



swan/nse/bse

12<sup>th</sup> August, 2026

Dept. of Corporate Compliances,  
National Stock Exchange Limited,  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra –Kurla Complex, Bandra-East,  
Mumbai – 400 051

**Symbol: SWANCORP**

Dept. of Corporate Service  
BSE Limited,  
P.J. Tower, Dalal Street, Fort,  
Mumbai – 400 001  
**Scrip Code: 503310**

Dear Sir / Madam,

**Sub: Business Responsibility and Sustainability Report for FY 2025-26**

**Dear Sir/Madam,**

Please find enclosed herewith the Business Responsibility and Sustainability Report (BRSR) of Swan Corp Limited ('Company') for FY 2025-26 along with Independent Reasonable Assurance Report provided by Dhir & Dhir Associates (collectively called 'BRSR'). The BRSR forms part of the Company's 118<sup>th</sup> Annual Report for the FY 2025-26.

The BRSR which forms part of the Annual Report is also available on the Company's website <https://www.swan.co.in/wp-content/uploads/2026/08/BRSR.pdf> and the website of National Securities Depository Limited at [www.evoting.nsdl.com](http://www.evoting.nsdl.com).

This is submitted pursuant to Regulation 34(2) and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with applicable SEBI Circulars, if any.

This is for your information and record.

Thanking You,

**For Swan Corp Limited**

**Saptarshi Ganguly**  
**Company Secretary**

Encl. as above

**SWAN CORP LIMITED** (Formerly Swan Energy Limited)

## Business Responsibility and Sustainability Report 2025-26

This Business Responsibility and Sustainability Report (BRSR) has been prepared in accordance with the format prescribed by the Securities and Exchange Board of India (SEBI) under Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended. The report covers disclosures for the financial year 2025-26 and reflects the Company's performance across the nine principles of the National Guidelines on Responsible Business Conduct (NGRBC).

For the purpose of this report, Swan Corp Limited, shall be hereinafter referred to as "Swan Corp" or "the Company". The data presented for previous years has been rationalized, wherever necessary, to improve consistency and comparability across reporting periods.

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity:

| 1.                                       | Corporate Identity Number (CIN) of the Listed Entity                                                                                                                                                                                                               | L17100MH1909PLC000294                                                                                                                                                                           |                      |            |             |        |                                          |          |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|------------|-------------|--------|------------------------------------------|----------|
| 2.                                       | Name of the Listed Entity                                                                                                                                                                                                                                          | Swan Corp Limited ( <i>formerly, Swan Energy Limited</i> )                                                                                                                                      |                      |            |             |        |                                          |          |
| 3.                                       | Year of Incorporation                                                                                                                                                                                                                                              | 22 <sup>nd</sup> February, 1909                                                                                                                                                                 |                      |            |             |        |                                          |          |
| 4.                                       | Registered Office address                                                                                                                                                                                                                                          | 6, Feltham House, 2 <sup>nd</sup> Floor, 10 J. N. Heredia Marg, Ballard Estate, Mumbai-400 001                                                                                                  |                      |            |             |        |                                          |          |
| 5.                                       | Corporate Office address                                                                                                                                                                                                                                           | 6, Feltham House, 2 <sup>nd</sup> Floor, 10 J. N. Heredia Marg, Ballard Estate, Mumbai-400 001                                                                                                  |                      |            |             |        |                                          |          |
| 6.                                       | E-mail                                                                                                                                                                                                                                                             | invgrv@swan.co.in                                                                                                                                                                               |                      |            |             |        |                                          |          |
| 7.                                       | Telephone                                                                                                                                                                                                                                                          | 022 - 40587300                                                                                                                                                                                  |                      |            |             |        |                                          |          |
| 8.                                       | Website                                                                                                                                                                                                                                                            | www.swan.co.in                                                                                                                                                                                  |                      |            |             |        |                                          |          |
| 9.                                       | Financial year for which reporting is being done                                                                                                                                                                                                                   | Previous Year: FY 2024-25<br>Current Year: FY 2025-26                                                                                                                                           |                      |            |             |        |                                          |          |
| 10.                                      | Name of the Stock Exchange(s) where shares are listed:                                                                                                                                                                                                             | <table><tr><th>Name of the Exchange</th><th>Stock Code</th></tr><tr><td>BSE Limited</td><td>503301</td></tr><tr><td>National Stock Exchange of India Limited</td><td>SWANCORP</td></tr></table> | Name of the Exchange | Stock Code | BSE Limited | 503301 | National Stock Exchange of India Limited | SWANCORP |
| Name of the Exchange                     | Stock Code                                                                                                                                                                                                                                                         |                                                                                                                                                                                                 |                      |            |             |        |                                          |          |
| BSE Limited                              | 503301                                                                                                                                                                                                                                                             |                                                                                                                                                                                                 |                      |            |             |        |                                          |          |
| National Stock Exchange of India Limited | SWANCORP                                                                                                                                                                                                                                                           |                                                                                                                                                                                                 |                      |            |             |        |                                          |          |
| 11.                                      | Paid Capital                                                                                                                                                                                                                                                       | ₹ 31,34,56,886/-                                                                                                                                                                                |                      |            |             |        |                                          |          |
| 12.                                      | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report.                                                                                                                                  | Name: Mr. Chetan Selarka, Whole-Time Director and Chief Financial Officer<br>Contact No: +91 22 4058 7300<br>Email ID: invgrv@swan.co.in                                                        |                      |            |             |        |                                          |          |
| 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). | The disclosures presented in this report are made on a standalone basis.                                                                                                                        |                      |            |             |        |                                          |          |

|                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14. Name of assurance or assessment provider | In line with the applicable provisions and guidance issued by the SEBI on the assurance of BRSR Core disclosures <sup>1</sup> , the Company has undertaken an independent assurance of select key performance indicators included in this report. The assurance engagement has been carried out by Dhir & Dhir Associates, an independent third-party firm. The scope, approach, and key observations of the assurance exercise are detailed in the assurance statement provided in this report.        |
| 15. Type of assurance or assessment obtained | The Company has obtained reasonable assurance on its BRSR Core disclosures, providing a high level of confidence in the accuracy and reliability of the reported information in accordance with the applicable guidelines prescribed by SEBI. The list of identified sustainability indicators covered under this assurance is detailed in the Independent Assurance Statement issued by Dhir & Dhir Associates and is also indicated in the footnotes to the respective indicators within this Report. |

## II. Products/Services:

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

| Sr. No. | Description of Main Activity                | Description of Business Activity | % of Turnover of the entity |
|---------|---------------------------------------------|----------------------------------|-----------------------------|
| 1.      | Construction                                | Construction                     | 4.25                        |
| 2.      | Spinning, weaving and finishing of textiles | Finishing of Textiles            | 95.75                       |

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

| Sr. No. | Product/Service                                            | NIC Code | % of Turnover contributed |
|---------|------------------------------------------------------------|----------|---------------------------|
| 1.      | Construction of residential and non-residential buildings. | 4100*    | 16.45                     |
| 2.      | Finishing of Textiles                                      | 1313     | 83.55                     |

\*As per National Industrial Classification (NIC) 2025.

## 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      | 1                | 1                 | 2     |
| International | 0                | 0                 | 0     |

### 19. Markets served by the entity:

#### a. Number of locations:

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States & UTs)   | 11     |
| International (No. of Countries) | 1      |

<sup>1</sup> SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dated 28<sup>th</sup> March, 2025

## SWAN CORP LIMITED

(formerly, Swan Energy Limited)

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

The contribution of exports to the total turnover of the entity during the reporting period is 1.90%.

### c. A brief on type of customers:

Swan Corp Limited caters to a diverse customer base spanning eleven states within India and one international market. As an integrated textile solutions provider, the Company offers an extensive portfolio of fabric finishes, comprising over 200 variants ranging from 100% cotton to blended fabrics such as polyester-cotton, linen, and viscose, available in both lycra and non-lycra forms. Backed by advanced dyeing and printing capabilities and a production capacity of 3 million meters per month, the Company is well-positioned to serve both domestic and international customers seeking high-quality, large-scale, and customised textile solutions.

## IV. Employees:

### 20. Details as at the end of Financial Year:

#### a. Employees and workers (including differently abled):

| Sr. No.   | Particulars                    | Total (A)  | Male       |              | Female    |              |
|-----------|--------------------------------|------------|------------|--------------|-----------|--------------|
|           |                                |            | No. (B)    | % (B / A)    | No. (C)   | % (C / A)    |
| EMPLOYEES |                                |            |            |              |           |              |
| 1.        | Permanent (D)                  | 158        | 140        | 88.61        | 18        | 11.39        |
| 2.        | Other than Permanent (E)       | 0          | 0          | 0.00         | 0         | 0.00         |
| 3.        | <b>Total employees (D + E)</b> | <b>158</b> | <b>140</b> | <b>88.61</b> | <b>18</b> | <b>11.39</b> |
| WORKERS   |                                |            |            |              |           |              |
| 4.        | Permanent (F)                  | 0          | 0          | 0.00         | 0         | 0.00         |
| 5.        | Other than Permanent (G)       | 258        | 250        | 96.90        | 8         | 3.10         |
| 6.        | <b>Total workers (F + G)</b>   | <b>258</b> | <b>250</b> | <b>96.90</b> | <b>8</b>  | <b>3.10</b>  |

#### b. Differently abled employees and workers:

| S. No.                      | Particulars                    | Total<br>(A) | Male     |             | Female   |             |
|-----------------------------|--------------------------------|--------------|----------|-------------|----------|-------------|
|                             |                                |              | No. (B)  | % (B/A)     | No. (C)  | % (C/A)     |
| DIFFERENTLY ABLED EMPLOYEES |                                |              |          |             |          |             |
| 1.                          | Permanent (D)                  | 0            | 0        | 0.00        | 0        | 0.00        |
| 2.                          | Other than Permanent (E)       | 0            | 0        | 0.00        | 0        | 0.00        |
| 3.                          | <b>Total employees (D + E)</b> | <b>0</b>     | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0.00</b> |
| DIFFERENTLY ABLED WORKERS   |                                |              |          |             |          |             |
| 4.                          | Permanent (F)                  | 0            | 0        | 0.00        | 0        | 0.00        |
| 5.                          | Other than Permanent (G)       | 0            | 0        | 0.00        | 0        | 0.00        |
| 6.                          | <b>Total workers (F + G)</b>   | <b>0</b>     | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0.00</b> |

### 21. Participation/Inclusion/Representation of women:

|                                                                  | Total (A) | No. and percentage of Females |           |
|------------------------------------------------------------------|-----------|-------------------------------|-----------|
|                                                                  |           | No. (B)                       | % (B / A) |
| Board of Directors                                               | 10*       | 1                             | 10.00     |
| Key Management Personnel<br>(as on 31 <sup>st</sup> March, 2026) | 5**       | 0                             | 0.00      |

\*Including Managing Director and three Whole-time Directors who are KMPs.

\*\*Comprising of Managing Director, three Whole-time Directors (including the Whole-time Director designated as Chief Financial Officer) and Company Secretary.

**22. Turnover rate for permanent employees and workers (in percent):**

|                     | FY 2025-26 |        |       | FY 2024-25 |        |       | FY 2023-24 |        |       |
|---------------------|------------|--------|-------|------------|--------|-------|------------|--------|-------|
|                     | Male       | Female | Total | Male       | Female | Total | Male       | Female | Total |
| Permanent Employees | 29.30      | 35.29  | 29.97 | 35.56      | 41.67  | 36.05 | 38.76      | 66.67  | 40.29 |
| Permanent Workers   | 0.00       | 0.00   | 0.00  | 0.00       | 0.00   | 0.00  | 0.00       | 0.00   | 0.00  |

**V. Holding, Subsidiary and Associate Companies (including joint ventures)****23. a. Names of holding/subsidiary/associate companies/joint ventures:**

| S. No. | Name of the holding/ subsidiary/ associate companies/ joint ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity                              | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? |
|--------|--------------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| 1.     | Swan LNG Private Limited                                                 | Subsidiary                                                     | 63.00                                                          | No                                                                                                                  |
| 2.     | Swan Mills Private Limited                                               | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 3.     | Veritas (India) Limited                                                  | Subsidiary                                                     | 55.01                                                          | Yes                                                                                                                 |
| 4.     | Triumph Offshore Private Limited                                         | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 5.     | Hazel Infra Limited                                                      | Subsidiary                                                     | 99.00                                                          | No                                                                                                                  |
| 6.     | Ignivis Trading FZE (formerly Wilson Corporation FZE)                    | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 7.     | Pegasus Ventures Private Limited                                         | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 8.     | Cardinal Energy and Infrastructure Private Limited                       | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 9.     | Swan Imagination Private Limited                                         | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 10.    | Agneyastra Innovations Private Limited                                   | Subsidiary                                                     | 60.00                                                          | No                                                                                                                  |
| 11.    | Swan Ignivis Private Limited                                             | Subsidiary                                                     | 100.00                                                         | No                                                                                                                  |
| 12.    | Swansat Private Limited                                                  | Step down Subsidiary                                           | 51% of the shares are held by Swan Imagination Private Limited | No                                                                                                                  |
| 13.    | Swan Balu Heavy Industries Private Limited                               | Subsidiary                                                     | 60.00                                                          | No                                                                                                                  |
| 14.    | Swan Defence and Heavy Industries Limited                                | Step down Subsidiary                                           | 89.90% of the shares are held by Hazel Infra Limited           | No                                                                                                                  |
| 15.    | Veritas Agro Ventures Private Limited                                    | Step down Subsidiary                                           | 100% of the shares are held by Veritas (India) Limited         | No                                                                                                                  |
| 16.    | Veritas Infra & Logistics Private Limited                                | Step down Subsidiary                                           | 100% of the shares are held by Veritas (India) Limited         | No                                                                                                                  |
| 17.    | Veritas Polychem Private Limited                                         | Step down Subsidiary                                           | 100% of the shares are held by Veritas (India) Limited         | No                                                                                                                  |

**VI. CSR Details:**

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

ii. Turnover (in Rs.) – ₹ 21,60117 Lakhs

iii. Net worth (in Rs.) – ₹ 4,59,404.52 Lakhs

**VII. Transparency and Disclosures Compliances:**
**25. Complaints/Grievance on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/ No)<br><br>(If Yes, then provide web-link for grievance redress policy)                                                                                                                                                                                                                                                   | FY 2025-26                                 |                                                              | FY 2024-25                                 |                                                              |
|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------------------------------------|--------------------------------------------|--------------------------------------------------------------|
|                                                   |                                                                                                                                                                                                                                                                                                                                                                        | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Number of complaints filed during the year | Number of complaints pending resolution at close of the year |
| Communities                                       | Yes, a structured grievance redressal mechanism is in place, allowing community members to submit their concerns through the designated portal available on the Company's official website ( <a href="https://swan.co.in/contact">https://swan.co.in/contact</a> )                                                                                                     | 0                                          | 0                                                            | 0                                          | 0                                                            |
| Investors (other than shareholders)               | Yes, the SEBI SCORES mechanism is effectively in place ( <a href="https://scores.sebi.gov.in">https://scores.sebi.gov.in</a> ). Additionally, investors may submit their grievances, complaints, and feedback through the online form available on the Company's official website ( <a href="https://swan.co.in/contact">https://swan.co.in/contact</a> )              | 0                                          | 0                                                            | 0                                          | 0                                                            |
| Shareholders                                      | Yes, the SEBI SCORES mechanism is effectively in place ( <a href="https://scores.sebi.gov.in">https://scores.sebi.gov.in</a> ). In addition, investors can submit their grievances, complaints, and feedback through the online form available on the Company's official website ( <a href="https://swan.co.in/contact">https://swan.co.in/contact</a> ).              | 3                                          | 0                                                            | 0                                          | 0                                                            |
| Employees and workers                             | Yes, the Company has proactively constituted a Grievance Redressal Committee comprising members from multiple departments. The Committee serves as a centralized and responsive forum for addressing and resolving a wide range of employee and worker concerns, thereby reinforcing the Company's commitment to a fair, transparent, and supportive work environment. | 0                                          | 0                                                            | 0                                          | 0                                                            |

|                      |                                                                                                                                                                                                                                                                                                                                                               |    |   |                                                                                                                       |    |   |                                                                                                                       |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|---|-----------------------------------------------------------------------------------------------------------------------|----|---|-----------------------------------------------------------------------------------------------------------------------|
| Customers            | Yes, the Company has established a formal grievance redressal mechanism to enhance customer satisfaction. Customers can submit their complaints and feedback through a dedicated email (sales@swan.co.in) as well as via the online form available on the Company's official website ( <a href="https://swan.co.in/contact">https://swan.co.in/contact</a> ). | 38 | 0 | Complaints were majority with respect to the quality of the product and were resolved within the estimated timelines. | 31 | 0 | Complaints were majority with respect to the quality of the product and were resolved within the estimated timelines. |
| Value Chain Partners | Yes, the Company has an established grievance redressal mechanism.<br>Web link: <a href="http://www.swan.co.in">www.swan.co.in</a>                                                                                                                                                                                                                            | 0  | 0 | NA                                                                                                                    | 0  | 0 | NA                                                                                                                    |

## 26. Overview of the entity's material responsible business conduct 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<sup>2</sup>

| Sr. No. | Material issue identified           | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity                                                                                                                                                                                                                                                                                                                                                                                                                                            | In case of risk, approach to adapt or mitigate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---------|-------------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 1       | Management of Chemicals in Products | Risk                                       | The Company's textile operations involve finishing fabrics such as cotton, blends, linen, viscose, and Lycra, which require the use of dyes, bleaches, softeners, and other chemicals. Some of these substance are strictly regulated due to potential impacts on human health and the environment, including carcinogenic effects or hormone disruption. Exceeding permissible limits can result in non-compliance, recalls, litigation, reputational damage, and loss of market access. | The Company addresses risks from regulated chemicals in textile finishing by adhering to globally recognized standards such as OEKO-TEX Standard 100, GOTS, OCS, and GRS, ensuring that dyes, bleaches, and softeners meet stringent health and environmental requirements. It emphasizes the use of eco-friendly and certified chemicals, supported by robust testing and quality assurance through NABL-accredited labs. Safe storage, handling, and disposal practices are enforced, alongside employee training on chemical history. | Negative.<br><br>*There has been no negative impact in the reporting period of FY 2025-26.     |

<sup>2</sup> Material issues identified are referred from the Sustainability Accounting Standards Board (SASB) 2023-24 version. SASB Standards are maintained and enhanced by the International Sustainability Standards Board (ISSB). This follows the SASB's merger with the International Integrated Reporting Council (IIRC) into the Value Reporting Foundation (VRF) and subsequent consolidation into the IFRS® Foundation in 2022. The latest standards have been accessed at <https://sasb.ifrs.org/> on 28<sup>th</sup> April, 2026 at 16:42 IST

| Sr. No. | Material Issue identified                 | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | In case of risk, approach to adapt or mitigate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Financial implications of the risk or opportunity (Indicate positive or negative implications)    |
|---------|-------------------------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 2       | Environmental Impacts in the Supply Chain | Risk                                       | <p>The Company's textile operations involve processes such as dyeing, bleaching, and finishing, which are water-intensive and can contribute to water and air pollution if not managed responsibly. In addition, these operations generate solid and hazardous waste that requires proper handling and disposal to prevent environmental harm. Discharge of untreated effluents, emissions from in-house manufacturing activities, and improper waste management can result in significant environmental damage, regulatory penalties, reputational loss, and operational restrictions. These risks are heightened by evolving environmental regulations and growing stakeholder expectations for sustainable operations within the Company's own facilities. Strengthening environmental management systems, investing in cleaner technologies, and ensuring effective waste management practices are therefore essential to reducing the Company's direct environment footprint.</p>                                                                                                                                                                                                                                                                                                                   | <p>The Company mitigates risks from water intensive dyeing, bleaching, and finishing through advanced Effluent Treatment Plants (ETPs) and robust environmental systems. At the Ahmedabad unit, a structured multistage process ensures responsible waste water management: effluents undergo clarification, aeration, biological treatment, and polishing through sand and carbon filters before safe discharge to CETP NTIEM. Sludge is dried, packed, and disposed of at a licensed TSDF facility. To address air emissions, the Company has installed ESP modifications, water scrubbers, and Continuous Emission Monitoring Systems (CEMS). These measures strengthen compliance with evolving environmental regulations, minimize pollution risks, and reinforce stakeholder confidence in sustainable operations.</p> | <p>Negative.</p> <p>*There has been no negative impact in the reporting period of FY 2025-26.</p> |
| 3       | Labour Conditions in the Supply Chain     | Risk                                       | <p>This issue is material due to its potential to expose the Company to significant reputational, regulatory, and operational risks. The Company's operations depend on a diverse workforce, including employees and on-site workers, whose health, safety, and overall wellbeing are critical to maintaining productivity, morale, and business continuity. Risks arise from potential labour rights violations, workplace hazards, inadequate safety measures, high-stress environments, and insufficient health support systems.</p> <p>Heightened scrutiny from consumers, investors, and regulators has increased the likelihood of adverse consequences, including legal penalties, supply chain disruptions due to strikes or non-compliance, and loss of market trust. Additionally, evolving labour regulations and enforcement mechanisms may increase compliance costs. Neglecting employee health, safety, and wellbeing can lead to increased absenteeism, reduced efficiency, higher attrition, and potential legal or regulatory repercussions. Any association with unethical labour practices or poor working conditions may adversely impact workplace culture, brand value, customer loyalty, and the Company's long-term financial performance, while eroding stakeholder trust.</p> | <p>The Company mitigates labour-related risks by promoting fair employment practices and ensuring compliance with applicable labour laws across its operations. It provides a safe and healthy work environment through regular safety training, welfare initiatives, and grievance redressal mechanisms. Contractors and on-site workers are expected to comply with the Company's health, safety, and ethical standards. Periodic monitoring and engagement with contractors help strengthen adherence to labour and human rights requirements and support responsible workforce management across the value chain.</p>                                                                                                                                                                                                    | <p>Negative.</p> <p>There has been no negative impact in the reporting period of FY 2025-26.</p>  |



| Sr. No. | Material Issue identified             | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | In case of risk, approach to adapt or mitigate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---------|---------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 4       | Employee Safety and Well Being        | Risk                                       | The Company's operations depend on a diverse workforce, including employees and on-site workers, whose health, safety, and overall wellbeing are critical to maintaining productivity and morale. Risks arise from potential workplace hazards, inadequate safety measures, high-stress environments, and insufficient health support systems. Neglecting these aspects can result in increased absenteeism, reduced efficiency, higher attrition, and potential legal or regulatory repercussions. Moreover, poor employee wellbeing can impact workplace culture, damage the company's reputation, and erode stakeholder trust.                                               | The Company mitigates risks to workforce health, safety, and wellbeing through a structured occupational health and safety framework. It ensures safe premises, equipment, and systems across all operations, supported by regular monitoring and compliance with statutory requirements. Employees and on-site workers undergo periodic safety trainings to strengthen awareness and preparedness. The Company also promotes wellbeing through healthcare initiatives, welfare measures, and a formal grievance redressal mechanism to address workplace concerns.                                                            | Negative.<br><br>*There has been no negative impact in the reporting period of FY 2025-26.     |
| 5       | Raw Materials Sourcing                | Risk                                       | This issue is material due to its direct implications on operations, cost structures, and financial performance. Limited supply chain transparency and dependence on geographically dispersed sourcing networks increase the Company's exposure to risks such as material shortages, supply disruptions, and price volatility. Additionally, stakeholder expectations around responsible sourcing are rising, and failure to address environmental and social concerns linked to raw material extraction can lead to reputational damage. These factors may result in delayed shipments, margin pressures, constrained revenue growth, and potentially higher costs of capital. | The Company mitigates raw material sourcing risks by maintaining a diversified supplier base and procuring materials from approved vendors that meet its quality and compliance requirements. Supplier performance is monitored on a periodic basis, and procurement practices emphasize reliability, timely availability, and adherence to applicable environmental and social standards. The Company also maintains appropriate inventory planning and supplier engagement to minimize the impact of supply disruptions and price volatility.                                                                                | Negative.<br><br>There has been no negative impact in the reporting period of FY 2025-26.      |
| 6       | Regulatory Compliance                 | Risk                                       | Regulatory compliance poses a significant risk due to the extensive and evolving framework of laws governing environmental protection, labour rights, chemical usage, and product safety. Non-compliance can lead to legal penalties, operational disruptions, and reputational damage, especially given the increasing scrutiny on pollution control, waste management, and ethical sourcing. Failure to meet legal requirements can not only restrict market access but also erode trust among customers, investors, and global supply chain partners.                                                                                                                        | The Company mitigates regulatory compliance risks through a comprehensive compliance management framework that is regularly updated to align with evolving laws. Statutory registers, returns, and records are maintained in accordance with applicable Acts, and compliance is further reinforced through board-level oversight. Employee training and internal reviews strengthen awareness of regulatory obligations, while external audits and certifications such as ISO and OEKO-TEX validate adherence. This structured approach minimizes legal, operational, and reputational risks while ensuring stakeholder trust. | Negative.<br><br>There has been no negative impact in the reporting period of FY 2025-26.      |
| 7       | Corporate Social Responsibility (CSR) | Opportunity                                | CSR presents a significant opportunity for the company to enhance its brand value, foster stronger relationships with stakeholders, and contribute to long-term business sustainability. By channelling efforts towards initiatives that benefit underprivileged sections of society, the company not only creates a positive social impact but also reinforces its commitment to responsible business practices. As part of its CSR strategy, the company places a special focus on child education, supporting programs that provide children with access to quality learning resources, improve educational infrastructure, and promote holistic development.                | NA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Positive                                                                                       |

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

| Disclosure Questions                                                                                                  | P1                                                                                                                                                                                                                       | P2                                                                                                                                                                                                                                                  | P3                                    | P4  | P5  | P6  | P7  | P8  | P9  |
|-----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-----|-----|-----|-----|-----|-----|
| <b>Policy and Management Processes</b>                                                                                |                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                     |                                       |     |     |     |     |     |     |
| <b>1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b> | Yes                                                                                                                                                                                                                      | Yes                                                                                                                                                                                                                                                 | Yes                                   | Yes | Yes | Yes | Yes | Yes | Yes |
| <b>b. Has the policy been approved by the Board? (Yes/No)</b>                                                         | Yes                                                                                                                                                                                                                      | Yes                                                                                                                                                                                                                                                 | Yes                                   | Yes | Yes | Yes | Yes | Yes | Yes |
| <b>c. Web Link of the Policies, if available</b>                                                                      | Yes. All the policies specified below this section are available on the Company's official website.: <a href="https://www.swan.co.in/investor-category/policies/">https://www.swan.co.in/investor-category/policies/</a> |                                                                                                                                                                                                                                                     |                                       |     |     |     |     |     |     |
| Sr. No.                                                                                                               | Name of Policy                                                                                                                                                                                                           | Link to Policy                                                                                                                                                                                                                                      | Which Principle Each Policy Goes Into |     |     |     |     |     |     |
| 1.                                                                                                                    | Insider Trading - Code of Conduct                                                                                                                                                                                        | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Code-for-Insider-Trading_SEL.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Code-for-Insider-Trading_SEL.pdf</a>                                                                 | P1                                    |     |     |     |     |     |     |
| 2.                                                                                                                    | Familiarization Program for Independent Directors                                                                                                                                                                        | <a href="https://www.swan.co.in/wp-content/uploads/2026/04/Familiarisation-programme-for-Independent-Directors-25-26.pdf">https://www.swan.co.in/wp-content/uploads/2026/04/Familiarisation-programme-for-Independent-Directors-25-26.pdf</a>       | P1                                    |     |     |     |     |     |     |
| 3.                                                                                                                    | Terms and Conditions for Appointment of Independent Directors                                                                                                                                                            | <a href="https://www.swan.co.in/wp-content/uploads/2026/04/Terms-and-Conditions-of-Appointment-of-Independent-Directors.pdf">https://www.swan.co.in/wp-content/uploads/2026/04/Terms-and-Conditions-of-Appointment-of-Independent-Directors.pdf</a> | P1                                    |     |     |     |     |     |     |
| 4.                                                                                                                    | Board Evaluation Policy                                                                                                                                                                                                  | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Board-Evaluation-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Board-Evaluation-Policy.pdf</a>                                                                           | P1                                    |     |     |     |     |     |     |
| 5.                                                                                                                    | Dividend Distribution Policy                                                                                                                                                                                             | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Dividend-Distribution-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Dividend-Distribution-Policy.pdf</a>                                                                 | P1, P4                                |     |     |     |     |     |     |
| 6.                                                                                                                    | Policy for Determining Material Subsidiaries                                                                                                                                                                             | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Policy-for-Determining-Material-Subsidiaries.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Policy-for-Determining-Material-Subsidiaries.pdf</a>                                 | P1                                    |     |     |     |     |     |     |
| 7.                                                                                                                    | Code of Conduct and Business Ethics (for Employees including Senior Manager)                                                                                                                                             | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Code-of-Conduct-Employees-including-Senior-Manager.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Code-of-Conduct-Employees-including-Senior-Manager.pdf</a>                     | P1, P3                                |     |     |     |     |     |     |
| 8.                                                                                                                    | Policy on Preservation and Archival of Documents                                                                                                                                                                         | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/preservation-of-documents-and-archival-policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/preservation-of-documents-and-archival-policy.pdf</a>                               | P1                                    |     |     |     |     |     |     |
| 9.                                                                                                                    | EHS Policy                                                                                                                                                                                                               | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/EHS-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/EHS-Policy.pdf</a>                                                                                                     | P2, P3, P6                            |     |     |     |     |     |     |
| 10.                                                                                                                   | CSR Annual Action Plan                                                                                                                                                                                                   | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/CSR-Annual-Action-Plan.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/CSR-Annual-Action-Plan.pdf</a>                                                                             | P8                                    |     |     |     |     |     |     |

| Sr. No. | Name of Policy                                                   | Link to Policy                                                                                                                                                                                                        | Which Principle Each Policy Goes Into |
|---------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| 11.     | Code of Conduct and Business Ethics – Directors                  | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Code-of-Conduct-and-Business-Ethics_Directors.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Code-of-Conduct-and-Business-Ethics_Directors.pdf</a> | P1, P3                                |
| 12.     | Policy for Legitimate Purpose                                    | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Policy-for-Legitimate-Purpose.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Policy-for-Legitimate-Purpose.pdf</a>                                 | P1                                    |
| 13.     | Code for Fair Disclosure of UPSI                                 | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Code-for-fair-disclosure-of-UPSI_SEL.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Code-for-fair-disclosure-of-UPSI_SEL.pdf</a>                   | P1                                    |
| 14.     | Equal Opportunity Policy                                         | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Equal-Opportunity-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Equal-Opportunity-Policy.pdf</a>                                           | P3, P5                                |
| 15.     | Nomination and Remuneration Policy                               | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Nomination-and-Remuneration-policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Nomination-and-Remuneration-policy.pdf</a>                       | P1, P5                                |
| 16.     | Risk Management Policy                                           | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Risk-management-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Risk-management-Policy.pdf</a>                                               | P1, P2                                |
| 17.     | Related Party Transaction Policy                                 | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Related-Party-Transaction-Policy_SEL-1.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Related-Party-Transaction-Policy_SEL-1.pdf</a>               | P1, P7                                |
| 18.     | Swan Whistle Blower Policy                                       | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Whistle-blower-policy_SWAN.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Whistle-blower-policy_SWAN.pdf</a>                                       | P1, P5                                |
| 19.     | Corporate Social Responsibility Policy                           | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/Corporate-Social-Responsibility-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/Corporate-Social-Responsibility-Policy.pdf</a>               | P8                                    |
| 20.     | Policy for Determination of Materiality of Events or Information | <a href="https://www.swan.co.in/wp-content/uploads/2025/12/SEL-Materiality-of-events.pdf">https://www.swan.co.in/wp-content/uploads/2025/12/SEL-Materiality-of-events.pdf</a>                                         | P1, P7                                |
| 21.     | Anti-Bribery Anti-Corruption Policy                              | <a href="https://www.swan.co.in/wp-content/uploads/2026/07/Anti-Bribery-and-Corruption-Policy.pdf">https://www.swan.co.in/wp-content/uploads/2026/07/Anti-Bribery-and-Corruption-Policy.pdf</a>                       | P1, P2                                |
| 22.     | Swan Quality Policy                                              | Available internally                                                                                                                                                                                                  | P2                                    |
| 23.     | Social Media Policy                                              | Available internally                                                                                                                                                                                                  | P1, P9                                |
| 24.     | Leave Policy                                                     | Available internally                                                                                                                                                                                                  | P3                                    |
| 25.     | Working Hours and Attendance Policy                              | Available internally                                                                                                                                                                                                  | P3                                    |
| 26.     | Prevention of Sexual Harassment at Workplace Policy              | Available internally                                                                                                                                                                                                  | P1, P3                                |
| 27.     | Code of Business Conduct                                         | Available internally                                                                                                                                                                                                  | P1, P2, P3                            |

|                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |     |     |     |     |     |     |     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|
| <b>2. Whether the entity has translated the policy into procedures. (Yes / No)</b>                                                                                                                                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| <b>3. Do the enlisted policies extend to your value chain partners? (Yes/No)</b>                                                                                                                                                                                   | No, only certain policies extend to the Company's value chain partners. These include policies relating to anti-bribery and anti-corruption, prevention of insider trading, the vigil mechanism/whistle blower framework, child labour, conflict of interest, ethics, and the determination of legitimate purpose.                                                                                                                                                                                                                                                                                                                                                                            |     |     |     |     |     |     |     |     |
| <b>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.</b> | <p>Swan Corp Limited has enhanced its facilities and operational systems through the adoption and integration of globally recognized standards, including:</p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 - Quality Management System – P2, P6</li> <li>2. OEKO-TEX-Standard 100.– P2, P6, P9</li> <li>3. Global Organic Textile Standard (GOTS) and Organic Content Standard (OCS). – P2, P6, P8</li> <li>4. Global Recycled Standard (GRS). – P2, P6, P8</li> </ol> <p>These frameworks collectively strengthen the Company's commitment to quality management, responsible sourcing, environmental stewardship, and customer-focused sustainable practices.</p>               |     |     |     |     |     |     |     |     |
| <b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</b>                                                                                                                                                                | Swan Corp Limited aims to lead in sustainable innovation by creating impactful solutions that support a more resilient and prosperous future. Its vision is anchored in a deep commitment to environmental responsibility, with a strong focus on lowering greenhouse gas emissions. By actively responding to the challenges posed by climate change, the Company endeavours to drive meaningful environmental progress and establish itself as a reliable partner in advancing global sustainability objectives.                                                                                                                                                                            |     |     |     |     |     |     |     |     |
| <b>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b>                                                                                                                           | <p>To progress toward its sustainability objectives, the Company has undertaken several targeted initiatives focused on emission reduction and resource conservation:</p> <ol style="list-style-type: none"> <li>1. Heat exchangers and improved insulation systems have been installed, resulting in a 10%–15% reduction in heat emissions.</li> <li>2. Carbon filter accessories have been fitted at the exhaust outlets of diesel generator sets, contributing to an approximate 15% reduction in carbon emissions.</li> <li>3. A condensate recovery system has been implemented to recycle condensed water back into the boiler, enabling a 5% reduction in coal consumption.</li> </ol> |     |     |     |     |     |     |     |     |

## GOVERNANCE, LEADERSHIP, AND OVERSIGHT

### 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.

Swan Corp remains steadfast in its commitment to Environmental, Social, and Governance (ESG) principles through a comprehensive approach that integrates sustainability into every facet of our operations. Our efforts span across water conservation, energy efficiency, waste reduction, and the mitigation of greenhouse gas (GHG) emissions. A major milestone in our environmental journey has been the shift from coal to agro-waste, specifically, De-Oiled Castor Cake (DOC), as a cleaner fuel alternative for our boilers. This transition has not only curtailed the release of hazardous gases but has also substantially reduced ash generation. To further advance emission control, we have implemented mechanical ash collectors and electrostatic precipitators (ESP), along with heat exchangers and high-grade insulation to lower heat emissions. Carbon filters installed on D.G. set exhausts have contributed to notable reductions in carbon output. In our pursuit of energy conservation, we have transitioned to energy-efficient LED lighting and upgraded conventional electrical systems to more sustainable technologies. On the social responsibility front, our CSR initiatives are centered on uplifting marginalized communities by enhancing access to healthcare, education, and basic amenities. These ongoing efforts reinforce our dual focus, tackling ESG challenges while fostering an inclusive and sustainable future for all.

Mr. Paresh Merchant, Whole-Time Director

|                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b>                                               | Mr. Paresh Merchant<br>Whole-time Director<br>DIN: 00660027                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>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.</b> | <p>Yes, the Management Committee of the Board of Directors holds a pivotal role in guiding Swan Corp's sustainability agenda. Tasked with making strategic decisions on environmental and social matters, the committee ensures that all initiatives are aligned with the company's overarching vision of responsible and inclusive growth.</p> <p>It actively shapes the sustainability roadmap by supervising project implementation and tracking impact, ensuring that every action taken contributes to community welfare and environmental preservation. Through its leadership, the committee upholds the Company's dedication to creating long-term value for both society and the planet.</p> |

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

| Subject for Review                                                                                               | Indicate whether review was under taken by Director / Committee of the Board/ Any other Committee | Frequency<br>(Annually/ Half yearly/ Quarterly/ Any other – please specify)                                                                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                  |                                                                                                   |                                                                                                                                                                                                                                                                                       |
| Performance against above policies and follow-up action                                                          | <p>P1 P2 P3 P4 P5 P6 P7 P8 P9</p>                                                                 | <p>The Board of Directors reviews the Company's performance in relation to the aforementioned policies on an annual basis. These periodic assessments help ensure ongoing alignment with the Company's governance framework, policy objectives, and overall strategic priorities.</p> |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | <p>P1 P2 P3 P4 P5 P6 P7 P8 P9</p>                                                                 | <p>There have been no instances of non-compliance reported. The Company undertakes compliance reviews on a quarterly basis and maintains a structured monitoring mechanism to ensure timely adherence to all applicable regulatory and statutory requirements.</p>                    |

|                                                                                                                                                                       | P 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|
| 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. | Adhita Advisors has evaluated the operationalization and effectiveness of the Company’s policies, with a specific focus on their practical implementation and outcomes. In addition, departmental heads and business leaders conduct periodic reviews to assess policy relevance and effectiveness. Any revisions or updates are subject to approval by the management and/or the Board, as applicable. While internal audits examine processes and compliance adherence, regulatory compliance is also reviewed by external authorities, where applicable. This multi-layered governance framework ensures that the Company’s policies remain effective, current, and aligned with both internal standards and external regulatory requirements. |     |     |     |     |     |     |     |     |

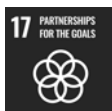
**12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:**

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

Not Available

## 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.**



*Guided by Principle 1, Swan Corp Limited views integrity not as a compliance checklist, but as our primary license to operate. We remain committed to a 'zero-tolerance' policy towards unethical practices, ensuring every decision is filtered through the lens of transparency. The Company ensures compliance through a detailed approach towards four core components viz. Integrity, Ethics, Transparency and Accountability. Besides consistency in actions, values, methods, and principles being the corner stones, going beyond mere legal compliance to ensure that business decisions do not harm stakeholders or the environment remains the main focus area. The Company continues to take ownership of the consequences of business actions and ensures that all stakeholders have access to relevant information regarding the company's operations and impact.*

## 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                 | 6                                                      | Briefings were conducted on the Annual Accounts for FY 2024-25, Audited Financial Results, CSR Annual Action Plan for FY 2025-26, amendments to the SEBI (LODR) Regulations and SEBI (PIT) Regulations, Cost Audit Report, and digitization initiatives. These programmes enhanced the Board's understanding of financial reporting, regulatory developments, corporate governance, CSR implementation, compliance requirements, and technology-driven business initiatives, enabling and supporting informed decision-making and effective oversight.                                                                                                                                                                                                                                                                                                                                      | 100.00                                                                       |
| Key Managerial Personnel           | 6                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 100.00                                                                       |
| Employees other than BoD and KMPs* | 38                                                     | During FY25-26, the Company conducted a range of training and capacity-building programmes for employees and workers to enhance technical competencies, strengthen compliance, reinforce workplace safety, and promote operational excellence. Key training programmes covered ZDHC MRS� (Zero Discharge of Hazardous Chemicals – Manufacturing Restricted Substances List) Awareness, Hohenstein Global Sustainability Conference, General Process Knowledge, Dyeing Process Knowledge, Pre-Finishing Process Knowledge, Behaviour and Attitude Development, Housekeeping and Cleanliness, Security Awareness, Safety and Health, Fire and Safety, Risk Management, GOTS (Global Organic Textile Standard) Compliance, General Awareness of ISO 9001:2015, Fabric Checking, Job Card Maintenance, Loading and Unloading of Materials, Communication Skills, Waste Handling and Management. | 7.68                                                                         |
| Workers*                           | 38                                                     | These programmes were designed to strengthen employees' technical capabilities, improve process efficiency and product quality, reinforce health, safety and environmental practices, and ensure adherence to applicable quality and sustainability standards across operations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4.14                                                                         |

\*the percentages reflected above are calculated as an average of the attendees from all the training sessions.

**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 (basis the materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):**

| MONETARY        |                 |                                                                     |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                        |
|-----------------|-----------------|---------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
|                 | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Amount (in INR) | Brief of the Case                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Has an appeal been preferred? (Yes/No) |
| Penalty/Fine    | P1              | National Stock Exchange of India Limited                            | ₹6,82,040/-     | The National Stock Exchange of India Limited (NSE) imposed fines on the Company for the quarters ended June 2025 and September 2025 due to non-compliance with certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The non-compliances related to Regulation 17(1), concerning the absence of an Independent Woman Director on the Board, and Regulation 6, concerning the non-appointment of a qualified Company Secretary as the Compliance Officer. The Company has since taken the necessary corrective measures to ensure compliance with the aforesaid regulations. | No                                     |
|                 | P1              | BSE Limited                                                         | ₹6,82,040/-     | The BSE Limited (BSE) imposed fines on the Company for the quarters ended June 2025 and September 2025 due to non-compliance with certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The non-compliances related to Regulation 17(1), concerning the absence of an Independent Woman Director on the Board, and Regulation 6, concerning the non-appointment of a qualified Company Secretary as the Compliance Officer. The Company has since taken the necessary corrective measures to ensure compliance with the aforesaid regulations.                              | No                                     |
| NON-MONETARY    |                 |                                                                     |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                        |
| Settlement      |                 |                                                                     |                 | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                        |
| Compounding Fee |                 |                                                                     |                 | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                        |
| Imprisonment    |                 |                                                                     |                 | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                        |
| Punishment      |                 |                                                                     |                 | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                        |



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

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

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.

The Company has adopted a formal Anti-Corruption and Anti-Bribery Policy, which outlines its commitment to conducting business with integrity, transparency, and in compliance with applicable laws and regulations. The policy is available on the Company's website and can be accessed at: <https://www.swan.co.in/wp-content/uploads/2026/07/Anti-Bribery-and-Corruption-Policy.pdf>

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

|           | FY 2025-26 | FY 2024-25 |
|-----------|------------|------------|
| Directors | 0          | 0          |
| KMPs      | 0          | 0          |
| Employees | 0          | 0          |
| Workers   | 0          | 0          |

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

|                                                                                              | 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 | 0          | NA      | 0          | NA      |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | 0          | NA      | 0          | NA      |

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

No complaints pertaining to corruption or conflicts of interest were received against any Director or Key Managerial Personnel during the reporting period.

8. Number of days of accounts payables [(Accounts payable \*365) / Cost of goods/services procured]] in the following format<sup>3</sup>:

|                                     | FY 2025-26 | FY 2024-25 |
|-------------------------------------|------------|------------|
| Number of days of accounts payables | 99         | 204        |

*The increase in FY 2024-25 was mainly due to a substantial reduction in the cost of goods.*

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

<sup>3</sup> The above calculations are in accordance with Part B, Attribute 9 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

**9. Open-ness of Business**

**Provide details of concentration of purchases and sales with trading houses, dealers and related parties along-with loans and advances & investments, with related parties, in the following format<sup>4</sup> :**

| Parameter                  | Metrics                                                                                | FY 2025-26 | FY 2024-25 |
|----------------------------|----------------------------------------------------------------------------------------|------------|------------|
| Concentration of Purchases | a. Purchases from Trading houses as % of total purchases                               | 92.70      | 72.62      |
|                            | b. Number of trading houses where purchases and made from                              | 189        | 188        |
|                            | c. Purchases from top 10 trading houses as % of total purchases from trading houses    | 88.45      | 76.45      |
| Concentration of Sales     | a. Sales to dealers/distributors as % of total sales                                   | 0.00       | 0.00       |
|                            | b. Number of dealers/distributors to whom sales are made                               | 0          | 0          |
|                            | c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors    | 0.00       | 0.00       |
| Share of RTPs in           | a. Purchases (Purchases with related parties/Total Purchases)                          | 0.00       | 0.00       |
|                            | b. Sales (Sales to related parties/Total Sales)                                        | 0.03       | 6.62       |
|                            | c. Loans & advances (Loans & advances given to related parties/Total loans & advances) | 99.96      | 94.51      |
|                            | d. Investments (Investments in related parties/Total Investments made)                 | 0.06       | 25.84*     |

*\*The investment data has been revised from previous year's published BRSR report to reflect the impact of intra-group corporate restructuring.*

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

**Leadership Indicators**
**1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:**

| Total number of awareness programmes held | Topic/principles covered under the training | %age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|-------------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
|-------------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------|

The Company has not conducted any awareness programmes for its value chain partners during the reporting period. However, the need for such initiatives will be assessed and undertaken in the future, as deemed appropriate.

**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 put in place a comprehensive Code of Conduct for its Board of Directors and senior management, providing clear directives for identifying, disclosing, and avoiding any actual or potential conflicts of interest. To reinforce this framework, annual declarations are collected from the Board and senior management detailing their interests in other entities. This practice ensures that any proposed transactions with such entities receive the necessary approvals in line with applicable legal requirements. Moreover, the Company has formulated a dedicated Policy on Material Related Party Transactions aimed at proactively addressing and mitigating potential conflicts of interest. This policy safeguards transparency and maintains stakeholder trust by ensuring such transactions are handled with due diligence and oversight.

<sup>4</sup> The above calculations are in accordance with Part B, Attribute 9 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122

The policy is publicly accessible at: <https://www.swan.co.in/investor-category/policies/>

**Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.**



At Swan Corp Limited, we acknowledge that the planetary resources are finite and recognize, inter-alia, Resource Efficiency, Circular Economy and Safety Assessments as some of the major impact areas. Guided by the said principles, we have transitioned to a circular model by optimizing our energy intensity and increasing our waste recycling rates, we aren't just lowering costs - we are de-linking our growth from environmental degradation. Safety being a state of mind, we conduct safety assessments wherever practicable and deemed necessary. This ensures that our growth does not come at the cost of consumer well-being or environmental health.

**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.**

|                | FY 2025-26 | FY 2024-25 | Details of Improvements in environmental and social impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------|------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>R&amp;D</b> | 0.00       | 0.00       | Not Applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>CapEx</b>   | 100.00     | 100.00     | Upgraded the air pollution control system through the modification of the Electrostatic Precipitator (ESP) and installation of a water scrubber to further reduce air emissions. Implemented a Continuous Emission Monitoring System (CEMS) for real-time monitoring of air emissions. Enhanced energy efficiency by installing a root blower in the Effluent Treatment Plant (ETP) and a new submersible pump with a variable frequency drive (VFD) on the tube well to optimize operations and reduce electricity consumption. |

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

No, the Company has no procedures in place for sustainable sourcing.

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

Not Applicable

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.**

Given the nature of the Company's products, there is no requirement for reclamation, recycling, or disposal at the end of their lifecycle across categories such as e-waste, hazardous waste, plastic (including packaging), and other waste. Accordingly, the Company has not established specific processes for end-of-life product recovery, recycling, or safe disposal for these categories.

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(formerly, Swan Energy Limited)

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.**

No, Extended Producer Responsibility (EPR) is not applicable to the Company's activities.

### Leadership Indicators

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

| NIC Code | Name of Product/Service | % of total Turnover Contributed | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency | NIC Code |
|----------|-------------------------|---------------------------------|--------------------------------------------------------------------------|--------------------------------------------------|----------|
|----------|-------------------------|---------------------------------|--------------------------------------------------------------------------|--------------------------------------------------|----------|

Currently, the Company has not undertaken any Life Cycle Assessment (LCA). However, the Company is evaluating the integration of LCA into its sustainability and environmental management initiatives, to be implemented in the future, as deemed appropriate.

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 |
|--------------------------|----------------------------------|--------------|
| Not Applicable           |                                  |              |

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

| Indicate input material | Recycled or re-used input material to total material |            |
|-------------------------|------------------------------------------------------|------------|
|                         | FY 2025-26                                           | FY 2024-25 |
| Water (KL)              | 21.23                                                | 24.26      |

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

|                               | FY 2025-26     |          |                 | FY 2024-25     |          |                 |
|-------------------------------|----------------|----------|-----------------|----------------|----------|-----------------|
|                               | Re-Used        | Recycled | Safely Disposed | Re-Used        | Recycled | Safely Disposed |
| Plastic (including packaging) | Not Applicable |          |                 | Not Applicable |          |                 |
| 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 percentage of products sold) for each product category |
|---------------------------|-------------------------------------------------------------------------------------------------------------|
| Not Applicable            |                                                                                                             |

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



Swan Corp Limited is committed to fostering a safe, inclusive, and empowering work environment. This commitment ensures that human dignity and safety are upheld across all operations. Our approach in this regard is grounded in the belief that our people are our greatest asset. The Company has implemented comprehensive policies covering Occupational Health and Safety (OHS), Human Rights, and Employee Benefits. We ensure that prevailing industry standards are met by regular audits, inclusion i.e. maintaining a non-discriminatory workplace, value chain extension thereby progressively extending our 'Safety First' culture to our contractual workforce through mandatory safety training and compliance checks and by way of operating a robust whistle-blower and grievance mechanism where employees can report concerns related to work conditions without fear of retaliation.

#### Essential Indicators

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

| Total (A)                      |            | % of employees covered by |               |                    |               |                    |               |                    |               |                     |             |
|--------------------------------|------------|---------------------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|---------------|---------------------|-------------|
|                                |            | 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                           | 140        | 140                       | 100.00        | 140                | 100.00        | 0                  | 0.00          | 140                | 100.00        | 0                   | 0.00        |
| Female*                        | 18         | 18                        | 100.00        | 18                 | 100.00        | 18                 | 100.00        | 0                  | 0.00          | 0                   | 0.00        |
| <b>Total</b>                   | <b>158</b> | <b>158</b>                | <b>100.00</b> | <b>158</b>         | <b>100.00</b> | <b>18</b>          | <b>100.00</b> | <b>140</b>         | <b>100.00</b> | <b>0</b>            | <b>0.00</b> |
| Other than Permanent Employees |            |                           |               |                    |               |                    |               |                    |               |                     |             |
| Male                           | 0          | 0                         | 0.00          | 0                  | 0.00          | 0                  | 0.00          | 0                  | 0.00          | 0                   | 0.00        |
| Female*                        | 0          | 0                         | 0.00          | 0                  | 0.00          | 0                  | 0.00          | 0                  | 0.00          | 0                   | 0.00        |
| <b>Total</b>                   | <b>0</b>   | <b>0</b>                  | <b>0.00</b>   | <b>0</b>           | <b>0.00</b>   | <b>0</b>           | <b>0.00</b>   | <b>0</b>           | <b>0.00</b>   | <b>0</b>            | <b>0.00</b> |

\*Percentage of (D) & (E) – Maternity and Paternity benefit is calculated as 100% as per FAQs on BRSR issued by NSE dated May 10, 2024

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

| Total (A)                    |     | % of workers covered by |         |                    |         |                    |         |                    |         |                     |         |
|------------------------------|-----|-------------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                              |     | 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 Workers            |     |                         |         |                    |         |                    |         |                    |         |                     |         |
| Male                         | 0   | 0                       | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                   | 0.00    |
| Female*                      | 0   | 0                       | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                   | 0.00    |
| Total                        | 0   | 0                       | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                   | 0.00    |
| Other than Permanent Workers |     |                         |         |                    |         |                    |         |                    |         |                     |         |
| Male                         | 250 | 232                     | 92.80   | 232                | 92.80   | 0                  | 0.00    | 250                | 100.00  | 0                   | 0.00    |
| Female*                      | 8   | 8                       | 100.00  | 8                  | 100.00  | 8                  | 100.00  | 0                  | 0.00    | 0                   | 0.00    |
| Total                        | 258 | 240                     | 93.02   | 240                | 93.02   | 8                  | 100.00  | 250                | 100.00  | 0                   | 0.00    |

\*Percentage of (D) & (E) – Maternity and Paternity benefit is calculated as 100% as per FAQs on BRSR issued by NSE dated May 10, 2024

**c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format<sup>5</sup>:**

|                                                                             | <b>FY 2025-26</b> | <b>FY 2024-25</b> |
|-----------------------------------------------------------------------------|-------------------|-------------------|
| Cost incurred on well-being measures as a % of total revenue of the company | 0.15              | 0.19              |

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

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

| Benefits | FY 2025-26                                         |                                                |                                                      | FY 2024-25                                         |                                                |                                                      |
|----------|----------------------------------------------------|------------------------------------------------|------------------------------------------------------|----------------------------------------------------|------------------------------------------------|------------------------------------------------------|
|          | 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       | 43.68                                              | 47.29                                          | Yes                                                  | 53.00                                              | 51.00                                          | Yes                                                  |
| Gratuity | 100.00                                             | 0.00                                           | NA                                                   | 100.00                                             | 0.00                                           | NA                                                   |
| ESI      | 3.16                                               | 72.87                                          | Yes                                                  | 8.11                                               | 77.00                                          | Yes                                                  |

**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, the Company's premises are accessible to differently abled employees and workers. Accessibility features, including ramps, elevators, and dedicated restrooms, have been provided to facilitate ease of movement and convenience. The Company remains committed to fostering an inclusive work environment and periodically reviews its infrastructure to support the diverse needs of its workforce and promote equal opportunity.

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

Yes, the Company has an Equal Opportunity Policy, which affirms its commitment to providing equal access to opportunities for persons with disabilities and ensuring a workplace free from discrimination, harassment, and bias. The policy outlines measures such as reasonable accommodation, accessible infrastructure, sensitization of managers, and relevant support systems to enable inclusive participation and growth.

The policy is available at the following link: <https://www.swan.co.in/wp-content/uploads/2025/12/Equal-Opportunity-Policy.pdf>

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

| Gender       | Permanent Employees                                         |                | Permanent workers   |                |
|--------------|-------------------------------------------------------------|----------------|---------------------|----------------|
|              | Return to work rate                                         | Retention rate | Return to work rate | Retention rate |
| Male         | During the reporting period, no parental leave was availed. |                |                     |                |
| Female       |                                                             |                |                     |                |
| <b>Total</b> |                                                             |                |                     |                |

<sup>5</sup> The above calculations are in accordance with Part B, Attribute 5 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

|                                       | Yes/No (If Yes, then give details of the mechanism in brief)                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Permanent Workers</b>              | Not Applicable                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Other than Permanent Workers</b>   | Yes. The Company has established a Grievance Redressal Committee comprising representatives from multiple functions to ensure an inclusive and structured approach to addressing workplace concerns. The Committee serves as a formal mechanism for employees and workers to raise grievances, which are reviewed and resolved in a fair, timely, and transparent manner, in line with the Company's commitment to employee well-being and ethical conduct. |
| <b>Permanent Employees</b>            |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Other than Permanent Employees</b> | Not Applicable                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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

| Category                         | FY 2025-26                                                      |                                                                                                                       |              | FY 2024-25                                                         |                                                                                                                       |              |
|----------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------|
|                                  | Total employees/<br>workers in<br>respective<br>category<br>(A) | No. of<br>employees/<br>workers in<br>respective<br>category, who<br>are part of<br>association(s) or<br>Union<br>(B) | %<br>(B / A) | Total<br>employees/<br>workers in<br>respective<br>category<br>(C) | No. of<br>employees/<br>workers in<br>respective<br>category, who<br>are part of<br>association(s) or<br>Union<br>(D) | %<br>(D / C) |
| <b>Total Permanent Employees</b> | <b>158</b>                                                      | <b>0</b>                                                                                                              | <b>0.00</b>  | <b>148</b>                                                         | <b>0</b>                                                                                                              | <b>0.00</b>  |
| Male                             | 140                                                             | 0                                                                                                                     | 0.00         | 133                                                                | 0                                                                                                                     | 0.00         |
| Female                           | 18                                                              | 0                                                                                                                     | 0.00         | 15                                                                 | 0                                                                                                                     | 0.00         |
| <b>Total Permanent Workers</b>   | <b>0</b>                                                        | <b>0</b>                                                                                                              | <b>0.00</b>  | <b>0</b>                                                           | <b>0</b>                                                                                                              | <b>0.00</b>  |
| Male                             | 0                                                               | 0                                                                                                                     | 0.00         | 0                                                                  | 0                                                                                                                     | 0.00         |
| Female                           | 0                                                               | 0                                                                                                                     | 0.00         | 0                                                                  | 0                                                                                                                     | 0.00         |

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

|           | Total (A) | FY 2025-26                       |         |                      |         | FY 2024-25 |                                  |         |                      |         |
|-----------|-----------|----------------------------------|---------|----------------------|---------|------------|----------------------------------|---------|----------------------|---------|
|           |           | On Health and Safety Measurement |         | On Skill Upgradation |         | Total (D)  | On Health and Safety Measurement |         | On Skill Upgradation |         |
|           |           | No. (B)                          | % (B/A) | No. (C)              | % (C/A) |            | No. (E)                          | % (E/D) | No. (F)              | % (F/D) |
| Employees |           |                                  |         |                      |         |            |                                  |         |                      |         |
| Male      | 140       | 79                               | 56.42   | 87                   | 62.14   | 133        | 73                               | 54.89   | 94                   | 70.68   |
| Female    | 18        | 3                                | 16.67   | 3                    | 16.67   | 15         | 3                                | 20.00   | 2                    | 13.33   |
| Total     | 158       | 82                               | 51.90   | 90                   | 56.97   | 148        | 76                               | 51.35   | 96                   | 64.86   |
| Workers   |           |                                  |         |                      |         |            |                                  |         |                      |         |
| Male      | 250       | 181                              | 72.4    | 181                  | 72.4    | 265        | 120                              | 45.28   | 190                  | 71.70   |
| Female    | 8         | 0                                | 0.00    | 0                    | 0.00    | 5          | 2                                | 40.00   | 0                    | 0.00    |
| Total     | 258       | 181                              | 70.15   | 181                  | 70.15   | 270        | 122                              | 45.19   | 190                  | 70.37   |

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

| Category         | FY 2025-26 |            |              | FY 2024-25 |            |              |
|------------------|------------|------------|--------------|------------|------------|--------------|
|                  | Total (A)  | No. (B)    | % (B/A)      | Total (C)  | No. (D)    | % (C/D)      |
| <b>Employees</b> |            |            |              |            |            |              |
| Male             | 140        | 117        | 83.58        | 133        | 96         | 72.18        |
| Female           | 18         | 8          | 44.44        | 15         | 5          | 33.33        |
| <b>Total</b>     | <b>158</b> | <b>125</b> | <b>79.11</b> | <b>148</b> | <b>101</b> | <b>68.24</b> |
| <b>Workers</b>   |            |            |              |            |            |              |
| Male             | 250        | 0          | 0.00         | 265        | 0          | 0.00         |
| Female           | 8          | 0          | 0.00         | 5          | 0          | 0.00         |
| <b>Total</b>     | <b>258</b> | <b>0</b>   | <b>0.00</b>  | <b>270</b> | <b>0</b>   | <b>0.00</b>  |

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

Yes, the Company has implemented an Occupational Health and Safety (OHS) management system to ensure a safe and healthy working environment. Regular health check-ups are conducted for employees engaged in hazardous processes, and fitness certificates from an Industrial Health Consultant or Factory Medical Officer are obtained prior to their deployment in such roles.

In addition, all employees are covered under SBI Insurance, while a majority of workers are enrolled under the Employees' State Insurance (ESI) scheme. The Company also conducts continuous safety training and risk reduction programs to enhance awareness and minimize workplace hazards, reinforcing its commitment to employee health and safety.

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

Currently, the Company does not have formally documented procedures for the proactive identification of work-related hazards, the regular conduct of risk assessments, or the systematic implementation of preventive measures.

Nevertheless, the Company places a strong emphasis on the safety and well-being of employees engaged in hazardous operations. To mitigate potential health risks, periodic medical examinations are conducted, and it is mandatory to obtain a fitness certification from a qualified Industrial Health Consultant or Factory Medical Officer prior to assigning personnel to high-risk activities.

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

The Company has established processes that enable workers to report work-related hazards and to remove themselves from situations involving such risks without fear of reprisal.

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

The Company places great importance on the health and well-being of its employees by offering an extensive range of health and wellness benefits. This includes medical insurance coverage that protects not only the employees but also their immediate family members, reflecting the Company's dedication to supporting the broader well-being of its workforce.



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

| Safety Incident/Number                                                           | Category  | FY 2025-26 | FY 2024-25 |
|----------------------------------------------------------------------------------|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR)<br>(per one million-person hours worked) | Employees | 0.00       | 0.00       |
|                                                                                  | Workers   | 0          | 5.81       |
| Total recordable work-related injuries                                           | Employees | 0          | 0          |
|                                                                                  | Workers   | 0          | 4          |
| No. of fatalities                                                                | Employees | 0          | 0          |
|                                                                                  | Workers   | 0          | 0          |
| High consequence work-related injury or ill-health<br>(excluding fatalities)     | Employees | 0          | 0          |
|                                                                                  | Workers   | 0          | 0          |

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

The Company actively organizes comprehensive fire and safety awareness programs aimed at educating employees on critical safety practices. By enhancing their understanding and preparedness, the company enables its workforce to respond swiftly and effectively to potential emergencies, thereby nurturing a strong culture of safety and alertness. To guarantee strict compliance with the established Standard Operating Procedures (SOPs), the Industrial Relations Department carries out rigorous safety audits. These assessments play a crucial role in verifying that safety measures are implemented thoroughly and consistently, ensuring the Company's protocols are upheld with genuine commitment and integrity.

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

| Category           | FY 2025-26            |                                       |         | FY 2024-25            |                                       |         |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
|                    | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | 0                     | 0                                     | NA      | 0                     | 0                                     | NA      |
| Health & Safety    | 0                     | 0                                     | NA      | 0                     | 0                                     | NA      |

**14. Assessments for the year:**

| % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |        |
|-------------------------------------------------------------------------------------------------------|--------|
| Health and safety practices                                                                           | 100.00 |
| Working condition                                                                                     | 100.00 |

**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.**

No incidents of this nature were reported during the reporting year.

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

The Company recognizes the importance of comprehensive employee welfare programmes, including life insurance and compensatory benefits in the unfortunate event of death. While such provisions are not currently in place, the Company remains open to evaluating and introducing these benefits in the future.

**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 undertakes stringent measures to ensure that all statutory dues are accurately deducted and deposited in a timely manner by its value chain partners. Specific provisions are incorporated into contractual agreements to enforce compliance, thereby ensuring that suppliers consistently meet their obligations relating to statutory deductions and payments.

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

|           | Total no. of affected employees/workers |            | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |            |
|-----------|-----------------------------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|           | FY 2025-26                              | FY 2024-25 | FY 2025-26                                                                                                                                        | FY 2024-25 |
| Employees | 0                                       | 0          | 0                                                                                                                                                 | 0          |
| Workers   | 0                                       | 0          | 0                                                                                                                                                 | 0          |

**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. The Company currently does not provide transition assistance programmes.

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

|                             | % of value chain partners (by value of business done with such partners) that were accessed |
|-----------------------------|---------------------------------------------------------------------------------------------|
| Health and safety practices | 0.00                                                                                        |
| Working condition           | 0.00                                                                                        |

**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.**

Not applicable, as the Company did not conduct any assessment of its value chain partners during the reporting year.

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



Swan Corp Limited recognizes that our long-term success is deeply linked to the trust and support of our stakeholders. We are committed to a transparent and inclusive engagement process that identifies the needs of our investors, employees, customers, local communities, and suppliers. We pay special attention to identifying and addressing the concerns of vulnerable and marginalized groups within our ecosystem.

**Essential Indicators**

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

The Company identifies employees, Government/competent authorities, investors, communities, suppliers, and customers as its key stakeholder groups. It adopts a structured approach to stakeholder identification and engagement, beginning with defining the scope of engagement across areas such as surveys, training, regulatory compliance, tax matters, audits, and performance evaluations.

Stakeholders are subsequently prioritised to facilitate targeted communication and engagement strategies. This approach enables the Company to effectively address stakeholder concerns, foster meaningful dialogue, share best practices, and enhance value creation and brand reputation.

**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                                                                            | Stakeholder Group            | Whether identified as Vulnerable & Marginalized Group (Yes/No)                                                                                                                                                                                                          |
|-----------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Customers                         | No                                                             | Website of the Company and stock exchanges, Advertisements, Meetings, Emails, Newspaper, and Letters | Ongoing basis                | Business related matters                                                                                                                                                                                                                                                |
| Government/ Competent Authorities | No                                                             | Email                                                                                                | Ongoing/ Quarterly/ Annually | Submissions of compliances and receipt of approvals, replies to queries                                                                                                                                                                                                 |
| Employees                         | No                                                             | Email, Website of the Company, Team training, and Rewards and recognitions                           | Ongoing basis                | <ul style="list-style-type: none"> <li>• Work culture, health and safe</li> <li>• Human resource policies and rules</li> <li>• Career management and growth prospects</li> </ul>                                                                                        |
| Suppliers                         | No                                                             | Website of the Company, Advertisements, Meetings, Emails, Newspaper, and Letters                     | Ongoing basis                | Business related matters                                                                                                                                                                                                                                                |
| Investors & funders               | No                                                             | Result publications in newspapers, Annual general meeting, Company Website, and Quarterly results    | Ongoing/ Quarterly/ Annually | <ul style="list-style-type: none"> <li>• To present business performance highlights to investors</li> <li>• To discuss publically available Company information to shareholders and investors</li> <li>• To answer investor queries on financial performance</li> </ul> |
| Communities                       | Yes                                                            | Newspaper, Email, Website                                                                            | Need basis                   | Requisite engagement under CSR objective                                                                                                                                                                                                                                |

**Leadership Indicators**

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

The Company does not have a formal mechanism for direct consultation between the Board and its stakeholders. However, the management engages with stakeholders on an ongoing basis across a range of economic, environmental, and social matters. Key insights and outcomes from these engagements are periodically presented to the Board and its committees for consideration.

- 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.**

The Company currently does not have a formal stakeholder consultation process for the identification and management of environmental and social issues. However, it recognizes the importance of such engagement and intends to strengthen this aspect going forward.

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

No such instances were reported during the reporting period. However, the Company's CSR initiatives are strategically designed to support disadvantaged and marginalised communities. These initiatives are implemented in alignment with the Company's CSR Policy, ensuring that projects effectively address the needs of vulnerable and underserved groups.

#### Principle 5: Businesses should respect and promote human rights.



The Company recognizes that human rights are inherent to all individuals and is committed to upholding and respecting these rights across its operations and value chain. The Company maintains a zero-tolerance approach towards child labour, forced labour, and any form of involuntary labour. It promotes a safe, inclusive, and respectful workplace through the implementation of policies and practices that prohibit discrimination on the basis of race, caste, religion, gender, disability, or any other protected characteristic. This commitment is further reinforced through regular training and awareness initiatives, including mandatory programmes on Prevention of Sexual Harassment (POSH), aimed at fostering a culture of dignity, equality, and mutual respect.

#### Essential Indicators

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

| Category               | FY 2025-26 |                                      |               | FY 2024-25 |                                      |             |
|------------------------|------------|--------------------------------------|---------------|------------|--------------------------------------|-------------|
|                        | Total (A)  | No. of employees/workers covered (B) | % (B / A)     | Total (C)  | No. of employees/workers covered (D) | % (D / C)   |
| <b>Employees</b>       |            |                                      |               |            |                                      |             |
| Permanent              | 158        | 158                                  | 100.00        | 148        | 0                                    | 0.00        |
| Other than permanent   | 0          | 0                                    | 0.00          | 0          | 0                                    | 0.00        |
| <b>Total Employees</b> | <b>158</b> | <b>158</b>                           | <b>100.00</b> | <b>148</b> | <b>0</b>                             | <b>0.00</b> |
| <b>Workers</b>         |            |                                      |               |            |                                      |             |
| Permanent              | 0          | 0                                    | 0.00          | 0          | 0                                    | 0.00        |
| Other than permanent   | 258        | 0                                    | 0.00          | 270        | 0                                    | 0.00        |
| <b>Total Employees</b> | <b>258</b> | <b>0</b>                             | <b>0.00</b>   | <b>270</b> | <b>0</b>                             | <b>0.00</b> |

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

| Category             | Total<br>(A) | FY 2025-26               |            |                           |            | 2024-25      |                          |            |                           |            |
|----------------------|--------------|--------------------------|------------|---------------------------|------------|--------------|--------------------------|------------|---------------------------|------------|
|                      |              | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            | Total<br>(D) | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            |
|                      |              | No. (B)                  | %<br>(B/A) | No. (C)                   | %<br>(C/A) |              | No. (E)                  | %<br>(E/D) | No. (F)                   | %<br>(F/D) |
| Employees            |              |                          |            |                           |            |              |                          |            |                           |            |
| Permanent            | 158          | 0                        | 0.00       | 158                       | 100.00     | 148          | 0                        | 0.00       | 148                       | 100.00     |
| Male                 | 140          | 0                        | 0.00       | 140                       | 100.00     | 133          | 0                        | 0.00       | 133                       | 100.00     |
| Female               | 18           | 0                        | 0.00       | 18                        | 100.00     | 15           | 0                        | 0.00       | 15                        | 100.00     |
| Other than permanent | 0            | 0                        | 0.00       | 0                         | 0.00       | 0            | 0                        | 0.00       | 0                         | 0.00       |
| Male                 | 0            | 0                        | 0.00       | 0                         | 0.00       | 0            | 0                        | 0.00       | 0                         | 0.00       |
| Female               | 0            | 0                        | 0.00       | 0                         | 0.00       | 0            | 0                        | 0.00       | 0                         | 0.00       |
| Workers              |              |                          |            |                           |            |              |                          |            |                           |            |
| Permanent            | 0            | 0                        | 0.00       | 0                         | 0.00       | 0            | 0                        | 0.00       | 0                         | 0.00       |
| Male                 | 0            | 0                        | 0.00       | 0                         | 0.00       | 0            | 0                        | 0.00       | 0                         | 0.00       |
| Female               | 0            | 0                        | 0.00       | 0                         | 0.00       | 0            | 0                        | 0.00       | 0                         | 0.00       |
| Other than permanent | 258          | 0                        | 0.00       | 258                       | 100.00     | 270          | 0                        | 0.00       | 270                       | 100.00     |
| Male                 | 250          | 0                        | 0.00       | 250                       | 100.00     | 265          | 0                        | 0.00       | 265                       | 100.00     |
| Female               | 8            | 0                        | 0.00       | 8                         | 100.00     | 5            | 0                        | 0.00       | 5                         | 100.00     |

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

### a. Median remuneration/wages:

|                                  | Male   |                                                                                 | Female |                                                                                 |
|----------------------------------|--------|---------------------------------------------------------------------------------|--------|---------------------------------------------------------------------------------|
|                                  | Number | Median remuneration/<br>Salary/ Wages of<br>respective category<br>(in ₹ lakhs) | Number | Median remuneration/<br>Salary/ Wages of<br>respective category<br>(in ₹ lakhs) |
| Board of Directors (BoD)         | 4      | 192.71                                                                          | 0      | 0.00                                                                            |
| Key Managerial Personnel         | 2      | 28.19                                                                           | 0      | 0.00                                                                            |
| Employees other than BoD and KMP | 134    | 8.83                                                                            | 18     | 9.08                                                                            |
| Worker                           | 250    | 0.19                                                                            | 8      | 0.16                                                                            |

For the purpose of median remuneration calculation, Independent Directors receiving only sitting fees have been excluded. Individuals serving as both Directors and Key Managerial Personnel (KMP) have been considered only once to avoid duplication. The KMP count (comprising the Company Secretary) has been revised to reflect changes during the reporting year.

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

<sup>6</sup>The above calculations are in accordance with Part B, Attribute 6 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

**b. Gross wages paid to females as % of total wages paid by the entity, in the following format<sup>6</sup>:**

|                                                | FY 2025-26 | FY 2024-25 |
|------------------------------------------------|------------|------------|
| Gross wages paid to female as % of total wages | 7.24       | 4.58       |

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

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

The Company has established a dedicated Grievance Redressal Committee to effectively address and resolve a broad spectrum of concerns and issues raised by its employees and workers.

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

The Company has constituted a Grievance Redressal Committee to address concerns raised by employees and workers. The Committee comprises representatives from various departments, ensuring broad-based participation. Employees and workers are encouraged to report their grievances to any member of the Committee. The Committee meets on a quarterly basis to review and address the issues brought to its attention, ensuring timely and effective resolution.

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

|                                    | FY 2025-26            |                                           |         | FY 2024-25            |                                           |         |
|------------------------------------|-----------------------|-------------------------------------------|---------|-----------------------|-------------------------------------------|---------|
|                                    | Filed during the year | Pending resolution at the end of the year | Remarks | Filed during the year | Pending resolution at the end of the year | Remarks |
| Sexual Harassment                  | 0                     | 0                                         | NA      | 0                     | 0                                         | NA      |
| Discrimination at workplace        | 0                     | 0                                         | NA      | 0                     | 0                                         | NA      |
| Child Labour                       | 0                     | 0                                         | NA      | 0                     | 0                                         | NA      |
| Forced Labour / Involuntary Labour | 0                     | 0                                         | NA      | 0                     | 0                                         | NA      |
| Wages                              | 0                     | 0                                         | NA      | 0                     | 0                                         | NA      |
| Other human rights related issues  | 0                     | 0                                         | NA      | 0                     | 0                                         | NA      |

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

|                                                                                                                                     | FY 2025-26 | FY 2024-25 |
|-------------------------------------------------------------------------------------------------------------------------------------|------------|------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0          | 0          |
| Complaints on POSH as a % of female employees / workers                                                                             | 0.00       | 0.00       |
| Complaints on POSH upheld                                                                                                           | 0          | 0          |

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

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

The Company is committed to maintaining a safe, inclusive, and transparent work environment where employees can raise concerns without fear of discrimination or retaliation. Under the Whistle Blower and Grievance

<sup>7</sup> The above calculations are in accordance with Part B, Attribute 6 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Redressal Policies, employees are assured protection, provided that concerns are raised in good faith, based on a reasonable belief in their accuracy, and are not motivated by malice, false intent, or personal gain.

The Company follows a zero-tolerance approach towards any form of retaliation against individuals who raise concerns. Further, matters relating to the prevention of sexual harassment are addressed with the highest level of sensitivity and confidentiality, in strict compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, reinforcing the Company's commitment to a respectful and equitable workplace.

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

Currently, the Company's business agreements and contracts do not explicitly incorporate human rights provisions. However, the Company recognises the growing global emphasis on human rights and remains open to evaluating the inclusion of such principles in its contractual frameworks going forward.

#### 10. Assessments for the year:

|                             | % of your plants and Offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|-------------------------------------------------------------------------------------------------------|
| Child Labour                | 100.00                                                                                                |
| Forced/involuntary Labour   | 100.00                                                                                                |
| Sexual Harassment           | 100.00                                                                                                |
| Discrimination at workplace | 100.00                                                                                                |
| Wages                       | 100.00                                                                                                |

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

No incidents of this nature were identified during the reporting year.

#### Leadership Indicators

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

As no grievances or complaints related to human rights were reported during the reporting year, there was no requirement to modify or introduce any new business processes in this regard.

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

The Company currently does not conduct human rights due diligence. However, it recognises its significance and remains open to evaluating its relevance and exploring its implementation in the future.

##### 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, the Company's premises are accessible to differently abled visitors. Accessibility features such as entrance ramps, elevators, and dedicated restrooms on the ground floor have been provided to ensure ease of movement and comfort.

The Company remains committed to fostering an inclusive and supportive environment and regularly reviews its infrastructure to ensure it accommodates the diverse needs of all individuals and promotes equal opportunity.

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

|              | % of value chain partners (by value of business done with such partners) that were assessed |
|--------------|---------------------------------------------------------------------------------------------|
| Child Labour | 0                                                                                           |

| % of value chain partners (by value of business done with such partners) that were assessed |   |
|---------------------------------------------------------------------------------------------|---|
| Forced/involuntary Labour                                                                   | 0 |
| Sexual Harassment                                                                           | 0 |
| Discrimination at workplace                                                                 | 0 |
| Wages                                                                                       | 0 |

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

As the Company has not yet undertaken an assessment of its value chain partners, no situations requiring corrective actions have arisen during the reporting period.

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



The Company is committed to minimising its environmental footprint through efficient use of resources and responsible waste management practices. Its approach is focused on optimising resource consumption and promoting circularity across operations. The Company is exploring renewable energy solutions and implementing water stewardship initiatives aimed at conservation, efficient utilisation, and responsible discharge. Through these efforts, the Company endeavours to reduce its environmental impact and contribute to the preservation and restoration of local ecosystems.

**Essential Indicators**

**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:<sup>8</sup>**

| Parameter                                                   | FY 2025-26<br>(In Gigajoules) | FY 2024-25<br>(In Gigajoules) |
|-------------------------------------------------------------|-------------------------------|-------------------------------|
| <b>From renewable sources</b>                               |                               |                               |
| Total electricity consumption (A)                           | 0.00                          | 0.00                          |
| Total fuel consumption (B) - Wood (De oiled Cakes)          | 3,05,412.02                   | 2,86,394.88                   |
| Energy consumption through other sources (C)                | 0.00                          | 0.00                          |
| Total Energy consumption from renewable sources (A+B+C)     | 3,05,412.02                   | 2,86,394.88                   |
| <b>From non-renewable sources</b>                           |                               |                               |
| Total electricity consumption (D)                           | 17,555.27                     | 17,920.49                     |
| Total fuel consumption (E)                                  | 3,176.72*                     | 2,793.76                      |
| Energy consumption through other sources (F)                | 0.00                          | 0.00                          |
| Total Energy consumption from non-renewable sources (D+E+F) | 20,731.99                     | 20,714.24                     |
| Total energy consumed (A+B+C+D+E+F)                         | 3,26,144.01                   | 3,07,109.12                   |

<sup>8</sup> The above calculations are in accordance with Part B, Attribute 3 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

<sup>9</sup> The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

<sup>10</sup> The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.



| Parameter                                                                                                                                                                      | FY 2025-26<br>(In Gigajoules) | FY 2024-25<br>(In Gigajoules) |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------|
| Energy intensity per rupee of turnover<br>(Total energy consumption/ Revenue from Operations) – GJ/Rupees                                                                      | 0.00015                       | 0.00023                       |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) <sup>9</sup><br>(Total energy consumed / Revenue from operations adjusted for PPP) – GJ/USD) | 0.0031                        | 0.0047                        |
| Energy intensity in terms of physical output <sup>10</sup> - GJ/MT                                                                                                             | 58.60                         | 52.70                         |
| Energy intensity per workforce - GJ/workforce                                                                                                                                  | 784.00                        | 734.71                        |

\*The Company has considered the fuel reimbursements made to its employees during FY 2025–26 in the calculation of Total Fuel Consumption.

**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.**

Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

**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**

The Company is not covered under the mandatory Perform, Achieve and Trade (PAT) scheme, as it does not fall within the category of designated energy-intensive industries. Accordingly, the regulatory obligations and incentive mechanisms under the PAT scheme are not applicable to the Company's operations.

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

| Parameter                                                                                                                                                                       | FY 2025-26         | FY 2024-25         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------|
| <b>Water withdrawal by sources (in Kilolitres)</b>                                                                                                                              |                    |                    |
| (i) Surface water                                                                                                                                                               | 0.00               | 0.00               |
| (ii) Groundwater                                                                                                                                                                | 1,90,373.00        | 1,53,147.00        |
| (iii) Third party water                                                                                                                                                         | 886.28             | 0.00               |
| (iv) Seawater / desalinated water                                                                                                                                               | 0.00               | 0.00               |
| (v) Others                                                                                                                                                                      | 0.00               | 0.00               |
| <b>Total volume of water withdrawal<br/>(in kilolitres) (i + ii + iii + iv + v)</b>                                                                                             | <b>1,91,259.28</b> | <b>1,53,147.00</b> |
| Total volume of water consumption<br>(in kilolitres)                                                                                                                            | 92,865.26          | 88,716.92          |
| Water intensity per rupee of turnover (Water consumed / Revenue from operations) - KL/Rupees                                                                                    | 0.000043           | 0.000065           |
| Water Intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) <sup>11</sup><br>(Total water consumption / Revenue from operations adjusted for PPP) – KL/USD | 0.0009             | 0.0014             |
| Water intensity in terms of physical output <sup>12</sup> - KL/MT                                                                                                               | 16.68              | 15.22              |
| Water intensity per workforce - KL/workforce                                                                                                                                    | 223.23             | 212.24             |

<sup>11</sup> The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

<sup>12</sup> The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

**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.**

Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

#### 4. Provide the following details related to water discharged

| Parameter                                                                    | FY 2025-26       | FY 2024-25       |
|------------------------------------------------------------------------------|------------------|------------------|
| <b>Water discharge by destination and level of treatment (in kilolitres)</b> |                  |                  |
| <b>(i) To Surface water</b>                                                  | 0.00             | 0.00             |
| - No treatment                                                               |                  |                  |
| - With treatment – please specify level of treatment                         |                  |                  |
| <b>(ii) To Groundwater</b>                                                   | 0.00             | 0.00             |
| - No treatment                                                               |                  |                  |
| - With treatment – please specify level of treatment                         |                  |                  |
| <b>(iii) To Seawater</b>                                                     | 0.00             | 0.00             |
| - No treatment                                                               |                  |                  |
| - With treatment – please specify level of treatment                         |                  |                  |
| <b>(iv) Sent to third-parties (CETP)</b>                                     |                  |                  |
| - No treatment                                                               | 709.02           | 730.08           |
| - With treatment – Primary, Secondary and Tertiary                           | 97,685.00        | 63,700.00        |
| <b>(v) Others</b>                                                            | 0.00             | 0.00             |
| - No treatment                                                               |                  |                  |
| - With treatment – please specify level of treatment                         |                  |                  |
| <b>Total water discharged (in kilolitres)</b>                                | <b>98,394.02</b> | <b>64,430.08</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.**

Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

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

The Ahmedabad unit of Swan Corp Ltd. has established a structured effluent treatment system to ensure responsible management of wastewater generated from its operations.

Wastewater is first collected in a collection tank, where aeration is introduced for proper mixing, addition of neutralising and de colouring chemicals and transfer to equalization tank and subsequently transferred to a primary clarifier with the addition of coagulants to facilitate floc formation and settling of suspended solids. The partially treated effluent then undergoes biological treatment in an aeration tank with diffused aeration, followed by secondary clarification for solid-liquid separation. The treated water is further processed through filtration systems, including pressure sand and activated carbon filters, before being discharged to the CETP at NTIEM.

Sludge generated during the treatment process is collected, dewatered using drying beds or filter press systems, and securely stored in designated areas. It is then disposed of through authorized channels at the TSDF facility operated by Eco-care Infrastructure Private Ltd. This process demonstrates the unit's commitment to regulatory compliance and environmentally sound wastewater management practices. Unit has not installed Zero Liquid Discharge System yet but utilising partial quantity of treated effluent in certain processes.

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

| Parameter | Please specify unit | FY 2025-26 | FY 2024-25 |
|-----------|---------------------|------------|------------|
| NOx       | ppm                 | 7.55       | 35.08      |
| SOx       | ppm                 | 17.54      | 38.73      |

| Parameter                           | Please specify unit | FY 2025-26 | FY 2024-25 |
|-------------------------------------|---------------------|------------|------------|
| Particulate matter (PM)             | mg/m <sup>3</sup>   | 60.33      | 84.43      |
| Persistent organic pollutants (POP) |                     | 0.00       | 0.00       |
| Volatile organic compounds (VOC)    |                     | 0.00       | 0.00       |
| Hazardous air pollutants (HAP)      |                     | 0.00       | 0.00       |
| Others – please specify             |                     | 0.00       | 0.00       |

**Note:** During FY 2025-26, the Company installed a new transformer equipped with an Electrostatic Precipitator (ESP) and a water scrubber system on another boiler to further control air emissions.

**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.

- The Ahmedabad Unit engaged MS Enviro Consultants for the assessment conducted in FY 2024–25, and Watair Envisol Consultancy Co. for an independent assessment in FY 2025-26.
- Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format<sup>13</sup>:**

| Parameter                                                                                                                                                                                               | Unit                                                   | FY 2025-26 | FY 2024-25 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|------------|------------|
| Total Scope 1 emissions<br>(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            | 23,616.99  | 22,134.68  |
| Total Scope 2 emissions <sup>14</sup><br>(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            | 3,462.51   | 3,618.94   |
| Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)                                                                           | Metric tonnes of CO <sub>2</sub> equivalent /Rupees    | 0.000013   | 0.000019   |
| Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP) <sup>15</sup> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | Metric tonnes of CO <sub>2</sub> equivalent /USD       | 0.00025    | 0.00039    |
| Total Scope 1 and Scope 2 emissions intensity in terms of physical output <sup>16</sup>                                                                                                                 | Metric tonnes of CO <sub>2</sub> equivalent /MT        | 4.87       | 4.42       |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity                                                                                             | Metric tonnes of CO <sub>2</sub> equivalent /workforce | 65.09      | 61.61      |

Scope 1 data for Ahmedabad and Mumbai for FY 2024–25 has been rationalised by considering the vehicle mileages updated in FY 2025–26.

**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.

Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

<sup>13</sup> The above calculations are in accordance with Part B, Attribute 1 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122

<sup>14</sup> The above calculations are as per the updated emission factors provided in the CO<sub>2</sub> Baseline Database for the Indian Power Sector – User Guide, Version 20.0, December 2024, published by the Central Electricity Authority, Ministry of Power, Government of India.

<sup>15</sup> The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122

<sup>16</sup> The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

Yes, the Company has undertaken several initiatives at its Ahmedabad unit to reduce greenhouse gas (GHG) emissions and enhance energy efficiency as part of its sustainability efforts.

Key measures include the installation of heat exchangers and insulation systems, resulting in a 10-15% reduction in heat losses, and the use of carbon filter accessories in DG set exhausts, contributing to approximately 15% reduction in carbon emissions. A condensate recovery system has been implemented to enable reuse of condensate water in boilers, leading to around 5% savings in coal consumption. Additionally, the installation of a submersible pump with a frequency drive has improved energy efficiency, reducing power consumption by 5–8%.

Further improvements include the use of root blowers in the Effluent Treatment Plant (ETP) for enhanced aeration efficiency, and upgrades to the air pollution control system through modifications in the Electrostatic Precipitator (ESP) and installation of a water scrubber, resulting in a 10-12% reduction in air emissions. During the year, the company has spent ₹ 22.21 lakhs towards the capital investment on energy conservation equipment. Installation of new Transformer with ESP to further control air emission, installation of new Tube well with enhanced efficiency. Installation of Water scrubber system on another Boiler. The Company is also evaluating the feasibility of integrating alternative energy sources, including solar power, into its operations.

These initiatives collectively demonstrate the Company's commitment to reducing emissions, improving energy efficiency, and advancing sustainable operational practices.

**9. Provide details related to waste management by the entity, in the following format:<sup>17</sup>**

| Parameter                                                                                                                                                                     | FY 2025-26   | FY 2024-25   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------|
| <b>Total waste generated (in Metric Tonnes)</b>                                                                                                                               |              |              |
| Plastic waste (A)                                                                                                                                                             | 0.00         | 0.00         |
| E-waste (B)                                                                                                                                                                   | 0.00         | 0.00         |
| Bio-medical waste (C)                                                                                                                                                         | 0.00         | 0.00         |
| Construction and demolition waste (D)                                                                                                                                         | 0.00         | 0.00         |
| Battery waste (E)                                                                                                                                                             | 0.00         | 0.00         |
| Radioactive waste (F)                                                                                                                                                         | 0.00         | 0.00         |
| Other Hazardous waste. Please Specify, if any. (G)                                                                                                                            |              |              |
| ETP Dry Sludge                                                                                                                                                                | 31.80        | 37.17        |
| Discarded Drums/Bags                                                                                                                                                          | 22.22        | 17.92        |
| Other Non-hazardous waste generated (H).                                                                                                                                      |              |              |
| Used Oil                                                                                                                                                                      | 0.03         | 0.04         |
| <b>Total (A+B + C + D + E + F + G + H)</b>                                                                                                                                    | <b>54.05</b> | <b>55.13</b> |
| Waste intensity per rupee of turnover<br>(Total waste generated / Revenue from operations) – MT/Rupees                                                                        | 0.000000025  | 0.000000041  |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) <sup>18</sup><br>(Total waste generated / Revenue from operations adjusted for PPP) – MT/USD | 0.000000051  | 0.000000084  |
| Waste intensity in terms of physical output <sup>19</sup> - MT/MT                                                                                                             | 0.0097       | 0.0095       |
| Waste intensity per workforce - MT/workforce                                                                                                                                  | 0.13         | 0.13         |
| <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 - Hazardous waste and Non-Hazardous waste</b>                                                                                                            |              |              |
| (i) Recycled                                                                                                                                                                  | 0.00         | 0.00         |
| (ii) Re-used – Discarded drums/bags and Used Oil                                                                                                                              | 22.25        | 17.96        |
| (iii) Other recovery operations                                                                                                                                               | 0.00         | 0.00         |

<sup>17</sup> The above calculations are in accordance with Part A, Section 1(ii) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

| Parameter                                                                                                         | FY 2025-26   | FY 2024-25   |
|-------------------------------------------------------------------------------------------------------------------|--------------|--------------|
| <b>Total</b>                                                                                                      | <b>22.25</b> | <b>17.96</b> |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b> |              |              |
| Category of waste - Hazardous waste                                                                               |              |              |
| (i) Incineration                                                                                                  | 0.00         | 0.00         |
| (ii) Landfilling – ETP Sludge (Sent to TSDF facility)                                                             | 31.80        | 37.17        |
| (iii) Other disposal operations                                                                                   | 0.00         | 0.00         |
| <b>Total</b>                                                                                                      | <b>31.80</b> | <b>37.17</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.**

Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

**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 follows a structured approach to waste management and environmental protection across its operations. It has established an Effluent Treatment Plant (ETP) to ensure proper treatment of waste water generated from manufacturing activities, thereby minimizing environmental impact. The company is member of CETP to discharge treated effluent from ETP which is authorized entity to final discharge treated effluent. The company also have agreement to dispose Ash from Boilers to Brick manufacturers there by no adverse impact on environment. The company used dyes and chemicals which are non-toxic and eco-friendly having approval from Oekotex and GOTS.

In line with regulatory requirements, the Company has obtained approval from the Gujarat Pollution Control Board (GPCB) for the handling and disposal of ETP sludge. The treated dry sludge is transported and disposed of at an authorized Treatment, Storage, and Disposal Facility (TSDF), ensuring safe and compliant waste management practices.

Additionally, the Company has implemented air pollution control systems to regulate emissions from boiler stacks, supporting the maintenance of ambient air quality. These measures reflect the Company's commitment to responsible handling of hazardous waste and reduction of environmental risks associated with its operations.

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

| Sr. No. | Location of operation/ offices | Types of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|---------|--------------------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
|---------|--------------------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|

The Company does not operate or maintain offices in or near any ecologically sensitive zones, including national parks, wildlife sanctuaries, biosphere reserves, wetlands, forests, or coastal regulation areas.

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

| Name and brief details of project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|-----------------------------------|----------------------|------|-------------------------------------------------------------|--------------------------------------------------|-------------------|
|-----------------------------------|----------------------|------|-------------------------------------------------------------|--------------------------------------------------|-------------------|

No Environmental Impact Assessments (EIAs) were carried out during the current reporting period, as none of the Company's projects required such assessments under the applicable regulatory provisions.

<sup>18</sup> The above calculations are in accordance with Part A, Section 1(l) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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, and Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

| 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 taken, if any action |
|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------|
| No material instances of non-compliance with applicable environmental laws, regulations, or guidelines were reported during FY 2025–26. |                                                                       |                                       |                                                                                                           |                                 |

#### 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:

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

| Parameter                                                                      | FY 2025-26      | FY 2024-25 |
|--------------------------------------------------------------------------------|-----------------|------------|
| Water withdrawal by sources (in Kilolitres)                                    |                 |            |
| (i) Surface water                                                              | Not Applicable. |            |
| (ii) Groundwater                                                               |                 |            |
| (iii) Third party water                                                        |                 |            |
| (iv) Seawater / desalinated water                                              |                 |            |
| (v) Others                                                                     |                 |            |
| Total volume of water withdrawal<br>(in kilolitres)                            |                 |            |
| Total volume of water consumption<br>(in kilolitres)                           |                 |            |
| Water intensity per rupee of turnover (Water consumed / turnover)              |                 |            |
| Water intensity (optional) – the relevant metric may be selected by the entity |                 |            |
| Water discharge by destination and level of treatment (in kilolitres)          |                 |            |
| (i) Into Surface water                                                         | Not Applicable. |            |
| - No treatment                                                                 |                 |            |
| - With treatment – please specify level of treatment                           |                 |            |
| (ii) Into Groundwater                                                          |                 |            |
| - No treatment                                                                 |                 |            |
| - With treatment – please specify level of treatment                           |                 |            |
| (iii) Into Seawater                                                            |                 |            |
| - No treatment                                                                 |                 |            |
| - With treatment – please specify level of treatment                           |                 |            |
| (iv) Sent to third-parties (CETP)                                              |                 |            |
| - No treatment                                                                 |                 |            |
| - With treatment – Primary, Secondary and Tertiary                             |                 |            |
| (v) Others                                                                     |                 |            |
| - No treatment                                                                 |                 |            |
| - With treatment – please specify level of treatment                           |                 |            |
| Total water discharged (in kilolitres)                                         |                 |            |

**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 independent verification or evaluation has been undertaken by any external organization to assess the Company's operational activities, performance metrics, or adherence to relevant regulatory requirements and standards.

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

| Parameter                                                                                                                                                                          | Unit                                                | FY 2025-26  | FY 2024-25  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|-------------|-------------|
| Total Scope 3 emissions<br>(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) (Limited) | Metric tonnes of CO <sub>2</sub> equivalent         | 17.02       | 19.72       |
| Total Scope 3 emissions per rupee of turnover                                                                                                                                      | Metric tonnes of CO <sub>2</sub> equivalent         | 0.000000008 | 0.000000015 |
| Total Scope 3 emission intensity                                                                                                                                                   | Metric tonnes of CO <sub>2</sub> equivalent /Rupees | 0.04        | 0.05        |

**Note:** Scope 3 has been calculated on the basis of Waste Generation and Disposal (Category 5) only.

**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 external review or independent assessment has been conducted to evaluate the Company's operations, performance, or compliance with applicable standards and regulations.

**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.**

The Company does not operate or maintain offices in or near any ecologically sensitive zones, including national parks, wildlife sanctuaries, biosphere reserves, wetlands, forests, or coastal regulation areas. Consequently, there was no requirement to obtain specific environmental approvals or clearances in this regard during the reporting period.

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

| Sr. No. | Initiative undertaken                                              | Details of the initiative (Web-link, if any, may be provided along-with summary)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Outcome of the initiative                                                                                                                                                    |
|---------|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1       | Enhancement of air pollution control and energy efficiency systems | Upgraded the Air Pollution Control System by modifying the Electrostatic Precipitator (ESP) and installing a Water Scrubber to further minimize air emissions. Additionally, a Continuous Emission Monitoring System (CEMS) was installed for real-time emission monitoring. To optimize energy usage, a Root Blower was installed in the Effluent Treatment Plant (ETP), additional water scrubber system installed on another Boiler to further reduce air emission.<br><br>A new Tube well installed with enhanced efficiency and power saver pump and motor and a new submersible pump with a frequency drive was installed on the tube well to improve operational efficiency and reduce electricity consumption. | The Company achieved an improvement of approximately 10-12% in air emission quality and a reduction of about 5-8% in electricity consumption in borewell and ETP operations. |

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

The Company has instituted a comprehensive Risk Management Policy along with an on-site emergency response plan. The Board of Directors oversees the formulation and monitoring of the Risk Management Policy and ensures the effectiveness of the overall risk management framework.

The day-to-day implementation and operational management of risks is entrusted to the Chief Risk Officer, supported by senior management as required. In addition, a Risk Management Committee (RMC) has been constituted to oversee the execution of the policy, periodically assess emerging risks, and review key leading indicators to ensure proactive risk mitigation.

**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?**

During the reporting period, no adverse environmental impacts were identified arising from the Company's value chain. Accordingly, no specific mitigation or adaptation measures were required to be undertaken by Swan Corp Limited.

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

During the current financial year, the Company did not conduct environmental impact assessments of its value chain partners.

**8. How many Green Credits have been generated or procured:<sup>20</sup>**

**a. By the listed entity – NIL**

**b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners – NIL**

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



Swan Corp Limited engages with regulators and policy makers primarily through recognized trade bodies and industry associations. We believe in constructive advocacy that supports sustainable economic growth, environmental protection, and social equity. Our engagement is guided by our Code of Conduct, ensuring that all interactions are documented, authorized, and conducted with the highest standards of integrity and transparency

**Essential Indicators**

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

The Company holds memberships in four trade and industry chambers/associations.

**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.**

| Sr. No. | Name of the trade and industry chambers/associations       | Reach of trade and industry chambers/ associations (State/National) |
|---------|------------------------------------------------------------|---------------------------------------------------------------------|
| 1       | Gujarat Chamber of Commerce (GCCCI)                        | State                                                               |
| 2       | Narol Textile Infrastructure and Enviro Management (NTIEM) | State                                                               |
| 3       | Textiles Committee                                         | National                                                            |
| 4       | The Cotton Textiles Export Promotion Council (TEXPROCIL)   | National                                                            |

<sup>20</sup> The above disclosure is made as per the SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dt. 28<sup>th</sup> March 2025.



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

| Name of authority | Brief of the case | Corrective action taken |
|-------------------|-------------------|-------------------------|
| Not Applicable    |                   |                         |

**Leadership Indicators**

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

| Sr. No.                                                                               | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually / Half yearly/ Quarterly / Others – please specify) | Web Link, If available |
|---------------------------------------------------------------------------------------|-------------------------|-----------------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------|
| The Company did not undertake any public policy advocacy during the reporting period. |                         |                                   |                                                          |                                                                                            |                        |

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



The Company is committed to fostering a society where growth is both inclusive and sustainable. We recognize that our operational success is intertwined with the well-being of the communities we serve. Our strategy focuses on equitable development by prioritizing local sourcing, supporting MSME ecosystems, and investing in high-impact social programs. We actively prioritize the inclusion of marginalized and vulnerable groups within our stakeholders, fostering a distributive economic environment where prosperity is shared. By investing in sustainable livelihoods and community infrastructure, we ensure that our growth contributes directly to the national agenda of inclusive development and social harmony.

**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, as the Company did not undertake any projects requiring Social Impact Assessments during the reporting period. |                      |                      |                                                           |                                                |                   |

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

| Sr. No         | Name of project for which R&R is ongoing | State | District | No. of Project Affected Families (PAFs) | 5 of PAFs covered by R&R | Amount paid to PAFs in the FY (in INR) |
|----------------|------------------------------------------|-------|----------|-----------------------------------------|--------------------------|----------------------------------------|
| Not Applicable |                                          |       |          |                                         |                          |                                        |

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

The Company maintains continuous engagement with local communities through various initiatives led by its CSR function, often in collaboration with affiliated institutions. It is committed to transparent and responsive communication, ensuring that community concerns are acknowledged and addressed in a timely manner.

Grievances, if any, may be submitted through the designated portal available on the Company's official website and are addressed in accordance with its established grievance redressal mechanism.

#### 4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:<sup>21</sup>

|                                              | FY 2025-26 | FY 2024-25 |
|----------------------------------------------|------------|------------|
| Directly sourced from MSMEs/ small producers | 20.62      | 30.14      |
| Directly from within India                   | 79.38      | 69.86      |

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

#### 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<sup>22</sup>

| Location     | FY 2025-26 | FY 2024-25 |
|--------------|------------|------------|
| Rural        | 0.00       | 0.00       |
| Semi-Urban   | 0.00       | 0.00       |
| Urban        | 0.00       | 0.00       |
| Metropolitan | 100.00     | 100.00     |

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

The above categorization has been carried out in accordance with the Reserve Bank of India's (RBI) classification of locations into rural, semi-urban, urban, and metropolitan areas. Previous year's data has been rationalised to improve comparability and consistency.

#### Leadership Indicators

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

| Details of negative social impact identified | Corrective actions taken |
|----------------------------------------------|--------------------------|
| Not Applicable                               |                          |

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

| Sr. No         | State | Aspirational District | Amount spent (In ₹) |
|----------------|-------|-----------------------|---------------------|
| Not Applicable |       |                       |                     |

##### 3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

No, the Company does not have a preferential procurement policy in place.

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

##### (b) From which marginalized /vulnerable groups do you procure?

Not applicable, as the Company does not procure from marginalized or vulnerable groups.

##### (c) What percentage of total procurement (by value) does it constitute?

Not applicable

<sup>21</sup> The above calculations are in accordance with Part B, Attribute 7 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

<sup>22</sup> The above calculations are in accordance with Part B, Attribute 7 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

**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:**

| Sr. No.        | Intellectual Property based on traditional knowledge | Owned/ Acquired (Yes/No) | Benefit shared (Yes / No) | Basis of calculating benefit share |
|----------------|------------------------------------------------------|--------------------------|---------------------------|------------------------------------|
| Not applicable |                                                      |                          |                           |                                    |

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

| Name of authority | Brief of the case | Corrective Action taken |
|-------------------|-------------------|-------------------------|
| Not applicable    |                   |                         |

**6. Details of beneficiaries of CSR Projects:**

| Sr. No | CSR Project            | No. of persons benefitted from CSR projects | % of beneficiaries from vulnerable and marginalized groups |
|--------|------------------------|---------------------------------------------|------------------------------------------------------------|
| 1      | Education & Healthcare | Not Ascertainable                           | Not Ascertainable                                          |
| 2      | Animal Welfare         | Not Ascertainable                           | Not Ascertainable                                          |

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



The Company is dedicated to delivering excellence by providing products that are safe, high-quality, and ethically marketed. Our strategy for Consumer Responsibility is built on transparency and trust; we prioritize the protection of customer data through our cybersecurity frameworks and ensure that our communication is honest and accurate. We maintain an accessible and responsive grievance redressal system to ensure that every customer concern is addressed promptly, reflecting our commitment to long-term value creation for our consumers.

**Essential Indicators**

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

The Company has established a formal grievance redressal mechanism aimed at enhancing customer satisfaction. To facilitate efficient communication, a dedicated email address i.e. sales@swan.co.in, has been designated for receiving customer complaints and feedback. This structured channel allows the Company to promptly acknowledge and address each concern with diligence, ensuring timely and effective resolution in line with its commitment to service excellence.

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

|                                                             | As a percentage of total turnover |
|-------------------------------------------------------------|-----------------------------------|
| Environmental and social parameters relevant to the product | 0.00                              |
| Safe and responsible usage                                  | 0.00                              |
| Recycling and/or safe disposal                              | 0.00                              |

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

|                                | FY 2025-26               |                                   |                                                                                                                  | FY 2024-25               |                                   |                                                                                                        |
|--------------------------------|--------------------------|-----------------------------------|------------------------------------------------------------------------------------------------------------------|--------------------------|-----------------------------------|--------------------------------------------------------------------------------------------------------|
|                                | Received during the Year | Pending resolution at end of year | Remarks                                                                                                          | Received during the Year | Pending resolution at end of year | Remarks                                                                                                |
| Data Privacy                   | 0                        | 0                                 | -                                                                                                                | 0                        | 0                                 | NA                                                                                                     |
| Advertising                    | 0                        | 0                                 | -                                                                                                                | 0                        | 0                                 | NA                                                                                                     |
| Cyber-security                 | 0                        | 0                                 | -                                                                                                                | 0                        | 0                                 | NA                                                                                                     |
| Delivery of essential services | 0                        | 0                                 | -                                                                                                                | 0                        | 0                                 | NA                                                                                                     |
| Restrictive Trade Practices    | 0                        | 0                                 | -                                                                                                                | 0                        | 0                                 | NA                                                                                                     |
| Unfair Trade Practices         | 0                        | 0                                 | -                                                                                                                | 0                        | 0                                 | NA                                                                                                     |
| Other                          | 38                       | 0                                 | Complaints were majorly with respect to quality of the product and were resolved within the estimated timelines. | 31                       | 0                                 | Complaints were majorly w.r.t. quality of the product and were resolved within the estimated timelines |
| <b>Total</b>                   | <b>38</b>                | <b>0</b>                          | <b>-</b>                                                                                                         | <b>31</b>                | <b>0</b>                          |                                                                                                        |

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

|                   | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | 0      | NA                 |
| Forced recalls    | 0      | NA                 |

**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.**

The Company has implemented a comprehensive Risk Management Policy that encompasses various dimensions of organizational risk, including those related to IT and cybersecurity. The policy categorizes risks into strategic, operational, reporting, compliance, and IT-related risks, enabling a structured approach to their identification, assessment, and mitigation. Further details are available in the Risk Management Policy on the Company's official website.

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

No such instances were reported during the reporting period.

**7. Provide the following information relating to data breaches:**
**a. Number of instances of data breaches**

No instances of data breaches were reported or identified during the reporting period.

Note: Independent Assurance (Reasonable Assurance) of the above has been carried out by Dhir & Dhir Associates.

**b. Percentage of data breaches involving personally identifiable information of customers<sup>23</sup>**

Nil

**c. Impact, if any, of the data breaches**

Nil

**Leadership Indicators**

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

Information about the Company's products and services can be accessed through the following platforms:

**Instagram:** <https://www.instagram.com/swancorplimited>

**Facebook:** <https://www.facebook.com/swancorplimited>

**Twitter:** <https://x.com/SwanCorpLimited>

**LinkedIn:** <https://www.linkedin.com/company/swancorplimited>

**YouTube:** <https://www.youtube.com/@swancorplimited>

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

The Company promotes awareness on the safe and responsible use of its products and services through its digital platforms, including its official website, Twitter, and Instagram. However, given its primary focus on a B2B business model, direct consumer education initiatives are limited in scope.

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

As a business operating primarily under a B2B model, the Company has minimal direct interface with end consumers. Accordingly, the scope for communicating potential risks related to the disruption or discontinuation of essential services to consumers is limited, given the nature of its operations.

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

The Company does not display product information beyond what is mandated under applicable local laws. This is not applicable, as the Company operates exclusively within a B2B framework and does not engage directly with individual consumers.

For and on behalf of the Board of Directors

Navinbhai C. Dave

Chairman

DIN: 01787259

Place: Mumbai

Date: 29<sup>th</sup> May 2026

<sup>23</sup> The above calculations are in accordance with Part B, Attribute 8 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.