange of India Limited (NSE)                                                  |
| 11. | Paid-up Capital                                                                                                                                                                                                                                                    | ₹ 11,02,30,810                                                                                                       |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report                                                                                                                                   | P D Dev Kishan<br>044-28332115<br><a href="mailto:dev.kishan@sundaramclayton.com">dev.kishan@sundaramclayton.com</a> |
| 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                                                                                                     |
| 14. | Name of the assurance provider                                                                                                                                                                                                                                     | Not Applicable                                                                                                       |
| 15. | Type of assurance obtained                                                                                                                                                                                                                                         | Not Applicable                                                                                                       |

**II. Products/services**

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

| S. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|--------|------------------------------|----------------------------------|-----------------------------|
| 1      | Manufacturing                | Metal and metal products         | 100                         |

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

| S. No. | Product/Service                                               | NIC Code | % of total Turnover contributed |
|--------|---------------------------------------------------------------|----------|---------------------------------|
| 1      | Aluminium alloy cast articles including parts and components. | 24320    | 100                             |

**III. Operations**

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

| Location      | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National      | 3                | 2                 | 5     |
| International | 0                | 1                 | 1     |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

19. Markets served by the entity:

a. Number of locations

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 8      |
| International (No. of Countries) | 13     |

b. What is the contribution of exports as a percentage of the total turnover of the entity? 53%

c. A brief on types of customers

SCL manufactures cast, machined and sub-assembled aluminium die castings for heavy and medium commercial vehicles and passenger vehicles. The customers for SCL's products are the automotive OEMs and Tier 1 manufacturers both within India and Globally. Since commencing operation in 1962, the demerged undertaking vested with the Company, has achieved many milestones and emerged as one of the preferred solution provider in machined and sun-assembled aluminium castings.

**IV. Employees**

Details as at the end of Financial Year 2025-26:

d. 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)            | 455       | 424     | 93.19     | 31      | 6.81      |
| 2.        | Other than Permanent (E) | 20        | 18      | 90.00     | 2       | 10.00     |
| 3.        | Total employees (D + E)  | 475       | 442     | 93.05     | 33      | 6.95      |
| WORKERS   |                          |           |         |           |         |           |
| 4.        | Permanent (F)            | 734       | 732     | 99.73     | 2       | 0.27      |
| 5.        | Other than Permanent (G) | 1281      | 964     | 75.25     | 317     | 24.75     |
| 6.        | Total workers (F + G)    | 2015      | 1696    | 84.17     | 319     | 15.83     |

e. 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)                             | -         | -       | -         | -       | -         |
| 2.                          | Other than Permanent (E)                  | -         | -       | -         | -       | -         |
| 3.                          | Total differently abled employees (D + E) | -         | -       | -         | -       | -         |
| DIFFERENTLY ABLED WORKERS   |                                           |           |         |           |         |           |
| 4.                          | Permanent (F)                             | 2         | 2       | 100.00    | -       | -         |
| 5.                          | Other than permanent (G)                  | 18        | 17      | 94.44     | 1       | 5.56      |
| 6.                          | Total differently abled workers (F + G)   | 20        | 19      | 95.00     | 1       | 5.00      |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

20. Participation/Inclusion/Representation of women

| Particulars              | Total (A) | No. and percentage of Females |           |
|--------------------------|-----------|-------------------------------|-----------|
|                          |           | No. (B)                       | % (B / A) |
| Board of Directors       | 8         | 2                             | 25        |
| Key Management Personnel | 2         | -                             | -         |

21. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

| Particulars         | FY 2025-26<br>(Turnover rate in current FY) (%) |        |       | FY 2024-25<br>(Turnover rate in previous FY) (%) |        |       | FY 2023-24<br>(Turnover rate in the year prior to the previous FY) (%) |        |       |
|---------------------|-------------------------------------------------|--------|-------|--------------------------------------------------|--------|-------|------------------------------------------------------------------------|--------|-------|
|                     | Male                                            | Female | Total | Male                                             | Female | Total | Male                                                                   | Female | Total |
| Permanent Employees | 11.43                                           | 0.2    | 11.6  | 13.31                                            | 1.16   | 14.47 | 8.61                                                                   | 1.20   | 9.81  |
| Permanent Workers   | 12.23                                           | 0.07   | 12.30 | 0.60                                             | -      | 0.60  | 3.81                                                                   | -      | 3.81  |

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

22. (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 in/ by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|-------|-----------------------------------------------------------------------------|----------------------------------------------------------------|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| 1.    | Sundaram Holding USA Inc., Delaware, USA                                    | Subsidiary                                                     | 100                                   | No                                                                                                                           |
| 2.    | Sundaram-Clayton GmbH, Germany                                              | Subsidiary                                                     | 100                                   | No                                                                                                                           |
| 3.    | SCL Properties Private Limited, India                                       | Subsidiary                                                     | 100                                   | No                                                                                                                           |
| 4.    | Green Hills Land Holding LLC, USA                                           | Subsidiary                                                     | -                                     | No                                                                                                                           |
| 5.    | Component Equipment Leasing LLC, USA                                        | Subsidiary                                                     | -                                     | No                                                                                                                           |
| 6.    | Sundaram – Clayton (USA) LLC, USA                                           | Subsidiary                                                     | -                                     | No                                                                                                                           |
| 7.    | Premier Land Holding LLC, USA                                               | Subsidiary                                                     | -                                     | No                                                                                                                           |
| 8.    | Sundram Non Conventional Energy Systems Limited, India                      | Associate                                                      | 23.53                                 | No                                                                                                                           |

**VI. CSR Details**

23. (i) Whether CSR is applicable as per Section 135 of the Companies Act, 2013: (Yes/~~No~~)

(ii) Turnover (in ₹) 1788,54,78,388

(iii) Net worth (in ₹) 1960,50,28,211

**VII. Transparency and Disclosures Compliances**

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

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No)<br>(If Yes, then provide web-link for grievance redress policy) | FY 2025-26<br>Current Financial Year       |                                                              |         | FY 2024-25<br>Previous Financial Year      |                                                              |         |
|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------------------------------------|---------|--------------------------------------------|--------------------------------------------------------------|---------|
|                                                   |                                                                                                                 | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities                                       | Yes                                                                                                             | -                                          | -                                                            | -       | -                                          | -                                                            | -       |
| Investors (other than shareholders)               | Yes                                                                                                             | -                                          | -                                                            | -       | -                                          | -                                                            | -       |
| Shareholders                                      | Yes                                                                                                             | 3                                          | -                                                            | -       | 3                                          | -                                                            | -       |
| Employees and workers                             | Yes                                                                                                             | -                                          | -                                                            | -       | -                                          | -                                                            | -       |
| Customers                                         | Yes                                                                                                             | 55                                         | -                                                            | -       | 45                                         | -                                                            | -       |
| Value Chain Partners                              | Yes                                                                                                             | -                                          | -                                                            | -       | -                                          | -                                                            | -       |
| Other (please specify)                            | Yes                                                                                                             | -                                          | -                                                            | -       | -                                          | -                                                            | -       |

The Company has established required framework for addressing specific grievances for all of its stakeholders. Code of Business Conduct and Ethics, Whistle Blower Mechanism provides sufficient guidance for reporting and resolving grievances. Web-link of such policies are available on the Company's website as provided in page no. 83 of this Annual Report.

25. 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.

Materiality analysis has been done to identify issues that concern our stakeholders and our business sustainability. Prioritization of the materiality issues in the current context constructed from the following sources;

- Issues based on sectoral guidelines.
- Issues flagged in peer reviews.
- Stakeholder engagement.
- Issues identified during discussions with management and internal workshops.

Very important issues both for company & stakeholders are considered Material issues that have significant Business, Environmental & Social impact. Examples of the identified material issues with approach for the risk mitigation and financial implication is described below –

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity                                                                                                                                                                                                                                                                                                                                       | In case of risk, approach to adapt or mitigate                                                                                                                        | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 1      | GHG Emission reduction    | Risk & Opportunity                         | <p><b>Risk</b></p> <ol style="list-style-type: none"> <li>1. Failure to meet 1.5 aligned GHG reduction emission targets</li> <li>2. Reputational impacts and loss of trust from customers, investors and employees</li> </ol> <p><b>Opportunity</b></p> <ol style="list-style-type: none"> <li>1. Increase energy efficient projects, more renewable energy into the system</li> </ol> | <ol style="list-style-type: none"> <li>1. Climate strategy for operations and supply chain</li> <li>2. Net zero commitment for operations and supply chain</li> </ol> | Positive                                                                                       |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity                                                                                                                                                                           | In case of risk, approach to adapt or mitigate                                                                                                                                | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 2      | Water Management          | Risk                                       | 1. Poor water resource management will lead to depletion of water resources<br>2. Public backlash due to pollution of water bodies                                                                                         | 1. Deploy a water conservation strategy and action plan for sites in water-stressed areas.<br>2. Site EHS assessment                                                          | Negative                                                                                       |
| 3      | Waste Management          | Risk & Opportunity                         | Risk<br>1. Non-compliance leading to fines<br>2. Health impacts on personnel and local communities<br><br>Opportunity<br>1. Increased recyclability leading to revenue creation<br>2. Enhancing circularity in value chain | 1. Deploy a waste recycle framework.<br>2. Site EHS assessment                                                                                                                | Positive                                                                                       |
| 4      | Cyber security            | Risk                                       | 1. Risk of a malicious exploitation or intrusion into the infrastructures of SCL premises<br>2. Impacts on productivity, data privacy, operations<br>3. Financial cost and loss of confidence from stakeholders            | 1. Dedicated cybersecurity management with policies focusing on data privacy, Asset management, IT security and Business continuity<br>2. Employees trained on cyber security | Negative                                                                                       |
| 5      | CSR                       | Opportunity                                | 1. Opportunity to give back to community<br>2. Upliftment of local community                                                                                                                                               | CSR policy and framework                                                                                                                                                      | 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.

|    |                                                                                                                                      |
|----|--------------------------------------------------------------------------------------------------------------------------------------|
| 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 customers in a responsible manner                                           |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

| 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)                                                                                                                                              | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Yes                                                                                                                                          | Yes | Yes                                                 | Yes | Yes | -   | Yes                 | Yes |
| b. Has the policy been approved by the Board? (Yes/No)                                                                                                                                                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Yes                                                                                                                                          | Yes | Yes                                                 | Yes | Yes | -   | Yes                 | Yes |
| c. Web Link of the Policies, if available                                                                                                                                                                                                                   | <a href="https://www.sundaram-clayton.com/Disclosures.htm">https://www.sundaram-clayton.com/Disclosures.htm</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
|                                                                                                                                                                                                                                                             | Refer to the Whistle-blower Policy, Code of Business Ethics which includes Anti-Bribery practices                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Refer to the Code of Business Conduct and Ethics which includes Fair dealing with customers, suppliers, competitors, officers and employees. | -   | Refer to policy on Prevention of Sexual Harassment. | -   | -   | -*  | Refer to CSR Policy | -   |
| 2. Whether the entity has translated the policy into procedures. (Yes / No)                                                                                                                                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Yes                                                                                                                                          | Yes | Yes                                                 | Yes | Yes | -   | Yes                 | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No)                                                                                                                                                                                   | Code of conduct, suppliers code of conduct and Human Rights policy extended to our value chain partners.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
| 4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | ISO 14001, ISO 45001, ISO 27001, IATF 16949 (TKP, Oragadam), IS 617                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any.                                                                                                                                                                | The Company is in the process of defining the ESG strategy with goals and targets on material issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.                                                                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
| 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)                                       | <p>The Company is committed to being a profitable, socially responsible and a leading provider of sustainable light alloy solutions, globally. Towards this the company is in the process of defining an overall ESG strategy and identifying the material issues with goals and targets.</p> <p>The Company proactively engages with stakeholders formally and informally to share information, discuss the Company's sustainability priorities, programs and performance, and determines opportunities to collaborate towards common goals.</p> <p>The Audit committee and Board oversees the implementation of various policies / codes as required under the legal framework in force from time to time. These are also reviewed at regular intervals by the board. The Board on a continuous basis reviews the business' alignment with the principles and core elements.</p> |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).                                                                                                                               | At the highest level, the Board of Directors of your Company, led by the Chairman and Managing Director, has the primary role to protect and assess the Business Responsibility (BR) performance of your Company.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                              |     |                                                     |     |     |     |                     |     |
| 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.                                                                                 | Chairman & Managing Director and Managing Director.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                              |     |                                                     |     |     |     |                     |     |

\* The Company through the various industrial forums endeavors to promote growth and technological process, economic reforms, inclusive development policies and sustainable business principles. Therefore, there is no need for such policy.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

| Subject for Review                                                                                               | Indicate whether review was undertaken by<br>Director / Committee of the Board/<br>Any other Committee                                                         |        |        |        |        |        |        |        |        | Frequency<br>(Annually/ Half yearly/ Quarterly/ Any other – please<br>specify) |        |        |        |        |        |        |        |        |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------------------------------------------------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
|                                                                                                                  | P<br>1                                                                                                                                                         | P<br>2 | P<br>3 | P<br>4 | P<br>5 | P<br>6 | P<br>7 | P<br>8 | P<br>9 | P<br>1                                                                         | P<br>2 | P<br>3 | P<br>4 | P<br>5 | P<br>6 | P<br>7 | P<br>8 | P<br>9 |
| Performance against above policies and follow up action                                                          | The policies of the Company are reviewed periodically / on a need basis by department heads / director / board Committees / board members, wherever applicable |        |        |        |        |        |        |        |        | on a need basis                                                                |        |        |        |        |        |        |        |        |
| 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.**

| P 1                                                                                                                                          | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|----------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|
| No                                                                                                                                           |     |     |     |     |     |     |     |     |
| The policies of the Company are subject to audit by the internal auditors of the Company.                                                    |     |     |     |     |     |     |     |     |
| The working of the policy is also ensured by the various department heads / director / board committees / board members, wherever applicable |     |     |     |     |     |     |     |     |

**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)                                                                                               | P7 – The Company through the various industrial forums endeavors to promote growth and technological process, economic reforms, inclusive development policies and sustainable business principles. Therefore, there is no need for such policy |     |     |     |     |     |     |     |     |



**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

**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                                                      | P1, P2 & P6                                                                                                                                                                                                                         | 100                                                                         |
| Key Managerial Personnel          | 8                                                      | P1, P2 & P6                                                                                                                                                                                                                         | 100                                                                         |
| Employees other than BoD and KMPs | 1                                                      | The employees / workers are imparted various trainings / awareness sessions such as induction / functional / behavioural training at the time of joining and leadership, technical, policy training during the course of employment | 100                                                                         |
| Workers                           | 1                                                      |                                                                                                                                                                                                                                     | 100                                                                         |

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

| Monetary        |                 |                                                                       |                   |                   |                                     |
|-----------------|-----------------|-----------------------------------------------------------------------|-------------------|-------------------|-------------------------------------|
| Particulars     | NGRBC principle | Name of the regulatory / enforcement Agencies / judicial institutions | Amount (in INR)   | Brief of the case | Has appeal been preferred? (Yes/No) |
| Penalty/Fine    | All             | NA                                                                    | NIL               | NA                | No                                  |
| Settlement      | All             | NA                                                                    | NIL               | NA                | No                                  |
| Compounding fee | All             | NA                                                                    | NIL               | NA                | No                                  |
| Non-Monetary    |                 |                                                                       |                   |                   |                                     |
| Particulars     | NGRBC principle | Name of the regulatory / enforcement Agencies / judicial institutions | Brief of the case |                   | Has appeal been preferred? (Yes/No) |
| Imprisonment    | All             | NA                                                                    | NA                |                   | No                                  |
| Punishment      | All             | NA                                                                    | NA                |                   | No                                  |

**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 |
|--------------|---------------------------------------------------------------------|
| NA           | NA                                                                  |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**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. As part of Code of Conduct for all employees, on discipline and misconduct, accepting bribe or illegal gratification, in any form, from anyone, in connection with the Company's business is considered as violation.

The Company has zero tolerance approach towards such violation, corruption and bribery. The Company has appropriate internal controls to ensure that the Company or its employees do not engage in unethical practices.

All employees are educated on the "Code of Conduct" with an objective to establish and specify standards of behaviour. Web-link of such policies covered under the code of conduct are available on the Company's website as provided in page no. 83 of this Annual Report.

**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 2025-26 | FY 2024-25 |
|-------------|------------|------------|
| Directors   | Nil        | Nil        |
| KMPs        | Nil        | Nil        |
| Employees   | Nil        | Nil        |
| Workers     | Nil        | Nil        |

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

| Particulars                                                                                  | FY 2025-26 |         | FY 2024-25 |         |
|----------------------------------------------------------------------------------------------|------------|---------|------------|---------|
|                                                                                              | Number     | Remarks | Number     | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | Nil        | Nil     | Nil        | Nil     |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | Nil        | Nil     | Nil        | Nil     |

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

Not Applicable

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

| Particulars                         | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|-------------------------------------|-------------------------------------|--------------------------------------|
| Number of days of accounts payables | 100 days                            | 83 days                              |

\*No. of days considered effective from 11<sup>th</sup> August 2023.

**9. Open-ness of business**

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

| Parameter                  | Metrics                                                                             | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|----------------------------|-------------------------------------------------------------------------------------|-------------------------------------|--------------------------------------|
| Concentration of Purchases | a. Purchases from trading houses as % of total purchases                            | -                                   | -                                    |
|                            | b. Number of trading houses where purchases are made from                           | -                                   | -                                    |
|                            | c. Purchases from top 10 trading houses as % of total purchases from trading houses | -                                   | -                                    |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

| Parameter              | Metrics                                                                                  | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|------------------------|------------------------------------------------------------------------------------------|-------------------------------------|--------------------------------------|
| Concentration of Sales | a. Sales to dealers / distributors as % of total sales                                   | -                                   | -                                    |
|                        | b. Number of dealers / distributors to whom sales are made                               | -                                   | -                                    |
|                        | c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors  | -                                   | -                                    |
| Share of RPTs in       | a. Purchase (Purchases with related parties / Total Purchases)                           | 1.99%                               | 2.04%                                |
|                        | b. Sales (Sales to related parties / Total Sales)                                        | 3.36%                               | 24.24%                               |
|                        | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | -                                   | -                                    |
|                        | d. Investments (Investments in related parties / Total Investments made)                 | 98.11%                              | 97.96%                               |

**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 programmes partners covered (by value of business done with such partners) under the awareness programmes |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| 4                                         | 1.Sustainability & its importance<br>2.GHG emission and reduction<br>3.Circularity & Landfill reduction strategies<br>4.Safety Management | 30                                                                                                                             |

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

Yes. The Company has in place a 'Policy on Related Party Transactions', conformance with the Company's Code of Conduct for Business and Ethics which provides that all Directors and Senior Management Personnel are required to disclose all potential or actual conflict of interest, which may be against the interest of the Company and take actions to eliminate such conflict, if so required.

**PRINCIPLE 2**

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

**ESSENTIAL INDICATORS**

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

| Particulars | Current FY 2025-26 | Previous FY 2024-25 | Details of improvements in environmental and social impacts       |
|-------------|--------------------|---------------------|-------------------------------------------------------------------|
| R & D       | 1%                 | 20%                 | Infrastructure development related to green building requirements |
| Capex       | 25%                | 42%                 |                                                                   |

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

Yes

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

83% of input is sourced locally. Initiatives taken to ensure sustainable sourcing and encouraged suppliers to get certified under ISO 14001, ISO 45001 & IATF. Systems and process audits are conducted at supplier end periodically for better control through sourcing team.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

The Company does not have a process to collect, reuse, recycle and dispose the aluminium castings after supply to customers. However, this process is being done by various OEMs and third parties to recover and reuse aluminium.

The material processed by the Company, i.e., aluminium based alloys is 100% recyclable. Presently rejected aluminium castings (8% of production) are re-melted inside the factory. The aluminium swarf is remelted and reused for production. Sand (5427 tonnes/year) used for making cores is recycled.

Hazardous waste materials generated by the Company during aluminium castings production are given to authorized vendors either for disposal or recycling.

**4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).**

If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes. Demonstrating our commitment to environmental responsibility, the Company fulfilled the EPR requirements. The target of 89.87 metric tonnes for Brand owner and 0.153 metric tonnes for Importer is achieved through collaboration with government authorized recyclers during the FY 25-26.

**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?**

Yes. Life Cycle Assessments (LCAs) have been conducted for Oil Pan Assembly part supplied to Hyundai Motor India Limited.

| NIC Code | Name of Product / Service | % of total Turnover contributed | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/ No) If yes, provide the web- link |
|----------|---------------------------|---------------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------------------------|
| 2930     | Oil Pan Assembly - HMIL   | Revenue yet to be realized      | Cradle to Gate                                                           | Yes                                                       | No                                                                            |

Life Cycle Assessments (LCAs) are conducted by an independent external agency. The resulting data undergoes periodic evaluation to identify areas for improvement, and corresponding actions will be implemented across the product to minimize environmental impact.

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

| Name of Product / Service | Description of the risk / concern                    | Action Taken          |
|---------------------------|------------------------------------------------------|-----------------------|
| Oil Pan Assembly          | Higher emission due to usage of Non renewable energy | Increase the RE share |

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

| Indicate input material | Recycled or re-used input material to total material |                                       |
|-------------------------|------------------------------------------------------|---------------------------------------|
|                         | FY 2025-26<br>Current Financial Year                 | FY 2024-25<br>Previous Financial Year |
| Aluminium               | 100%                                                 | 100%                                  |
| Sand core               | 90%                                                  | 90%                                   |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

| Particulars                    | FY 2025-26<br>Current Financial Year |          |                 | FY 2024-25<br>Previous Financial Year |          |                 |
|--------------------------------|--------------------------------------|----------|-----------------|---------------------------------------|----------|-----------------|
|                                | Re-Used                              | Recycled | Safely Disposed | Re-Used                               | Recycled | Safely Disposed |
| Plastics (including packaging) | -                                    | -        | -               | -                                     | -        | -               |
| E-waste                        | -                                    | -        | -               | -                                     | -        | -               |
| Hazardous waste                | -                                    | -        | -               | -                                     | -        | -               |
| Other waste                    | -                                    | -        | -               | -                                     | -        | -               |

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

|                            |                                                                                                     |
|----------------------------|-----------------------------------------------------------------------------------------------------|
| Indicate product category  | Reclaimed products and their packaging materials as % of total products sold in respective category |
| Materials received in bins | -                                                                                                   |

**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 insurance |           | 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                           | 424                       | 424              | 100       | 424                | 100       | -                  | -         | 424                | 100       | 424                 | 100       |
| Female                         | 31                        | 31               | 100       | 31                 | 100       | 31                 | 100       | -                  | -         | 31                  | 100       |
| Total                          | 455                       | 455              | 100       | 455                | 100       | 31                 | 100       | 424                | 100       | 455                 | 100       |
| Other than Permanent employees |                           |                  |           |                    |           |                    |           |                    |           |                     |           |
| Male                           | 18                        | 18               | 100       | 18                 | 100       | -                  | -         | -                  | -         | 18                  | 100       |
| Female                         | 2                         | 2                | 100       | 2                  | 100       | 2                  | 100       | -                  | -         | 2                   | 100       |
| Total                          | 20                        | 20               | 100       | 20                 | 100       | 2                  | 100       | -                  | -         | 20                  | 100       |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

| Category                     | % of workers covered by |                  |              |                    |              |                    |              |                    |              |                     |              |
|------------------------------|-------------------------|------------------|--------------|--------------------|--------------|--------------------|--------------|--------------------|--------------|---------------------|--------------|
|                              | Total<br>(A)            | Health insurance |              | Accident insurance |              | Maternity benefits |              | Paternity Benefits |              | Day Care facilities |              |
|                              |                         | Number (B)       | %<br>(B / A) | Number<br>(C)      | %<br>(C / A) | Number (D)         | %<br>(D / A) | Number<br>(E)      | %<br>(E / A) | Number<br>(F)       | %<br>(F / A) |
| Permanent workers            |                         |                  |              |                    |              |                    |              |                    |              |                     |              |
| Male                         | 732                     | 732              | 100          | 732                | 100          | -                  | -            | 732                | 100          | 732                 | 100          |
| Female                       | 2                       | 2                | 100          | 2                  | 100          | 2                  | 100          | -                  | -            | 2                   | 100          |
| Total                        | 734                     | 734              | 100          | 734                | 100          | 2                  | 0.28         | 732                | 99.72        | 734                 | 100          |
| Other than Permanent workers |                         |                  |              |                    |              |                    |              |                    |              |                     |              |
| Male                         | 964                     | 964              | 100          | 964                | 100          | -                  | -            | -                  | -            | -                   | -            |
| Female                       | 317                     | 317              | 100          | 317                | 100          | -                  | -            | -                  | -            | -                   | -            |
| Total                        | 1281                    | 1281             | 100          | 1281               | 100          | -                  | -            | -                  | -            | -                   | -            |

**c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) –**

| Particulars                                                                  | FY 2025-26 Current Financial Year | FY 2024-25 Previous Financial Year |
|------------------------------------------------------------------------------|-----------------------------------|------------------------------------|
| Cost incurred on well- being measures as a % of total revenue of the company | 1.82%                             | 2.09%                              |

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

| Benefits                | FY 2025-26 Current Financial Year                  |                                                |                                                      | FY 2024-25 Previous Financial Year                 |                                                |                                                      |
|-------------------------|----------------------------------------------------|------------------------------------------------|------------------------------------------------------|----------------------------------------------------|------------------------------------------------|------------------------------------------------------|
|                         | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF                      | 100                                                | 100                                            | Yes                                                  | 100                                                | 100                                            | Yes                                                  |
| Gratuity                | 100                                                | 100                                            | Yes                                                  | 100                                                | 100                                            | Yes                                                  |
| ESI                     | 100                                                | 100                                            | Yes                                                  | 100                                                | 100                                            | Yes                                                  |
| Others – please specify | -                                                  | -                                              | -                                                    | -                                                  | -                                              | -                                                    |

**3. Accessibility of workplaces**

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

Yes, to identified areas. Steps are being taken to improve on the same.

**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 (Fair and Ethical practices policy). - <https://www.sundaram-clayton.com/Disclosures.htm>

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

| Gender       | Permanent employees |                | Permanent workers   |                |
|--------------|---------------------|----------------|---------------------|----------------|
|              | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male         | 100                 | 100            | 100                 | 100            |
| Female       | 100                 | 100            | 100                 | 100            |
| <b>Total</b> | 100                 | 100            | 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.**

| Particulars                    | Yes/No<br>(If Yes, then give details of the mechanism in brief) | Remark                                                                                                                                                                                                                                                                                          |
|--------------------------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Permanent Workers              | Yes                                                             | The Company POSH committee members are from diverged group. Whistle blower, CoC (Code of Conduct) for all categories of permanent employees and workers are available. Dedicated channel for raising such grievances have been put in place and communicated to all the concerned stakeholders. |
| Other than Permanent Workers   | Yes                                                             |                                                                                                                                                                                                                                                                                                 |
| Permanent Employees            | Yes                                                             |                                                                                                                                                                                                                                                                                                 |
| Other than Permanent Employees | Yes                                                             |                                                                                                                                                                                                                                                                                                 |

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

100% of permanent employees working in workers grade are members of internal Employees Union that is affiliated to INTUC.

| Category                  | FY 2025-26<br>Current Financial Year                |                                                                                                |           | FY 2024-25<br>Previous Financial Year                |                                                                                                |           |
|---------------------------|-----------------------------------------------------|------------------------------------------------------------------------------------------------|-----------|------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------|
|                           | Total employee / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B / A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D / C) |
| Total Permanent Employees | 455                                                 | -                                                                                              | -         | 579                                                  | -                                                                                              | -         |
| - Male                    | 424                                                 | -                                                                                              | -         | 545                                                  | -                                                                                              | -         |
| - Female                  | 31                                                  | -                                                                                              | -         | 34                                                   | -                                                                                              | -         |
| Total Permanent Workers   | 734                                                 | 734                                                                                            | 100       | 837                                                  | 837                                                                                            | 100       |
| - Male                    | 732                                                 | 732                                                                                            | 100       | 834                                                  | 834                                                                                            | 100       |
| - Female                  | 2                                                   | 2                                                                                              | 100       | 3                                                    | 3                                                                                              | 100       |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**8. Details of training given to employees and workers:**

| Category  | FY 2025-26 Current Financial Year |                               |              |                      |              | FY 2024-25 Previous Financial Year |                               |              |                      |              |
|-----------|-----------------------------------|-------------------------------|--------------|----------------------|--------------|------------------------------------|-------------------------------|--------------|----------------------|--------------|
|           | Total (A)                         | On Health and safety measures |              | On Skill upgradation |              | Total (D)                          | On Health and safety measures |              | On Skill upgradation |              |
|           |                                   | No. (B)                       | %<br>(B / A) | No. (C)              | %<br>(C / A) |                                    | No. (E)                       | %<br>(E / D) | No. (F)              | %<br>(F / D) |
| Employees |                                   |                               |              |                      |              |                                    |                               |              |                      |              |
| Male      | 442                               | 400                           | 90.50        | 350                  | 79.19        | 545                                | 450                           | 82.57        | 450                  | 82.57        |
| Female    | 33                                | 30                            | 90.91        | 28                   | 84.85        | 34                                 | 30                            | 88.24        | -                    | -            |
| Total     | 475                               | 430                           | 90.53        | 378                  | 79.58        | 579                                | 480                           | 82.90        | 450                  | 77.72        |
| Workers   |                                   |                               |              |                      |              |                                    |                               |              |                      |              |
| Male      | 732                               | 732                           | 100          | 732                  | 100          | 834                                | 800                           | 95.92        | 800                  | 95.92        |
| Female    | 2                                 | 2                             | 100          | 2                    | 100          | 3                                  | 3                             | 100          | 3                    | 100          |
| Total     | 734                               | 734                           | 100          | 734                  | 100          | 837                                | 803                           | 95.94        | 803                  | 95.94        |

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

| Category  | FY 2025-26 Current Financial Year |         |           | FY 2024-25 Previous Financial Year |         |           |
|-----------|-----------------------------------|---------|-----------|------------------------------------|---------|-----------|
|           | Total (A)                         | No. (B) | % (B / A) | Total (A)                          | No. (B) | % (B / A) |
| Employees |                                   |         |           |                                    |         |           |
| Male      | 442                               | 424     | 95.93     | 545                                | 452     | 82.94     |
| Female    | 33                                | 31      | 93.94     | 34                                 | 32      | 94.12     |
| Total     | 475                               | 455     | 95.79     | 579                                | 484     | 83.59     |
| Workers   |                                   |         |           |                                    |         |           |
| Male      | 732                               | -       | -         | 834                                | -       | -         |
| Female    | 2                                 | -       | -         | 3                                  | -       | -         |
| Total     | 734                               | -       | -         | 837                                | -       | -         |

**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. Covering Chennai location.

Scope : Manufacture of Aluminium Gravity die casting and pressure die casting components and machined components

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

Hazard Identification and Risk Assessment(HIRA), Safety Audit by EHS professionals, Safety Interaction by line management, Safety inspection by Government authorities, External Auditors, ISO 45001 (Occupational Health & Safety Management system).

Hazard Identification Risk Assessment (HIRA) is a process of defining and describing hazards by characterising their probability, frequency, and severity and evaluating adverse consequences, including potential losses and injuries. A risk assessment that provides the factual basis for activities is included in the corporate safety strategy to reduce losses from identified hazards at workplace. While carrying out Hazard Assessment, all the activities including routine and non-routine in each section are selected, Hazard Assessment conducted to identify the significant risks. For all the significant risks, control measures are defined to mitigate the risks. The HIRA



**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

process is a dynamic document which is reviewed every year or if there is change in process, layout, materials etc. of there is an accident or incident in that particular activity.

Periodic medical check-ups are done in-house with specific tests identified as per risk assessment of employees working in different departments having exposure to different occupational health hazards. Health assessment on return-to-work is done prior to rejoining. Medical fitness certificate is verified and validated and maintained as record..

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

Yes. Work related hazards are identified through reporting mechanisms viz., Unsafe Condition Reporting, Near Miss Reporting, Reports from Safety committee meeting, Total Employee Involvement (TEI) – Suggestions and TEI – QCC.

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

Yes, the Company has tied-up with nearby multispecialty hospitals for non-occupational health services to all our employees.

**11. Details of safety related incidents:**

| Safety Incident/Number                                                        | Category* | FY 2025-26<br>Current Financial Year | FY 2024-25<br>Previous Financial Year |
|-------------------------------------------------------------------------------|-----------|--------------------------------------|---------------------------------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | -                                    | -                                     |
|                                                                               | Workers   | 0.10                                 | 0.10                                  |
| Total recordable work-related injuries                                        | Employees | -                                    | -                                     |
|                                                                               | Workers   | 1                                    | 2                                     |
| No. of fatalities                                                             | Employees | -                                    | -                                     |
|                                                                               | Workers   | -                                    | 1                                     |
| High consequence work-related injury or ill-health (excluding fatalities)     | Employees | -                                    | -                                     |
|                                                                               | Workers   | -                                    | -                                     |

\*Including in the contract workforce

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

The Company engages employees to improve safety and health such as safety audits through internal and external experts, safety training for its employees on topics like Four Stage Safety Clearance, 100% Induction Training, Contractor Safety Management System, Plant Safety Rating System, Work Permit System, Visual Control System Related to Safety, Work Environment Monitoring, Internal & External Safety Audits, Fire Extinguishers, Fire Hydrants and Automatic suppression systems.

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

| Particulars        | FY 2025-26               |                                       |         | FY 2024-25                |                                       |         |
|--------------------|--------------------------|---------------------------------------|---------|---------------------------|---------------------------------------|---------|
|                    | (Current Financial Year) |                                       |         | (Previous Financial Year) |                                       |         |
|                    | Filed during the year    | Pending resolution at the end of year | Remarks | Filed during the year     | Pending resolution at the end of year | Remarks |
| Working Conditions | Nil                      | Nil                                   | -       | Nil                       | Nil                                   | -       |
| Health & Safety    | Nil                      | Nil                                   | -       | Nil                       | Nil                                   | -       |

The observations/ suggestions made by safety committee members and Union committee members during monthly safety committee meeting & monthly union meeting respectively are addressed appropriately.

**14. Assessments for the year:**

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

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**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.**

Planning to engage with Dupont for implementation of safety systems for cultural transformation.

**Leadership Indicators**

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

**a. Employees (Y/N)**

Yes, Employee death benefit scheme, group personal accident coverage and all other benefits in line with Statutory benefits provided for employee benefit.

**b. Workers (Y/N)**

Yes, Family Relief Fund is extended to the family members of the deceased employees by making contribution from all permanent employees and matching contribution by the Company.

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

The Company has adequate mechanisms to monitor and ensure that any statutory dues have the deducted and deposited by the value chain partners, in accordance applicable regulations and reviewed as per the regular audit processes. The Company also collects necessary certificates and proofs from its contractors with respect to payment of statutory dues like PF, ESIC, etc. relating to contractual employees and workers.

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

| Particulars | Total no. of affected employees/ workers |                                         | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |                                         |
|-------------|------------------------------------------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
|             | FY 2025-26<br>(Current Financial Year)   | FY 2024-25<br>(Previous Financial Year) | FY 2025-26<br>(Current Financial Year)                                                                                                            | FY 2024-25<br>(Previous Financial Year) |
| Employees   | Nil                                      | Nil                                     | Nil                                                                                                                                               | Nil                                     |
| Workers     | Nil                                      | 1                                       | Nil                                                                                                                                               | Nil                                     |

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

No

**5. Details on assessment of value chain partners:**

| Particulars                 | % of value chain partners (by value of business done with such partners) that were assessed) |
|-----------------------------|----------------------------------------------------------------------------------------------|
| Health and safety practices | 30                                                                                           |
| Working Conditions          | 30                                                                                           |

**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**

There were no significant risks / concerns arising from the assessments of health and safety practices and working conditions of value chain partners.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**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 continuously expands its proactive engagement with all the stakeholder groups. The Company prioritizes engagement as an integral part of partnership building and aims to institutionalize a structured approach through a formal process in the future.

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

| Stakeholder Group       | Whether identified as Vulnerable & Marginalized Group (Yes/ No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement                                                                                                                                                                                               |
|-------------------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Customer                | No                                                              | E mail , Website, Meetings                                                                                                    | Monthly / Daily / Weekly / Quarterly / Half yearly / Annually                        | Through frequent Customer interaction, Customer satisfaction surveys. Key Concerns include Product / Service quality, Timely Delivery, Fair Pricing                                                                                                                                           |
| Employees               | No                                                              | Notice board, Email                                                                                                           | Monthly / Daily / Weekly / Quarterly / Half yearly / Annually                        | Performance appraisal, employee engagement survey, grievance handling process, training workshops. Key Concerns: Career planning, communication on employee related policies.                                                                                                                 |
| Policy makers           | No                                                              | Email, Meetings                                                                                                               | As & When required                                                                   | Policy advocacy participation, industry associations. Key Concerns: No specific concerns.                                                                                                                                                                                                     |
| Supplier                | No                                                              | Email, Meetings                                                                                                               | As & When required                                                                   | Supplier meets/supplier visits/supplier survey. Key Concerns: Supply chain communication on long range plan/ financial transactions/ rejections update/ scheduling, fluctuating order volumes, early involvement from suppliers to meet new product development targets, performance, rewards |
| Regulatory body         | No                                                              | Email, Meetings                                                                                                               | As & When required                                                                   | Submission of reports, inspection visits, need-based meetings on directives. Key Concerns: Regulatory compliance and transparency in disclosure.                                                                                                                                              |
| Shareholders/ Investors | No                                                              | E mail , Website, Meetings                                                                                                    | Quarterly / Half yearly / Annually                                                   | Investor forums, corporate communication, annual general meetings, annual reports. Key Concerns: Company strategy and performance, future plans, returns to shareholders.                                                                                                                     |
| Trade union             | No                                                              | Meetings                                                                                                                      | Monthly / Quarterly / Half yearly / Annually<br>As & When required                   | Monthly meeting.<br>Key concerns : Occupational health and safety concerns, other benefits.                                                                                                                                                                                                   |
| Local community         | No                                                              | Community meetings                                                                                                            | As & When required                                                                   | Panchayat board meeting.Key concerns: Welfare related requests.                                                                                                                                                                                                                               |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**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.

Respective business / functional heads engage with the stakeholders on various ESG topics and the relevant feedback from such consultation is provided to the Board, wherever applicable.

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.

Employees & Workers: Based on demand & towards facilitating Health & wellness, special camps were conducted tying up with local hospitals.

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

Towards enhancing engagement of Persons with Disability (PwD) and based on requests from Service providers/NGOs, job fairs and recruitment camps were conducted, and employment provided.

**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:

| Category             | FY 2025-26 Current Financial Year |                                        |           | FY 2024-25 Previous Financial Year |                                        |           |
|----------------------|-----------------------------------|----------------------------------------|-----------|------------------------------------|----------------------------------------|-----------|
|                      | Total (A)                         | No. of employees / workers covered (B) | % (B / A) | Total (C)                          | No. of employees / workers covered (D) | % (D / C) |
| <b>Employees</b>     |                                   |                                        |           |                                    |                                        |           |
| Permanent            | 455                               | 455                                    | 100       | 579                                | 579                                    | 100       |
| Other than permanent | 20                                | -                                      | -         | 36                                 | 36                                     | 100       |
| Total Employees      | 475                               | 455                                    | 95        | 615                                | 615                                    | 100       |
| <b>Workers</b>       |                                   |                                        |           |                                    |                                        |           |
| Permanent            | 734                               | 734                                    | 100       | 837                                | 837                                    | 100       |
| Other than permanent | 1281                              | 1281                                   | 100       | 1390                               | 1390                                   | 100       |
| Total Workers        | 2015                              | 2015                                   | 100       | 2227                               | 2227                                   | 100       |

- Annual coverage of training through an e-module is mandatory for all employees.
- All existing employees have been imparted training on Company's policies on human rights issues. All new joiners are taken through these policies as part of induction program. The Company is in the process of developing self e-modules to ensure tracking going forward.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**2. Details of minimum wages paid to employees and workers:**

| Category             | FY 2025-26 Current Financial Year |                       |              |                        |              | FY 2024-25 Previous Financial Year |                       |              |                        |              |
|----------------------|-----------------------------------|-----------------------|--------------|------------------------|--------------|------------------------------------|-----------------------|--------------|------------------------|--------------|
|                      | Total (A)                         | Equal to Minimum Wage |              | More than Minimum Wage |              | Total (D)                          | Equal to Minimum Wage |              | More than Minimum Wage |              |
|                      |                                   | No. (B)               | %<br>(B / A) | No. (C)                | %<br>(C / A) |                                    | No. (E)               | %<br>(E / D) | No. (F)                | %<br>(F / D) |
| Employees            |                                   |                       |              |                        |              |                                    |                       |              |                        |              |
| Permanent            | 455                               | -                     | -            | -                      | -            | 579                                | -                     | -            | -                      | -            |
| Male                 | 424                               | -                     | -            | -                      | -            | 545                                | -                     | -            | -                      | -            |
| Female               | 31                                | -                     | -            | -                      | -            | 34                                 | -                     | -            | -                      | -            |
| Other than Permanent | 20                                | -                     | -            | -                      | -            | 36                                 | -                     | -            | -                      | -            |
| Male                 | 18                                | -                     | -            | -                      | -            | 36                                 | -                     | -            | -                      | -            |
| Female               | 2                                 | -                     | -            | -                      | -            | -                                  | -                     | -            | -                      | -            |
| Workers              |                                   |                       |              |                        |              |                                    |                       |              |                        |              |
| Permanent            | 734                               | -                     | -            | 734                    | 100          | 837                                | -                     | -            | 837                    | 100          |
| Male                 | 732                               | -                     | -            | 732                    | 100          | 834                                | -                     | -            | 834                    | 100          |
| Female               | 2                                 | -                     | -            | 2                      | 100          | 3                                  | -                     | -            | 3                      | 100          |
| Other than Permanent | 1281                              | -                     | -            | 1281                   | 100          | 1390                               | -                     | -            | 1390                   | 100          |
| Male                 | 964                               | -                     | -            | 964                    | 100          | 1172                               | -                     | -            | 1172                   | 100          |
| Female               | 317                               | -                     | -            | 317                    | 100          | 218                                | -                     | -            | 218                    | 100          |

**3. Details of remuneration/salary/wages**

a. Median remuneration / wages:

| Particulars                      | Male   |                                                                     | Female |                                                                     |
|----------------------------------|--------|---------------------------------------------------------------------|--------|---------------------------------------------------------------------|
|                                  | Number | Median remuneration/ salary/ wages of respective category (₹ in Cr) | Number | Median remuneration/ salary/ wages of respective category (₹ in Cr) |
| Board of Directors (BoD)         | 7      | 0.21                                                                | 2      | 2.93                                                                |
| Key Managerial Personnel         | 3      | 0.50                                                                | -      | -                                                                   |
| Employees other than BoD and KMP | 440    | 0.12                                                                | 33     | 0.08                                                                |
| Workers                          | 732    | 0.07                                                                | 2      | 0.07                                                                |

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

| Particulars                                     | FY 2025-26 Current Financial Year | FY 2024-25 Previous Financial Year |
|-------------------------------------------------|-----------------------------------|------------------------------------|
| Gross wages paid to females as % of total wages | 4.7%                              | 5.4%                               |

**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)**

Heads of IR and HR are the persons responsible for addressing any human rights impacts or issues for the employees in the business. For POSH complaints there is an internal committee comprising of senior team across locations which addresses any issues raised.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

Employees can reach out to Head HR / Head IR with reference to grievances related to human rights issues. As email ID is made available for this purpose. There is also an automated voice recording facility to register any specific grievances. Confidentiality of the complaints raising such issues is assured.

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

| Particulars                       | FY 2025-26 Current Financial Year |                                       |         | FY 2024-25 Previous Financial Year |                                       |         |
|-----------------------------------|-----------------------------------|---------------------------------------|---------|------------------------------------|---------------------------------------|---------|
|                                   | Filed during the year             | Pending resolution at the end of year | Remarks | Filed during the year              | Pending resolution at the end of year | Remarks |
| Sexual Harassment                 | -                                 | -                                     | -       | -                                  | -                                     | -       |
| Discrimination at workplace       | -                                 | -                                     | -       | -                                  | -                                     | -       |
| Child Labour                      | -                                 | -                                     | -       | -                                  | -                                     | -       |
| Forced Labour/ Involuntary Labour | -                                 | -                                     | -       | -                                  | -                                     | -       |
| Wages                             | -                                 | -                                     | -       | -                                  | -                                     | -       |
| Other human Rights related issues | -                                 | -                                     | -       | -                                  | -                                     | -       |

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

| Particulars                                                                                                                         | FY 2025-26<br>Current Financial Year | FY 2024-25<br>Previous Financial Year |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|---------------------------------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | -                                    | -                                     |
| Complaints on POSH as a % of female employees / workers                                                                             | -                                    | -                                     |
| Complaints on POSH upheld                                                                                                           | -                                    | -                                     |

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

Company assures confidentiality and protection to the complainant in furtherance, any attempts to intimidate the complainant would be treated as a violation of code of conduct. The following steps are followed:

- All complaints are handled in time bound manner.
- At the request of the aggrieved employee, steps are taken to settle the matter through mutual agreement, before initiating enquiry, provided that no monetary settlement shall be made as a basis of conciliation.
- If a settlement is arrived through conciliation, the committee shall prepare a written settlement with its recommendations duly signed by both parties and witnessed by the committee and provide the same to Management.
- The Committee shall provide Unclassified / Restricted / Protected / Confidential copies of the settlement to the aggrieved employee and the respondent, and no enquiry shall be conducted further.

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

Yes. Business agreements and contracts contain a standard provision of compliance with all the applicable laws, conventions, and policies etc., which encompasses the human rights requirements.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**10. Assessments for the year:**

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

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

Infra development for person with disability.

**Leadership Indicators**

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

The Company has introduced flexible working hours for the welfare of the employees. The Company has also introduced an independent helpline for employee to call anonymously and register their grievance.

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

Nil

**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 production facilities are accessible.

**4. Details on assessment of value chain partners:**

| Particulars                      | % of value chain partners (by value of business done with such partners) that were assessed |
|----------------------------------|---------------------------------------------------------------------------------------------|
| Sexual Harassment                | 30                                                                                          |
| Discrimination at workplace      | 30                                                                                          |
| Child Labour                     | 30                                                                                          |
| Forced Labour/Involuntary Labour | 30                                                                                          |
| Wages                            | 30                                                                                          |
| Others – please specify          | -                                                                                           |

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

There were no significant risks / concerns arising from the above said assessments.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**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 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------|
| <b>From renewable sources</b>                                                                                                                                  |                                        |                                         |
| Total electricity consumption (A) - tera Joules                                                                                                                | 211.79                                 | 103.53                                  |
| Total fuel consumption (B)                                                                                                                                     | -                                      | -                                       |
| Energy consumption through other sources (C)                                                                                                                   | -                                      | -                                       |
| <b>Total energy consumed from renewable sources (A+B+C) - tera Joules</b>                                                                                      | <b>211.79</b>                          | <b>103.53</b>                           |
| <b>From non-renewable sources</b>                                                                                                                              |                                        |                                         |
| Total electricity consumption (D) - tera Joules                                                                                                                | 64.04                                  | 207.05                                  |
| Total fuel consumption (E) - tera Joules                                                                                                                       | 159.47                                 | 98.63                                   |
| Energy consumption through other sources (F)                                                                                                                   | -                                      | -                                       |
| <b>Total energy consumed from non-renewable sources (D+E+F) - tera Joules</b>                                                                                  | <b>223.51</b>                          | <b>305.68</b>                           |
| <b>Total energy consumed (A+B+C+D+E+F)</b>                                                                                                                     | <b>435.30</b>                          | <b>409.21</b>                           |
| <b>Energy intensity per rupee of turnover</b><br>(Total energy consumed / Revenue from operations)                                                             | 0.00000000243                          | 0.0000000194                            |
| <b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total energy consumed / Revenue from operations adjusted for PPP) | 0.000000053                            | 0.000000072                             |
| <b>Energy intensity in terms of physical Output</b>                                                                                                            | 0.01530                                | 0.009768214                             |
| Energy intensity ( <i>optional</i> ) – the relevant metric may be selected by the entity                                                                       | 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

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

No

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

| Parameter                                         | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|---------------------------------------------------|----------------------------------------|-----------------------------------------|
| <b>Water withdrawal by source (in kilolitres)</b> |                                        |                                         |
| (i) Surface water                                 | -                                      | -                                       |
| (ii) Groundwater                                  | 12,867                                 | 76,988                                  |
| (iii) Third party water                           | 2,04,982                               | 6,28,532                                |
| (iv) Seawater / desalinated water                 | -                                      | -                                       |
| (v) Others                                        | 22,318                                 | 29,216                                  |



**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

|                                                                                                                                                              |             |              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------|
| <b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>                                                                              | 2,40,167    | 7,34,736     |
| <b>Total volume of water consumption (in kilolitres)</b>                                                                                                     | 2,40,167    | 7,34,736     |
| <b>Water intensity per rupee of turnover</b> (Total water consumption / Revenue from operations)                                                             | 0.000013428 | 0.0000348358 |
| <b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP) | 0.00029172  | 0.000130111  |
| <b>Water intensity in terms of physical Output</b>                                                                                                           | 4.8 KL/Ton  | 5.5 KL/Ton   |
| <b>Water intensity (optional)</b> – the relevant metric may be selected by the Entity                                                                        | NA          | NA           |

- Wastewater from industrial process is treated, recycled and used in industrial application.
- Direct rainwater harvesting is also adopted.

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

No

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

| Parameter                                                                    | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------|
| <b>Water discharge by destination and level of treatment (in kilolitres)</b> |                                        |                                         |
| (i) To Surface water                                                         | -                                      | -                                       |
| - No treatment                                                               | -                                      | -                                       |
| - With treatment – please specify level of treatment                         | -                                      | -                                       |
| (ii) To Groundwater                                                          | -                                      | -                                       |
| - No treatment                                                               | -                                      | -                                       |
| - With treatment – please specify level of treatment                         | -                                      | -                                       |
| (iii) To Seawater                                                            | -                                      | -                                       |
| - No treatment                                                               | -                                      | -                                       |
| - With treatment – please specify level of treatment                         | -                                      | -                                       |
| (iv) Sent to third-parties                                                   | -                                      | -                                       |
| - No treatment                                                               | -                                      | -                                       |
| - With treatment – please specify level of treatment                         | -                                      | -                                       |
| (v) Others                                                                   | -                                      | -                                       |
| - No treatment                                                               | -                                      | -                                       |
| - With treatment – please specify level of treatment                         | 1,79,915                               | 1,43,002                                |
| <b>Total water discharged (in kilolitres)</b>                                | <b>1,79,915</b>                        | <b>1,43,002</b>                         |

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

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

The Company has implemented Zero Liquid Discharge System in all its locations. We have dedicated Effluent Treatment Plants and Sewage Treatment Plants in all locations and effluent / sewage generated from the operations. Effluent / Sewage treated are reused for the processes, toilet flushing and gardening purpose.

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

| Parameter                           | Please specify unit | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|-------------------------------------|---------------------|----------------------------------------|-----------------------------------------|
| NOx                                 | Micrograms / M3     | 19.81                                  | 24.83                                   |
| SOx                                 | Micrograms / M3     | 15.96                                  | 20.5                                    |
| Particulate matter (PM)             | Micrograms / M3     | 41.62                                  | 58.05                                   |
| Persistent organic pollutants (POP) | -                   | -                                      | -                                       |
| Volatile organic compounds (VOC)    | PPM                 | BDL (DL:01)                            | BDL (DL:01)                             |
| Hazardous air pollutants (HAP)      | -                   | -                                      | -                                       |
| Others – please specify             | Micrograms / M3     | 0.05                                   | 0.05                                    |

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

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:**

| Parameter                                                                                                                                                                                             | Unit                                | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------|-----------------------------------------|
| Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)                                                                                                  | Metric tonnes of CO2 equivalent     | 9208.4                                 | 17822                                   |
| Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)                                                                                                  | Metric tonnes of CO2 equivalent     | 12924.2                                | 41024                                   |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)                                                             | Metric tonnes of CO2 equivalent/Rs. | 0.0000012375                           | 0.00000279                              |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | Metric tonnes of CO2 equivalent/Rs. | -                                      | -                                       |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output                                                                                                                              | Metric tonnes of CO2 equivalent     | -                                      | -                                       |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity                                                                                           | Metric tonnes of CO2 equivalent     | -                                      | -                                       |

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

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

1) Increase in share of renewable energy. e.g., Augmentation of solar energy & procurement of green power through Indian Energy Exchange. 2) Implementation of energy efficient projects. 3) Eliminating fossil fuels from the process. e.g., Diesel forklifts to be converted in electrical forklifts.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

**9. Provide details related to waste management by the entity:**

| Parameter                                                                                                                                                            | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------|
| <b>Total Waste generated (in metric tonnes)</b>                                                                                                                      |                                        |                                         |
| Plastic waste (A)                                                                                                                                                    | 54.46                                  | 65.59                                   |
| E-waste (B)                                                                                                                                                          | 0.79                                   | 1.55                                    |
| Bio-medical waste (C)                                                                                                                                                | 0.19                                   | 0.25                                    |
| Construction and demolition waste (D)                                                                                                                                | 0                                      | 52.08                                   |
| Battery waste (E)                                                                                                                                                    | 0.83                                   | 2.06                                    |
| Radioactive waste (F)                                                                                                                                                | Nil                                    | Nil                                     |
| Other Hazardous waste. Please specify, if any. (Waste oil, Waste residue containing oil, discarded oil barrel, chemical sludge from waste water treatment plant) (G) | 115.62                                 | 293.54                                  |
| Other Non-hazardous waste generated (H).<br>Please specify, if any.<br>(Break-up by composition i.e. by materials relevant to the sector)                            | 783.07                                 | 1212.31                                 |
| <b>Total (A+B + C + D + E + F + G + H)</b>                                                                                                                           | 954.96                                 | 1627.39                                 |
| <b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations)                                                                       | 0.0000005234                           | 0.000000772                             |
| <b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total waste generated / Revenue from operations adjusted for PPP)        | 0.000000288                            | 0.000000288                             |
| <b>Waste intensity in terms of physical output</b>                                                                                                                   | 0.033541023                            | 0.038847417                             |
| <b>Waste intensity (optional)</b> – the relevant metric may be selected by the entity                                                                                | -                                      | -                                       |
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>                       |                                        |                                         |
| <b>Category of waste</b>                                                                                                                                             |                                        |                                         |
| (i) Recycled (Aluminium Swarf)                                                                                                                                       | 5401.48                                | 5635.05                                 |
| (ii) Re-used                                                                                                                                                         | -                                      | -                                       |
| (iii) Other recovery operations                                                                                                                                      | -                                      | -                                       |
| <b>Total</b>                                                                                                                                                         | 5401.48                                | 5635.05                                 |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>                                                    |                                        |                                         |
| <b>Category of waste</b>                                                                                                                                             |                                        |                                         |
| (i) Incineration                                                                                                                                                     | -                                      | -                                       |
| (ii) Landfilling                                                                                                                                                     | -                                      | -                                       |
| (iii) Other disposal operations                                                                                                                                      | 7149.11                                | 3856.01                                 |
| <b>Total</b>                                                                                                                                                         | 7149.11                                | 3856.01                                 |

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

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

The Company restricts the use of "hazardous chemicals" in the parts of our products/processes. Company has an internal standard which controls the usage of hazardous substances considering various national and international laws on hazardous substance. Aluminium swarfs are melted and converted into aluminium alloys. All other categories of wastes are disposed through authorized agencies.

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

| S. No. | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N)<br>If no, the reasons thereof and corrective action taken, if any. |
|--------|--------------------------------|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                |                    | Not applicable                                                                                                                                                 |

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

Necessity for environment impact assessment did not arise during reporting period

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

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

| S. No.         | Specify the law / regulation / guidelines which was not complied with | Provide details of the non-compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action taken, if any |
|----------------|-----------------------------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------|
|                |                                                                       |                                       |                                                                                                           |                                 |
| Not applicable |                                                                       |                                       |                                                                                                           |                                 |

**Leadership Indicators**

- 1. 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:

- (i) Name of the area: Thervoy Kandigai, Mahindra World City and Oragadam
- (ii) Nature of operations: Manufacturer of Die-casting
- (iii) Water withdrawal, consumption and discharge in the following format:

| Parameter                                               | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|---------------------------------------------------------|----------------------------------------|-----------------------------------------|
| <b>Water withdrawal by source (in kilolitres)</b>       |                                        |                                         |
| (i) Surface water                                       | -                                      | -                                       |
| (ii) Groundwater                                        | 12,867                                 | 76,988                                  |
| (iii) Third party water                                 | 2,04,982                               | 6,28,532                                |
| (iv) Seawater / desalinated water                       | -                                      | -                                       |
| (v) Others                                              | 22,318                                 | 29,216                                  |
| <b>Total volume of water withdrawal (in kilolitres)</b> | <b>2,40,167</b>                        | <b>7,34,736</b>                         |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

|                                                                                                |            |            |
|------------------------------------------------------------------------------------------------|------------|------------|
| <b>Total volume of water consumption (in kilolitres)</b>                                       | 2,39,687   | 7,34,736   |
| <b>Water intensity per rupee of turnover</b> ( <i>Water consumed / turnover</i> )              | 0.00001326 | 0.00003483 |
| <b>Water intensity</b> ( <i>optional</i> ) – the relevant metric may be selected by the entity | -          | -          |
| <b>Water discharge by destination and level of treatment (in kilolitres)</b>                   |            |            |
| (i) Into Surface water                                                                         | NA         | NA         |
| - No treatment                                                                                 | NA         | NA         |
| - With treatment – please specify level of treatment                                           | NA         | NA         |
| (ii) Into Groundwater                                                                          | NA         | NA         |
| - No treatment                                                                                 | NA         | NA         |
| - With treatment – please specify level of treatment                                           | NA         | NA         |
| (iii) Into Seawater                                                                            | NA         | NA         |
| - No treatment                                                                                 | NA         | NA         |
| - With treatment – please specify level of treatment                                           | NA         | NA         |
| (iv) Sent to third-parties                                                                     | NA         | NA         |
| - No treatment                                                                                 | NA         | NA         |
| - With treatment – please specify level of treatment                                           | NA         | NA         |
| (v) Others                                                                                     | NA         | NA         |
| - No treatment                                                                                 | NA         | NA         |
| - With treatment – please specify level of treatment                                           | 1,79,915   | 1,43,002   |
| <b>Total water discharged (in kilolitres)</b>                                                  | 1,79,915   | 1,43,002   |

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

**2. Please provide details of total Scope 3 emissions & its intensity:**

| Parameter                                                                                                                                                                    | Unit                                              | FY 2025-26<br>(Current Financial Year)                                                             | FY 2024-25<br>(Previous Financial Year) |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------|
| <b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) | Metric tonnes of CO <sub>2</sub> equivalent       | Scope 3 emissions assessment is under progress for FY 2025-26. It is due to be completed by Jul'26 | 541274.7                                |
| <b>Total Scope 3 emissions per rupee of turnover</b>                                                                                                                         | Metric tonnes of CO <sub>2</sub> equivalent / Rs. |                                                                                                    | 0.00002566                              |
| <b>Total Scope 3 emission intensity</b> ( <i>optional</i> ) – the relevant metric may be selected by the entity                                                              | Metric tonnes of CO <sub>2</sub> equivalent       |                                                                                                    | 12.92072                                |

**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

No, Scope 3 emissions assessment is under progress for FY 2025-26. It is due to be completed by Jul'26.

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not applicable

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives:

| Sr. No | Initiative undertaken          | Details of the initiative (Web-link, if any, may be provided along-with summary)             | Outcome of the initiative                               |
|--------|--------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------|
| 1      | Direct harvesting of rainwater | Rainwater is collected and used for industrial operations                                    | Savings of ground water / fresh water from third party  |
| 2      | Water conservation             | Special projects undertaken to reduce use of process water in production                     | Saving of ground water and fresh water from third party |
| 3      | Energy savings                 | Special projects undertaken to reduce the consumption of energy in premises across the plant | Reduction in energy consumed                            |

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

Flooding due to heavy rains are mitigated by initiating various controls like providing pumping facilities, deployment of sand bags at low areas to avoid water entry into the process zones. Plant buildings are constructed with seismic load into consideration. Fire and explosion effects are reduced through underground storage for hazardous chemical. Secondary storage facility is provided for keeping IT related back-ups.

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.

Company has started to conduct environment audit among the value chain and has started insisting all its value chains to obtain ISO14001 standards.

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

30%

**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.

7

- 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<br>(State/National) |
|--------|--------------------------------------------------------------|------------------------------------------------------------------------|
| 1      | Confederation of Indian Industry (CII)                       | National                                                               |
| 2      | Employers Federation of India (EFI)                          | National                                                               |
| 3      | Employers Federation of South India (EFSI)                   | State                                                                  |
| 4      | Madras Chamber of Commerce and Industry (MCCI)               | State                                                                  |
| 5      | Automotive Component Manufacture Association (ACMA)          | National                                                               |
| 6      | Federation of Indian Chambers of Commerce & Industry (FICCI) | National                                                               |
| 7      | Indo German Chamber of Commerce                              | International                                                          |

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

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

**LEADERSHIP INDICATORS**

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

| S.No. | Public advocacy | 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 |
|-------|-----------------|-----------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------|
| 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 entity based on applicable laws, in the current financial year.**

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

- 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity:**

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

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

Village Development Officers (VDOs) play a crucial role in bridging the gap between government programs and rural communities. Their physical presence within villages allows for:

Firsthand understanding of community needs: VDOs can directly observe and interact with residents, gaining a clear picture of local challenges and priorities.

Immediate feedback mechanisms: VDOs can gather community feedback on existing programs and identify areas for improvement.

VDOs facilitate effective program implementation through ongoing interaction:

- SHG meetings: Regular engagement with Self-Help Groups (SHGs) fosters community participation and ensures program alignment with local needs.
- Collaboration with community organizations: VDOs work alongside local organizations, leveraging their expertise and connections.
- Feedback from government officials: VDOs actively seek input from officials at various levels (panchayat, block, district) to assess program implementation and identify potential gaps..

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

| Particulars                                  | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|----------------------------------------------|----------------------------------------|-----------------------------------------|
| Directly sourced from MSMEs/ small producers | 54.0%                                  | 43.5%                                   |
| Directly from within India                   | 92.6%                                  | 90.2%                                   |

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

| Location     | FY 2025-26<br>(Current Financial Year) | FY 2024-25<br>(Previous Financial Year) |
|--------------|----------------------------------------|-----------------------------------------|
| Rural        | -                                      | -                                       |
| Semi-urban   | 100%                                   | 100%                                    |
| Urban        | -                                      | -                                       |
| Metropolitan | -                                      | -                                       |

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

**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):**

Company adheres to the practice of conducting Social Impact Assessments (SIAs) for all greenfield projects. However, during the fiscal year 2025-26, no SIAs were conducted.

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

The Company does not operate in any aspirational districts

- 3. (a)** Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes/No) No
- (b)** From which marginalized /vulnerable groups do you procure? Nil
- (c)** What percentage of total procurement (by value) does it constitute? Nil

**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: Nil**

**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: Nil**

**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.**

Customers will receive the complaints from the consumers and based on the complaints the Company will respond.

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



**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

**Annexure - VI to Directors' Report to the shareholders - (continued)**

| Particulars                                                 | As a percentage to total turnover |
|-------------------------------------------------------------|-----------------------------------|
| Environmental and social parameters relevant to the product | 100                               |
| Safe and responsible usage                                  | -                                 |
| Recycling and/or safe disposal                              | -                                 |

The Company produces parts to the prints and specifications provided by the customers. The Company displays product information as required by the customers. This is approved by them during the development process.

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

| Particulars                    | FY 2025-26 (Current Financial Year) |                                   | Remarks | FY 2024-25 (Previous Financial Year) |                                   | Remarks |
|--------------------------------|-------------------------------------|-----------------------------------|---------|--------------------------------------|-----------------------------------|---------|
|                                | Received during the year            | Pending resolution at end of year |         | Received during the year             | Pending resolution at end of year |         |
| Data privacy                   | -                                   | -                                 | -       | -                                    | -                                 | -       |
| Advertising                    | -                                   | -                                 | -       | -                                    | -                                 | -       |
| Cyber-security                 | -                                   | -                                 | -       | -                                    | -                                 | -       |
| Delivery of essential services | -                                   | -                                 | -       | -                                    | -                                 | -       |
| Restrictive Trade Practices    | -                                   | -                                 | -       | -                                    | -                                 | -       |
| Unfair Trade Practices         | -                                   | -                                 | -       | -                                    | -                                 | -       |
| Other                          | -                                   | -                                 | -       | -                                    | -                                 | -       |

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

| Particulars       | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | Nil    | Not applicable     |
| Forced recalls    | Nil    | 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, the Company has framework and policy in place to address cyber security risks as well as data privacy.

**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.**

Not applicable

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

- Number of instances of data breaches  
Nil
- Percentage of data breaches involving personally identifiable information of customers  
Nil
- Impact, if any, of the data breaches  
Nil

**LEADERSHIP INDICATORS**

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

Official website, Social media, labels

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

Not applicable

**Sundaram-Clayton Limited**  
(Formerly known as Sundaram-Clayton DCD Limited)

---

**Annexure - VI to Directors' Report to the shareholders - (continued)**

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

Risks – business and operational are identified and appropriate counter measures deployed. These are reviewed by the management and Board periodically. As appropriate, the risk of disruption / discontinuation of services are also communicated to customers as well as external agencies.

**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.**

The Company displays product information as required by the customers. This is approved by them during the development process.

**5. 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

For and on behalf of the Board of Directors

Chennai  
14<sup>th</sup> May 2026

Venu Srinivasan  
Chairman & Managing Director  
DIN: 00051523