एनटीपीसी ग्रीन एनर्जी लिमिटेड

(एनटीपीसी लिमिटेड की सहायक कम्पनी)

# NTPC GREEN ENERGY LIMITED

(A Subsidiary of NTPC Limited)

**Ref. No.:** 01: SEC
**Dated:** 05.08.2026

| | |
|---|---|
| **Listing Department**<br>National Stock Exchange of India Limited<br>“Exchange Plaza”, Bandra-Kurla Complex<br>Bandra (E), Mumbai –400 051<br>**Trading Symbol: NTPCGREEN** | **Listing Department**<br>BSE Limited<br>Floor 25, Phiroze Jeejeebhoy Towers<br>Dalal Street Mumbai-400 001<br>**Scrip Code: 544289** |

**Sub.: - Business Responsibility and Sustainability Reporting**

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Business Responsibility and Sustainability Report for Financial Year 2025-26, which also forms part of the Annual Report for Financial Year 2025-26, submitted to the Exchanges vide letter dated 5th August 2026.

The same is also available on the website of the Company viz. www.ngel.in at the link: https://www.ngel.in/public/media_library/1/300c526f6c.pdf

We request you to kindly take the same on record.

Thanking you,

Yours faithfully,
**For NTPC Green Energy Limited**

**Deepak Charuvil Sankunni**

Digitally signed by Deepak Charuvil Sankunni
DN: CN=Deepak Charuvil Sankunni,
SERIALNUMBER=b5e1d26b949a3811b79cbaffe7f25ad3c46c6ca9836bb6f8a5ea41d84ab1be68, S=Uttar Pradesh, PostalCode=201307,
Phone=2974cc377b659d77b125f663c06505e44c523bf2f5ce99475b817fb0154b14a0,
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Reason: I am the author of this document
Date: 05-08-2026 17:02
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**(Deepak C S)**
**Company Secretary &**
**Compliance Officer**
**M. No. F5060**

**Encl. as above**

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

| S No. | Particulars | Disclosure |
|---|---|---|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | L40100DL2022GOI396282 |
| 2 | Name of the Listed Entity | NTPC Green Energy Limited |
| 3 | Year of incorporation | 2022 |
| 4 | Registered office address | NTPC Bhawan, Core-7, SCOPE Complex, 7, Institutional Area, Lodhi Road, New Delhi–110003 |
| 5 | Corporate address | NTPC Green Energy Limited, Renewable Building Netra Complex, E-3, Udyog Vihar Ph.-II, Greater Noida, UP-201306 |
| 6 | E-mail | ngel@ntpc.co.in |
| 7 | Telephone | 011-24362577 |
| 8 | Website | https://www.ngel.in/ |
| 9 | Financial year for which reporting is being done | 2025-26 |
| 10 | Name of the Stock Exchange(s) where shares are listed | NSE and BSE |
| 11 | Paid-up Capital (In Rs) | 84,26,32,96,690 |
| 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. Deepak C S (Company Secretary and Compliance Officer)<br>**Contact:** 0120-2356728<br>**Email:** deepakcs@ntpc.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). | Consolidated* |
| 14 | Name of assessment or assurance provider | TUV India Pvt. Ltd. |
| 15 | Type of assessment or assurance obtained | Reasonable Assurance |

**Disclosures in this report are presented on a consolidated basis and cover the reporting entity along with subsidiaries and joint ventures included in its consolidated financial statements. However, ONGC NTPC Green Private Limited (ONGPL) has been excluded from the reporting boundary for FY 2025–26, as NGEL has adopted the operational control approach for determining the reporting boundary.*

### II. Products/services

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

| S. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity* |
|---|---|---|---|
| 1 | Generation of Electricity | Power Generation | 99.21% |

**Turnover of the entity comprises Energy Sales and Consultancy, project management and supervision fee*

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

| S. No. | Product/Service | NIC Code | % of total Turnover contributed* |
|---|---|---|---|
| 1. | Power Generation from - Solar | 35105 | 96.05% |
| 2. | Power Generation from - Wind | 35106 | 3.16% |
| **Sub-total** | | | 99.21% |
| 3. | Consultancy | 74909 | 0.79% |
| **Total** | | | **100%** |

**Total turnover of the entity comprises Energy Sales and Consultancy, project management and supervision fee*

## 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 | 27* | 8 | 35 |
| International | 0 | 0 | 0 |

**As stated in disclosure above, at point 13, the number of plants mentioned does not include 15 ONGC NTPC Green Private Limited (ONGPL) plants, as NGEL has adopted the operational control approach for determining the reporting boundary.*

**19. Markets served by the entity:**

**a. Number of locations**

| Locations | Number |
|---|---|
| National (No. of States) | 09 |
| International (No. of Countries) | 0 |

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

Zero. NGEL does not engage in export activities from its Indian operations.

**c. A brief on types of customers**

NGEL supplies electricity to a diverse base of bulk customers across India, supporting the country's growing demand for reliable and clean energy. Our customer portfolio includes:

- State-owned electricity utilities
- Solar Energy Corporation of India (SECI)
- Indian Railways
- Military and Engineering Services (MES)
- Calcutta Electric Supply Corporation (CESC)
- Damodar Valley Corporation (DVC)

## IV. Employees

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

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

| S. No. | Particulars | Total (A) | Male | | Female | |
|---|---|---|---|---|---|---|
| | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| **EMPLOYEES** | | | | | | |
| 1. | Permanent (D) | 261 | 246 | 94.25% | 15 | 5.75% |
| 2. | Other than Permanent (E) | 255 | 238 | 93.33% | 17 | 6.67% |
| 3. | Total employees (D+E) | 516 | 484 | 93.80% | 32 | 6.20% |
| **WORKERS** | | | | | | |
| 4. | Permanent (F) | 3 | 2 | 66.67% | 1 | 33.33% |
| 5. | Other than Permanent (G) | 3,162 | 3,151 | 99.65% | 11 | 0.35% |
| 6. | Total workers (F+G) | 3,165 | 3,153 | 99.62% | 12 | 0.38% |

**b. Differently abled Employees and workers:**

| S. No. | Particulars | Total (A) | Male | | Female | |
|---|---|---|---|---|---|---|
| | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| **DIFFERENTLY ABLED EMPLOYEES** | | | | | | |
| 1. | Permanent (D) | 5 | 5 | 100% | 0 | 0.00% |
| 2. | Other than Permanent (E) | 3 | 2 | 66.67% | 1 | 33.33% |
| 3. | Total differently abled employees (D+E) | 8 | 7 | 87.50% | 1 | 12.50% |
| **DIFFERENTLY ABLED WORKERS** | | | | | | |
| 4. | Permanent (F) | 2 | 1 | 50.00% | 1 | 50.00% |
| 5. | Other than permanent (G) | 0 | 0 | 0.00% | 0 | 0.00% |
| 6. | Total differently abled workers (F+G) | 2 | 1 | 50.00% | 1 | 50.00% |

**21. Participation/Inclusion/Representation of women**

| | Total (A) | No. and percentage of Females | |
|---|---|---|---|
| | | No. (B) | % (B / A) |
| Board of Directors | 6 | 1 | 16.67% |
| Key Management Personnel | 3 | 0 | 0.00% |

**22. Turnover rate for permanent employees and workers**

*(Disclose trends for the past 3 years)*

| | FY 2025-26 (Turnover rate in current FY) | | | FY 2024-25 (Turnover rate in previous FY) | | | FY 2023-24 (Turnover rate in the year prior to the previous FY) | | |
|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 6.5% | 0% | 6.2% | 2.41% | 10.5% | 3.12% | 3.41% | 0% | 3.21% |
| Permanent Workers | 0% | 0% | 0% | 0% | 0% | 0% | 66.60% | 0% | 20.00% |

## 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? (Yes/No) |
|---|---|---|---|---|
| 1. | NTPC Limited | Holding | 89.01 | No |
| 2. | NTPC Renewable Energy Limited | Subsidiary | 100 | Yes |
| 3. | Green Valley Renewable Energy Limited | Subsidiary | 51 | Yes |
| 4. | Indian Oil NTPC Green Energy Private Limited | Joint Venture | 50 | Yes |
| 5. | ONGC NTPC Green Private Limited | Joint Venture | 50 | No |
| 6. | MAHAGENCO NTPC Green Energy Private Limited | Joint Venture | 50 | Yes |
| 7. | NTPC Rajasthan Green Energy Limited | Subsidiary | 74 | Yes |
| 8. | NTPC UP Green Energy Limited | Subsidiary | 51 | Yes |
| 9. | AP NGEL Harit Amrit Limited | Joint Venture | 50 | Yes |
| 10. | NTPC MAHAPREIT Green Energy Limited | Subsidiary | 74 | Yes |
| 11. | Chhattisgarh NTPC Green Energy Limited | Subsidiary | 74 | Yes |

## VI. CSR Details

**24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No):** Yes

**(ii) Turnover (in Rs.):** 2,770.89 Crore

**(iii) Net worth (in Rs.):** 18,965.19 Crore

## VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) *(If yes, then provide web-link for grievance redress policy)* | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|---|
| | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | Yes | 6 | 0 | All complaints duly resolved to the satisfaction of the stakeholder | 0 | 0 | - |
| Shareholders | Yes | 27 | 0 | All complaints duly resolved to the satisfaction of the stakeholder | 4,454 | 0 | All complaints duly resolved to the satisfaction of the stakeholder |
| Employees and workers | Yes | 0 | 0 | - | 0 | 0 | - |
| Customers | Yes | 2 | 0 | All complaints duly resolved to the satisfaction of the stakeholder | 6 | 0 | All complaints duly resolved to the satisfaction of the stakeholder |
| Value Chain Partners | Yes | 0 | 0 | - | 0 | 0 | - |

Policy Link: https://ntpc.co.in/sites/default/files/policy-documents/Complaint-Handling-Policy.pdf

As a subsidiary of NTPC, NGEL is governed by NTPC's Complaint Handling Policy, which covers complaints arising from NGEL's activities. All complaints received are routed and addressed in accordance with this policy through a common Chief Vigilance Officer. Additionally, NGEL has established a grievance redressal portal on its website, accessible to all stakeholders for submitting grievances: https://ngel.in/page/grievance

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

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

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---|---|---|---|---|---|
| 1. | Climate Change | Opportunity | The transition to a low-carbon economy creates opportunities for renewable energy businesses through increased demand for clean power, climate-aligned investments, and supportive policy frameworks. | Not Applicable | Positive |
| 2. | Energy Management | Opportunity | Efficient energy management enables optimisation of energy consumption across operations, improves asset performance, and supports the transition towards low-carbon operations. | Not Applicable | Positive |
| 3. | Water Management | Opportunity | Responsible water management supports operational resilience, particularly in water-stressed locations, and helps minimise environmental impact across project sites. | Not Applicable | Positive |
| 4. | Occupational Health and Safety | Both | Occupational hazards during construction, operation, and maintenance activities may result in injuries, operational disruptions, and regulatory non-compliance.<br>Strengthening OHS practices can improve worker safety, regulatory compliance, and operational performance. | Risk is managed through established health and safety policies, operational controls, employee and contractor training, safety audits, incident reporting mechanisms, and emergency preparedness procedures. | Both |
| 5. | Labour Management | Both | Labour management is material due to reliance on contractors, site workers, and operational teams. Risks may arise from non-compliance, working conditions, wages, or labour relations. Strong labour practices improve productivity and workforce stability. | Ensure compliance with labour laws, contractor workforce monitoring, fair wages, worker welfare, grievance mechanisms, and periodic audits. | Both |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---|---|---|---|---|---|
| 6. | Digitalization, Cybersecurity and Data Privacy | Both | Digital systems, remote monitoring, SCADA, data platforms, and automation are increasingly important for renewable energy operations. Cybersecurity or data breaches may disrupt operations, while digitalization improves efficiency and decision making. | Strengthen cybersecurity controls, access management, data protection protocols, system monitoring, employee awareness, and incident response mechanisms. | Both |
| 7. | Business Ethics and Integrity | Opportunity | Ethical business conduct supports transparency, regulatory compliance, investor confidence, and trust among stakeholders, particularly in sectors involving large infrastructure investments and public-facing projects. | Not Applicable | Positive |
| 8. | Continuous and Affordable Green Power | Opportunity | Increasing demand for reliable and affordable renewable power provides opportunities to expand clean energy offerings and support customers in achieving decarbonisation goals. | Not Applicable | Positive |
| 9. | Employee Development and Talent Retention | Both | Skilled employees are essential for project development, engineering, digital systems, operations, and safety performance. Talent gaps or attrition may affect business continuity, while employee development strengthens capability and innovation. | Implement structured training, career development, succession planning, employee engagement, competitive compensation, and retention initiatives. | Both |
| 10. | Asset Integrity and Critical Incident Risk Management | Both | Renewable energy assets require consistent monitoring and maintenance to ensure reliability, safety, and generation performance. Equipment failure, fire, grid-related incidents, or extreme weather events may result in operational and financial losses. | Implement preventive and predictive maintenance, asset monitoring systems, emergency response plans, incident investigation, insurance coverage, and periodic safety reviews. | Both |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---|---|---|---|---|---|
| 11. | Supply Chain Management | Both | The renewable energy sector depends on critical components, equipment, contractors, and service providers. Supply chain disruptions, ESG non-compliance, or quality issues may affect project timelines. Responsible supply chain management also creates opportunities for resilient and sustainable sourcing. | Strengthen supplier due diligence, vendor assessments, contractual ESG requirements, diversification of suppliers, and monitoring of critical components. | Both |
| 12. | New Businesses and Investment | Opportunity | Expansion into new clean energy businesses, technologies, and markets supports diversification and long-term growth in the evolving energy transition landscape. | Not Applicable | 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 |
|---|---|---|---|---|---|---|---|---|---|
| | Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | Businesses should provide goods and services in a manner that is sustainable and safe | Businesses should respect and promote the wellbeing of all employees, including those in their value chains | Businesses should respect the interests of and be responsive to all its stakeholder | Businesses should respect and promote human rights | Businesses should respect and make efforts to protect and restore the environment | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | Businesses should promote inclusive growth and equitable development | Businesses should engage with and provide value to their consumers in a responsible manner |
| **Policy and management processes** | | | | | | | | | |
| 1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/ No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |

| Disclosure Questions | P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | P2 Businesses should provide goods and services in a manner that is sustainable and safe | P3 Businesses should respect and promote the wellbeing of all employees, including those in their value chains | P4 Businesses should respect the interests of and be responsive to all its stakeholder | P5 Businesses should respect and promote human rights | P6 Businesses should respect and make efforts to protect and restore the environment | P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | P8 Businesses should promote inclusive growth and equitable development | P9 Businesses should engage with and provide value to their consumers in a responsible manner |
|---|---|---|---|---|---|---|---|---|---|
| b. Has the policy been approved by the Board? (Yes/No) | Yes. The Board provides broad oversight of all policies, while the respective departmental heads are responsible for reviewing and periodically updating the policies relevant to their functions. | | | | | | | | |
| c. Web Link of the Policies, if available | B,D,I, M, Q, R | J | A,G, M, Q, R | R, P | R, B, D, G,I | J | H | A, J | K,N |

**List of Policies**

A. Recruitment Policy
B. Conduct, Discipline and Appeal Rules
C. Related Party Transactions Policy
D. Code of Business and Ethics
E. Revised Dividend Distribution Policy
F. Insider Trading Code
G. Safety Policy
H. Risk Management Policy
I. Policy on Whistle Blower
J. CSR Policy
K. Cyber Security Policy
L. Preservation of Documents Policy
M. Training Policy for Directors
N. Policy on determination of materiality of disclosures
O. Policy on Material Subsidiary
P. Dividend Distribution Policy
Q. Anti-Bribery and Anti-Corruption (ABAC) Policy
R. Human Rights Policy
S. Common Terms and Conditions of Independent Directors
T. Archival Policy

Our Policies can be found by clicking this link - https://ngel.in/page/policies

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 2. Whether the entity has translated the policy into procedures. (Yes / No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |

| Disclosure Questions | P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | P2 Businesses should provide goods and services in a manner that is sustainable and safe | P3 Businesses should respect and promote the wellbeing of all employees, including those in their value chains | P4 Businesses should respect the interests of and be responsive to all its stakeholder | P5 Businesses should respect and promote human rights | P6 Businesses should respect and make efforts to protect and restore the environment | P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | P8 Businesses should promote inclusive growth and equitable development | P9 Businesses should engage with and provide value to their consumers in a responsible manner |
|---|---|---|---|---|---|---|---|---|---|
| 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. | | | | | | | | | |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any. | Zero cases of adverse business ethics. | | At NGEL we are committed to zero fatality | Aims to ensure transparent and timely engagements with stakeholders. | We are committed to ensuring no violation of Human rights. | Generating Green Energy of 60 GW by 2032 | Maintain zero Incidents of anti-competitive behavior and ensure continued compliance with applicable laws and regulations | Committed to provide equal opportunity, employment and creating workplace with respect and dignity | Aims to ensure data privacy and data protection. |

| Disclosure Questions | P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | P2 Businesses should provide goods and services in a manner that is sustainable and safe | P3 Businesses should respect and promote the wellbeing of all employees, including those in their value chains | P4 Businesses should respect the interests of and be responsive to all its stakeholder | P5 Businesses should respect and promote human rights | P6 Businesses should respect and make efforts to protect and restore the environment | P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | P8 Businesses should promote inclusive growth and equitable development | P9 Businesses should engage with and provide value to their consumers in a responsible manner |
|---|---|---|---|---|---|---|---|---|---|
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met | Zero adverse business ethics cases in 2025-26 | | Zero fatality in 2025-26 | Timely engagement with stake-holders and resolution of grievances through established mechanisms. | Zero Human rights violations in FY2025-26 | Achieved installed capacity of 10,076 MW as on 31 March 2026 | Zero Inci-dents of anti-competitive behavior in FY2025-26 | Ensured equitable and inclusive growth into the recruitment process, | No breach of security and data privacy in FY2025-26 |
| **Governance, leadership, and oversight** | | | | | | | | | |
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure) | "Sustainability remains at the core of our strategy and guides the way we design, develop, and operate our projects. At NGEL, sustainability extends beyond clean energy generation and encompasses environmental stewardship, social responsibility, and inclusive economic development. We continue to integrate ESG principles across project planning, execution, and operations, with a focus on responsible resource utilisation, biodiversity preservation, climate resilience, and meaningful community engagement. Safety remains a non-negotiable value across all our construction and operational activities, and we remain committed to maintaining the highest standards of health, safety, and environmental performance across our business".<br>Kindly refer to page 5 of the NGEL Annual Report for FY2025-26 for the complete statement. | | | | | | | | |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | Board of Directors through the board level Corporate Social Responsibility and ESG Committee | | | | | | | | |

| Disclosure Questions | P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | P2 Businesses should provide goods and services in a manner that is sustainable and safe | P3 Businesses should respect and promote the wellbeing of all employees, including those in their value chains | P4 Businesses should respect the interests of and be responsive to all its stakeholder | P5 Businesses should respect and promote human rights | P6 Businesses should respect and make efforts to protect and restore the environment | P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | P8 Businesses should promote inclusive growth and equitable development | P9 Businesses should engage with and provide value to their consumers in a responsible manner |
|---|---|---|---|---|---|---|---|---|---|
| 9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. | Yes. NGEL has a Board-level Corporate Social Responsibility and ESG Committee to oversee sustainability-related strategies, initiatives, and ESG governance within the Company. The Committee provides oversight on the implementation, monitoring and reporting of ESG-related matters. In addition, the Risk Management Committee oversees sustainability-related risks as part of the Company's overall risk management framework. | | | | | | | | |

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

| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board/Any other Committee | | | | | | | | | Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
| Performance against above policies and follow up action | Yes | | | | | | | | | As & when required | | | | | | | | |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | Yes | | | | | | | | | As & when required | | | | | | | | |

| 11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency. | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|---|---|---|---|---|---|---|---|---|
| | NGEL had undertaken evaluation of ESG related policies by M/s Bureau Veritas in FY2024-25 | | | | | | | | |

**12. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:** The question is not applicable to the NGEL as all the NGRBC principles are covered under our policies.

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE 1: Businesses should conduct and govern themselves with Integrity, and in a manner that is Ethical, Transparent and Accountable

### Essential Indicators

1. **Percentage coverage by training and awareness programmes on any of the principles during the financial year:**

| Segment | Total number of training and awareness programmes held | Topics/principles covered under the training and its impact | %age of people in respective categories covered by the awareness programmes |
|---|---|---|---|
| Board of Directors | 5 | P1, P2, P3, P6 | 46.67% |
| Key Managerial Personnel | 5 | P3, P9 | 100% |
| Employees other than BoD and KMP | 275 | P1-P9 | 97.27% |
| Workers | 8 | P2, P3, P5, P8, P9 | 100% |

2. **Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format**

| 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 | Principle 1 – Ethical, Transparent and Accountable Governance | National Stock Exchange (NSE), Bombay Stock Exchange (BSE) | 23,600 (including GST) | During the year under review, the Company has received penalty notice from NSE/BSE amounting to Rs. 23,600/- (Including GST). The Company has filed an appeal/representation against the said penalty, and the matter is currently pending resolution. No amount has been deposited towards the penalty as of the reporting date. | Yes |
| Settlement | Nil | Nil | Nil | Nil | Nil |
| Compounding fee | Nil | Nil | Nil | Nil | Nil |

**Non-Monetary**

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

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

| Case Details | Name of the regulatory/ enforcement agencies/ judicial institutions |
|---|---|
| During the year under review, the Company has received penalty notice from NSE/BSE amounting to Rs. 23,600/- (Including GST). The Company has filed an appeal/representation against the said penalty, and the matter is currently pending resolution. No amount has been deposited towards the penalty as of the reporting date. | National Stock Exchange (NSE), Bombay Stock Exchange (BSE) |

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

Yes, NGEL has an Anti-Bribery and Anti-Corruption Policy to uphold integrity, ethics & transparency in governance of the Company and thereby to reinforce the trust and confidence reposed in the Company by the shareholders and other stakeholders. The policy defines bribery and corruption and prohibits all bribery and corruption practices. The policy has been uploaded on the Company's website and can be accessed at https://ngel.in/public/media_library/1/905e9e51f9.pdf

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| 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 (Current Financial Year) | | FY 2024-25 (Previous Financial Year) | |
|---|---|---|---|---|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | 0 | - | 0 | - |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | 0 | - | 0 | - |

**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 corrective action was taken as no complaints were received in relation to issues of corruption and conflict of interest.

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| Number of days of accounts payables* | 182.10 | 121.43# |

**Total other expenses are considered as cost of goods sold*

*#FY 2024–25 comparative figure has been restated based on the audited consolidated financial statements.*

**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.

| Parameter | Metrics | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|---|
| Concentration of Purchases | a. Purchases from trading houses as % of total purchases | - | - |
| | b. Number of trading houses where purchases are made from | - | - |
| | c. Purchases from top 10 trading houses as % of total purchases from trading houses | - | - |
| Concentration of Sales | a. Sales to dealers / distributors as % of total sales | 100% | 100% |
| | b. Number of dealers / distributors to whom sales are made | 11 | 8 |
| | c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors | 99% | 100% |
| Share of RPTs in* | a. Purchases (Purchases with related parties / Total Purchases#) | 0.31% | 0.03% |
| | b. Sales (Sales to related parties / Total Sales) | 4.57% | 3.02% |
| | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | 100% | - |
| | d. Investments (Investments in related parties / Total Investments made) | 100% | 100% |

**The figures are reported on standalone basis*
*#Total purchases refer to other expenses as per Standalone financial statements.*

## Leadership Indicators

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

| Total number of awareness programs held | Topics / principles covered under the training | %age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|---|---|
| 23 | Project implementation requirements, contractual obligations, bid submission and evaluation process, annual energy production assessment, and General Conditions of Contract (GCC), including statutory, labour, health and safety, and human rights requirements | 71.46% |

**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, there is a statutory mechanism provided under Companies Act, 2013 wherein the following processes is adopted to avoid/ manage conflict of interests involving members of the Board:

a. Submission of disclosures and declarations by directors of the Company under the provisions of Companies Act, 2013 and SEBI (LODR) Regulations, 2015 regarding interest in various entities and abstaining from discussions wherever conflict of interest occurs.

b. Adhering to a Code of Conduct laid down as per SEBI (LODR) Regulations, 2015 regarding various matters including management of conflict of interest and providing annual affirmations.

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

### Essential Indicators

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) | Details of improvements in environmental and social impacts |
|---|---|---|---|
| R&D | 0% | 0% | - |
| Capex | 100% | 100% | Capital expenditure is directed towards renewable energy generation assets, reducing greenhouse gas emissions, contributing to the clean energy transition and supporting the expansion of renewable energy generation capacity. |

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

   No. While NGEL does not currently have a formal sustainable sourcing procedure, sustainability-related considerations are addressed through various existing policies and operational practices relating to environmental management, resource conservation, health & safety, ethics, compliance and responsible business conduct. These principles are increasingly reflected in supplier and contractor engagement processes. Additionally, a significant proportion of procurement is sourced from established organisations that have defined sustainability practices and publicly disclose their ESG and sustainability performance.

   **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.**

| S. No. | Product | Process to safely reclaim the product |
|---|---|---|
| a. | Plastics (including packaging) | Not applicable. NGEL is engaged in renewable energy generation and does not manufacture or sell products that require end-of-life reclamation or take-back. |
| b. | E-Waste | |
| c. | Hazardous Waste | |
| d. | Other waste | |

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.**

   Extended Producer Responsibility (EPR) is not applicable to NGEL's principal activities as per the definition and coverage of EPR regulations. However, waste generated from NGEL's operations, such as plastic waste, e-waste, battery waste, and other regulated waste streams, is managed in accordance with applicable waste management rules.

### 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 forwhich the LifeCycle Perspective / Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain(Yes/No) If yes, provide the web-link. |
|---|---|---|---|---|---|
| No. NGEL is engaged in the generation of renewable energy and does not manufacture products. Further, no Life Cycle Assessment (LCA) has been undertaken for its renewable energy generation activities or related services during the reporting period. | | | | | |

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 the Product/Service | Description of the Risk/Concern | Action Taken |
|---|---|---|
| *No Life Cycle Assessment (LCA) has been conducted.* | | |

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 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
| Not Applicable | | |

**Please note that NGEL is engaged in the generation of renewable energy. As the Company's business operations do not involve the manufacture or sale of products with associated packaging materials, there is no scope for reclaiming products or packaging materials. Accordingly, this disclosure is not applicable.*

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

| | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Re-used | Recycled | Safely Disposed | Re-used | Recycled | Safely Disposed |
| Plastics (including packaging) | Not Applicable | | | Not Applicable | | |
| E-waste | | | | | | |
| Hazardous waste | | | | | | |
| Other waste | | | | | | |

**Please note that NGEL is engaged in the generation of renewable energy. As the Company's business operations do not involve the manufacture or sale of products with associated packaging materials, there is no scope for reclaiming products or packaging materials. Accordingly, this disclosure is not applicable.*

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

| Indicate product category | Reclaimed products and their packaging materials as % of total products sold in respective category |
|---|---|
| Not Applicable | |

**Please note that NGEL is engaged in the generation of renewable energy. As the Company's business operations do not involve the manufacture or sale of products with associated packaging materials, there is no scope for reclaiming products or packaging materials. Accordingly, this disclosure is not applicable.*

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

## Essential Indicators

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

| Category | Total (A) | Health Insurance | | Accident Insurance | | Maternity benefits | | Paternity benefits | | Day Care facilities | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) |
| **Permanent Employees** | | | | | | | | | | | |
| Male | 246 | 246 | 100% | 246 | 100% | 0 | 0.00% | 246 | 100% | 0 | 0.00% |
| Female | 15 | 15 | 100% | 15 | 100% | 15 | 100% | 0 | 0.00% | 0 | 0.00% |
| Total | 261 | 261 | 100% | 261 | 100% | 15 | 5.75% | 246 | 94.25% | 0 | 0.00% |
| **Other than Permanent Employees** | | | | | | | | | | | |
| Male | 238 | 238 | 100% | 238 | 100% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Female | 17 | 17 | 100% | 17 | 100% | 17 | 100% | 0 | 0.00% | 0 | 0.00% |
| Total | 255 | 255 | 100% | 255 | 100% | 17 | 6.67% | 0 | 0.00% | 0 | 0.00% |

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

| Category | Total (A) | Health Insurance | | Accident Insurance | | Maternity benefits | | Paternity benefits | | Day Care facilities | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) |
| **Permanent Workers** | | | | | | | | | | | |
| Male | 2 | 2 | 100% | 2 | 100% | 0 | 0.00% | 2 | 100% | 0 | 0.00% |
| Female | 1 | 1 | 100% | 1 | 100% | 1 | 100% | 0 | 0.00% | 0 | 0.00% |
| Total | 3 | 3 | 100% | 3 | 100% | 1 | 0.33% | 2 | 0.67% | 0 | 0.00% |
| **Other than Permanent Workers** | | | | | | | | | | | |
| Male | 3,151 | 3,151 | 100% | 3,151 | 100% | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Female | 11 | 11 | 100% | 11 | 100% | 11 | 100% | 0 | 0.00% | 0 | 0.00% |
| Total | 3,162 | 3,162 | 100% | 3,162 | 100% | 11 | 0.35% | 0 | 0.00% | 0 | 0.00% |

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| Cost incurred on well-being measures as a % of total revenue* of the company | 1.18% | 1.01%# |

**Total Revenue includes Other Income*

*#FY 2024-25 data was restated based on the sub-headings covered under cost of well-being measures.*

**2. Details of retirement benefits, for current FY and previous FY:**

| Benefits | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF | 100% | 100% | Yes | 100% | 100% | Yes |
| Gratuity | 100% | 0.09% | Yes | 100% | 0.11% | Yes |
| ESI | NA | 99.91%* | Yes | 100% | 99.89% | Yes |

**For other than permanent workers, ESI or Employees' Compensation coverage is provided, as applicable.*

**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, our offices are equipped with accessibility features that ensure an inclusive workplace for differently abled employees and workers, in accordance with the Rights of Persons with Disabilities Act, 2016.

**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.**

NGEL provides equal opportunity to all persons with benchmark disabilities (as defined in the Rights of Persons with Disabilities Act 2016) for all class and categories of employees. And NGEL ensures that the work environment is free from any discrimination against persons with benchmark disabilities. Further, the company ensures that conducive environment is provided to Persons with Disabilities to perform their roles, responsibilities and excel in the same.

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

| | Permanent employees | | Permanent workers | |
|---|---|---|---|---|
| Gender | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male | 100% | 100% | - | - |
| Female | - | - | - | - |
| Total | 100% | 100% | - | - |

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

| | Yes/No (If yes, then give details of the mechanism in brief) |
|---|---|
| Permanent Workers | Yes. NGEL has a grievance mechanism for permanent employees and workers. As the permanent employees and workers are on secondment from NTPC, workplace-related grievances can be submitted through the Grievance Redressal System available on the NTPC Corporate HR Portal. The grievances received are reviewed by the concerned authorities and addressed in accordance with the established grievance redressal process, with an emphasis on timely resolution. In addition, employee concerns and feedback are identified and addressed through regular communication and stakeholder engagement initiatives. |
| Permanent Employees | |
| Other than Permanent Workers | For other than permanent employees, other than permanent workers, and other stakeholders, a grievance mechanism is available through the grievance section on the NGEL website. Grievances may be submitted through the prescribed channels available at: https://ngel.in/page/grievance and are reviewed and addressed through the applicable grievance redressal process. |
| Other than Permanent Employees | |

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

| Category | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Total employees / workers in respective category (A) | No. of employees / Workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees/ workers in respective category (C) | No. of employees/ workers in respective category, who are part of association(s) or Union (D) | % (D/C) |
| **Total permanent employees** | 261 | 182 | 69.73% | 229 | 127 | 55.46% |
| Male | 246 | 173 | 70.33% | 217 | 123 | 56.68% |
| Female | 15 | 9 | 60.00% | 12 | 4 | 33.33% |
| **Total permanent workers** | 3 | 0 | 0.00% | 3 | 0 | 0.00% |
| Male | 2 | 0 | 0.00% | 2 | 0 | 0.00% |
| Female | 1 | 0 | 0.00% | 1 | 0 | 0.00% |

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

| Category | FY 2025-26 (Current Financial Year) | | | | | FY 2024-25 (Previous Financial Year) | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | On health and safety measures | | On Skill Upgradation | | Total (D) | On health and safety measures | | On Skill Upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | %(E/D) | No. (F) | %(F/D) |
| **Employees*** | | | | | | | | | | |
| Male | 484 | 422 | 87.19% | 428 | 88.43% | 325 | 217 | 66.6% | 143 | 44.00% |
| Female | 32 | 25 | 78.13% | 23 | 71.88% | 21 | 2 | 9.52% | 13 | 61.90% |
| Total | 516 | 447 | 86.63% | 451 | 87.40% | 346 | 219 | 63.29% | 156 | 45.09% |
| **Workers**** | | | | | | | | | | |
| Male | 2 | 2 | 100% | 2 | 100% | 2 | 0 | 0.00% | 0 | 0.00% |
| Female | 1 | 1 | 100% | 1 | 100% | 1 | 0 | 0.00% | 1 | 100% |
| Total | 3 | 3 | 100% | 3 | 100% | 3 | 0 | 0.00% | 1 | 33.33% |

** Employees include both Permanent and Other than Permanent Employees*

*** Workers include only Permanent Workers*

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

| Category | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) |
| **Employees*** | | | | | | |
| Male | 484 | 484 | 100% | 325 | 325 | 100% |
| Female | 32 | 32 | 100% | 21 | 21 | 100% |
| Total | 516 | 516 | 100% | 346 | 346 | 100% |

| Category | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) |
| **Workers**** | | | | | | |
| Male | 2 | 2 | 100% | 2 | 2 | 100% |
| Female | 1 | 1 | 100% | 1 | 1 | 100% |
| Total | 3 | 3 | 100% | 3 | 3 | 100% |

** Employees include both Permanent and Other than Permanent Employees*

*** Workers include only Permanent Workers*

**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. NGEL maintains a robust occupational health and safety management framework across all its operational sites and project locations. Safety and well-being form an integral part of the organization's operational philosophy, supported by established procedures, safety protocols, and internationally recognized safety management systems. These requirements require strict adherence from employees, contractors, and other personnel working at NGEL facilities, creating a strong culture of prevention and continuous improvement with the objective of achieving a zero-incident workplace.

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

NGEL follows a structured Hazard Identification, Risk Assessment and Control (HIRAC) process to systematically identify workplace hazards and evaluate associated risks across routine and non-routine activities. Risk mitigation measures are implemented in accordance with the established hierarchy of controls, prioritizing hazard elimination, followed by substitution, engineering controls, administrative measures, and the use of personal protective equipment (PPE).

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

Yes. Workers are encouraged to report work-related hazards, unsafe conditions, and deviations through established reporting mechanisms. Toolbox talks/PEP talks are conducted prior to the commencement of work to communicate task-specific hazards and safety measures, along with equipment-specific checklists, wherever applicable. Emergency contact numbers and assembly points are prominently displayed across the plant, and emergency response arrangements are in place. Supervisors are empowered to stop work and remove workers in situations involving imminent danger until the identified hazards have been addressed.

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

Yes, employees and workers have access to non-occupational medical and healthcare services through empaneled hospitals or medical insurance coverage, as part of the Company's commitment to employee well-being.

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

| Safety Incident/Number | Category | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|---|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| Total recordable work-related Injuries | Employees | 0 | 0 |
| | Workers | 0 | 0 |

| Safety Incident/Number | Category | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|---|
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | Workers | 0 | 0 |

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

NGEL conducts safety audits of project sites and stations periodically on a sample basis to assess compliance with safety standards and identify opportunities for improvement. During FY 2025–26, safety audits were carried out at 17 project/ station locations. Prior to the commencement of any work activity, a Job Safety Analysis (JSA) and Hazard Identification and Risk Assessment (HIRA) is undertaken to identify potential hazards and define appropriate risk mitigation measures. The identified safety precautions are communicated to workers through Induction training conducted by the concerned engineer or supervisor before assigning the job and toolbox talks provided before the start of every job. Additionally, periodic safety awareness sessions and mass pep talks are organized to reinforce safe work practices, enhance hazard awareness, and promote a strong safety culture across all project locations.

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

| | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during theyear | Pending resolution at the endof year | Remarks |
| **Working Conditions** | 0 | 0 | - | 0 | 0 | - |
| **Health & Safety** | 0 | 0 | - | 0 | 0 | - |

**14. Assessments for the year:**

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)* |
|---|---|
| Health and safety practices | ~63% |
| Working Conditions | ~63% |

**Assessments are limited to commissioned plants. Corporate offices and other administrative offices are not covered in such assessments.*

**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.**

All safety-related incidents are investigated within a defined timeframe to identify root causes and implement appropriate corrective and preventive actions. These may include strengthening work procedures, conducting targeted safety training, enhancing supervision, implementing engineering controls, and reinforcing permit-to-work systems. The implementation and effectiveness of these actions are monitored through the Company's safety management processes, and lessons learned are incorporated to continuously improve health and safety practices and mitigate significant risks.

## Leadership Indicators

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

**(A) Employees**: Yes

**(B) Workers**: Yes

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

NGEL has processes in place to ensure deduction and deposit of applicable statutory dues by its value chain partners.

Applicable tax deductions, including TDS, are made from vendor payments as per statutory requirements. Further, NGEL's contract terms include provisions requiring contractors and vendors to comply with applicable laws and statutory obligations, including payment of wages, PF/ESI, taxes, duties, levies, and other dues, wherever applicable.

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 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 (Current Financial Year) | FY 2024-25 (Previous Financial Year) | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
| 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. NGEL provides transition assistance programmes for employees approaching superannuation. Employees nearing retirement are nominated for a three-day programme on "Planning for Superannuation", which covers financial planning, investment strategies, legal and estate planning, health and wellness, and other aspects to support a smooth transition into post-retirement life. In addition, the Company conducts skill development and refresher training programmes on renewable energy to support continuous learning and enhance employee capabilities.

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

| | % of value chain partners (by value of business done with such partners) that were assessed* |
|---|---|
| Health and safety practices | 100% |
| Working Conditions | 100% |

**We have sections in our GCC to mandate our contractors to have relevant certifications.*

6. **Provide details of any corrective actions taken or underway to address significant risks/concerns a rising from assessments of health and safety practices and working conditionsof value chain partners.**

For addressing significant risk, Hazard Identification and Risk Assessment (HIRA) is conducted, and control measures are implemented as per risk control hierarchy in all activities inside NGEL premises. This includes activities of value chain partners inside our stations. HIRA is reviewed as and when required. Our agencies / contractors' workers are continuously trained for awareness about the hazards and their mitigation measures. In case of an unsafe practice on the part of an agency is observed then appropriate corrective actions are initiated as per contractual provision. During the reporting period, corrective actions included improvements in site safety arrangements, supervision, safety communication, and work permit controls for high-risk activities.

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

### Essential Indicators

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

Stakeholder engagement is a continuous process at NGEL and is guided by a structured stakeholder engagement framework and the AA1000 Stakeholder Engagement Standard (AA1000SES). NGEL identifies stakeholders as individuals or groups that influence or are influenced by the Company's operations, have a direct or indirect interest in its activities, or are linked to operational, regulatory, financial, or ESG risks and opportunities. Stakeholders are classified into internal and external groups and are prioritized based on their operational dependency, accountability, influence, and impact/ risk exposure. This process enables NGEL to identify key stakeholder groups and integrate their perspectives into business strategy, governance, risk management, and operational decision-making.

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

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---|---|---|---|---|
| Leadership and Board | No | » Board meetings, strategy reviews,<br>» ESG performance reviews,<br>» Internal communications | Quarterly / Periodic | » Business strategy, governance,<br>» Risk management,<br>» ESG performance,<br>» Regulatory compliance,<br>» Project execution,<br>» Capital allocation<br>» Long-term value creation |
| Departmental Heads | No | » Functional reviews,<br>» Meetings,<br>» Workshops,<br>» Internal communications | Periodic | » Operational performance,<br>» Project execution,<br>» ESG implementation, compliance management,<br>» Resource planning<br>» Cross-functional coordination. |
| Plant / Site Leadership | No | » Site reviews,<br>» Operational meetings,<br>» Safety meetings,<br>» Inspections | Continuous / Periodic | » Project execution,<br>» Operational efficiency,<br>» Health and safety,<br>» Environmental compliance,<br>» Community interface<br>» Risk mitigation. |
| Joint Ventures (JVs) | No | » Board meetings,<br>» Review meetings,<br>» Formal communications,<br>» Reporting mechanisms | Periodic | » Project development and execution,<br>» Governance,<br>» Compliance,<br>» Operational performance,<br>» Risk management<br>» Achievement of business objectives. |
| Employees and Workers | No | » Training programmes,<br>» Surveys,<br>» Grievance mechanisms,<br>» Internal communication platforms | Periodic | » Employee well-being,<br>» Health and safety,<br>» Capability development,<br>» Workplace practices, diversity and inclusion,<br>» ESG awareness and organisational performance. |

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---|---|---|---|---|
| Regulators & Government Bodies | No | » Statutory filings,<br>» Compliance submissions,<br>» Meetings, consultations,<br>» Workshops | Need-based / As per statutory requirements | » Regulatory compliance,<br>» Approvals and clearances,<br>» Policy developments,<br>» Environmental and social requirements,<br>» Safety standards and renewable energy sector developments. |
| Local Communities | Yes | » Community meetings,<br>» Consultations,<br>» CSR programmes,<br>» Grievance redressal mechanisms,<br>» Public interactions | Need-based | » Community development,<br>» Livelihood concerns,<br>» Environmental and social impacts,<br>» Land-related matters,<br>» Local employment opportunities and project acceptance. |
| Investors and Shareholders | No | » Annual reports,<br>» Investor meetings,<br>» Earnings calls,<br>» Stock exchange disclosures,<br>» ESG disclosures | Quarterly / Annual | » Financial performance,<br>» Business strategy,<br>» Corporate governance,<br>» Risk management,<br>» ESG performance,<br>» Climate-related initiatives and long-term value creation |
| Customers | No | » Service agreements,<br>» Meetings,<br>» Feedback mechanisms,<br>» Customer interactions | Periodic | » Reliability of power supply,<br>» Contractual obligations,<br>» Service quality,<br>» Operational performance and sustainability commitments |
| Value Chain Partners (Suppliers, EPC Contractors, Logistics Partners and Other Service Providers) | No | » Vendor meetings,<br>» Audits,<br>» Contracts,<br>» Performance reviews,<br>» Capacity-building programmes | Periodic | » Procurement practices,<br>» Project execution, quality standards,<br>» Health and safety,<br>» ESG requirements,<br>» Responsible supply chain management and contractual compliance. |

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---|---|---|---|---|
| Industry Bodies and Media | No | » Industry forums, conferences,<br>» Consultations,<br>» Media interactions,<br>» Publications | Need-based | » Industry developments,<br>» Policy advocacy,<br>» Sector best practices,<br>» Sustainability trends,<br>» Knowledge sharing<br>» Corporate reputation. |
| Government of India | No | » Policy consultations,<br>» Regulatory interactions,<br>» Statutory reporting,<br>» Sectoral engagements | Need-based | » Alignment with national renewable energy objectives,<br>» Policy implementation,<br>» Climate commitments,<br>» Energy transition and regulatory compliance. |
| Citizens of India | No | » Sustainability reports,<br>» Website disclosures,<br>» Public communications,<br>» Media outreach | Periodic | » Access to clean energy,<br>» Environmental stewardship,<br>» Social responsibility,<br>» Transparency,<br>» Climate action and contribution to national sustainability goals. |

## 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.**

Our leadership team actively engages with a wide range of stakeholders, including investors, employees, customers, and suppliers. Through these regular interactions, they collect valuable feedback on critical economic, environmental, and social topics. Key discussions, suggestions and concerns raised during these exchanges are carefully reviewed and when necessary, are escalated to the Board or relevant Committees for further deliberation and appropriate action. The committees of the Board, viz. the CSR & ESG Committee of the Board and the Risk Management Committee of the Board specifically look into matters concerning economic, environmental and social aspects. This process ensures that the Board is equipped with insights directly related to economic, environmental, and social matters, enabling informed decisions that effectively shape the company's strategy and drive its long-term objectives.

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

Yes, NGEL uses stakeholder consultation to identify and manage environmental and social topics through a structured engagement process. Inputs received from key stakeholder groups, including regulators, local communities, investors, employees, and value chain partners, are considered in project planning, ESG risk management, regulatory compliance, sustainability disclosures, and operational decision-making. These inputs help the Company strengthen its environmental and social performance and support long-term value creation.

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

We engage with all stakeholders including the vulnerable/ marginalized stakeholder groups through intermediaries and conduct meetings and subsequently provide clarifications and address their concerns.

## PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

### Essential Indicators

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

| Category | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. of employees/ workers covered (B) | % (B/A) | Total (C) | No. of employees/ workers covered (D) | % (D/C) |
| **Employees** | | | | | | |
| Permanent | 261 | 97 | 37.16% | 229 | 229 | 100% |
| Other than permanent | 255 | 99 | 38.82% | 117 | 117 | 100% |
| Total Employees | 516 | 196 | 37.98% | 346 | 346 | 100% |
| **Workers** | | | | | | |
| Permanent | 3 | 1 | 33.33% | 3 | 3 | 100% |
| Other than permanent*# | 3,162 | 0 | 0.00% | 2,854 | 0 | 0.00% |
| Total Workers | 3,165 | 1 | 0.03% | 2,857 | 3 | 0.10% |

**General awareness on human rights issues and related policies is imparted to contractual workers. However, detailed records and data relating to such awareness programmes are not maintained separately.*

*#Comparative figures for FY 2024–25 have been restated for "Other than permanent workers" consistent with the reporting basis described above.*

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

| Category | FY 2025-26 (Current Financial Year) | | | | | FY 2024-25 (Previous Financial Year) | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | Equal to Minimum Wage | | More than Minimum Wage | | Total (D) | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| **Employees** | | | | | | | | | | |
| **Permanent** | 261 | 0 | 0.00% | 261 | 100% | 229 | 0 | 0.00% | 229 | 100% |
| Male | 246 | 0 | 0.00% | 246 | 100% | 217 | 0 | 0.00% | 217 | 100% |
| Female | 15 | 0 | 0.00% | 15 | 100% | 12 | 0 | 0.00% | 12 | 100% |
| **Other than Permanent** | 255 | 0 | 0.00% | 255 | 100% | 117 | 0 | 0.00% | 117 | 100% |
| Male | 238 | 0 | 0.00% | 238 | 100% | 108 | 0 | 0.00% | 108 | 100% |
| Female | 17 | 0 | 0.00% | 17 | 100% | 9 | 0 | 0.00% | 9 | 100% |
| **Workers** | | | | | | | | | | |
| **Permanent** | 3 | 0 | 0.00% | 3 | 100% | 3 | 0 | 0.00% | 3 | 100% |
| Male | 2 | 0 | 0.00% | 2 | 100% | 2 | 0 | 0.00% | 2 | 100% |
| Female | 1 | 0 | 0.00% | 1 | 100% | 1 | 0 | 0.00% | 1 | 100% |
| **Other than Permanent** | 3,162 | 1,937 | 61.26% | 1,225 | 38.74% | 2,854 | 2,655 | 93.03% | 199 | 6.97% |
| Male | 3,151 | 1,926 | 61.12% | 1,225 | 38.88% | 2,849 | 2,650 | 93.01% | 199 | 6.99% |

| Category | FY 2025-26 (Current Financial Year) | | | | | FY 2024-25 (Previous Financial Year) | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | Equal to Minimum Wage | | More than Minimum Wage | | Total (D) | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Female | 11 | 11 | 100% | 0 | 0.00% | 5 | 5 | 100% | 0 | 0.00% |

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

**a. Median remuneration/wages:**

| | Male | | Female | |
|---|---|---|---|---|
| | Number | Median remuneration/salary/ wages of respective category | Number | Median remuneration/salary/ wages of respective category |
| Board of Directors (BoD) | 5 | NA* | 1 | NA* |
| Key Managerial Personnel (KMP) | 3 | 76,79,829.11 | 0 | 0 |
| Employees other than BoD and KMP | 481 | 13,44,822 | 32 | 12,93,258 |
| Workers | 2 | 27,07,842.73 | 1 | 22,40,628.88 |

**Please note that the Directors on the Board of NGEL receive remuneration from NTPC Limited.*

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| Gross wages paid to females as % of total wages | 5.69% | 4.99% |

**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. The Head of Human Resources serves as the designated focal point for addressing human rights-related impacts or concerns arising from the Company's operations. Further details are available at the link – https://www.ngel.in/public/media_library/1/1a734719ba.pdf

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

NGEL has established formal institutional grievance redressal mechanisms to address human rights-related concerns in a timely, transparent, and equitable manner. The Company integrates human rights safeguards into its key investment agreements and contracts through specific provisions aimed at minimizing the risk of violations. Regular reviews and compliance monitoring are undertaken to ensure adherence to applicable regulations, contractual obligations, and internal policies.

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

| | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Sexual Harassment | 0 | 0 | - | 0 | 0 | - |
| Discrimination at workplace | 0 | 0 | - | 0 | 0 | - |

| | FY 2025-26 (Current Financial Year) | | | FY 2024-25 (Previous Financial Year) | | |
|---|---|---|---|---|---|---|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Child Labour | 0 | 0 | - | 0 | 0 | - |
| Forced Labour/ Involuntary Labour | 0 | 0 | - | 0 | 0 | - |
| Wages | 0 | 0 | - | 0 | 0 | - |

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| 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 | 0 |
| Complaints on POSH upheld | 0 | 0 |

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

   NGEL has established Internal Complaints Committees (ICCs) at its operational locations to address complaints related to sexual harassment and discrimination. These committees provide a formal and confidential grievance redressal mechanism, ensuring that complaints are handled impartially, investigated promptly, and resolved in accordance with applicable legal requirements, while safeguarding complainants against retaliation or adverse consequences.

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

   Yes. The Company's significant business agreements and contracts include provisions to safeguard human rights and minimize the risk of human rights violations.

10. **Assessments for the year:**

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

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

    No significant risks or concerns were identified during the assessments conducted during the reporting period. Accordingly, no corrective actions were required, as no instances relating to child labour, forced/involuntary labour, sexual harassment, discrimination at the workplace, or wages were reported or registered.

## Leadership Indicators

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

   No modifications to business processes were made as a result of addressing human rights grievances or complaints during FY 2025–26, as no such grievances or complaints were registered during the reporting period. The Company continues to maintain established grievance redressal mechanisms, including the Grievance Management System, Internal Complaints Committee (ICC), and Whistle-blower Mechanism.

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

The Company did not undertake a separate Human Rights Due Diligence process during FY 2025–26. Human rights-related risks were managed through existing policies, compliance processes, contractual provisions and grievance redressal mechanisms.

**3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**

Yes

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

| | % of value chain partners (by value of business done with such partners) that were assessed* |
|---|---|
| Sexual Harassment | 100% |
| Discrimination at workplace | 100% |
| Child Labour | 100% |
| Forced Labour/Involuntary Labour | 100% |
| Wages | 100% |

**The Assessment was undertaken for the value chain partners working in the NGEL boundary, in accordance with the General Conditions of Contract (GCC), which require compliance with applicable labour laws and statutory obligations.*

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

No action was taken since no case were registered.

## PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

### Essential Indicators

**1. Details of total energy consumption (in Giga Joules) and energy intensity, in the following format:**

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| **From renewable sources (GJ)** | | |
| Total electricity consumption (A) | 6,74,102 | 4,12,560 |
| Total fuel consumption (B) | - | - |
| Energy consumption through other sources (C) | - | - |
| **Total energy consumed from renewable sources (A+B+C)** | **6,74,102** | **4,12,560** |
| **From non-renewable sources (GJ)** | | |
| Total electricity consumption (D) | 1,56,411 | 95,400 |
| Total fuel consumption (E) | 8,259 | 3,965.7 |
| Energy consumption through other sources (F) | - | - |
| **Total energy consumed from non-renewable sources (D+E+F)** | **1,64,670** | **99,365.7** |
| **Total energy consumed (A+B+C+D+E+F)** | **8,38,772** | **5,11,925.7** |
| **Energy intensity per rupee of turnover** (Total energy consumed / Revenue from operations) (GJ/INR) | 0.000030 | 0.000023 |

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| **Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)**<br>(Total energy consumed / Revenue from operations adjusted for PPP) (GJ/$) | 0.00062 | 0.00048 |
| **Energy intensity in terms of physical**<br>**Output (GJ/KWh)** | 0.00008873 | 0.00007497* |

*The energy intensity in terms of physical output value has been restated for FY2024-25

**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.**

Yes, Assurance has been carried out by TUV India Pvt. Ltd

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

   Not Applicable. NGEL does not have any site identified as designated consumers DCs under the Performance, Achieve and Trade (PAT) Scheme.

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

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| **Water withdrawal by source (in Kilo-Litre)** | | |
| (i) Surface water | 39,305 | 24,950 |
| (ii) Groundwater | 5,26,300 | 3,07,125 |
| (iii) Third party water | 84,534 | 9,361 |
| (iv) Seawater / desalinated water | - | - |
| (v) Others | - | 6,204 |
| **Total volume of water withdrawal (in Kilo-Litre) (i + ii + iii + iv + v)** | 6,50,139 | 3,47,640 |
| **Total volume of water consumption (in Kilo-Litre)** | 6,50,139 | 3,47,640 |
| **Water intensity per rupee of turnover**<br>(Total water consumption / Revenue from operations) (Kilo-Litre/INR) | 0.000023 | 0.000016 |
| **Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)**<br>(Total water consumption / Revenue from operations adjusted for PPP) (Kilo-Litre/$) | 0.00048 | 0.00033 |
| **Water intensity in terms of physical output (Kilo-Litre/KWh)** | 0.000069 | 0.000051 |

**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.**

Yes, Assurance has been carried out TUV India Pvt. Ltd

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

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year)# |
|---|---|---|
| **Water discharge by destination and level of treatment (in Kilo-litre)** | | |
| (i) To Surface water | - | - |

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year)# |
|---|---|---|
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (ii) To Groundwater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iii) To Seawater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iv) Sent to third parties | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (v) Others | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| **Total water discharged (in Kilo-litre)** | - | - |

**Note: Given the nature of NGEL's renewable energy operations, there is no process-related discharge of water. Water used for solar module cleaning is either evaporated or naturally percolates into the ground. Further, the adoption of robotic dry module cleaning systems has significantly reduced water consumption for solar panel cleaning, where applicable.*

*#Comparative figures for FY 2024–25 have been restated to conform to the reporting year's presentation and basis, as detailed in the note above.*

**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**.

Yes, Assurance has been carried out TUV India Pvt. Ltd

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

   Not applicable. NGEL operates in the renewable energy sector, with a portfolio primarily comprising solar and wind power projects. Its operations do not involve water-intensive industrial processes or generate process effluents and liquid discharges that require treatment or disposal. Therefore, the implementation of a Zero Liquid Discharge (ZLD) system is not relevant to the nature and scale of the Company's current operations**.**

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 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|---|
| NOx | Metric tonnes | - | - |
| SOx | Metric tonnes | - | - |
| Particulate matter (PM) | Metric tonnes | - | - |
| Persistent organic pollutants (POP) | Metric tonnes | - | - |
| Volatile organic compounds (VOC) | Metric tonnes | - | - |
| Hazardous air pollutants (HAP) | Metric tonnes | - | - |

**Note: NGEL's operations fall under the White Category of industries and are primarily focused on renewable energy generation. As electricity is generated through renewable energy sources, the operations do not involve combustion-based processes and therefore do not result in any significant process-related air emissions.*

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

Yes, Assurance has been carried out TUV India Pvt. Ltd

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

| Parameter | Unit | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|---|
| **Total Scope 1 emissions** (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 618.77 | 295.54 |
| **Total Scope 2 emissions** (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 30,847.72 | 19,697.33 |
| **Total Scope 1 and Scope 2 emissions intensity per rupee of turnover** (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | Metric tonnes of CO2 equivalent/ INR | 0.00000114 | 0.00000090 |
| **Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | Metric tonnes of CO2 equivalent/$ | 0.000023 | 0.000019 |
| **Total Scope 1 and Scope 2 emission intensity in terms of physical output** | Metric tonnes of CO2 equivalent/ kWh | 0.0000033 | 0.0000029 |

**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.**

Yes, Assurance has been carried out by TUV India Pvt. Ltd.

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

   Yes. NGEL's renewable energy projects contribute to the reduction of greenhouse gas emissions through the generation of electricity from renewable sources, thereby displacing electricity that would otherwise be generated from conventional fossil fuel-based sources. During FY 2025-26, the renewable energy generation from NGEL Group's operating assets is estimated to have avoided approximately 6.71 million tonnes of $CO_2$eq. emissions by displacing fossil fuel-based electricity generation. The resulting renewable electricity generation supports India's transition towards a higher share of non-fossil fuel-based electricity generation and contributes to the achievement of the country's Nationally Determined Contributions (NDCs) under the Paris Agreement.

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

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| **Total Waste Generated (in metric tonnes)** | | |
| Plastic waste (A) | 0.30 | 3.36 |
| E-waste (B) | 196.10 | 506.4 |
| Bio-medical waste (C) | - | 0.003 |
| Construction and demolition waste (D) | - | - |
| Battery waste (E) | - | 3.72 |
| Radioactive waste (F) | - | - |
| **Other Hazardous waste. Please specify, if any. (G)** (Used Transformer Oil) | 0.10 | - |

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| **Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)** | 40.30 | 304.9 |
| Metal Scrap | 27.00 | - |
| Wooden Waste | 13.30 | - |
| **Total (A+B + C + D + E + F + G + H)** | 236.80 | 818.38 |
| **Waste intensity per rupee of turnover** (Total waste generated / Revenue from operations) (MT/ INR) | 0.00000001 | 0.00000003 |
| **Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total waste generated / Revenue from operations adjusted for PPP) (MT/$) | 0.00000017 | 0.00000076 |
| **Waste intensity in terms of physical output (MT/KWh)** | 0.00000003 | 0.00000019 |
| **For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)** | | |
| **Category of waste** | | |
| (i) Recycled | 13.85 | 3.52 |
| (ii) Re-used | 21.1 | 0.003 |
| (iii) Other recovery operations | - | 689.50 |
| **Total** | **34.95** | **693.02** |
| **For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)** | | |
| Category of waste | | |
| (i) Incineration | - | - |
| (ii) Landfilling | - | - |
| (iii) Other disposal operations* | 201.85 | 125.36 |
| **Total** | **201.85** | **125.36** |

*Waste reported under the "Other Disposal Operations" category is temporarily stored at designated scrapyards within the respective project sites and is disposed of in accordance with applicable regulatory requirements and established waste management practices.

**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:**

Yes, Assurance has been carried out by TUV India Pvt. Ltd.

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.**

    NGEL is committed to managing all types of waste generated from its operations in an environmentally responsible manner and in compliance with applicable regulatory requirements. The Company follows a structured waste management approach encompassing waste identification, segregation, collection, storage, transportation, recycling, recovery, and disposal, as appropriate. Our primary objective is to maximize resource utilization and minimize waste generation. Where waste disposal is unavoidable, it is carried out in full compliance with applicable laws and regulatory requirements. The management of hazardous and non-hazardous waste generated from our operations is governed by relevant statutory regulations.

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

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

**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 |
|---|---|---|---|---|---|
| EIA notification is not applicable for renewable energy power generation | Not Applicable | | | | |

*NGEL's operational portfolio primarily comprises solar and wind power generation projects, which are generally not covered under the categories requiring prior Environmental Clearance under the Environmental Impact Assessment (EIA) Notification, 2006. For emerging technologies and projects where environmental appraisal or statutory clearances are applicable, the Company complies with all relevant regulatory requirements and obtains the necessary approvals from the competent authorities.

**13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder.**

Yes, NGEL is compliant with the applicable environmental law/ regulations/ guidelines in India

## Leadership Indicators

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

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

**(i) Name of the area:** Bhuj, Mandsaur, Phalodi, Jaisalmer and Sankra

**(ii) Nature of operations:** Renewable Energy Generation

**(iii) Water withdrawal, consumption, and discharge in the following format:**

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year)* |
|---|---|---|
| **Water withdrawal by source (in Kilo-Litre)** | | |
| (i) Surface water | 1,950 | - |
| (ii) Groundwater | 2,12,699 | - |
| (iii) Third party water | 4,993 | - |
| (iv) Seawater / desalinated water | - | - |
| (v) Others | - | - |
| **Total volume of water withdrawal (in Kilo-Litre)** | 2,19,642 | - |
| **Total volume of water consumption (in Kilo-Litre)** | 2,19,642 | - |
| **Water intensity per rupee of turnover** (Water consumed / turnover) (Kilo-litre/INR) | 0.0000079 | - |

| Parameter | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year)* |
|---|---|---|
| **Water discharge by destination and level of treatment (in Kilo-Litre)** | | |
| (i) Into Surface water | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (ii) Into Groundwater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iii) Into Seawater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iv) Sent to third parties | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (v) Others | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| **Total water discharged (in Kilo-Litre)** | - | - |

*Data was not reported in FY 2024-25

**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.**

Yes, assurance was conducted by TUV India Pvt. Ltd

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

| Parameter | Unit | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|---|
| **Total Scope 3 emissions** (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | - | - |
| **Total Scope 3 emissions per rupee of turnover** | | - | - |
| **Total Scope 3 emission intensity** (optional) - the relevant metric may be selected by the entity | | - | - |

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

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

Not Applicable

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

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along with summary) | Outcome of the Initiative |
|---|---|---|---|
| 1. | AI/ML-based weather forecasting | AI/ML-based hybrid weather forecasting model is being developed with IIT Chennai to improve scheduling and forecasting for solar and wind operation. | » Improved generation forecasting.<br>» Supporting efficient plant operations and grid scheduling. |
| 2. | RAMC Setup Through IBM Maximo Renewables | Implementation of Centralized AI/ML based Analytics Portal at REAMG Jaipur. Around 25 Stations already onboarded and Implementation for all NGEL & NREL Station under progress. | » Improved asset performance monitoring.<br>» Enabling timely maintenance and optimisation of plant performance. |
| 3. | SCB Thermography | SCB Thermography has been implemented at the station to enhance operational safety and improve preventive maintenance practices. | » Supports condition-based monitoring<br>» Improving equipment reliability.<br>» Reducing operational downtime. |
| 4. | Aggregation QCA | All ISTS station except Khavda Projects are covered in aggregation through QCA Agencies – Manikaran and Emsys. | » Aggregation helps average out deviations across multiple plants/geographies, reducing net error and smoothing performance.<br>» QCA can optimize aggregated forecasting, scheduling, and dispatch coordination. |
| 5. | SKY Camera | Sky camera installed at SKB-I, with installation at SKB-II under progress, for real-time weather monitoring. | » Improved weather forecasting, supporting more accurate generation forecasting.<br>» Efficient grid operations. |
| 6. | Additional pyranometer installation | At selected Solar Stations, additional Pyranometers have been installed to enhance the accuracy and reliability of Solar Radiation (Irradiance) Measurement. | » This initiative will enhance the reliability of PG Test results.<br>» Support accurate evaluation of plant performance. |
| 7. | Use High efficiency Solar PV Bifacial modules | All our new power plants use High efficiency Bifacial solar PV modules for electricity generation | » Improved solar energy generation efficiency.<br>» Enhanced land-use efficiency. |

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along with summary) | Outcome of the Initiative |
|---|---|---|---|
| 8. | Robotic dry cleaning of solar modules | Robotic dry cleaning is employed fully at Bhadla-II Solar Power Plant | » Improved module efficiency.<br>» Reduced water consumption for module cleaning, particularly in water-scarce regions. |
| 9. | Grass Cutting Robot | Grass-cutting robot successfully tested at Ettayapuram Solar Station to enhance vegetation management and improve O&M efficiency. | » Improve Solar Efficiency.<br>» Reduced Shading Loss |

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

   NGEL is in the process of developing a Business Continuity Plan to support the continuity of critical business operations during disruptions and strengthen operational resilience. The Company has emergency preparedness and response procedures, including site-specific emergency and disaster management measures, as applicable, to address potential incidents and minimize operational impacts. Periodic reviews, training and mock drills are undertaken, where applicable, to enhance preparedness and response capabilities.

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?**

   Waste generated at site is being disposed through government authorised agencies.

7. **Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts**. 0%

   *Note: Environmental impact assessments of value chain partners were not conducted during the reporting period.*

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

   a. **By the listed entity:** Zero, NGEL has not generated or procured any Green Credits during the reporting period.

   b. **By the top ten (in terms of value of purchases and sales respectively) value chain partners:** Not Applicable

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

### Essential Indicators

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

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

| S. No. | Name of the trade and industry chambers/associations | Reach of trade and industry chambers/ associations (State/National) |
|---|---|---|
| 1 | Global Alliance for Sustainable Energy | National |

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

| Name of authority Brief of the case Corrective action taken | Name of authority Brief of the case Corrective action taken | Name of authority Brief of the case Corrective action taken |
|---|---|---|
| No cases were reported during FY 2025–26; therefore, no corrective action was required. | | |

## Leadership Indicators

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

| S. No. | Public Policy Advocated | Method resorted for such advocacy | Whether information available in public domain (Y/N)? | Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify) | Web Link, if available |
|---|---|---|---|---|---|
| Not Applicable | | | | | |

## PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

### Essential Indicators

**1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

| Name and brief of the project | SIA Notification No. | Date of Notification | Whether conducted by independent in external agency (Yes/No) | Results communicated in public domain (Yes/ No) | Relevant web link |
|---|---|---|---|---|---|
| Not Applicable. No Social Impact Assessments were undertaken during FY 2025–26, as the Company's projects were developed on land obtained through lease or other contractual arrangements and did not involve land acquisition requiring a Social Impact Assessment under the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013. (RFCTLARR Act, 2013) | | | | | |

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

| S. No. | Name of the project for which R&R is ongoing | State | District | No. of project affected families (PAFs) | % of PAFs covered by R&R | Amounts paid to PAFs in the FY (In INR) |
|---|---|---|---|---|---|---|
| Not applicable, as no projects involved displacement during FY 2025–26. Accordingly, no ongoing Rehabilitation and Resettlement (R&R) activities were undertaken by the Company during the reporting period. | | | | | | |

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

In order to facilitate resolution of grievances in transparent and time bound manner. NGEL has developed an interactive grievance redressal mechanism which can be accessed through our website at https://ngel.in/page/grievance. In addition to this, grievances (if any) are also received through individual sites which are resolved satisfactorily to the stakeholder's requirement.

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

| | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| Directly sourced from MSMEs/small producers | 68.2% | 70% |
| Directly from within India | 99.98% | 98.66% |

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

| Location | FY 2025-26 (Current Financial Year) | FY 2024-25 (Previous Financial Year) |
|---|---|---|
| Rural | 29.26% | 25.83% |
| Semi-urban | 8.89% | 13.11% |
| Urban | 57.56% | 59.38% |
| Metropolitan | 4.29% | 1.68% |

## Leadership Indicators

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

| Details of negative social impact identified | Corrective action taken |
|---|---|
| Not applicable, as no Social Impact Assessments were undertaken during FY 2025–26. Accordingly, no mitigation actions were required during the reporting period. | |

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

| S. No. | State | Aspirational District | Amount Spent (In Lakh INR) |
|---|---|---|---|
| 1 . | Rajasthan | Jaisalmer | 115.92 |
| 2. | Madhya Pradesh | Rajgarh | 16.36 |

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

NGEL follows a preferential procurement policy aligned with the 'Public Procurement (Preference to Make in India)' Guidelines, aimed at enhancing the share of indigenous goods and services. NGEL has also implemented the Public Procurement Policy for Micro and Small Enterprises (MSEs) Order, 2012, as amended from time to time, which mandates preference to MSE (Micro and small enterprise) bidders for procurement of goods and services. These measures collectively strengthen domestic supply chains, support inclusive economic development, and promote self-reliance.

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

NGEL extends preference to Micro and Small Enterprises (MSEs) across its procurement processes, in line with the Government of India's procurement policies for MSEs.

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

During FY 2025-26, procurement from MSEs constituted approximately Rs. 119.7 crore out of Rs 175.49 crore, i.e., 68.2% of total procurement.

**4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:**

| S. No. | Intellectual Property based on traditional knowledge | Owned/Acquired (Yes/No) | Benefit shared (Yes/No) | Basis of calculating benefit share |
|---|---|---|---|---|
| Not applicable, as NGEL did not derive or share any benefits from intellectual properties owned or acquired based on traditional knowledge during FY 2025–26. | | | | |

**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**

**Contribution of CSR budget amount is deposited as per the Schedule VII of Section 135 of Companies Act 2013.**

| S. No. | CSR Project | No. of persons benefitted from CSR projects | % of beneficiaries from vulnerable and marginalized groups |
|---|---|---|---|
| 1. | Distribution of assistive aids and appliances to support Persons with Disabilities (PwDs) through ALIMCO in Bikaner District Rajasthan | 130 | ~100% |

| S. No. | CSR Project | No. of persons benefitted from CSR projects | % of beneficiaries from vulnerable and marginalized groups |
|---|---|---|---|
| 2. | Procurement of 26 NOs water coolers for Govt. institutions of Baap Sub-division, Phalodi | 3,000 | ~100% |
| 3. | Procurement of 1 no. RO machine for DM office, Phalodi | ~500 | ~100% |
| 4. | Providing financial support towards distribution of 2500 no's tracksuits to girl students from Govt. Schools of Baap sub-division | 2,500 | ~100% |
| 5. | Construction of 6 no's water recharge shafts under Karm Bhoomi Se Matribhoomi Mission | 2,140 | ~77% |
| 6. | Construction of 14 no's water recharge shafts under Karm Bhoomi Se Matribhoomi Mission | 4,160 | ~54% |
| 7. | Financial support towards plantation of 6,000 trees in Thar Vatika near NH 168 Fatehgarh | 8,190 | ~96% |
| 8. | Financial support towards construction of Gym complex in Indira Stadium, Jaisalmer | 2,500 | ~85% |
| 9. | Provision of financial support towards procurement of infrastructure support items for CHC Fatehgarh | 7,200 | ~80% |
| 10. | Provision of drinking water facility near waiting hall of Rajgarh Bus Stand | 10,000 | ~91% |
| 11. | Provision of drinking water facility in Primary Health Centre Patan Kala, Rajgarh | 2,500 | ~93% |
| 12. | Provision of essential items including ceiling fan, light, table, chair, bed etc. in Primary Health Centre Patan Kala | 2,500 | ~90% |
| 13. | Procurement of 50 No's desk benches for 4 Govt. Primary schools and 5 no's of computers for 1 Govt. aided school situated Near Bilhaur Solar PV | 533 | ~76% |
| 14. | Provision of health equipment to strengthen Ettayapuram Government Hospital | 1,000 | ~100% |
| 15. | Financial support towards procurement of essential archery equipment for young sportsperson of Andhra Pradesh | 1 | - |
| 16. | Provision of educational inputs including ceiling fans, chairs, tables etc. in Government School, Malviya Nagar Jaipur | 170 | ~66% |
| 17. | Financial support towards Bithoor Mahotsav 2026 | 32,000 | ~99% |

## PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner.

### Essential Indicators

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

NGEL maintains a robust and responsive grievance redressal mechanism in accordance with the provisions of the Electricity Act, 2003. As a generating company engaged with state-owned distribution companies, NGEL ensures prompt, transparent, and effective resolution of all grievances and operational concerns. Complaints and representations are received through multiple channels, including email, telephone, and written correspondence. Each grievance is duly acknowledged, recorded, and addressed through a structured resolution framework that emphasizes transparency, accountability, and timely disposal of issues.

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

| | As a percentage to total turnover |
|---|---|
| Environmental and social parameters relevant to the product | Not applicable, considering the nature of NGEL's products and service offerings. NGEL is engaged in renewable energy generation and supplies electricity primarily to bulk customers; therefore, disclosures relating to safe and responsible usage of products are not applicable. |
| Safe and responsible usage | |
| Recycling and/or safe disposal | |

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

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

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

| | Number | Reasons for recall |
|---|---|---|
| Voluntary recalls | NA | NA |
| Forced recalls | NA | 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.**

Yes, we have a Cyber Security Policy. It can be found on our website: https://ngel.in/public/media_library/1/881edf02ec.pdf

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

No corrective actions were required during FY 2025–26, as no issues were reported in relation to advertising, delivery of essential services, cybersecurity and data privacy of customers, product recalls, or penalties/actions by regulatory authorities concerning the safety of products or services.

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

a. **Number of instances of data breaches -** Zero

b. **Percentage of data breaches involving personally identifiable information of customers -** Zero

c. **Impact, if any, of the data breaches-** Not Applicable

## Leadership Indicators

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

   The information of our products and services can be found at our website- https://www.ngel.in/

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

   NGEL operates under a Business-to-Business (B2B) model and does not directly engage in retail consumer services. However, the company actively promotes health, safety, and community awareness through workshops, seminars, and outreach programmes. Safety instructions are also displayed in local languages at project sites to ensure greater accessibility and public awareness.

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

   NGEL works in close coordination with the Regional Power Committees (RPCs) and Load Dispatch Centres, including the National Load Dispatch Centre (NLDC), Regional Load Dispatch Centres (RLDCs), and State Load Dispatch Centres (SLDCs), to ensure reliable and secure operation of the power system. Continuous coordination and real-time monitoring are undertaken to anticipate and mitigate grid disturbances, maintain grid stability, and minimize the impact of unforeseen incidents. In the event of any disruption, NGEL undertakes timely operational interventions in coordination with the concerned agencies to facilitate restoration of essential power services and ensure uninterrupted supply to beneficiaries.

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

   Not applicable, considering the nature of NGEL's business operations. NGEL is engaged in renewable energy generation and supplies electricity primarily to bulk customers; therefore, product labelling and product information disclosures over and above those mandated by local laws are not applicable.

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

   **(a) Number of instances of data breaches along-with impact:** Zero

   **(b) Percentage of data breaches involving personally identifiable information of customers:** Zero


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# Reasonable Assurance Statement

To the Directors and Management
NTPC Green Energy Limited (NGEL),
3rd Floor, NETRA Building, E-3, Ecotech-II, Udyog Vihar,
Greater Naida, Gautam Budh Nagar,
Uttar Pradesh, India, Pin - 201306

NGEL commissioned TUV India Private Limited (TUVI) to conduct an independent external assurance engagement of BRSR Core disclosures (nine attributes as per Annexure I - Format of BRSR Core), KPIs of the BRSR Core presented under (Annexure I/- BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING FORMAT) following the requirements of the (BRSR Core -Framework for assurance and ESG disclosures for value chain stipulated in SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122. Para 6 & Annexure II. dated 12/07/2023 and Industry Standards on Reporting of BRSR Core. circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177. dated 20/12/2024 and the MASTER CIRCULAR: H0/49/14/14(7)2025-CFD-POD2/I/3762/2026 (last updated on 30 January 2026)).

NGEL developed Business Responsibility and Sustainability Report (hereinafter 'the BRSR') for the period 01/04/2025 to 31/03/2026. The BRSR is based on the National Guidelines on Responsible Business Conduct (NGRBC), SEBI Circular: SEBI/HO/CFD/CMD-2/P/CIR/2021/562. dated 10/05/2021 followed by the notification number SEBI/LAD-NRO/GN/2023/131. dated 14/06/2023 pertaining to BRSR requirement.

This engagement was conducted as a reasonable assurance engagement in accordance with ISAE 3000 (Revised) and is specifically aligned with the SEBI BRSR Core - Framework for Assurance and ESG Disclosures for Value Chain, as stipulated under SEBI Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 and the Industry Standards on Reporting of BRSR Core.

For the avoidance of doubt, this assurance engagement covers only the information disclosed by NGEL within the defined scope for the reporting period stated above, and does not extend to any prospective information, future targets, commitments, or forward-looking statements referenced in the BRSR.

## Applicable Assurance Criteria

The assurance engagement was conducted against the following applicable assurance criteria:

**Primary Criteria (SEBI):**

i. BRSR Core Key Performance Indicators (KPIs) as prescribed under Annexure I - Format of BRSR Core

ii. SEBI Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12/07/2023

iii. Industry Standard on Reporting of BRSR Core SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated 20/12/2024

iv. Master Circular under SEBI (LODR) Regulations_H0/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated 30/01/2026

**Secondary Criteria (Internal Methodologies):**

v. NGEL's documented internal methodologies, measurement protocols, and calculation approaches applied consistently for the reporting period

**Regulatory References (not part of Applicable Criteria):** SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dated 28/03/2025, concerning ESG disclosures for the value chain and green credits, is noted here for regulatory context only. It does not form part of the applicable assurance criteria for this engagement; value-chain KPIs and green credit disclosures are explicitly excluded from scope - see Out of Scope Items below - and no assurance conclusion is expressed on them.

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These criteria were applied to assess the completeness, accuracy, consistency, and reliability of the BRSR Core disclosures. In accordance with ISAE 3000 (Revised) paragraph 24, TUVI assessed the suitability of the above criteria and confirmed that they are complete, relevant, neutral, understandable, and reliable for the purpose of this engagement, and that they are available to intended users of this statement.

## Management's Responsibility

NGEL is responsible for the preparation and presentation of the BRSR Core disclosures (nine attributes as per Annexure I-Format of BRSR Core). NGEL's management holds responsibility for the collection, analysis, and disclosure of the information presented in both the BRSR (web-based and print versions). This includes maintaining the integrity of the associated website and ensuring that all disclosed information is accurate, complete, and aligned with the applicable criteria outlined in the BRSR requirements and is free from material misstatement, whether due to fraud or error. Furthermore, NGEL is accountable for the archiving, storage, and reproduction of the reported data and information, and for making it available to stakeholders and regulators upon request. NGEL's management is further responsible for the design, implementation, and maintenance of internal controls relevant to the preparation and presentation of the BRSR Core disclosures that are free from material misstatement, whether due to fraud or error, and for the establishment of internal controls over the ESG data collection, aggregation, and reporting process.

## Scope and Boundary

The scope of work includes the assurance of the following nine attributes as per Annexure I - Format of BRSR Core disclosed in the BRSR Report. The BRSR core requirements encompass essential disclosures pertaining to the organization's environmental, social, and governance (ESG) performance. For precision, reasonable assurance was obtained over all applicable Key Performance Indicators (KPIs) falling within each of the nine BRSR Core attributes prescribed under Annexure I, and not merely over the nine attribute headings themselves; references to "nine attributes" throughout this statement should be read as shorthand for "all applicable KPIs within the nine BRSR Core attributes." For clarity, disclosures in the BRSR fall into three categories in relation to this engagement: (i) assured disclosures - the nine BRSR Core attributes and their KPIs, on which a reasonable assurance conclusion is expressed; (ii) referenced-only disclosures- contextual information cited in the BRSR that supports understanding of the assured disclosures but is not itself subject to assurance procedures; and (iii) out-of-scope disclosures - items explicitly excluded from this engagement and listed under "Out of Scope Items" below, on which no assurance conclusion, positive or negative, is expressed. In particular, the assurance engagement included the following:

i. Review of nine attributes as per Annexure I - Format of BRSR Core submitted by NGEL (refer Annexure-1 of this statement),

ii. Evaluation of the quality, completeness, and consistency of disclosures

iii. Review of evidence (on a risk-based sample basis) for nine attributes as per Annexure I - Format of BRSR Core.

iv. KPI-level verification of supporting evidence using a risk-based sampling approach, including review of data from selected sites, functions, and data owners. A KPI evidence traceability matrix has been maintained by NGEL, mapping each BRSR Core KPI to its primary source evidence (meter logs, SAP reports, HR systems, invoices, and third-party certifications). TUVI verified the adequacy of source-to-disclosure traceability for each assured KPI during the engagement. For each KPI, the primary evidence source type was identified. The full evidence traceability is maintained by NGEL and was made available to TUVI as part of the engagement documentation. Traceability was validated by tracing a risk-based sample of disclosed KPI values back to their primary source evidence (e.g., meter readings, invoices, SAP/SCADA extracts) and, conversely, by tracing a sample of primary source records forward to confirm accurate reflection in the final disclosure, with any variances investigated and resolved with the relevant data owner before conclusion.

Sampling was designed to provide reasonable assurance over the BRSR Core disclosures using KPI-level sampling procedures,

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taking into consideration inherent risk, estimation uncertainty, and data materiality. Electricity and LPG activity data received 100% coverage (all monthly bills/invoices reconciled to reported totals). Specifically: (a) reconciliation method - every monthly electricity bill and LPG invoice for the reporting period, for every site/office within the reporting boundary, was matched line-by-line to the corresponding consumption figure recorded in the centralized MIS, with the total number of bills/invoices reviewed, by site and month, recorded in the sampling working papers; (b) exceptions - instances where a bill/invoice could not be reconciled to the MIS figure (e.g., due to billing-period cut-off differences or provisional/estimated bills) were logged, investigated with site personnel, and resolved or disclosed as a limitation; (c) completeness testing - TUVI additionally tested completeness by confirming, for a sample of sites, that no bill/invoice for the period was omitted from the population reconciled, using the vendor's own billing cycle records as a cross-check. higher-risk and higher-value KPIs (e.g., GHG emissions, energy, water, waste, safety indicators) were sampled at a higher intensity than lower-risk qualitative disclosures. Overall, sampling procedures covered more than 80% of total activity data by value across the reporting boundary, with sample sizes and site selection determined using professional judgment linked to the KPI-level materiality thresholds described under Materiality below, rather than a fixed statistical confidence interval, consistent with the risk-based approach permitted under ISAE 3000 (Revised).

Site and stream selection for the 80% coverage was determined using a documented risk matrix scoring each site/stream on (i) quantitative significance to the relevant KPI, (ii) inherent risk (reliance on estimation, manual data entry, or third-party data), and (iii) prior-period findings or data quality issues, if any; sites/streams scoring highest were prioritized for testing until the coverage threshold was met.

**Site Coverage Summary (population and physical vs. remote coverage):**

| Reporting Boundary Category | Total Population | Physically Visited | Remote/Desk-Reviewed | Coverage Approach |
|---|---|---|---|---|
| Commissioned renewable energy sites | 27 sites | - | 2 sites | Centralized MIS/SCADA review, all 27 sites' generation and consumption data reconciled; higher-capacity/higher-risk sites (top contributors to Scope 1/2 and energy KPIs by value) subjected to deeper testing |
| Under-construction sites | 13328 MW Capacity | 1 (Kalasar-II) | 13328 MW Capacity | 1 site sampled on a risk basis for physical attendance (highest-risk category per Section 5.5); remaining sites covered via scanned documentation and remote interviews |
| Offices | 8 Offices | 1 (Corporate Office - physically located) | 7 offices (all reviewed; Corporate Office also served as verification venue) | Corporate Office assessed as low risk (data consolidation function only); remote review for other offices |

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| | | | | |
|---|---|---|---|---|
| Total reporting boundary | 27 Commissioned Sites + 8 Offices and 13328 MW of Under-Construction Capacity | 1 site physically visited (1.5% of locations) | (98.5%) | By location count, coverage is necessarily low given the remote/office-based methodology; by activity data value, coverage exceeded 80% (see below) |

Coverage of more than 80% "by value" refers to activity data (MWh generated, energy/water/waste quantities, and safety incident records) rather than site count: the 27 commissioned sites collectively account for the substantial majority of NGEL's reporting-boundary activity data and received full centralized-data review; higher-generation-capacity sites were prioritized for deeper testing (recalculation, invoice-level checks) under the risk matrix described above. The complete KPI-wise, site-wise sample selection with percentages tested is recorded in the engagement working papers (Sampling Sheet, referenced in Section on Evidence Traceability below) and is available for inspection; it is not reproduced in full in this statement for length.

ESG data for the reporting boundary is consolidated on the basis of Operational Control; all sites and offices over which NGEL exercise operational control are included within the reporting boundary. The reporting boundary for the above attributes includes NGEL's 27 commissioned renewable energy (solar and wind) sites of 7165MW capacity, under-construction sites of 13328 MW capacity, and 8 offices, excluding ONGC NTPC Green Private Limited (ONGPL) located across various states in India. ONGPL is a joint venture entity in which NGEL holds a non-controlling equity interest; NGEL does not hold operational control over ONGPL's day-to-day operations, policies, or ESG data systems, and accordingly ONGPL is excluded from NGEL's reporting boundary under the operational control consolidation approach applied consistently across this engagement (see below). This ownership/control assessment was confirmed with NGEL management and is consistent with the same operational control basis applied to determine which of NGEL's own sites are included. All commissioned and under-construction sites listed above are confirmed to fall within NGEL's defined BRSR reporting boundary on an operational control basis; the assurance scope does not extend beyond this defined boundary. The assurance was conducted as a office-based Verification at NGEL's Corporate Office (NETRA Building, Greater Naida) on 20/0712026 and 21/07/2026.

**On-site Verification**

1. NTPC Green Energy Limited, Corporate Office, NETRA Building, E-3, Ecotech-II, Udyog Vihar, Greater Naida, Gautam Budh Nagar, Uttar Pradesh - 20/07/2026 & 21/07/2026
2. NTPC Green Energy, Kalasar-II Solar PV Project (Under Construction Project), Village Kalasar, District Bikaner, Rajasthan - 29/0712026

The assurance was conducted primarily as an office-based Verification at NGEL's Corporate Office, covering the reporting boundary of 27 commissioned renewable energy sites (capacity of 7165 MW), under-construction sites (capacity of 13328 MW), and 8 offices (excluding ONGC NTPC Green Private Limited (ONGPL)), through review of centralized MIS/SCADA records, supporting documentation, and management interviews, together with a desk-based review of the entire reporting boundary. The Corporate Office was assessed as a low-risk location for the purpose of site selection, as it performs a data consolidation and reporting function only, with no on-site generation, construction, or physical waste/safety activity; monitoring scope required at this location was accordingly very limited and was addressed through the office-based procedures described above. This was supplemented by a physical on-site visit to NTPC Green Energy's Kalasar-II Solar PV Project (an under-construction site), Village Kalasar, District Bikaner, Rajasthan, conducted on 29/0712026, selected on a risk basis (as the only site type - under construction - carrying elevated workforce safety and waste management to provide physical corroboration of remote findings for the remaining 27 operational sites and the balance of the under-construction portfolio (13328MW capacity) not physically visited.

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## Limitations

Inherent Limitations: Reasonable assurance is a high, but not absolute, level of assurance and is not a guarantee that an audit conducted in accordance with ISAE 3000 (Revised) will always detect a material misstatement when it exists. Because of the inherent limitations of an assurance engagement, together with the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the engagement was properly planned and performed in accordance with ISAE 3000 (Revised). During fieldwork, five Corrective Action Requests (CARs) were raised in relation to initially missing or incomplete primary evidence (fuel consumption declaration, utility lease agreement, refrigerant calculation sheets, third-party water purchase invoices, and electricity bill reconciliation); all five were subsequently addressed by NGEL management and independently verified and closed by TUVI on the basis of third-party documentary evidence (supplier invoices, statutory filings, utility bills, and equivalent independent records) obtained for each CAR, corroborated remotely; closure was not based solely on management representations, and the closure evidence for each CAR is retained in the engagement file. Closure criteria applied: a CAR was only marked closed where (i) independent third-party documentary evidence (not a management assertion alone) was obtained that directly addressed the specific gap identified; (ii) the evidence was dated within, or clearly attributable to, the reporting period; and (iii) the evidence was cross-checked for internal consistency against other data already verified (e.g., a supplier invoice cross-checked against the corresponding MIS entry and, where available, the supplier's own account statement). Where these three criteria were not all met, the CAR would have remained open and been reported as such; no CAR in this engagement remained open on this basis. Physical site visit verification was not performed in closing these CARs. This engagement was conducted primarily as an office-based verification, supplemented by a physical on-site visit to one sampled under-construction site (NTPC Green Energy's Kalasar-II Solar PV Project, Village Kalasar, District Bikaner, Rajasthan) conducted on 29/0712026; TUVI did not perform physical site visits at the remaining 27 operational or under-construction sites, and accordingly this statement relies on scanned documentation, SCADA/MIS data feeds, and management representations without independent ground-level physical corroboration for those sites. TUVI did not perform any assurance procedures on the prospective information disclosed in the Report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information or on any disclosure other than the BRSR Core disclosures within scope, including the value-chain-related and other items listed under Out of Scope Items below. All other BRSR Core KPIs covered under the nine attributes are included within the assured scope as detailed in Annexure 1 of this statement. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI did not verify any ESG goals and claims through this assignment. TUVI verified data on a sample basis; the responsibility for the authenticity of data entirely lies with NGEL.

Out of Scope Items: For the avoidance of doubt, the following disclosures in the BRSR are explicitly outside the scope of this assurance engagement and carry no assurance conclusion: (i) Scope 3 GHG emission disclosures and value-chain related environmental or social data; (ii) Net Zero and Carbon Neutrality claims or targets; (iii) ESG ratings, scores, or rankings assigned by external agencies; (iv) product-level sustainability claims; (v) biodiversity claims; (vi) carbon offsets and credits; and (vii) future commitments, targets, or transition plans, unless any such item is specifically and explicitly included within the defined scope above - readers should not place reliance on these disclosures as assured information.

A KPI-specific materiality approach was applied comprising two tiers: (i) a 5% quantitative threshold relative to the applicable KPI base value for volume-based KPIs (GHG emissions, energy, water, waste); and (ii) a qualitative zero-tolerance threshold for high-risk ESG indicators - fatalities, permanent disabilities, POSH complaints upheld, regulatory non-compliances, and customer data breaches - where any occurrence is treated as material irrespective of magnitude. The 5% quantitative threshold was selected on the basis of common assurance practice for GHG and utility-based intensity metrics under ISAE 3000 (Revised), calibrated specifically to this engagement by reference to NGEI's scale (27 commissioned sites of 7165 MW capacity, under-construction sites of 13328 MW capacity) and the observed variability in site-level meter and invoice data during planning fieldwork at Corporate Office; a tighter (lower) threshold was considered but not adopted, as it would not be proportionate

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to the estimation tolerance inherent in SCADA-derived and third-party utility data at this scale, while a wider threshold was rejected as insufficiently conservative for a reasonable assurance engagement and reflects the inherent measurement and aggregation tolerance across meter readings, weighbridge data, and third-party invoices observed during planning; it is applied at the individual KPI level rather than in aggregate, so a misstatement in any single KPI exceeding 5% of that KPI's base value is treated as material even where the overall disclosure set is not. Qualitative materiality considerations extend beyond the zero-tolerance indicators listed above to include the nature and cause of a misstatement (e.g., indicative of a broader control weakness or fraud), its effect on trend comparability with the prior reporting period, and its potential to influence the assessment of intended users of this statement, consistent with ISAE 3000 (Revised) paragraph 44's qualitative considerations.

The materiality thresholds described above were proposed by the engagement team during planning, based on the rationale set out above, and formally reviewed and approved by the Engagement Partner prior to commencement of fieldwork as part of the engagement planning sign-off; this approval, together with the supporting rationale.

Materiality Approval Record: KPI-level materiality thresholds were formally approved by the Engagement Partner prior to fieldwork and documented in the engagement file per ISAE 3000 (Revised). A 5% quantitative threshold was applied to volume-based KPIs, reflecting measurement and aggregation tolerance across emission sources, meter readings, water supply data, and waste weighbridges. For estimated KPIs, a ±10% range applies to reflect estimation uncertainty inherent in the underlying calculation methodology; this range is distinct from, and should not be read as, the assurance materiality threshold applied to form the assurance conclusion. This assurance statement is not intended to support, and should not be used in connection with, any greenwashing or misleading environmental or social or product level claims. This assurance statement should be read in its entirety and does not cover value chain disclosures unless specifically included within the defined scope.

Any reliance that a person or third party places on the BRSR Report is entirely at their own risk. TUVI has relied upon audited financial information from the audited financial reports (specifically, NGEL's audited consolidated financial statements for FY 2025-26, as reported by NGEl's statutory auditors and approved by the Board of Directors, from which the Revenue from Operations figure used as the intensity-KP! denominator was sourced), and financial figures are not assured under this engagement. TUVI cross-referenced the Revenue from Operations figure used to the signed audited consolidated financial statements of NGEL for FY 2025-26 (as approved by the Board of Directors and reported by the statutory auditors); the specific reference/identifier of the signed financial statements reviewed is retained in the engagement working papers. NGEL will be responsible for the appropriate application of the financial data. The application of this assurance statement is limited w.r.t SEBI Circular SEBIIHOICFDICFD-SEC-2/PICIR/2023/122. dated 12/07/2023 and Industry Standards on Reporting of BRSR Core. circular SEBIIHOICFOICFO-PoD-1/PICIR/2024/177. dated 20/12/2024). This assurance statement does not endorse any environmental and social claims (related to the product, manufacturing process, packaging, disposal of product etc.) as well as advertisements by the reporting organization. This statement shall not be used to support misleading environmental claims or greenwashing. This assurance statement shall not be interpreted as a certification or endorsement by TUVI of NGEl's sustainability performance, or of any product, service, or environmental/social claim made by NGEL. This assurance statement has been prepared solely to meet the requirements of SEBI BRSR Core assurance and shall not be used or relied upon for any other purpose.

## Our Responsibility

TUVl's responsibility in relation to this engagement is to perform a reasonable level of assurance and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of NGEL's strategy, management of ESG-related matters or the sufficiency of the Report against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVl's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information (nine attributes as per Annexure I - Format of BRSR Core) disclosed by NGEL. Reporting Organization is responsible for archiving the related data for a reasonable time period. The intended users of this assurance statement are the management of 'NGEL'. The data was verified on

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a sample basis, the responsibility for the authenticity of data lies with the reporting organization. TUVI expressly disclaims any liability or co-responsibility 1) for any decision a person or entity would make based on this assurance statement and 2) for any damages arising from erroneous data being reported. This assurance engagement is based on the assumption that the data and information provided to TUVI by NGEL are complete and true.

### Assurance Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing on verification efforts with respect to disclosures. The GHG emission factor hierarchy applied by NGEL and verified by TUVI is as follows: (i) Tier 1 - Site-specific measured factors (fuel calorific value analysis, bomb calorimeter results with calibration certificates);(ii) Tier 2 - Industry-specific published factors (IPCC Guidelines for National Greenhouse Gas Inventories 2006/2019 Refinement; Central Electricity Authority (CEA) $CO_2$ Baseline Database for the Indian Power Sector); (iii) Tier 3 - National factors (Central Electricity Authority (CEA) India grid emission factor for Scope 2 market-based; CPCB/BEE published factors where applicable); (iv) Tier 4 - International published factors (DEFRA greenhouse gas conversion factors applied selectively for vehicle and refrigerant emissions). Site-specific factors were applied where available and validated; published factors were applied with version control documentation maintained by NGEL. The specific editions/versions of the CEA $CO_2$ Baseline Database, CEA grid emission factor, CPCB/BEE factors, and DEFRA greenhouse gas conversion factors applied were verified by TUVI as the latest editions published and applicable to the FY 2025-26 reporting year at the time of use; the exact edition reference for each factor is recorded in the engagement working papers. Emission factors were validated by TUVI against the current published source (IPCC, CEA, DEFRA, as applicable) at the time of the engagement to confirm the correct version was applied; where a factor had been updated or superseded during the reporting period, NGEL's version-control log was reviewed to confirm the change was applied prospectively and consistently. TUVI independently recalculated Scope 1 and Scope 2 emissions for a risk-based sample of source streams and sites by re-deriving emissions from underlying activity data and the applicable factor and compared the result to NGEL's reported figures within the KPI-level materiality threshold. The recalculation sample was drawn from the same risk-based sample described under Sampling above (higher-generation-capacity sites and higher-value emission source streams prioritized), with the specific sites, streams, and number of independent recalculations performed recorded in the recalculation working papers. Variance acceptance criteria applied: a recalculated value within ±5% of NGEl's reported figure (the applied quantitative materiality threshold) was accepted without further procedures; a variance between 5% and 10% was investigated with the site/data owner and accepted only where a documented, verifiable explanation was obtained (e.g., a timing difference or an identified data-entry correction); a variance exceeding 10%, or an unexplained variance in the 5%-10% range, would have been treated as a potential misstatement requiring escalation and disclosure. No recalculated Scope 1 or Scope 2 emission figure in the sample tested produced an unexplained variance exceeding these criteria. Estimation uncertainty (e.g., for factors without site-specific measurement) was treated as described under Materiality, with a ±10% range applied to reflect the inherent uncertainty of estimated values, distinct from the assurance materiality threshold. TUVI has verified the disclosures and assessed the robustness of the underlying data management system, information flows, and controls. In doing so:

a) TUVI examined and reviewed the documents, data, and other information made available by NGEL for non-financial disclosures relating to the nine attributes as per Annexure I - Format of BRSR Core (non-financial disclosures)

b) TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of NGEL,

c) Sampling was performed using a risk-based approach to obtain sufficient and appropriate evidence to support a reasonable assurance conclusion.

d) TUVI performed sample-based reviews of the mechanisms for implementing the sustainability-related policies and data management (qualitative and quantitative)

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e) TUVI adopted a risk-based assurance approach, identifying key assurance risks such as estimation risk, boundary definition risk, and data completeness risk, which informed the nature, timing, and extent of assurance procedures, including sampling.

f) The nature and extent of procedures included inquiries, analytical procedures, and selective testing of supporting documentation for selected ESG disclosures and KPIs. Specifically, procedures performed comprised: walkthroughs of the data flow from source system to final disclosure for selected KPIs; independent recalculation of reported values from underlying activity data and applicable factors; analytical procedures, including trend and ratio analysis against the prior reporting period and expectation benchmarks; inspection of supporting documentation (invoices, meter logs, certificates, policy documents, and Board/Committee minutes); observation of data-collection and monitoring practices during the engagement; inquiry of data owners and management; and reperformance of selected calculations and control activities.

g) The sample selection and sample size were determined using professional judgment, taking into account factors such as the nature of the disclosure, data availability, prior-year observations, and perceived risk, within the constraints of a reasonable assurance engagement.

h) TUVI assessed compliance with reporting requirements of "BRSR"

i) TUVI assessed NGEL's data governance arrangements, including the documented QA/QC process applied to ESG data prior to submission to TUVI, data validation checks embedded in the reporting workflow, and version control over calculation worksheets and emission factor libraries

j) TUVI tested, on a sample basis, the design and operation of relevant ESG internal controls, including maker-checker review and sign-off of KPI data prior to consolidation, segregation of duties between data preparers and reviewers, and NGEl's evidence retention and document control practices supporting the reported disclosures.

**Results of Control Testing:** Based on the sample tested, the maker-checker review and sign-off control and the segregation-of-duties control were assessed as designed and operating effectively, with no exceptions noted in the sample. Evidence retention and document control practices were assessed as designed effectively; operating effectiveness was assessed as partially effective - a control deficiency was noted in that a formal, centralized document retention policy with defined retention periods was not consistently evidenced across all sites at the time of testing (see Opportunities for Improvement, Evidence Retention and KPI Ownership Register). This deficiency was not assessed as sufficient, individually or in aggregate with other matters, to affect the assurance conclusion, but has been reported to NGEL management for remediation.

**SCADA and Remote Data System Reliability:** Given the engagement's substantial reliance on desk review of SCADA-derived and centralized MIS data, TUVI performed a limited-scope evaluation of the reliability of these systems as data sources for assurance purposes: this comprised (i) inquiry of NGEl's IT/OT personnel regarding SCADA data capture and transmission architecture, (ii) confirmation that automated meter/generation readings are transmitted directly to the centralized MIS with minimal manual intervention, reducing transcription risk, and (iii) a general (non-technical) assessment that access to the MIS is restricted to authorized personnel. TUVI did not perform a formal IT general controls (ITGC) audit, penetration testing, or a detailed cybersecurity/data integrity assessment of NGEl's SCADA or MIS systems, as this fell outside the scope of the BRSR Core assurance engagement; this is disclosed as a scope limitation, and users of this statement should not infer that a full IT systems assurance opinion is expressed.

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**KPI-wise Inherent Risk Assessment (basis for sampling intensity):**

| KPI Category | Inherent Risk Rating | Key Risk Driver(s) | Resulting Sampling Intensity |
|---|---|---|---|
| GHG emissions (Scope 1 & 2) | High | Multiple emission factor sources (IPCC/CEA/ DEFRA); estimation for non-metered sources; aggregation across 27+ sites | 100% activity data coverage; recalculation sample from highest- capacity sites |
| Energy consumption/ generation | High | SCADA automation reduces risk, whereas DG consumption still invoiced | 100% bill/invoice coverage (electricity, LPG) |
| Water | Medium | Multiple waste categories and disposal routes; vendor-dependent data | Risk-based sample prioritizing highest-value/hazardous streams |
| Employee well-being/ safety (incidents) | High (zero-tolerance) | Under-reporting risk; safety incidents are qualitatively material regardless of magnitude | 100% review of incident registers; zero-tolerance materiality applied |
| Governance/Board disclosures | Low | Board/Committee minutes are formal, dated records with limited estimation risk | Sample-based review of minutes and ToR documents |

Professional judgement was exercised by the engagement team throughout this assurance engagement, including in planning (assessing inherent and control risk at the KPI level and determining the nature, timing, and extent of procedures), in sampling (determining sample sizes and site/data selection with reference to risk and materiality rather than a fixed statistical formula), and in forming the assurance conclusion (evaluating the nature and cause of identified misstatements, individually and in aggregate, against the materiality thresholds described above).

As part of planning, TUVI considered the risk of material misstatement in the BRSR Core disclosures arising from fraud or error, including the risk of intentional misstatement and the possibility of management override of controls, consistent with ISAE 3000 (Revised). No indicators of fraud, intentional misstatement, or management override were identified during the performance of assurance procedures; had any such indicators been identified, this would have been reported to those charged with governance and reflected in the conclusion.

TUVI maintains appropriate documentation of all assurance procedures performed, evidence obtained, and conclusions reached in accordance with the requirements of ISAE 3000.

**Evidence Obtained and Retained in the Engagement File:** For traceability, the following categories of documented evidence were specifically obtained by TUVI and are retained in the engagement file: (i) the materiality approval record, evidencing sign-off of the quantitative and qualitative materiality thresholds by the Engagement Partner prior to fieldwork; (ii) the KPI evidence traceability matrix maintained by NGEL; (iii) the signed Management Representation Letter (MRL) obtained from NGEL's management; (iv) the sampling plan/sheet recording the sites, KPIs, and sample sizes selected for testing; (v) the recalculation worksheets documenting TUVI's independent recalculation of sampled KPI values; (vi) the internal control testing working papers documenting the maker-checker, segregation-of-duties, and evidence-retention procedures tested; and (vii) SCADA data extracts corroborating generation and plant-performance data for the sampled sites. The absence of an explicit cross-reference to any of these items elsewhere in this statement should not be read as evidence that the underlying procedure was not performed; each is available for inspection in the engagement file.

Such records are securely stored and retained for a minimum period of five years from the date of issuance of the assurance statement (or longer, where required by applicable laws or regulations), to support the basis of our conclusions and enable

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appropriate quality reviews. As part of the evidence obtained for this engagement, TUVI obtained a signed Management Representation Letter (MRL) from NGEL's management, confirming the completeness and accuracy of the information and explanations provided during the course of the assurance engagement. The MRL was used by TUVI to corroborate matters where independent third-party evidence was not available or practicable to obtain (e.g., confirmation that all known instances of non-compliance had been disclosed), and to formally document management's acknowledgement of responsibility for the BRSR Core disclosures. The MRL was not, and was not treated as, a substitute for primary evidence: for all KPI values and disclosures within the sample tested, TUVI obtained and relied primarily upon independent documentary evidence (invoices, meter readings, statutory filings, third-party certificates); the MRL supplemented, rather than replaced, this evidence, consistent with ISAE 3000 (Revised) paragraph A99's guidance that representations do not, by themselves, provide sufficient appropriate evidence. This engagement was subject to an internal Engagement Quality Control Review (EQCR) prior to issuance of this statement, consistent with TUVI's quality control policies and procedures referenced above. The EQCR was performed by a TUVI reviewer who was not a member of the engagement team and had no involvement in the performance of the assurance procedures for this engagement, ensuring independence of the review from the work reviewed. The EQCR reviewer holds authorization from TUVI to perform quality control reviews for BRSR Core assurance engagements, based on relevant sector experience and qualification in sustainability/ESG assurance consistent with ISAE 3000 (Revised) competence requirements; the reviewer's name, qualification, and authorization record are retained in TUVI's internal quality control records. TUVI further confirms that the calculation of Scope 1 and Scope 2 GHG emissions disclosed by NGEL was reviewed for consistency with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard.

## Opportunities for Improvement

The following are the opportunities for

The following are the opportunities for improvement reported to NGEL. However, they are generally consistent with NGEL management's objectives and programs. NGEL has already identified the topic below, and the Assurance team endorses the same to achieve the sustainability goals of the organization.

1. **Capacity Building/ ESG Competency Development:** NGEL may consider imparting dedicated ESG training modules or certifications for identified personnel responsible for data monitoring to ensure consistent reporting.
2. **Internal ESG Audit Depth:** NGEL may consider implementing a formal internal ESG audit calendar (semi-annual plant-level audits, annual cross-site consolidation review, and defined escalation timelines) to strengthen internal assurance depth ahead of external assurance cycles.
3. **Governance - ESG Committee Reporting Cadence:** NGEL may consider increasing the frequency and formality of ESG performance reporting to the Sustainability/ESG Committee (e.g., quarterly dashboards against material KPI targets) to strengthen the evidence trail of Board-level oversight ahead of future assurance cycles.
4. **Automation of Data Flows:** NGEL may consider extending automated (SCADA/system-based) data capture to remaining manual data-entry points in the KPI traceability flow, to reduce manual transcription risk and support more efficient future assurance cycles.

## Conflict of Interest

In the context of BRSR requirements set by SEBI, addressing conflict of interest is crucial to maintain high integrity and independence of assurance engagements. As per SEBI guidelines, assurance providers need to disclose any potential conflict of interest that could compromise the independence or neutrality of their assessments. TUVI diligently identifies any relationships, affiliations, or financial interests that could potentially cause conflict of interest. We proactively implement measures to mitigate or manage these conflicts, ensuring independence and impartiality in our assurance engagements. We provide clear

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and transparent disclosures about any identified conflicts of interest in our assurance statement. We recognize that failure to address conflict of interest adequately could undermine the credibility of the assurance process and the reliability of the reported information. Therefore, we strictly adhere to SEBI guidelines and take necessary measures to avoid, disclose, or mitigate conflicts of interest effectively. Please refer para **"Independence and Code of Conduct"** below.

## Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPIs described in the BRSR Report along with the referenced information are prepared, in all material respects, in accordance with BRSR Core requirements as per Annexure I for the nine attributes, and meets the general content and quality requirements of the BRSR. TUVI confirms its competency to conduct the assurance engagement for the BRSR as per SEBI guidelines. Our team possesses expertise in ESG verification, assurance methodologies, and regulatory frameworks.

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the BRSR requirements. NGEL refers to general disclosure to report contextual information about NGEL, while the Management & Process disclosures the management approach for each indicator (nineattributes as per Annexure I - Format of BRSR Core).

Reasonable Assurance Opinion: Based on the procedures performed and evidence obtained as described in this statement, and subject to the limitations set out above, in our opinion, for each of the nine BRSR Core attributes, the disclosed information is prepared, in all material respects, in accordance with BRSR Core requirements as per Annexure I for BRSR Core criteria, for the reporting period 01/04/2025 to 31/03/2026.

**Operational Commentary (This section is separate from, and does not form part of, the assurance opinion expressed above; it is provided for contextual purposes only):**

Operational Commentary (separate from the assurance opinion above): NGEL has maintained structured data management controls, evidence archives, documented estimation methodologies, and defined data ownership across its operational boundary. This commentary is contextual only and does not modify the assurance opinion above. BRSR complies with the below requirements:

a) Governance, leadership and oversight: The messages of top management, the business model to promote inclusive growth and equitable development, action and strategies, focus on services, risk management, protection and restoration of environment, and priorities are disclosed appropriately.

b) Connectivity of information: NGEL discloses nine attributes as per Annexure I - Format of BRSR Core and their inter-relatedness and dependencies with factors that affect the organization's ability to create value over time.

c) Stakeholder responsiveness: The Report covers mechanisms of communication with key stakeholders to identify major concerns to derive and prioritize the short, medium and long-term strategies. The Report provides insights into the organization's relationships (nature and quality) with its key stakeholders. In addition, the Report provides a fair representation of the extent to which the organization understands, takes into account and responds to the legitimate needs and interests of key stakeholders.

d) Materiality: The material issues within nine attributes and corresponding KPI as per BRSR requirement are reported properly.

e) Conciseness: The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to the point, with sentences, graphs, and pictorial/tabular representation applied where relevant. At the same time, due care is taken to maintain continuity of information flow in the BRSR.

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f) Reliability and completeness: NGEL has established internal data aggregation and evaluation systems to derive the performance. NGEL confirms that all data provided to TUVI has been passed through the QA/QC function. The majority of the data and information was verified by TUVI's assurance team (on sample basis) during the BRSR verification and found to be fairly accurate. All data is reported transparently, in a neutral tone, and without material error.

g) Consistency and comparability: The information presented in the BRSR is disclosed on a yearly basis and is found to be reliable and complete. Thus, the principle of consistency and comparability is established.

**Independence and Code of Conduct:** TUVI follows IESBA (International Ethics Standards Board for Accountants) Code, which adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI Circular SEBIIHOICFDICFD-SEC-2/PICIR/2023/122. dated 12/07/2023 and Industry Standards on Reporting of BRSR Core. circular SEBIIHOICFDICFD-PoD-1/PICIR/2024/177. dated 20/12/2024.

TUVI confirms that during the reporting period:

a. No consulting, advisory, system design, data preparation, or implementation services related to ESG or BRSR were provided to NGEL,

b. TUVI was not involved in the preparation of the BRSR or underlying data,

c. No relationships or circumstances exist that could create a conflict of interest or impair independence,

d. TUVI confirms that it complied with the independence requirements of the IESBA Code of Ethics for Professional Accountants and with TUVI's internal independence policies throughout the planning, fieldwork, and reporting phases of this engagement, and that no threats to independence arose or were identified during the course of the engagement that were not appropriately addressed through safeguards,

Appropriate safeguards were applied to ensure objectivity, impartiality, and professional judgment throughout the assurance engagement.

TUVI solely focuses on delivering verification and assurance services and does not engage in the sale of service or the provision of any non-audit/non-assurance services, including consulting.

Quality control: The assurance team complies with quality control standards, ensuring that the engagement partner possesses requisite expertise and the assigned team collectively has the necessary competence to perform engagements with reference to standards and regulations. Assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Control, TUVI maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

## Our Assurance Team and Independence

This independence declaration is made with explicit reference to, and in accordance with, TUVI's internal Independence and Impartiality Policy and its conflict-of-interest management procedures, which are established consistent with the impartiality and independence principles of ISO/IEC 17029 (Conformity assessment - General principles and requirements for validation and verification bodies). TUVI is an independent, neutral third-party providing ESG Assurance services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "no conflict of interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with NGEL on any engagement that could

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compromise the independence or impartiality of our findings, conclusions, and observations. TUVI was not involved in the preparation of any content or data included in the BRSR, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement. The engagement was led by Mr. Gaurav Gulati (Engagement Lead), with Mr. Ravi Jangid performing the independent Technical Review (TR) and Mr. Manojkumar Borekar serving as the Final Approver, ensuring appropriate segregation of duties between engagement execution, technical review, and final approval in accordance with TUVI's independence and technical review policy. This was further supplemented by an independent Engagement Quality Control Review (EQCR) prior to issuance, which was completed for this engagement as noted below. The engagement team was supported by Ms. Pritha Chakraborty (Team Member). The team collectively holds the competence, capability, and relevant sector experience required to perform this engagement, including expertise in GHG quantification and verification, ESG data systems, and SEBI BRSR Core requirements, consistent with the competence requirements of ISAE 3000 (Revised).

**Verifier Competence Mapping (by BRSR Core Attribute):**

| BRSR Core Attribute | Basis of Competence |
|---|---|
| GHG footprint (Scope 1 & 2) | GHG quantification/verification expertise (GHG Protocol, ISO 14064 trained) |
| Water footprint | ESG/environmental data systems expertise |
| Energy footprint | ESG/environmental data systems expertise |
| Embracing circularity (waste) | ESG/environmental data systems expertise |
| Employee well-being and safety | Social/HR data and OH&S disclosure expertise |
| Enabling employment | Social/HR data expertise |
| Board oversight/ governance disclosures | SEBI BRSR Core and corporate governance requirements expertise |
| Openness of business | SEBI BRSR Core requirements expertise |
| Retirement benefits/ social welfare | Social/HR data expertise |

MBorekar

TUV INDIA PRIVATE LIMITED TÜVINDIA

For and on behalf of TUV India Private Limited
Manojkumar Borekar
Product Head-Sustainability Assurance Services

Date: 30/07/2026
Place: Mumbai, India
Project Reference No: 8125173282

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**Annexure 1:** TUVI has verified the below nine attributes as per Annexure I- Format of BRSR Core disclosed in the BRSR

| Attributes | KPI |
|---|---|
| Green-house gas (GHG) footprint<br>Boundary:<br>All domestic and international operations. | Total Scope 1 emissions (with breakup by type) - GHG (C02e) Emission in MT - Direct emissions from the orqanization's owned- or controlled sources |
| | Total Scope 2 emissions in MT - Indirect emissions from the generation of energy that is purchased from a utility provider |
| | GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT)/ Total Revenue from Operations adjusted for PPP |
| | GHG Emission Intensity (Scope 1+2), (Total Scope 1 and Scope 2 emissions (MT) / Electricity Generated (MWh) |
| Water footprint<br>Boundary:<br>All domestic and international operations. | Total water consumption (in kl) |
| | Water consumption intensity - kl/ Total Revenue from Operations adjusted for PPP |
| | Water consumption intensity - kl /Electricity Generated (MWh) |
| | Water Discharae bv destination and levels of Treatment (kl) |
| Energy footprint<br>Boundary:<br>All domestic and international operations. | Total enerqy consumed in GJ |
| | % of enerqy consumed from renewable sources - In % terms |
| | Eneray intensity -GJ/ Rupee adjusted for PPP |
| | Eneray intensity -GJ/Electricity Generated (MWh) |
| Embracing circularity - details related to waste management by the entity<br>Boundary:<br>All domestic and international operations. | Plastic waste (A) (MT) |
| | E-waste (B) (MT) |
| | Bio-medical waste (C) (MT) |
| | Construction and demolition waste (D) (MT) |
| | Batterv waste (El |
| | Radioactive waste (F) |
| | Other Hazardous waste G) (MT) |
| | Other Non-hazardous waste (H) (MT) |
| | Total waste aenerated (A + B + C + D + E + F + G + H) (MT) |
| | Waste intensity<br>• MT/ Rupee adjusted for PPP<br>• MT /Electricity Generated (MWh) |
| | Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT) |

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| | |
|---|---|
| | Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity)<br>✓ Waste Recycled Recovered /Total Waste qenerated |
| | For each cateaory of waste aenerated, total waste disposed by nature of disposal method (MT) |
| | For each category of waste generated, total waste disposed by nature of disposal method (Intensity)<br>✓ Waste Recycled Recovered /Total Waste qenerated |
| Enhancing Employee Wellbeing and Safety | Spending on measures towards well-being of employees and workers - cost incurred as a% of total revenue of the company - In % terms |
| | Details of safety related incidents for employees and workers (including contract-workforce e.g.<br>workers in the company's construction sites)<br>1) Number of Permanent Disabilities<br>2) Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)<br>3) No. of fatalities |
| Enabling Gender Diversity in Business | Gross waqes paid to females as % of waqes paid - In % terms |
| | Complaints on POSH<br>1) Total Complaints on Sexual Harassment (POSH) reported<br>2) Complaints on POSH as a% of female employees/ workers<br>3) Complaints on POSH upheld |
| Enabling Inclusive Development | Input material sourced from following sources as % of total purchases - Directly sourced from MSMEs/ small producers and from within India - In% terms - As% of total purchases by value |
| | Job creation in smaller towns - Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total waqe cost - In % terms - As % of total waqe cost |
| Fairness in Engaging with Customers and Suppliers | Instances involving loss/ breach of data of customers as a percentage of total data breaches or cyber security events - In % terms |
| | Number of days of accounts payable - (Accounts payable *365) / Cost of aoods/services procured |

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| | | |
|---|---|---|
| Open-ness of business | Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties | 1) Purchases from tradina houses as % of total purchases |
| | | 2) Number of trading houses where purchases are made from |
| | | 3) Purchases from top 10 trading houses as % of total purchases from trading houses |
| | | 1) Sales to dealers/ distributors as% of total sales |
| | | 2) Number of dealers/ distributors to whom sales are made |
| | | 3) Sales to top 10 dealers/ distributors as% of total sales to dealers/ distributors |
| | | Share of RPTs (as respective %aqe) in - |
| | | • Purchases |
| | | • Sales |
| | | • Loans & advances |
| | | • Investments |

**Notes:**

**Energy:** For all offices, in absence of monitoring of actual vehicular fuel consumption (i.e., Petrol/Diesel/CNG) data attributable to owned vehicle for employees, the GHG emissions are estimated by calculating the fuel consumption in liters using the formula, (Distance Travelled in KM I Fuel efficiency of the vehicle).

**Waste:** The data of total waste recovered through recycling, re-using or other recovery operations or total waste disposed by nature of disposal method could be assessed based on interviews and sample records as presented during the remote review.

**Use of Estimates:** Certain BRSR Core KPIs, including energy consumption, water withdrawal, waste generation, and energy usage and corresponding GHG emissions for leased offices and employee-related activities, are based on estimates due to limitations in direct measurement. These estimates were derived using reasonable assumptions, headcount-based methodologies, Industry Standards on Reporting of BRSR Core and industry-accepted factors.

For such KPIs, our assurance procedures focused on evaluating the appropriateness and consistent application of estimation methodologies, the reasonableness of key assumptions, and the reliability of supporting data. The use of estimated data did not affect our reasonable assurance conclusion on the selected KPIs as a whole. Estimation Uncertainty Assessment: Estimated KPIs (energy, water, GHG for leased offices and employee activities) were validated through: (i) cross-check against BRSR Core Industry Standards benchmark factors; (ii) sensitivity test- ±10% variation in key inputs produced no change to the assurance conclusion; and (iii) data owner sign-off on all estimated values. The applicable confidence range is ±10%, consistent with IPCC Good Practice Guidance Tier 1 uncertainty ranges (5-15%) for activity data where direct measurement is absent.