

## Annexure VI to the Board's Report

**Business Responsibility and Sustainability Report****Section A: General Disclosures****I. Details of the listed entity**

1	Corporate Identity Number (CIN) of the Listed Entity	L91110GJ1989PLC012802
2	Name of the Listed Entity	APAR Industries Limited
3	Year of incorporation	1989
4	Registered office address	301, Panorama Complex, R. C. Dutt Road, Vadodara - 390007, Gujarat, India
5	Corporate address	APAR House, Bldg. No. 4 & 5, Corporate Park, V N Purav Marg, Sion - Trombay Road, Chembur, Mumbai - 400071 (Maharashtra), India
6	E-mail	com.sec@apar.com
7	Telephone	+91 0265 2339906
8	Website	www.apar.com
9	Financial year for which reporting is being done	FY 2023-24
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited, BSE Limited
11	Paid-up Capital	Rs. 40,16,83,150/-
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Suyash Saraogi, President - Strategy & Projects Telephone: 022-67800400 Email ID: suyash.saraogi@apar.com
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Consolidated basis
14	Name of assurance provider	Planned
15	Type of assurance obtained	Planned

**II. Products/ Services**

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

Sl	Description of main activity	Description of business activity	% of turnover of the entity
1	AAC/ AAAC/ ACSR Conductors	Manufacturing	47.66%
2	Transformer & Speciality Oils	Manufacturing	28.71%
3	Power/ Telecom Cable	Manufacturing	22.90%
4	Polymer	Manufacturing	0.73%

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

Sl	Product/ Services	NIC Code	% of total turnover contributed
1	AAC/ AAAC/ ACSR Conductors	2732	47.66%
2	Transformer & Speciality Oils	1920	28.71%
3	Power/ Telecom Cable	2732	22.90%
4	Polymer	22208	0.73%

### 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	10 a) Maharashtra: 1 (Rabale) b) Silvassa: 5 (Athola Unit 3, Athola Unit 5, Khutli Unit 6, Khutli Unit 7, Rakholi) c) Orissa: 2 (Jharsuguda & Sambalpur) d) Gujarat: 2 (Khatalwada, Umbergaon)	15 [Bangalore, Bhopal, Chennai, Delhi (301), Delhi (302-304), Delhi (306 & 307), Hyderabad, Kolkata, Kolkata (Merlyn), Mumbai (Bezolla), Mumbai (CP4), Mumbai (CP5), Mumbai (NP), Pune, Vadodara]	25
International	1 [Sharjah, Hamriyah]	2 [Singapore & USA]	3

19 Markets served by entity:

a. Number of Locations	<table border="1"> <thead> <tr> <th>Number of Locations</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>National (No. of States)</td> <td>28 states + 8 UTs</td> </tr> <tr> <td>International (No. of Countries)</td> <td>140+ countries</td> </tr> </tbody> </table>	Number of Locations	Number	National (No. of States)	28 states + 8 UTs	International (No. of Countries)	140+ countries
Number of Locations	Number						
National (No. of States)	28 states + 8 UTs						
International (No. of Countries)	140+ countries						
b. What is the contribution of exports as a percentage of the total turnover of the entity?	45.2%						
c. A brief on types of customers	<p>Our customers include:</p> <ul style="list-style-type: none"> <li>◆ Industries/ Corporates (includes Cosmetics, Pharma, Rubber, Plastics, Lubricants, Rail, Defence, Shipping, Mining, Telecom etc.)</li> <li>◆ OEMs</li> <li>◆ EPC – Transmission Companies</li> <li>◆ Utilities – Transmission &amp; Distribution Companies</li> <li>◆ Renewables</li> <li>◆ Export customers</li> <li>◆ Distributors/ Channel Partners</li> </ul>						

### IV. Employees

20 Details as at the end of Financial Year :

a. Employees and workers (including differently abled):

Sl	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	1941	1761	90.72%	180	9.27%
2.	Other than Permanent (E)	0	0	0%	0	0%
	<b>Total employees (D + E)</b>	<b>1941</b>	<b>1761</b>	<b>90.72%</b>	<b>180</b>	<b>9.27%</b>
<b>WORKERS</b>						
3.	Permanent (F)	104	104	100%	0	0%
4.	Other than Permanent (G)	6554	6516	99.42%	38	0.58%
	<b>Total workers (F + G)</b>	<b>6658</b>	<b>6620</b>	<b>99.43%</b>	<b>38</b>	<b>0.57%</b>
<b>b. Differently abled Employees and workers:</b>						
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	4	2	50%	2	50%
2.	Other than Permanent (E)	0	0	0	0	0%
	<b>Total differently abled employees (D + E)</b>	<b>4</b>	<b>2</b>	<b>50%</b>	<b>2</b>	<b>50%</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
3	Permanent (F)	0	0	0%	0	0%
4	Other than Permanent (G)	4	4	100%	0	0%
	<b>Total differently abled workers (F + G)</b>	<b>4</b>	<b>4</b>	<b>100%</b>	<b>0</b>	<b>0%</b>

## 21 Participation/Inclusion/Representation of women:

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	7	2	29%
Key Management Personnel	4	0	0%

## 22 Turnover rate for permanent employees and workers:

Particulars	FY 23-24 (Turnover rate)			FY 22-23 (Turnover rate)			FY 21-22 (Turnover rate)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12.24%	9.46%	12.00%	8.60%	8.00%	8.60%	8.40%	6.50%	8.30%
Permanent Workers	0%	0%	0%	0.74%	0.00%	0.74%	0.00%	0.00%	0.00%

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

## 23 a. Names of holding/ subsidiary/ associate companies/ joint ventures:

Sl	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	Petroleum Specialities Pte. Limited, Singapore (PSPL)	Wholly Owned Subsidiary of the Company	100	No
2	Petroleum Specialities FZE, Sharjah (PS FZE)	Wholly Owned Subsidiary of PSPL	100	No
3	APAR Transmission & Distribution Projects Private Limited, India (ATDPPL)	Wholly Owned Subsidiary of the Company	100	No
4	APAR Distribution & Logistics Private Limited, India (ADLPL)	Wholly Owned Subsidiary of the Company	100	No
5	CEMA Wires & Cables LLC, USA., (CEMA)	Wholly Owned Subsidiary of the Company	100	No
6	Ampoil Apar Lubricants Private Limited, India (AALPL)	Associate	40	No
7	Clean Max Rudra Private Limited, India (Clean Max)	Associate	26	No
8	Apar Industries Middle East Limited, Saudi Arabia (AIMEL)	Wholly Owned Subsidiary of the Company	100	No

**VI. CSR Details**

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(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes, Section 135 is applicable to APAR
(ii) Turnover (in Rs.)	1,51,09,27,67,293.78
(iii) Net worth (in Rs.)	36,57,26,50,554.04

## 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 2023-24			FY 2022-23		
		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. Please refer Note A2 below	0	0	NA	0	0	NA
Investors * (other than shareholders)	Yes. Please refer Note A3 below	NA	NA	NA	NA	NA	NA
Shareholders	Yes. Please refer Note A4 below	13	1	Redressed except 1 Complaint	5	1	Redressed except 1 Complaint which was resolved, updated and closed by BSE on April 19, 2023.
Employees and workers	Yes. Please refer Note A5 below	0	0	NA	0	0	NA
Customers	Yes. Please refer Note A6 below	55	0	NA	185	0	NA
Value Chain Partners	Yes. Please refer Note A7 below	22	2	2 complaints pending which were resolved by May 2024	Not Recorded. Will start recording from FY 23-24	NA	NA
Other (please specify)							

\*We have no investors apart from shareholders

### Notes:

**A2:** Yes, a mechanism is in place to interact with community leaders to understand and address their concerns, if any.

We ensure that there is regular engagement on a pro-active basis at all our manufacturing locations, with the local communities and their representatives. As such there are no long-standing grievances at any of our locations. In addition, any stakeholder can also submit any grievance through email to [ethics.taskforce@apar.com](mailto:ethics.taskforce@apar.com)

**A3:** Yes, there is an Investor Redressal Cell. The details are as follows:

Designated Officials	Address	Contact Details
Mr. Harish Malsatter Ms. Mahati MS Mr. Jaydeepsinh Rathod Mr. Scophild Christian Mr. H. B. Trivedi	301, Panorama Complex R.C. Dutt Road Vadodara 390007 Gujarat India	Telephone: 0265 2339906 / 2322798 Email id: <a href="mailto:com.sec@apar.com">com.sec@apar.com</a>

The weblink is as follows: <https://apar.com/investor/>

**A4:** Yes. Shareholder can register their grievances at <https://scores.gov.in/scores/Welcome.html> and also web links of BSE (<http://tiny.cc/m1l2vz>) and NSE (<http://tiny.cc/s1l2vz>) for Arbitration.

**A5:** The link to Grievance Redressal Policy for Employees is as follows:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/APAR-Grievance\\_Redressal\\_Policy\\_for\\_Employees.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/APAR-Grievance_Redressal_Policy_for_Employees.pdf)

**A6:** 22 complaints were received each in Cable & Oil business, and 11 complaints in Conductor business.

Customer complaints and feedback are received by the business development/ sales team and attended to by them and the respective manufacturing facility. Complaints are tracked till closure.

In the detailed monthly review meeting, the details of all the complaints and the resolution status are shared, and corrective actions discussed to eliminate such issues in future.

In addition, any stakeholder can also submit any grievance through email to [ethics.taskforce@apar.com](mailto:ethics.taskforce@apar.com)

**A7:** The link to Supplier Grievance handling Policy is as follows:

[https://apar.com/wp-content/uploads/2023/03/Supplier\\_Grievance\\_Handling\\_Policy.pdf](https://apar.com/wp-content/uploads/2023/03/Supplier_Grievance_Handling_Policy.pdf)

The Company has Supplier Grievance/ Complaint redressal policy in Place.

Most of the complaints related to payments because of delay on work execution and some quality related issues. Additionally, there were 2 complaints related to unloading of the material due to high number of trucks arrival.

## 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:

SI	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.	Higher costs of energy	Risk	Increase in (a) energy consumption due to increased production (b) regular increase in rates of electricity grid (c) increase in rate of fossil fuels	<p>A. Increasing share of Renewable Energy (RE):</p> <p>Our renewable energy consumption has increased from 4% in FY 2022-23 to 7.3% in FY 2023-24. This was made possible due to commissioning of a wind-solar hybrid (3.30 MW wind-turbine and 2.80 MWp of solar energy) project in partnership with a leading supplier in June 2023. Work initiated to commission another two similar projects. This will significantly increase the share of RE in overall electricity (and hence energy) consumption and will reduce the impact of higher cost of energy.</p> <p>B. In addition, we had conducted energy audit at all our plants during FY 23-24, and most of the recommendations have been implemented. This will help in reduction of energy intensity.</p>	Negative

SI	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Increased severity of extreme weather events	Risk	<p>Cyclones occur frequently in India. On average, they happen about 7 times a year. The hardest hit regions are Eastern, Southern and Western.</p> <p>Some recent cyclones were as follows: Cyclone Yaas, Cyclone Gulaab and Cyclone Jawad caused major disruptions in many states incl. Odisha, where our 2 conductor plants (Jharsuguda &amp; Sambalpur) are situated. Cyclone Tauktae hit Gujarat &amp; Dadra and Nagar Haveli, where our 2 Cable plants (Khatalwad &amp; Umbergaon), 2 Conductor plants (Rakholi &amp; Athola), and 1 Oil plant (Silvassa) are situated.</p>	<p>The company has taken mitigations steps like</p> <ul style="list-style-type: none"> <li>(a) design-strengthening during construction phase,</li> <li>(b) covered sheds and</li> <li>(c) higher capacity pumps for water evacuation at most of its plants.</li> </ul> <p>Additionally, we are planning to initiate detailed Climate Risk Assessment, which will include:</p> <ul style="list-style-type: none"> <li>a) review of physical and transition risks,</li> <li>b) quantification of risks,</li> <li>c) scenario analysis,</li> <li>d) assign identified climate risk to various functions at APAR,</li> <li>e) quantification of financial impact with respect to climate risk &amp; opportunities,</li> <li>f) incorporation of climate risk into risk framework etc.</li> </ul>	Negative
3	Carbon Tax	Risk	European Council approved the world's first Carbon Border Adjustment Mechanism (CBAM). This may cause financial impact.	Most of our customers are based in US, Canada & Latin America. So the impact of the CBAM (Carbon Border Adjustment Mechanism) would be minimal. In addition, we are working to reduce our carbon emission intensity.	Negative
4.	Change in customer's preference	Opportunity	Apar has been continuously working to bring down the carbon footprint in our products. This is already giving us the competitive advantage over other suppliers, and we are confident to maintain this advantage in the near future.		Positive
5.	Access to new markets	Opportunity	<p>The global wires and cables market size is projected to reach USD 294.73 billion in 2029 from USD 200.23 billion in 2022 and exhibit a CAGR of 5.7% during the forecast period (source: Fortune Business Insights, in its report titled, Wires and Cables Market, 2022-2029).</p> <p>The main drivers behind this are:</p> <ol style="list-style-type: none"> <li>1) Rising urbanization and growing infrastructure worldwide</li> <li>2) Increasing demand for renewable energy generation</li> <li>3) Increased investments in smart upgrading of the power transmission and distribution systems and the development of smart grid</li> <li>4) Increasing need for grid interconnection</li> <li>5) escalating demand from IT facilities and data centres</li> </ol>		Positive

SI	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)
			<p>The deployment of green energy technologies by governments all across the globe to reduce the usage of fossil fuels is rising. India has some of the most aggressive RE targets in the world – to reach 450 GW by 2030 (from about 100 GW installed today). The escalating establishment of solar farms and wind turbines boosts the demand for wires and cables, and APAR is the largest producer of renewable Cables in India.</p> <p>The electricity grids in India don't have enough resiliency. A lot of work needs to be done to improve the power quality of the grids. APAR's conductor business will be a prime beneficiary of the upgradation of the grids.</p> <p>Increased electricity demands in Asia Pacific, Middle East, and the Americas have resulted in rising investments in smart grids in these regions. This will fuel the demand for APAR's conductor businesses. We are already seeing substantially increased business from overseas markets.</p> <p>APAR being a leading manufacturer of Cables &amp; Conductors, and with a wide and diversified product portfolio, we anticipate significant growth in our business and market share.</p>		

## 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.

### I. Policy & Management Process:

		P1	P2	P3	P4	P5	P6	P7	P8	P9
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
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	<ul style="list-style-type: none"> <li>The web-link and mapping of Company's policies against each Principle is provided in Note B1 at the end of this section.</li> <li>The policies are categorized in 5 tabs namely: Environment Policies, Social Policies, Governance Policies, Procurement Policies and IT Policies.</li> </ul>								
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
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.	<p>APAR supports, adopts and complies with multiple domestic and international standards in India, as relevant. Some key certifications are listed below:</p> <ol style="list-style-type: none"> <li>All plants of APAR have ISO 9001 (Quality Management System) certification.</li> <li>All key plants of APAR are certified under ISO 14001 (compliance to environmental management system).</li> <li>All key plants of APAR are certified under ISO 45001/OHSAS 18001 (Occupational Health &amp; Safety Management Systems).</li> <li>APAR has adopted ISO 27001 for IT systems.</li> <li>APAR's Cable, Oil &amp; Conductor division have state of the art laboratories with more than 2000+ testing facilities as per various national &amp; international standards, and are certified by NABL (National Accredited Board for Laboratories) as per ISO 17025:2017.</li> <li>APAR is the largest manufacturer in India for special application and renewable cables; have the largest e-beam facility in India; and hold the maximum number of UL approvals in US (UL-44, UL-854, UL-758, UL-2882, UL-3003, UL-1277, UL-83, UL-4703, UL-493, UL-1493, UL-66, UL-1651, UL-1072, UL-1650 etc.) from India.</li> </ol> <p>ISO 9001, ISO 14001, ISO 45001, and NABL certificates are available under the 'certificate' tab at <a href="https://apar.com/apar-esg-report/">https://apar.com/apar-esg-report/</a></p>								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company has set the internal targets with defined timelines.</p> <p>In addition, specific ESG commitments are also publicly available in its ESG reports at the url: <a href="https://apar.com/apar-esg-report/">https://apar.com/apar-esg-report/</a></p>								
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<p>Key Performance targets are set and monitored internally.</p> <p>In addition, key ESG parameters are set, monitored and disclosed publicly in its ESG report at the url: <a href="https://apar.com/apar-esg-report/">https://apar.com/apar-esg-report/</a></p>								

\*\* We have a Supplier Code of Conduct which covers multiple aspects of this Principle. We have also started supplier outreach program through in-person meetings as well as webinars. We have covered 310 suppliers in FY 2023-24, through this out-reach program.



## II. Governance, Leadership & Oversight

7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>The statement made by our Chairman &amp; Managing Director, Mr. Kushal Desai, is as follows:</p> <p>APAR's mission is to design and manufacture building blocks for energy infrastructure, transportation and telecommunication sectors that contribute meaningfully to make this world a more energy efficient, environmentally sustainable and safer place. Sustainability is embedded in our strategy, operations and behaviours. We have set internal targets to reduce emissions in line with the Paris Agreement goals. We recognize the challenges we will face in achieving the same, but we are committed to not only meet these targets, but also to help our value chain partners in this journey.</p>
8	Details of the highest authority responsible for implementation and oversight of the Business responsibility policy(ies)	The Board of APAR Industries Limited is the highest authority responsible for the oversight of the implementation of sustainability related policies.
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.	<p>Yes, the Board of APAR Industries has established Corporate Social Responsibility and Sustainability (CSR&amp;S) Committee for overseeing and managing APAR's key sustainability-related issues, as detailed below:</p> <p>Corporate Social Responsibility and Sustainability (CSR&amp;S) Committee – The CSR&amp;S committee of the Board governs and reviews the Corporate Social Responsibility and Sustainability activities of the Company. The CSR&amp;S Committee recommends the annual business plan for APAR's CSR and Sustainability initiatives to the Board for its approval. The main responsibilities of the committee include reviewing sustainability goals, objectives, and strategies consistent with APAR's mission, values, and long-term interests.; reviewing APAR's ESG risks and opportunities and recommend actions to mitigate risks and capitalize on opportunities; reviewing targets for ESG performance and report to the Board; monitoring APAR's performance against established sustainability metrics, targets, and benchmarks; reviewing sustainability-related policies, programs, and initiatives etc.</p>

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

Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes									Reviews are done on a regular basis								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes									Reviews are done on a need basis								
	P1	P2	P3	P4	P5	P6	P7	P8	P9									
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	No	No	Yes #	No	Yes	Yes ^	No	Yes **	No									

# APAR has been recognized as Great Place to Work for the period from February 2024 to February 2025. This certification is given to organizations post assessment and anonymous feedback from employees regarding their workplace experience, covering areas such as trust, camaraderie, fairness, respect, and credibility.

^ DNV has done the assessment of GHG scope-1, scope-2 and scope-3 (category-1) emissions.

APAR also obtained certification under various national and international standards, including ISO 14001, ISO 45001/OHSAS 18001, ISO 9001 etc. These certifications also include assessment of the policies of the Company by independent external assessor. A summary of certifications received by APAR is provided against Question #4 in Section B of this report.

\*\* Our financial auditor has assessed our CSR spends as per the policy, as part of annual report

	P1	P2	P3	P4	P5	P6	P7	P8	P9
12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:									
The entity does not consider the Principles material to its business (Yes/ No)						NA			
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/ No)						NA			
The entity does not have the financial or/ human and technical resources available for the task (Yes/ No)						NA			
It is planned to be done in the next financial year (Yes/ No)						NA			
Any other reason (please specify)						NA			

Note

B1: Mapping of APAR's policies against each of the NGRBC principles:

Mapping with APAR's policy	P1	P2	P3	P4	P5	P6	P7	P8	P9	Website Link
Apar Code of Conduct	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<a href="https://apar.com/sustain_envt_policies_social/">https://apar.com/sustain_envt_policies_social/</a>
Employee H&S Policy			<input checked="" type="checkbox"/>							
Health Care Coverage Policy			<input checked="" type="checkbox"/>							
Working Condition Policy			<input checked="" type="checkbox"/>							
Apar Human Rights Policy					<input checked="" type="checkbox"/>					
Child & Forced Labour Policy					<input checked="" type="checkbox"/>					
Prevention of Workplace Harassment					<input checked="" type="checkbox"/>					
Policy on POSH					<input checked="" type="checkbox"/>					
Diversity, Equity and Inclusion Policy			<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		<a href="https://apar.com/sustain_envt_policies_environment/">https://apar.com/sustain_envt_policies_environment/</a>
Employee Relation Policy			<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		
Goods & Services Policy		<input checked="" type="checkbox"/>							<input checked="" type="checkbox"/>	
Water Policy						<input checked="" type="checkbox"/>				
Air Pollution Policy						<input checked="" type="checkbox"/>				
Materials, Chemicals and Waste Policy						<input checked="" type="checkbox"/>				
Biodiversity Policy						<input checked="" type="checkbox"/>				
Climate Change Policy						<input checked="" type="checkbox"/>				
Environment Policy						<input checked="" type="checkbox"/>				<a href="https://apar.com/sustain_envt_policies_governance/">https://apar.com/sustain_envt_policies_governance/</a>
Anti-Corruption & Anti Bribery Policy	<input checked="" type="checkbox"/>									
Fraud Prevention & Detection Policy	<input checked="" type="checkbox"/>									
Policy on Related Party Transaction	<input checked="" type="checkbox"/>									
Supplier Code of Conduct	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					<a href="https://apar.com/sustain_envt_policies_procurement/">https://apar.com/sustain_envt_policies_procurement/</a>

P1: Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable

P2: Business should provide goods and services in a manner that is sustainable and safe

P3: Businesses should respect and promote the well-being of all employees, including those in their value chains

P4: Businesses should respect the interests of and be responsive to all its stakeholders

P5: Businesses should respect and promote human rights

P6: Businesses should respect and make efforts to protect and restore the environment

P7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

P8: Businesses should promote inclusive growth and equitable development

P9: Businesses should engage with and provide value to their consumers in a responsible manner

## 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.

The principles of integrity, ethics, transparency, and accountability are fundamental to the sustainable success of APAR. APAR's Code of Conduct (CoC) is the foundation of its commitment to integrity and ethical behaviour. The CoC serves as the guide to do the right thing and follow the law, act honourably and treat each other with respect and never retaliate against those who speak up. It applies not just to employees but also to suppliers, partners and customers, who can all raise concerns at any level of the organization.

Policies at APAR serves as a strong set of internal controls. Bribery and corruption are prohibited in all business dealings, whether with public officials or private sector business partners. Clear guidelines in terms of Do's and Don'ts are provided in case of Conflict of Interest and for raising ethical issues. Agreements with suppliers and business partners are aligned with the Company's commitment to integrity in performance of the contract, including commitments not to violate anti-bribery laws. The Company's suppliers are also required to maintain integrity standards which are satisfactory to the Company and all suppliers need to subscribe and provide consent to the APAR's Supplier Code of Conduct.

All existing and new employees of the Company are required to undergo offline and on-line trainings, and need to acknowledge their commitment to adhere to the Code of Conduct.

Channels for reporting on integrity issues are available to the Company's employees. Employees are encouraged to speak up and report integrity and compliance concerns and to seek guidance. All reports received are subject to appropriate investigation, follow up, and brought to full closure; through a systematic process and tracking system.

The Whistle-blower Policy of the Company governs the reporting and investigation of alleged improper or illegal activities within the Company as well as the protection afforded to those employees who report them (the "whistle-blowers"). In case of reported incidents, all reports are subject to appropriate investigation and are brought to full closure using systematic processes and tracking systems.

The Company has an ethics committee in place. The contact details of all the members of ethics committee are available at the internal portal. In addition, an email id ethics.taskforce@apar.com, is in place for all stakeholders to raise their concerns.

The Company has an Internal Complaints Committee for POSH (Prevention of Sexual Harassment) as a part of the Prevention, Prohibition and Redressal Act, 2013. POSH training is mandatory for every employee.

### ESSENTIAL INDICATORS

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

Segment	Total number of training & awareness programmes held	Topics/ principles covered under the training and its impact	% of persons in respective category covered by the awareness programs
Board of Directors	Orientation and awareness sessions for the Directors of the Company are regularly organised, covering issues related to health & safety, environment, strategy, industry trends, ethics & governance and legal & regulatory matters. These matters are also regularly discussed and deliberated upon in Board meetings.  In addition, the Chairman of APAR has completed a specialized course on 'Business and Climate Change: Towards Net Zero Emissions' from Cambridge Institute for Sustainability Leadership (CISL).	Principles 1, 6	100%

Segment	Total number of training & awareness programmes held	Topics/ principles covered under the training and its impact	% of persons in respective category covered by the awareness programs																																	
Key Managerial Personnel Employees other than BoD and KMPs Workers	<p>Regular training programs are conducted for KMPs and all employees (100%) of APAR on various environmental and social aspects.</p> <p>The details of training organized during FY 2023-24 is as follows:</p> <table border="1"> <thead> <tr> <th>Sl</th> <th>Topic</th> <th># of Training programs</th> </tr> </thead> <tbody> <tr> <td>1)</td> <td>APAR values: APAR Code of Conduct *</td> <td># 16</td> </tr> <tr> <td>2)</td> <td>Soft Skill</td> <td># 73</td> </tr> <tr> <td>3)</td> <td>ESG: Social</td> <td># 58</td> </tr> <tr> <td>4)</td> <td>ESG: Environment</td> <td># 64</td> </tr> <tr> <td>5)</td> <td>Occupational Health &amp; Safety (OH&amp;S)</td> <td># 2,442</td> </tr> <tr> <td>6)</td> <td>IT Awareness</td> <td># 43</td> </tr> <tr> <td>7)</td> <td>Skill Upgradation</td> <td># 701</td> </tr> <tr> <td>8)</td> <td>Quality Management System (QMS)</td> <td># 128</td> </tr> <tr> <td>9)</td> <td>Supplier Code of Conduct (for Suppliers)</td> <td># 13</td> </tr> <tr> <td>10)</td> <td>Team building &amp; APAR OD strategy 2030 (for senior leadership)</td> <td># 1</td> </tr> </tbody> </table> <p>* Code of Conduct training is already provided to all the existing employees.</p>	Sl	Topic	# of Training programs	1)	APAR values: APAR Code of Conduct *	# 16	2)	Soft Skill	# 73	3)	ESG: Social	# 58	4)	ESG: Environment	# 64	5)	Occupational Health & Safety (OH&S)	# 2,442	6)	IT Awareness	# 43	7)	Skill Upgradation	# 701	8)	Quality Management System (QMS)	# 128	9)	Supplier Code of Conduct (for Suppliers)	# 13	10)	Team building & APAR OD strategy 2030 (for senior leadership)	# 1	Principles 1,2,3,4,5,6,8,9	100%
Sl	Topic	# of Training programs																																		
1)	APAR values: APAR Code of Conduct *	# 16																																		
2)	Soft Skill	# 73																																		
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9)	Supplier Code of Conduct (for Suppliers)	# 13																																		
10)	Team building & APAR OD strategy 2030 (for senior leadership)	# 1																																		

All the employees including those in key managerial positions, were imparted training on following Principles:

- a) **Principle 1:** Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable  
 Topics covered –
  - ◆ APAR Code of Conduct
  - ◆ Supplier Code of Conduct
- b) **Principle 2:** Business should provide goods and services in a manner that is sustainable and safe  
 Topics covered –
  - ◆ Goods & Services Policy
- c) **Principle 3:** Businesses should respect and promote the well-being of all employees, including those in their value chains  
 Topic covered –
  - ◆ Employee H&S Policy
  - ◆ Health Care Coverage Policy
  - ◆ Working Condition Policy
  - ◆ Diversity, Equity and Inclusion Policy
  - ◆ Employee Relation Policy

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

Topics covered –

- ◆ APAR Code of Conduct
- ◆ Supplier Code of Conduct

e) **Principle 5:** Businesses should respect and promote human rights

Topic covered –

- ◆ APAR Human Right Policy
- ◆ Child Labour/ Forced Labour
- ◆ Workplace Harassment
- ◆ POSH
- ◆ APAR Code of Conduct
- ◆ Supplier Code of Conduct

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

Topics covered –

- ◆ Water Policy
- ◆ Air Pollution Policy
- ◆ Materials, Chemicals and Waste Policy
- ◆ Biodiversity Policy
- ◆ Climate Change Policy
- ◆ Environment Policy

g) **Principle 8:** Businesses should promote inclusive growth and equitable development

Topics covered –

- ◆ Diversity, Equity and Inclusion Policy
- ◆ Employee Relation Policy

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

Topics covered –

- ◆ Goods & Services Policy

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	NA	NA	NA	NA	NA
Penalty/ Fine	NA	NA	NA	NA	NA
Penalty/ Fine	NA	NA	NA	NA	NA
Penalty/ Fine	NA	NA	NA	NA	NA
Settlement					
Compounding fee					

Non- 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)
Imprisonment	NA	NA	NA	NA	NA
Punishment	NA	NA	NA	NA	NA

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

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

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

Yes. APAR has implemented a policy on Anti-Corruption & Anti Bribery (ACAB).

The objective of Anti-Corruption & Anti Bribery policy is to provide a guideline to prevent corruption and bribery and promote transparency, integrity, and accountability within the organization that ensure:

- Compliance with applicable anti-bribery laws;
- Creating awareness about APAR's emphasis on ethical business practices and its zero-tolerance approach towards conduct that is in breach of this Policy;
- Effective Implementation of ACAB Policy by incident reporting, investigation and compliance.

The link to Anti-Corruption & Anti-Bribery policy are as follows:

<https://apar.com/wp-content/uploads/2024/01/Anti-Corruption-Anti-Bribery-Policy.pdf>

APAR is committed to maintaining the highest ethical standards in all aspects of its operations. Our Code of Conduct requires that the Company, its employees, and anyone acting on behalf of the Company obey company policies and all applicable laws in any country where APAR operates, including specific anti-corruption laws.

In addition, the link to other policies related to Anti-Corruption & Anti-Bribery are as follows:

APAR Code of Conduct Policy:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/1.APAR\\_Code\\_of\\_Conduct.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/1.APAR_Code_of_Conduct.pdf)

Whistle Blower Policy:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/20.Whistle\\_Blower\\_Policy.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/20.Whistle_Blower_Policy.pdf)

Integrity is important for suppliers also, as they play a critical role in ensuring the integrity of the entire supply chain. We have implemented a Supplier Code of Conduct policy to maintain ethical business standards and a fair business environment. The link of the Supplier Code of Conduct policy is as follows:

Supplier Code of Conduct Policy:

[https://apar.com/wp-content/uploads/2023/03/APAR\\_Supplier\\_Code\\_of\\_Conduct.pdf](https://apar.com/wp-content/uploads/2023/03/APAR_Supplier_Code_of_Conduct.pdf)

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

	FY 2023-24	FY 2022-23
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	1	Nil
Workers	Nil	Nil

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

KMPs	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	Nil	Nil	Nil

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

Not Applicable

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	137.03	165.48

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 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	9.3%	Started measuring from FY 2023-24
	b. Number of trading houses where purchases are made from	1540	
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	62.9%	
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	3.07%	2.81%
	b. Number of dealers / distributors to whom sales are made	713	655
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	22.64%	24.36%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.00% ^	0.00% ^
	b. Sales (Sales to related parties / Total Sales)	0.04%	0.01%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0.17%	10.56%
	d. Investments (Investments in related parties / Total Investments made)	68.55%	7.70%

^ represents ratio less than 0.01%

## LEADERSHIP INDICATORS

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

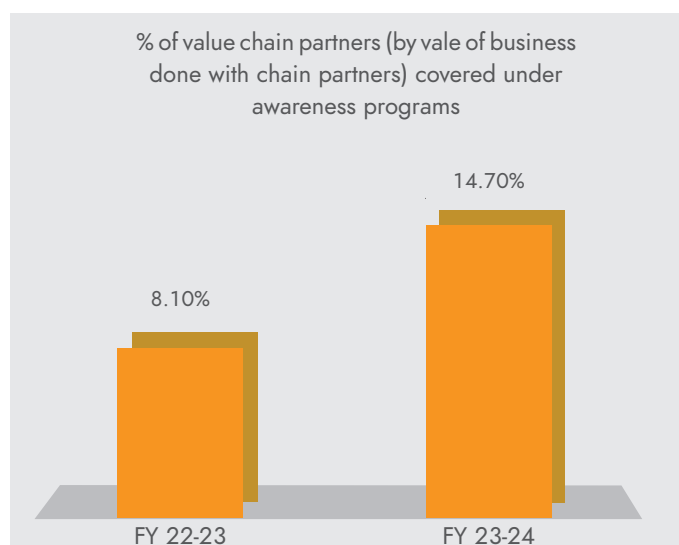
Total number of awareness programmes held	Topics / principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programs																																																																											
<p>APAR has taken several initiatives to create awareness amongst its value chain partner on key issues related to the 9 Principles of the NGRBC (National Guidelines for Responsible Business Conduct). 13 awareness programs were conducted for our supply chain partners during FY 2023-24. The details are provided below:</p> <table border="1"> <thead> <tr> <th>#</th> <th>Webinar Date</th> <th>Oil</th> <th>Cable</th> <th>Conductor</th> </tr> </thead> <tbody> <tr><td>1</td><td>29<sup>th</sup> Sep 2023</td><td>27</td><td>-</td><td>-</td></tr> <tr><td>2</td><td>01<sup>st</sup> Nov 2023</td><td>-</td><td>-</td><td>17</td></tr> <tr><td>3</td><td>16<sup>th</sup> Dec 2023</td><td>-</td><td>-</td><td>32</td></tr> <tr><td>4</td><td>6<sup>th</sup> Feb 2024</td><td>11</td><td>-</td><td>-</td></tr> <tr><td>5</td><td>14<sup>th</sup> Feb 2024, Batch-1</td><td>-</td><td>13</td><td>-</td></tr> <tr><td>6</td><td>14<sup>th</sup> Feb 2024, Batch-2</td><td>-</td><td>31</td><td>-</td></tr> <tr><td>7</td><td>14<sup>th</sup> Feb 2024, Batch-3</td><td>-</td><td>10</td><td>-</td></tr> <tr><td>8</td><td>15<sup>th</sup> Feb 2024</td><td>23</td><td>-</td><td>-</td></tr> <tr><td>9</td><td>16<sup>th</sup> Feb 2024, Batch-1</td><td>-</td><td>-</td><td>32</td></tr> <tr><td>10</td><td>16<sup>th</sup> Feb 2024, Batch-2</td><td>-</td><td>-</td><td>28</td></tr> <tr><td>11</td><td>27<sup>th</sup> Feb 2024</td><td>-</td><td>-</td><td>22</td></tr> <tr><td>12</td><td>2<sup>nd</sup> Mar 2024</td><td>-</td><td>33</td><td>-</td></tr> <tr><td>13</td><td>14<sup>th</sup> Mar 2024</td><td>31</td><td>-</td><td>-</td></tr> <tr> <td><b>Total</b></td> <td></td> <td><b>92</b></td> <td><b>87</b></td> <td><b>131</b></td> </tr> </tbody> </table> <p>The awareness programs were held for total 310 suppliers.</p>	#	Webinar Date	Oil	Cable	Conductor	1	29 <sup>th</sup> Sep 2023	27	-	-	2	01 <sup>st</sup> Nov 2023	-	-	17	3	16 <sup>th</sup> Dec 2023	-	-	32	4	6 <sup>th</sup> Feb 2024	11	-	-	5	14 <sup>th</sup> Feb 2024, Batch-1	-	13	-	6	14 <sup>th</sup> Feb 2024, Batch-2	-	31	-	7	14 <sup>th</sup> Feb 2024, Batch-3	-	10	-	8	15 <sup>th</sup> Feb 2024	23	-	-	9	16 <sup>th</sup> Feb 2024, Batch-1	-	-	32	10	16 <sup>th</sup> Feb 2024, Batch-2	-	-	28	11	27 <sup>th</sup> Feb 2024	-	-	22	12	2 <sup>nd</sup> Mar 2024	-	33	-	13	14 <sup>th</sup> Mar 2024	31	-	-	<b>Total</b>		<b>92</b>	<b>87</b>	<b>131</b>	<p>We had covered following topics during the webinar/ workshops:</p> <ul style="list-style-type: none"> <li>ESG overview</li> <li>Cause of Climate Change</li> <li>Global Warming Potential</li> <li>Emission Scopes</li> <li>Sustainability Initiatives @ APAR</li> <li>GHG Emissions @ APAR and various emission reduction initiatives taken</li> <li>Water Footprint @ APAR and various water footprint reduction initiatives</li> <li>Human Rights initiatives @ APAR</li> <li>Supplier Code of Conduct</li> <li>Questionnaire for Suppliers to assess their readiness</li> <li>NGRBC Principles</li> <li>Open forum to discuss how the emission reduction initiative can result in lowering the costs</li> </ul>	<p>Please see note P1a below</p>
#	Webinar Date	Oil	Cable	Conductor																																																																									
1	29 <sup>th</sup> Sep 2023	27	-	-																																																																									
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<b>Total</b>		<b>92</b>	<b>87</b>	<b>131</b>																																																																									

Note: P1a

14.7% of supply chain partners were covered (by value of business done with such partners) under the awareness programs during FY 2023-24.

59.1% of our procurement value is from Suppliers who are very progressive and large Companies, and they have very strong formal ESG program as is evident from their published ESG reports. These include names like Hindalco, Vedanta, S-Oil, Ergon Refining Inc., HPCL, JSW Steel, Sumitomo Metal Mining Co. Ltd., Borouge Pte Ltd., Dow Chemicals, etc. They do not need any awareness program and hence we did not reach out to them for such programs.

**In effect, 73.8% supply chain partners have been covered.**





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

Yes, the Company has a Code of Conduct, which is explicitly also applicable to APAR Directors, senior management and Independent Directors. It provides clear guidelines for avoiding and disclosing actual or potential conflict of interest with the Company.

The Company receives an annual declaration from its Board of Directors and senior management personnel on the entities they are interested in, and ensures requisite approvals, as required under the applicable laws are taken prior to entering into transactions with each entities.

The policy is available on the Company's website at [https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/1.APAR\\_Code\\_of\\_Conduct.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/1.APAR_Code_of_Conduct.pdf)

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

### Product Innovation & Research

APAR's vision is to be a global leader in the energy infrastructure, transportation & telecommunication sectors by providing the best solutions & value creation for our stakeholders. The mission that drives us can be summed up in three words: 'tomorrow's solutions today'. APAR is committed to provide sustainable goods and services for a cleaner, greener tomorrow.

APAR's commitment is customer focused R&D. The Company's specialty lies in delivering product performance in extreme environments; the Company engineers and manufactures cable, conductor and speciality oil that consistently outlast and outperform the competitions.

The Company has state of the art laboratories, in each businesses, with more than 2000+ testing scope as per various national & international standards. All its laboratories are accreditation by NABL (National Accredited Board for Laboratories) as per ISO 17025:2017. 'Certificates' section at <https://apar.com/apar-esg-report/> can be referred for list of NABL certifications across the plants.

The Company has implemented 'Goods & Services' policy to provide guidelines on providing goods and services in a manner that is sustainable and safe. The policy can be accessed at the Company's website at [https://apar.com/sustain\\_envt\\_policies\\_environment/](https://apar.com/sustain_envt_policies_environment/).

### 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.

Segment	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D revenue expenses	0.10%	0.09%	
R&D CapEx	0.02%	0.00% ^	
Total CapEx	2.05%	1.73%	
R&D revenue expenses	Rs 15.97 crores	Rs 12.69 crores	
R&D CapEx	Rs 3.50 crores	Rs 0.36 crores	
Total CapEx	Rs 330.67 crores	Rs 247.83 crores	

^ denotes ratio is less than 0.01%

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)
- Yes.
- APAR has rolled out Supplier Code of Conduct (SCoC) for all its suppliers. The suppliers are required to go through, and provide consent on APAR's SCoC. It focusses on the following four principles for sustainable sourcing:
- ◆ Human rights: APAR expects suppliers to develop and implement policies and procedures to promote and protect human rights in their business and to encourage their step-down suppliers to do likewise.
  - ◆ Health and safety: APAR expects its suppliers to adopt proper H&S management practices for their workers.
  - ◆ Environmental protection: APAR expects suppliers to maintain effective policies, processes, and procedures to manage their environmental footprints.
  - ◆ Fair business practices: The APAR's SCoC outlines the ethical standards and fair business practices (incl. anti bribery and prohibition of insider trading) which the suppliers are expected to adopt.

	<p>Additionally, majority of our sourcing is done from big suppliers. This includes names like Hindalco, Vedanta, S-Oil, Balco, Nalco, Toyota, Union Copper Rods, HPCL, Afton, Lubrizol, Indian Additives, Ergon International etc. All these suppliers have their internal system of sustainability, which is followed and reported by them. The Link to ESG reports of some of these suppliers are as follows:</p> <p>Vedanta <a href="https://www.vedantalimited.com/uploads/investor-overview/annual-report/Executive-Summary-SR-FY23.pdf">https://www.vedantalimited.com/uploads/investor-overview/annual-report/Executive-Summary-SR-FY23.pdf</a></p> <p>Hindalco <a href="https://www.hindalco.com/integrated-annual-report2022-23/index.html">https://www.hindalco.com/integrated-annual-report2022-23/index.html</a></p> <p>S-Oil <a href="https://www.s-oil.com/en/sustainability/Report.aspx">https://www.s-oil.com/en/sustainability/Report.aspx</a></p> <p>Ergon <a href="https://go.ergon.com/rs/763-ZJY-981/images/Ergon%20Doing%20Right%20Report%202023.pdf?version=0">https://go.ergon.com/rs/763-ZJY-981/images/Ergon%20Doing%20Right%20Report%202023.pdf?version=0</a></p> <p>We also have a focused Supplier out-reach program for MSMEs and smaller Suppliers where we train them about aspects of sustainability that are necessary for their journey of ESG. Total 13 (online webinars &amp; offline workshops) awareness programs were conducted during FY 2023-24, and 310 suppliers were benefitted. Through this out-reach as well as our Supplier Code of Conduct, and our vendor selection process, we ensure sustainable sourcing even from smaller suppliers.</p>
<p>b. If yes, what percentage of inputs were sourced sustainably?</p>	<p>59.1% of our sourcing is done through suppliers who have their own internal system of sustainability, which is followed and reported by them.</p>

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.

Solid waste inventory is prepared for all the plants, and we manage and minimize waste through the 3R principle of Reduce, Reuse and Recycle.

We manufacture mainly Cables, Conductors and Speciality Oil across our plants. The Cables & Conductors typically have a long life of 30+ years, and most of the material are recyclable and the users do the recycling to get value out of the material. In case of Oil, we ensure long life of oil through product innovation. However, used-oil finds its way to the unorganized sector where it is burnt in an uncontrolled manner for its inherent calorific value which causes the attendant emissions. Ministry of Environment, Forest and Climate Change has issued draft notification for re-refining of used-oil. We expect that over next few years, the infrastructure and required regulation will ensure adequate collection of used-oil for re-refining.

Following initiatives are implemented and practiced at APAR:

#### Waste reduction

- ◆ We manage waste reduction through implementation of various quality improvement processes, upgradation of the plant, regular trainings, six sigma implementation, and process monitoring.

#### Waste disposal

- ◆ Plastic Waste - We ensure compliance with the Plastic Waste Management (PWM) Rules 2016, and follow the Extended Producer Responsibility (EPR) regulation to manage the downstream operations' plastic packaging waste, and these are recycled through a certified re-cycler.

#### Waste recycle & re-use

- ◆ Our conductor division re-cycles 100% aluminium waste. 100% of the plain copper scrap is directly recycled by the company, and the tinned copper scrap is sold to authorized recyclers for further processing, in our Cable division.
- ◆ The waste of GI wire/ aluminium wire or strip which is used as an armouring material for the cable, is directly used as a re-manufacturing armouring material for the new cable.
- ◆ The waste of copper tape which is used as a screening material for the MV/ HV cables is used as a re-manufacturing material for the new cable.

- ◆ We have replaced the packaging wooden drum/ reels with steel/ hybrid (made of steel frame & PP sheet) drums/ reels. These are re-used 6-7 times, before being sold as MS scrap for further re-cycling.
- ◆ PTFE additives and PTFE grease – PTFE pre-sintered scrap is converted into low molecular type PTFE additives by molecular scissoring using in-house E-beam and ultrahigh speed pulverisers. The PTFE micronized powders are used as additives in ink and resin industry and in grease applications for improving anti blocking and extreme pressure additives respectively.

E-Waste: We have tie-ups with certified e-waste recyclers who specialize in safely dismantling and processing electronic devices. The recyclers extract valuable materials such as metals, plastics, and glass, which can be reused in the manufacturing of new products.

Hazardous Waste: We are constantly exploring to reduce the amount of hazardous waste. All such waste is strictly kept under the limits prescribed in the CTO (Consent to Operate) of respective plant locations. The waste is provided to Govt. approved vendors for proper treatment.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes, EPR is applicable to the Company. We ensure compliance with the Plastic Waste Management (PWM) Rules 2016, and follow the Extended Producer Responsibility (EPR) regulation to manage the downstream operations' plastic packaging waste, and these are recycled through a certified re-cycler.

## LEADERSHIP INDICATORS

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

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/ No). If yes, provide the web-link.
EPD HUB, EPD HUB-0183	AL 59 Conductor		Cradle to gate with options, A4-A5, and modules C1-C4, D in accordance with EN15804+A2:2019 and ISO 14025	Yes	Yes. It can be downloaded from: a) <a href="https://manage.epdhub.com/">https://manage.epdhub.com/</a> and search for 'HUB-0183' or b) <a href="https://apar.com/apar-esg-report/">https://apar.com/apar-esg-report/</a> under 'Other Reports' tab  (Publishing date - 11 Nov 2022 Last updated date – 19 Jan 2024 Valid until - 11 Nov 2027)

APAR is the world's largest producer of Aluminium conductors. With the growing global environmental issues, we have taken an initiative to address carbon emissions of our conductors compared to global standards. Accordingly, we have successfully developed and published the first Environmental Product Declaration on EPD HUB for our products AL59 power conductor. The report covers carbon footprint computation, verification, validation and certification over its lifetime by EPD Hub on of AL59 conductor as per EN 15804+A2 & ISO 14025 / ISO 21930 standards.

EPD report can be downloaded from:

- <https://manage.epdhub.com/> and search for 'HUB-0183' or
- <https://apar.com/apar-esg-report/> under 'Other Reports' tab

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.

There are no significant social or environmental concerns and/ or risks arising from disposal of our products/ services. However, production process results in GHG emission footprint.

We manufacture mainly Cables, Conductors and Speciality Oil across our plants. The Cables & Conductors typically have a long life of 30+ years, and most of the material are recyclable and the users do the recycling to get value out of the material. In case of Oil, we ensure long life of oil through product innovation. However, used-oil finds its way to the unorganized sector where it is burnt in an uncontrolled manner for its inherent calorific value which causes the attendant emissions. Ministry of Environment, Forest and Climate Change has issued draft notification for re-refining of used-oil. We expect that over next few years, the infrastructure and required regulation will ensure adequate collection of used-oil for re-refining.

Plastic – We ensure compliance with the Plastic Waste Management (PWM) Rules 2016, and follow the Extended Producer Responsibility (EPR) regulation to manage the downstream operations' plastic packaging waste, and these are recycled through a certified re-cycler.

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 2023-24	FY 2022-23
Some of the input materials re-cycled/ reused in production process were as follows:	Total 4.1% of recycled or reused input material (by value) was used in production.	Total 2.8% of recycled or reused input material (by value) was used in production.
<ul style="list-style-type: none"> <li>◆ Pinewood Pallets – Grade I</li> <li>◆ Reconditioned IBC – 1000 Litre</li> <li>◆ Base Oil SN-300</li> <li>◆ PVC Lumps and Chips</li> <li>◆ HDPE on drum non virgin</li> <li>◆ LDPE on drum non virgin</li> <li>◆ PVC Strap</li> <li>◆ Refurbish lagging</li> <li>◆ Recycled Drum</li> <li>◆ Recycled PP Sheet</li> <li>◆ Aluminium &amp; Copper metal scraps</li> </ul>		

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:

Parameter	FY 23-24			FY 22-23		
	Re-used	Re-cycled	Safely disposed	Re-used	Re-cycled	Safely disposed
Plastic (including packaging)		100% (3797 MT) as per EPR			100% as per EPR	
E-waste						
Hazardous waste						
Other waste						

APAR does not have any specific product to reclaim at the end of life, However, at the project and operation sites, there are systems in place to recycle, reuse and dispose in line with regulatory requirement for the above waste being generated during course of construction and operation

As far as products are concerned, we manufacture mainly Cables, Conductors and Speciality Oil across our plants. The Cables & Conductors typically have a long life of 30+ years, and most of the material are recyclable and the users do the recycling to get value out of the material. In case of Oil, we ensure long life of oil through product innovation. However, used-oil finds its way to the unorganized sector where it is burnt in an uncontrolled manner for its inherent calorific value which causes the attendant

emissions. Ministry of Environment, Forest and Climate Change has issued draft notification for re-refining of used-oil. We expect that over next few years, the infrastructure and required regulation will ensure adequate collection of used-oil for re-refining.

For packaging material, all the plastic sold in the domestic market, which forms part of packaging, is recycled in line with the EPR.

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	Not Applicable. Details of our products are mentioned under Q. 4 above.

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

#### Our people

APAR's people are the key to its growth. One of its fundamental beliefs is that a group of passionate and empowered individuals can accomplish absolutely everything.

APAR's corporate philosophy is to encourage practice "to do what is right as a human being". It nurture a cohesive team culture that inspires employees to actively participate in all organizational development initiatives with no limitation of opportunities which makes APAR an exciting place to be in.

APAR encourages employees to undertake fun-at-work initiatives so that they enjoy a sense of bonding within the company.

#### Employee Care

APAR respects the right to freedom of association, participation, collective bargaining, and provides access to appropriate grievance redressal mechanisms.

The Company's employment policies provide and maintain equal opportunities for employment. Socio-economic background, race, caste, religion, ancestry, marital status, sex, age, nationality and disability have never been, and will never be a deciding factor for employment.

The Company's corporate & factory locations do not have any child labor, forced labor or any form of involuntary labour, paid or unpaid.

The Company's priority is to provide a work environment that is safe, hygienic, humane, and which upholds the dignity of the employees. This ensures that employees feel safe and secure in discharging their responsibilities.

There is continuous skill and competence upgradation of employees through provision of access to necessary learning opportunities, on an equal and non-discriminatory basis to promote employee morale and career development.

Benefits to its employees include:

- ◆ Long term service award
- ◆ Benevolent fund for employees
- ◆ Education assistance
- ◆ Advance loan
- ◆ Home loan interest subsidy
- ◆ Employee wedding (premium car rental) policy
- ◆ Mediclaim for employee & family members & GPA for employees
- ◆ Annual medical checkup & hospital assistance
- ◆ Ambulance service @ home
- ◆ Free bus facility
- ◆ Financial support to family members (employee deceased due to Covid-19)
- ◆ Parental leaves
- ◆ Flexi working hours
- ◆ Hybrid model of work from home & work from office

#### Employee engagement

APAR engages with its people through direct interactions, feedback, newsletter, e-mails, employee engagement surveys, open-forum and exit interviews. All of its people are free and are motivated to provide their ideas, suggestions, and insights across strategy, operations, technology, and organization.

Employee Engagement survey was carried out in April 2022 through online mode. To ensure Employees' responses to survey remain completely confidential, APAR had engaged an external independent company Market Search India Pvt. Ltd., a sister concern of Thomas Assessments.

Highest engagement scoring of 81% was obtained on two key questions:

Questions:

- ◆ I would recommend my company to a friend as a good place to work.
- ◆ Considering all things, I am satisfied working in APAR

### Mentorship program

The Company has a mentorship program in place, which is designed to facilitate the senior leaders (identified as Mentors) in the company to pass on their experience and expertise to the Mentees (High Potential – HiPo employees) and develop them into the future leaders of the company. This is a great opportunity for the senior leaders to pass on their legacy and give back to the company in terms of knowledge & skills and strengthen the organization further in the long run. Unlike similar learning initiatives like training programs or online courses, mentoring utilizes the current available resources that company already has in order to upgrade its workforce.

### Learning & Development

For the Company to grow, its employees must grow and develop continuously. APAR offers learning and development opportunities for its employees across levels. These include training on:

- ◆ Leadership development
- ◆ Soft skills development
- ◆ Technical trainings
- ◆ Training on Human Right and other social issues
- ◆ Training on Sustainability
- ◆ IT awareness & Cyber Security program

In addition, the Company had designed and implemented a 55 hours rigorous training program for new joiners in the Company's LDC business, which includes training on Sales Basics, Product Basics, Sales field automation, Soft skills, Presentation skills etc.

### Great place to work

- ◆ APAR Industries has completed the assessment conducted by GPTW (Great Place to Work), India and is certified as a Great Workplace from February 2024 to February 2025.



- ◆ This certification is given to organizations that demonstrate a high level of trust, camaraderie, and positive workplace culture based on employee feedback and assessment.
- ◆ It has enhanced APAR's reputation as an employer of choice and help attract and retain top talent.

## ESSENTIAL INDICATORS

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

% of employees covered by

Category	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent Employees											
Male	1761	1761	100%	1761	100%	NA	NA	1761	100%	NA	NA
Female	180	180	100%	180	100%	180	100%	NA	NA	77	43%
<b>Total</b>	<b>1941</b>	<b>1941</b>	<b>100%</b>	<b>1941</b>	<b>100%</b>	<b>180</b>	<b>100%</b>	<b>1761</b>	<b>100%</b>	<b>77</b>	<b>43%</b>
Other than Permanent Employees											
Male	0	0	0%	0	0%	NA	NA	0	0%	NA	NA
Female	0	0	0%	0	0%	0	0%	NA	NA	0	0%
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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

% of workers covered by

Category	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent Workers											
Male	104	104	100%	104	100%	NA	NA	104	100%	NA	NA
Female	0	0	0%	0	0%	0	0%	NA	NA	0	0%
<b>Total</b>	<b>104</b>	<b>104</b>	<b>100%</b>	<b>104</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>104</b>	<b>100%</b>	<b>0</b>	<b>0%</b>
Other than Permanent Workers											
Male	6516	6516	100%	6516	100%	NA	NA	0	0%	NA	NA
Female	38	38	100%	38	100%	38	100%	NA	NA	28	74%
<b>Total</b>	<b>6554</b>	<b>6554</b>	<b>100%</b>	<b>6554</b>	<b>100%</b>	<b>38</b>	<b>100%</b>	<b>0</b>	<b>0%</b>	<b>28</b>	<b>74%</b>

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

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company	1.79%	1.54%

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

Benefits	FY 2023-24			FY 2022-23		
	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%	Y	100%	100%	Y
Gratuity	100%	100%	NA	100%	100%	NA
ESI	100%	100%	Y	100%	100%	Y
Others – Superannuation (Managers & above, voluntary)	100%	0%	Y	100%	0%	Y

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.

The Company is committed to promote and to have an inclusive and diverse workforce. Hence aspects of accessibility and equity are equally important and are considered.

The Company has implemented 'Equal Opportunity and Accessibility Policy for Persons with Disabilities', in accordance with the requirements of the Rights of Persons with Disabilities Act, 2016, which can be accessed at:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/8.Equal\\_Opportunity\\_Accessibility\\_Policy\\_for\\_Persons\\_with\\_Disabilities.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/8.Equal_Opportunity_Accessibility_Policy_for_Persons_with_Disabilities.pdf)

We are in the process of preparing a comprehensive plan to address workplace accessibility for differently-abled employees and visitors at Company's existing and new infrastructure – this will include work areas, rest rooms, common areas, and areas for movement in and around facilities.

All our facilities have ramps at entry locations and lobbies to facilitate wheelchairs.

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

Yes. APAR nurtures an inclusive culture that does not discriminate on the basis of religion, gender, caste or disabilities and has a policy for equal opportunity for all, as per the Rights of Persons with Disabilities Act, 2016.

The web-link to this policy is:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/8.Equal\\_Opportunity\\_Accessibility\\_Policy\\_for\\_Persons\\_with\\_Disabilities.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/8.Equal_Opportunity_Accessibility_Policy_for_Persons_with_Disabilities.pdf)

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	100%	100%
Female	100%	100%	NA	NA
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

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, the Company is committed to providing a safe and conducive work environment to all of its employees and workers, and has a mechanism to receive and redress grievances for its employees and stakeholders.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	<p>Mechanism:</p> <p>a) Employees are encouraged to share their concerns with their reporting manager. An answer is expected within 48 hours from the reporting manager.</p> <p>b) In case the employee is not satisfied with the answer of his reporting manager, or answer is not received within the stipulated time, the employee can present his case to the head of the department. An answer is expected within 3 days from the head of the department.</p> <p>c) In case the employee is not satisfied with the answer of head of the department, the aggrieved employee can request to forward his case to the Grievance Committee, which shall make its recommendations within 7 days.</p> <p>d) The final decision by the management is communicated to the employee. If no agreement is possible, the employee and management may refer the matter to voluntary arbitration.</p> <p>The Grievance Committee consists of 5 members across functions at locations out of which one of the members shall be Chairman of the Committee, nominated by the local management.</p>



Link to the Grievance Redressal Policy for employees is provided below:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/APAR-Grievance\\_Redressal\\_Policy\\_for\\_Employees.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/APAR-Grievance_Redressal_Policy_for_Employees.pdf)

Additionally, the Company has implemented following policies to ensure amicable work environment:

a) Policy for Prevention of Sexual Harassment at Workplace (POSH), which can be accessed from the link:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/16.POSH\\_at\\_Workplace.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/16.POSH_at_Workplace.pdf)

b) Whistle Blower Policy, which can be accessed from the link:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/20.Whistle\\_Blower\\_Policy.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/20.Whistle_Blower_Policy.pdf)

c) Employee Relations Policy, which can be accessed from the link:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/7.Employee\\_Relations\\_Policy.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/7.Employee_Relations_Policy.pdf)

Over and above, the Company has works committee, safety committee, canteen committee to manage and ensure conducive work environment. Employee Satisfaction Survey was conducted to gauge the satisfaction level of employees.

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

Gender	FY 2023-24			FY 2022-23		
	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 (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)
Total Permanent Employees						
Male	1761	0	0%	1522	0	0%
Female	180	0	0%	137	0	0%
Total Permanent Workers						
Male	104	0	0%	148	33	22%
Female	0	0	0%	0	0	0%

The Company respects the right of employees to free association and union representation. During the year under review, there was no employee association and union representation in the Company. In respect to this we have an internal Works Committee as per the Industrial Disputes Rules 1957 Subsection (1) of Section (3). This committee comprises of employees & workmen who are elected. This committee addresses to the concerns and issues raised by employees, takes collective decisions and maintains harmonious relationship between employer and workmen.

8. Details of training given to employees and workers

Safety is of paramount importance to the Company. All the plant person, including employees, workers and contract workers are imparted at least one training on H&S each year. The Company's contractual employees receive mandatory safety training before entering the premises and also get on-the-job training through the contractor.

Skill development training is provided as per the TNI (Training Need Identification). Following types of skill-development trainings are imparted for skill upgradation:

- i. Functional/ Technical training
- ii. Training on soft skills
- iii. On-the-job training

The employees receive training through classroom as well as web-based training programs. Various trainings are identified and conducted as per the training calendar, including operational/ functional training, six sigma, soft skills and leadership development programs which are derived from the performance appraisals and competency matrix.

Category	FY 2023-24					FY 2022-23				
	Total (A)	On H&S issues		On Skill Upgradation		Total (D)	On H&S issues		On Skill Upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	1761	1527	87%	979	56%	1522	1225	80%	1065	70%
Female	180	147	82%	73	41%	137	95	69%	96	70%
<b>Total</b>	<b>1941</b>	<b>1674</b>	<b>86%</b>	<b>1052</b>	<b>54%</b>	<b>1659</b>	<b>1320</b>	<b>80%</b>	<b>1161</b>	<b>70%</b>
Workers										
Male	6516	6516	100%	1868	29%	5814	5680	98%	4345	75%
Female	38	38	100%	28	74%	7	7	100%	6	86%
<b>Total</b>	<b>6554</b>	<b>6554</b>	<b>100%</b>	<b>1896</b>	<b>29%</b>	<b>5821</b>	<b>5687</b>	<b>98%</b>	<b>4351</b>	<b>75%</b>

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

All the employees undergo Performance and Career Development Reviews. The Company has a robust HRMS portal to conduct the same. Discussions are carried out periodically and feedback for development is provided. In addition, High Potential (HiPo) employees are identified for the further career development.

The Company also initiated a 'Sarasvati Trainee Program' for women employees across the company.

Internal Job Posting policy is in place to encourage the existing employees for better opportunity within the organization.

Employee satisfaction survey 2022 shows that majority of the employees are satisfied with the company and have a strong affinity towards the organization.

Career development programs and the suggestion schemes are in place which enhance the overall development of an individual.

Category	FY 2023-24			FY 2022-23		
	Total (A)	No (B)	% (B/A)	Total (A)	No (B)	% (B/A)
Employees						
Male	1761	1761	100%	1522	1522	100%
Female	180	180	100%	137	137	100%
<b>Total</b>	<b>1941</b>	<b>1941</b>	<b>100%</b>	<b>1659</b>	<b>1659</b>	<b>100%</b>
Workers						
Male	104	104	100%	148	148	100%
Female	0	0	0%	0	0	0%
<b>Total</b>	<b>104</b>	<b>104</b>	<b>100%</b>	<b>148</b>	<b>148</b>	<b>100%</b>

## 10 Health and safety management system:

<p>a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No)</p>	<p>Yes, we have implemented a robust health and safety management system across our business.</p> <p>All APAR's manufacturing locations have been certified for OHSAS-18001/ ISO 45001 for Occupational Health &amp; Safety; undertakes regular safety audits to identify hazardous acts; ensure compliance with standard operating procedures; and assess the performance of the company's safety measures. The certificates are uploaded at our website, and can be accessed through:</p> <p><a href="https://apar.com/apar-esg-report/">https://apar.com/apar-esg-report/</a> under the 'Certificates' tab.</p> <p>In addition to a collaborative approach for continual improvement and promotion of Health &amp; Safety at the workplace, each plant has been equipped with:</p> <ul style="list-style-type: none"> <li>a) safety &amp; 5S committee</li> <li>b) suggestion scheme</li> <li>c) Kaizen</li> <li>d) Safety engagement activities, and</li> <li>e) a team of qualified H&amp;S professionals at each manufacturing location</li> </ul>
<p>b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?</p>	<p>Hazard Identification and Risk Assessment ("HIRA") is used for routine and non-routine activities. When there is a change in the workplace, such as to a production line layout, equipment, applicable legal requirements, we conduct hazard identification and risk assessments to prevent new hazards and reduce risks.</p> <p>Each manufacturing location conducts hazard and risk assessments annually to determine if additional precautions are needed for health and safety management. We engage employees and encourage participation in health and safety management. This program enables employees to understand how to identify potential risks and hazards in their daily work environment. Through this and other programs, we are able to increase awareness and implement a sense of ownership in maintaining a safe workplace for everyone.</p>
<p>c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)</p>	<p>Yes, all our plant locations have incident and hazard reporting procedures laid down to assist the workforce to highlight unsafe working conditions.</p>
<p>d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)</p>	<p>Yes. All employees are covered under Company's health insurance and personal accident policy.</p> <p>In order to provide quality healthcare to all sections of society, including its employees and workers. APAR has tie-ups with local hospitals for healthcare facilities.</p> <p>All these facilities have benefitted its employees, workers, and the community at large.</p>

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

Safety Incident/ Number	Category	FY 23-24		FY 22-23	
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.31	0.49		
	Workers	1.27	1.94		
Total recordable work-related injuries	Employees	1	2		
	Workers	20	25		
No. of fatalities	Employees	0	0		
	Workers	0	0		
High consequence work-related injury or ill-health (excluding fatalities)	Employees	1	0		
	Workers	4	8		

Due to various safety measure taken by the Company, as described in Q. 15 (under Principle 3), significant reduction in LTIFR was observed (from 1.94 to 1.27) and 'total recordable work-related injuries' also dropped.

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

Following measures are taken by APAR to ensure a safe & healthy workplace:

- Hazard identification, Risk Assessment and Management is done in accordance with Hazard Identification and Risk Assessment (HIRA) Procedure.
- Hierarchy of controls is followed for application of risk control measures. Control Plans commensurate to risk are deployed before execution of job. No job is executed until risks are brought to acceptable range i.e. work permit system.
- Safety Committees are in place at various levels to review the adequacy of resources for safety and to provide support for safety management system deployment
- Deployment of safe and healthy system of work is assured through periodic safety audits and inspections across sites.
- Suggestion and feedback scheme deployed at all levels for further improvement towards safe & healthy work place.

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

	FY 23-24			FY 22-23		
	Filed during the year*	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	**1	0		2	0	
Health & Safety	***1	0		1	0	

\*Company has not received complaints for Working Conditions or Health & Safety of employees, but some suggestions were noted during the reporting period from employees for improvement. These are -

\*\* the existing food canteen at Khatalwada plant was smaller to accommodate the manpower. Suggestion was given by the member of safety committee to increase the sitting capacity which was accepted by the Management and the canteen expansion project was carried out.

\*\*\* There was a risk of incident during the access of building roof at Khatalwada as there was no permanent lifeline. Suggestion was given during the safety committee meeting and the Permanent horizontal lifeline was installed to make the maintenance work safe.

14. Assessments for the year:

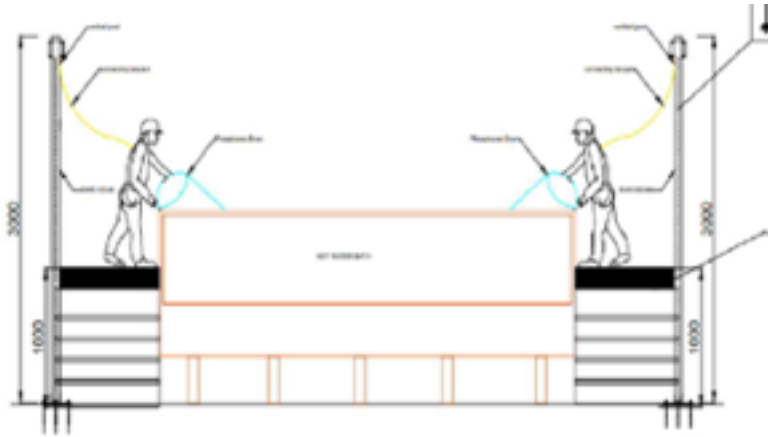
	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Working Conditions	100%
Health & Safety	100%

All of APAR's manufacturing locations are covered under the ISO 45001/2018: Occupational Health and Safety Management Systems. Compliance to safe working conditions is an essential aspect of EHS management systems. In addition, all APAR units undergo periodic Environment, Health & Safety audits at all division to verify compliance with Standards.

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.

Company has Fatal & Serious Injury (FSI) prevention system in which the potential risks are identified through regular safety inspections, audits, HIRA and incident reporting system. Accordingly the corrective & preventive actions are implemented to mitigate the risk within the stipulated time frame. Thus the system keeps on improving on a regular basis. This year we have undertaken many project to benchmarking the safety system like:

- Fire Hydrant system to ensure the fire safety
- Installation of retractable life line system for curing tank
- Fall protection system for rooftops during the project and maintenance work at height



- Additionally, more than 150 numbers of safety Kaizen has been implemented under the suggestion schemes to make our people safe
- Flood management system implemented to prevent plant property in premises – we have hired flood management consultant and designed complete control system, and implemented his recommendations:
  - construction of water collection pit
  - installation of heavy capacity water evacuation pumps along with flood gates to prevent flood during monsoon in plant premises
- Provided safety railings and walkways in roof top solar panels for safe repairing and cleaning jobs etc.

## LEADERSHIP INDICATORS

1.	Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).	Employees – Yes 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	<p>The Company had taken following measures to ensure that statutory dues have been deducted and deposited by the value chain partners:</p> <ol style="list-style-type: none"> <li>GST: The finance department of the Company checks with the GST portal to ensure that the GST dues are deposited by our supply chain partners. This exercise is done every quarter. In case of any non-compliances, it is escalated to the concerned purchase manager for action.</li> <li>PF &amp; ESIC of Contract Labours employed by our supply chain partners within APAR premises is checked thoroughly and monitored by APAR HR team.</li> <li>Majority of our sourcing (59.1%) is through top suppliers, who have their own internal checks and balances to ensure compliance and payment of all the statutory dues in time.</li> <li>For smaller suppliers, the Company has a system of vendor assessment/ audit during vendor on-boarding, wherein we take declaration from the suppliers that all statutory dues are paid in time. Additionally, vendors are sensitized on this topic through regular webinars.</li> </ol>

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 23-24	FY 22-23	FY 23-24	FY 22-23
Employees	1	0	NA	NA
Workers	4	8	NA	NA

In all these cases, the employees & workers have re-joined work.

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)
- Yes.
- We do provide opportunities to employees & workmen who have superannuated from the services of the company.
- The extended services of superannuated employees are used in the advisory roles or in the capacity of retainers with the organization. These employees with their rich experience help the organization to achieve the desired objective more effectively and efficiently.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Working Conditions	* 100%
Health & Safety practices	* 100%

100% of our suppliers are assessed for Working Conditions, and Health & Safety through vendor assessment/ audit at the time of vendor on-boarding.

\* All traders and manufacturing suppliers having insignificant supply values are not included.

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

In case of any non-compliance, the matter is taken up with the supplier immediately. The suppliers need to take corrective actions and are on-boarded only when the corrective actions are implemented.

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

The Company has a wide variety of stakeholders and has been consciously engaging with them to understand their requirements.

Many of the Company's key stakeholders, including customers, investors, suppliers, and employees have been increasingly asking about performance on sustainability parameters. This has helped the Company to determine its priorities on areas of sustainability that are material to its business success.

#### ESSENTIAL INDICATORS

1. Describe the processes for identifying key stakeholder groups of the entity.
- Our stakeholders are those individuals or organisations who have an interest in, and/ or whose actions impact our ability to execute our strategy. Our stakeholders play an integral role in our journey and we recognise the need to partner with them and understand their concerns to run and manage our businesses.
- Our process of stakeholder engagement involves identifying key internal and external stakeholders followed by analysing the impact of each stakeholder groups on our business and vice versa.

## 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
Shareholders	No	Annual General Meeting, Stock Exchange Disclosures, Quarterly and Half yearly Results Publication, Email Communications, Letters, Press Release, Complaints and Resolutions	<ul style="list-style-type: none"> <li>◆ AGM- Annual</li> <li>◆ H/ Y Results- Half yearly</li> <li>◆ Q/ Y Results- Quarterly</li> <li>◆ Others- Ongoing</li> </ul>	Financial Results, Dividends, Induction of Board members, Changes in shareholding, Company's growth plan etc.
Employees	No	Training & Awareness programs, In-house APAR Engage magazines, Goal setting, Performance appraisal, Meetings, Exit interviews, Wellness initiatives, Grievance Mechanism Functioning, Email, Intranet, Circulars etc.	Regular	KRA setting, Performance Management, Improvement areas, Training and awareness, Brand communication, Health & Safety engagement etc.
Customers	No	Awareness Programs, Distributor/ Retailer/ meets, APAR Plant visits, Trade body membership, Complaints management, Conferences, Website etc.	Regular	Target setting, Product quality & availability, New product launches etc.
Suppliers	No	Awareness Programs, Plant visits, Trade association meets, Seminars, Grievance handing mechanism etc.	Regular	Delivery schedule, Product & Service quality, Payments, ESG consideration (sustainability, safety checks, compliances, ethical behaviour) etc.
Government	No	Meetings with local administration/ state government authorities through seminars on need basis, emails and meetings, Regulatory audits/ inspections etc.	Need basis	Discussions with regard to various regulations, amendments, inspections, approvals and assessments; Govt. Policies etc.
Community	No	Community visits and projects, partnership with local charities, volunteerism, seminars / conferences	Regular	Training & Employment, Water management, Community development, Livelihood support, disaster relief etc.

## 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.	In the Board Meetings, feedback/ internal audit reports are discussed, and progress on various sustainability (ESG) parameters are shared. Suggestions from the Board Members are implemented.
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.	<p>Yes.</p> <p>We engage with our stakeholders regularly on sustainability related issues. Employees are actively encouraged to give their suggestions and participate in the implementation thereof.</p> <p>Awareness programs on environmental and social topics are conducted regularly for our employees and suppliers. These awareness programs provide a platform to discuss the environmental and social issues with the stakeholders, and accordingly the inputs received from stakeholders are discussed, debated and implemented where feasible.</p> <p>In addition, prominent customers send us detailed questionnaires on the progress of our sustainability initiatives, to which we regularly respond. This also gives us a detailed understanding of their expectations.</p> <p>Platforms such as CDP and EcoVadis give us a clear indications of the expectations from a global standpoint, which enable us to fine-tune our policies and practices.</p>
3.	Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.	<p>APAR follows an integrated development approach which specifically targets the disadvantaged, vulnerable and marginalised stakeholders. It has been the Company's constant endeavour to focus on inclusive and collaborative growth.</p> <ul style="list-style-type: none"> <li>◆ Employment: APAR management always looks forward to offering merit-based employment to the historically disadvantaged sections of society including scheduled castes/ tribes, other backward classes at all the plant locations.</li> </ul> <p>Currently we are providing training to 47 apprentices at our plants. 85% (40 out of 47) apprentices belong to SC (Scheduled Caste), ST (Scheduled Tribes) or OBC (Other Backward Classes).</p> <p>In addition, 80% of our total contract workforce at plants belong to SC, ST or OBC category; and 38% of our employees at plants belong to SC, ST or OBC category.</p> <p>Inclusion of person with disabilities (PwDs): APAR is committed to including persons with disabilities in our employment ecosystem and workforce. The count of differently abled employees has increased from 1 in FY 2022-23 to 4 in FY 2023-24; and differently abled workers from Nil in FY 2022-23 to 4 in FY 2023-24.</p> <p>We are focusing to improve women worker's participation in our factory shop floors. The count of women workers has increased from 7 in FY 2022-23 to 38 in FY 2023-24.</p> <p>The overall employee diversity has increased from 8.3% in FY 2022-23 to 9.3% in FY 2023-24.</p> <p>Employment Generation: We have tied up with Sri Nityanand Educational Trust Sanchalit Govardhan Skill Development Centre, Wada (District: Palghar, Maharashtra). Govardhan Skill Development Centre is working with the objective of employment generation for tribal youth through their technical skill development. They run various short term technical courses which are affiliated to National Institute of Open Schooling.</p> <ul style="list-style-type: none"> <li>◆ Procurement: APAR is responsible member of the local communities where it has its plants, and the focus is on increasing local procurement where possible.</li> <li>◆ Water security: 61,497 KL of RWH (Rainwater Harvesting) was done during FY 2023-24 through aquifer recharge. We are expecting to achieve water neutrality for our largest facility at Khatalwada, by December 2024. It will improve the water table and ensure water security for both APAR and the neighbourhood communities.</li> </ul>



**PRINCIPLE 5: Businesses should respect and promote human rights.**

The Company is committed to support the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Core Conventions on Labor Standards, the UK Modern Slavery Act and other similar laws and principles.

Towards this the Company had implemented many policies, including:

- ◆ APAR Code of Conduct
- ◆ Child & Forced Labour Policy
- ◆ Human Rights Policy
- ◆ Policy on POSH
- ◆ Policy for Prevention of Workplace Harassment
- ◆ Working Condition Policy
- ◆ Grievance Redressal Policy for Employees
- ◆ Whistle Blower Policy
- ◆ Flexible Working Hours Policy

These policies are available at Company's website at [https://apar.com/sustain\\_envt\\_policies/](https://apar.com/sustain_envt_policies/) under 'Social Policies' tab.

Regular training is being conducted to make all employees aware of these issues.

In addition, human right issues form an integral part of Company's new supplier on-boarding assessment and APAR's Supplier Code of Conduct to which each supplier need to agree and provide consent.

Respect for the dignity of the individual and for the importance of each individual's Human Rights forms the basis of the behaviors, the Company expects of every individual who works for us, either as an employee or indirectly or through its supply chain.

The Company does not accept any form of discrimination, harassment or bullying within APAR or its supply chain. These include requiring suppliers to take measures to avoid any form of forced, bonded or compulsory labor (or any other kind of modern slavery or human trafficking).

**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 2023-24			FY 2022-23		
	Total (A)	No. of persons covered (B)	% (B/A)	Total (C)	No. of persons covered (D)	% (D/C)
Employees						
Permanent	1941	1941	100%	1659	841	51%
Other than Permanent	0	0	0%	0	0	0%
<b>Total Employees</b>	<b>1941</b>	<b>1941</b>	<b>100%</b>	<b>1659</b>	<b>841</b>	<b>51%</b>
Workers						
Permanent	104	64	62%	148	76	51%
Other than Permanent	6554	4297	66%	5673	0	0%
<b>Total Workers</b>	<b>6658</b>	<b>4361</b>	<b>66%</b>	<b>5821</b>	<b>76</b>	<b>1%</b>

All our employees are provided training on the APAR Code of Conduct, which cover key human rights issues. In addition, regular webinars are conducted which covers topic such as human rights, child labour, forced labour, harassment, POSH (Prevention on Sexual Harassment), etc.

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

The Company is paying more than the minimum wage to all its employees and workers.

The wage rates in scheduled employments differ across states, sectors, skills, regions, and occupations owing to various factors. Hence, there is no single uniform minimum wage rate across the country and the revision cycle differs for each state. However Minimum wages are paid and adhered by the Company as per the minimum wage notification issued by the respective Central and State bodies for different establishments under the Minimum Wages Act and Rules.

Category	FY 2023-24					FY 2022-23				
	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										
Male	1761	0	0%	1761	100%	1522	0	0%	1522	100%
Female	180	0	0%	180	100%	137	0	0%	137	100%
Other than Permanent										
Male	0	NA	NA	NA	NA	0	NA	NA	NA	NA
Female	0	NA	NA	NA	NA	0	NA	NA	NA	NA
Workers										
Permanent										
Male	104	0	0%	104	100%	148	0	0%	148	100%
Female	0	NA	NA	NA	NA	0	NA	NA	NA	NA
Other than Permanent										
Male	6516	0	0%	6516	100%	5666	0	0%	5666	100%
Female	38	0	0%	38	100%	7	0	0%	7	100%

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

a. Median remuneration / wages:

Segment	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	7	Rs. 7,57,500	2	Rs. 4,66,250
Key Managerial Personnel	4	Rs. 7,57,50,431	0	NA
Employees other than BoD and KMP	1757	Rs. 755,360 CTC p.a.	180	Rs. 750,420 CTC p.a.
Workers	104	Rs. 439,565 CTC p.a.	0	NA

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	5.93%	8.48%

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

Yes. The Company has following committees for addressing human right issues :

- 1) Ethics Committee – Ethics Committee can be reached by sending email at ethics.taskforce@apar.com
- 2) Grievance Committee
- 3) Works Committee

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

The Company seeks to conduct business in a manner that respects the human rights and dignity of people. The Company's Code of Conduct demonstrates its commitment towards the preservation of human rights across the value chain. The Company believes that a sustainable organization rests on ethics and respect for human rights. The Company promotes awareness of the importance of respecting human rights within its value chain and discourages instances of abuse. The Company has constituted the following Committees to take care of human rights issues:

- a) Ethics Taskforce – This Committee is responsible for addressing all unethical issues, including human rights, violation of APAR Code of Conduct, integrity, financial wrongdoing, harassment, discrimination, victimization, malpractices etc.
- b) Grievance Committee – This committee addresses the grievances raised by employees & workmen incl. human rights issue, mainly grievances against canteen facilities, working conditions, harassments, facilities, OT, leave etc. This consists of five members across functions at locations, and the Chairman is nominated by the local management.
- c) Works Committee – The Company has an internal Works Committee as per the Industrial Disputes Rules 1957 Subsection (1) of Section (3). This committee comprises of employees & workmen who are elected. This committee addresses the concerns and issues raised by employees, takes collective decisions and maintains harmonious relationship between employer and workmen.

The Company has implemented a Human Rights Policy, which can be accessed from the below link:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/13.Human\\_Rights\\_Policy.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/13.Human_Rights_Policy.pdf)

The Grievance redressal policy for Employees can be accessed from below link:

[https://apar.com/wp-content/uploads/2023/03/Social\\_Policies/APAR-Grievance\\_Redressal\\_Policy\\_for\\_Employees.pdf](https://apar.com/wp-content/uploads/2023/03/Social_Policies/APAR-Grievance_Redressal_Policy_for_Employees.pdf)

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

Category	FY 2023-24			FY 2022-23		
	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	
Child Labour	0	0		0	0	
Forced Labour/Involuntary Labour	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

The relationship between the Company and its employees/ workers is harmonious. As such, the employees/ workers voice their suggestions on an ongoing basis and these are discussed and implemented as per merit. Accordingly, there are no formal complaints.

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

	FY 2023-24	FY 2022-23
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

<p>8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.</p>	<p>APAR has implemented various policies to ensure prevention of adverse consequences to the complainant. These are</p> <p>(a) Whistle Blower Policy:</p> <p>APAR's Whistle Blower Policy provides for the following protection:</p> <ul style="list-style-type: none"> <li>◆ Whistle blower complaint is a protected disclosure and the complainant can choose to remain anonymous.</li> <li>◆ The investigating officer has to protect the identity of the whistle blower.</li> <li>◆ The whistle blower is protected against any adverse action not limited to harassment, unfair termination of employment, demotion, suspension and biased behavior on account of whistle blower.</li> </ul> <p>(b) POSH policy</p> <p>It provides following protection:</p> <ul style="list-style-type: none"> <li>◆ The POSH Committee has a women member to provide additional comfort to the victim.</li> <li>◆ The parties (victim and the alleged harasser) are advised to refrain from communication with each other in all possible ways, during the period of investigation.</li> <li>◆ The Company is determined to prevent retaliation, victimization, additional harassment, intimidation, humiliation, character assassination or reprisal in any manner of the complainant or any witnesses. In certain cases, the identity of the complainant is kept confidential.</li> </ul> <p>(c) Policy for Prevention of Workplace Harassment:</p> <p>It provides the following protection:</p> <ul style="list-style-type: none"> <li>◆ Any retaliation or threat of retaliation against any complainant is considered as a violation of the Code of Conduct of the company and will necessitate appropriate disciplinary action.</li> </ul>
<p>9. Do human rights requirements form part of your business agreements and contracts? (Yes/ No)</p>	<p>Yes.</p> <p>Human rights requirement is a part of APAR Supplier Code of Conduct, which makes it integral to all agreements &amp; contracts.</p> <p>We have initiated the process of getting our Suppliers (and service providers) read, understand, and accept (by signing) the APAR Supplier Code of Conduct. The link to Company's Supplier Code of Conduct is as below:</p> <p><a href="https://apar.com/wp-content/uploads/2023/03/APAR_Supplier_Code_of_Conduct.pdf">https://apar.com/wp-content/uploads/2023/03/APAR_Supplier_Code_of_Conduct.pdf</a></p>

10. Assessments for the year:

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child Labour	100% - by Deloitte
Forced Labour/Involuntary Labour	100% - by Deloitte
Sexual Harassment	100% - by Deloitte
Discrimination at workplace	100% - by Deloitte
Wages	100% - by Deloitte
Other human rights related issues	

Approx. 45% of our revenue is from exports and majority of this is to US and European customers who have very stringent requirements from their supply chain on these aspects. Our overseas customers regularly conduct audits in our plant and take declaration from us on human right compliances including discrimination, child labour, forced labour, sexual harassment, workplace harassment, working hours, minimum wages etc.

<p>11. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 10 above.</p>	<p>We have not found any major concern.</p>
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## LEADERSHIP INDICATORS

1.	Details of a business process being modified/ introduced as a result of addressing human rights grievances/ complaints.	During the reporting period, no business processes have been modified or introduced for addressing human rights grievances/ complaints.
2.	Details of the scope and coverage of any Human rights due-diligence conducted.	Our overseas customers regularly conduct audits in our plant and take declaration from us on human right compliances including discrimination, child labour, forced labour, sexual harassment, workplace harassment, working hours, minimum wages etc.
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?	All our facilities have ramps at entry locations and lobbies to facilitate wheelchairs.  However, we are working to improve the facilities as well as increase the coverage to address workplace accessibility for differently-abled employees and visitors at Company's existing and new infrastructure – this will include work areas, rest rooms, common areas, and areas for movement in and around facilities.

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

	% of value chain partners (by value of business done with such partners) that were assessed
Child Labour	83.4% * Please refer the Note P5a below this table
Forced Labour/Involuntary Labour	
Sexual Harassment	
Discrimination at workplace	
Wages	
Other human rights related issues	

#### Note

P5a:

\* There were 83.4% suppliers who were assessed on the above parameters through self-assessment either (a) in the form of their own published ESG reports (b) through signing of Apar Supplier Code of Conduct to comply the above parameters.

Additionally, we sensitize the suppliers through regular awareness webinars (13 webinars/ workshops were conducted for suppliers during FY 2023-24 covering a total of 310 suppliers) on key social & environmental issues.

We also undertake following measures to ensure adherence to human right parameters (Sexual Harassment, Discrimination at workplace, Child Labour, Forced Labour/ Involuntary Labour, Minimum Wages etc.):

- Vendor assessment while on-boarding/ audit:** The parameters are assessed while vendor on-boarding, and only the suppliers who declare adherence to above parameters are on-boarded, and all human right assessments are in place from the very beginning.
- Questionnaire on human rights:** The Company had implemented a questionnaire for Suppliers to check adherence to human right issues. These are circulated-to and filled-by all those suppliers who attend our webinar.

5.	Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 4 above.	In case of any non-compliance, the matter is taken up with the supplier immediately. The suppliers need to take corrective actions and are on-boarded only when the corrective actions are implemented.
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## **PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.**

### **Environmental management**

The Company has implemented adequate steps for protecting the environment. These include:

- a) Working to reduce Energy Intensity through various productivity measures, six sigma trainings, efficiency improvement initiatives etc.
- b) Focusing on electrification – shifting away from fossil-fuel based energy
- c) Increasing the share of RE (Renewable Energy) – A wind-solar hybrid (3.30 MW wind-turbine and 2.80 MWp of solar energy) project was commissioned in partnership with a leading supplier in June 2023 which has increased the share of renewable energy consumption from 4% to 7.3%. Another two similar projects are being commissioned which will ensure significant increase in share of renewable energy consumption by June 2025.
- d) Focus to reduce water consumption, increasing re-cycling of water through ETP/ STP, and augmenting the RWH (Rain Water Harvesting) efforts.
- e) We expect to achieve water neutrality, for our largest facility at Khatalwada, by December 2024. Additionally, APAR has decided to integrate water neutrality in the plant design considerations for its upcoming facilities.
- f) Reduction of wastes – plastic waste management through EPR, and minimising waste, re-cycling of waste, and safe disposal through proper channels.

Towards the above, the following policies have been implemented at APAR:

- ◆ Air Pollution Policy
- ◆ Biodiversity Policy
- ◆ Climate Change Policy
- ◆ Environment Policy
- ◆ Goods & Services Policy
- ◆ Materials, Chemicals and Waste Policy
- ◆ Water Policy

These policies are available at Company's website at [https://apar.com/sustain\\_envt\\_policies\\_environment/](https://apar.com/sustain_envt_policies_environment/) under 'Environment Policies' tab.

APAR is inspiring its supply chain partners by conducting regular sustainability awareness webinars for them and will continue to do the same. 13 such webinars/ workshops were conducted during FY 2023-24 covering 310 suppliers.

As a responsible company, APAR is not only trying to manage the climate related risks to its business, but also consistently trying to reduce the impact that its business contributes to this risk. APAR's Task Force on Climate-Related Financial Disclosures (TCFD) Report is a testimonial towards its effort, and it can be accessed from the link <https://apar.com/apar-esg-report/> under 'TCFD Report' tab. Additionally, we are planning to initiate detailed Climate Risk Assessment, which will include:

- ◆ review of physical and transition risks,
- ◆ quantification of risks,
- ◆ scenario analysis,
- ◆ assign identified climate risk to various functions at APAR,
- ◆ quantification of financial impact with respect to climate risk & opportunities,
- ◆ incorporation of climate risk into risk framework etc.

## ESSENTIAL INDICATORS

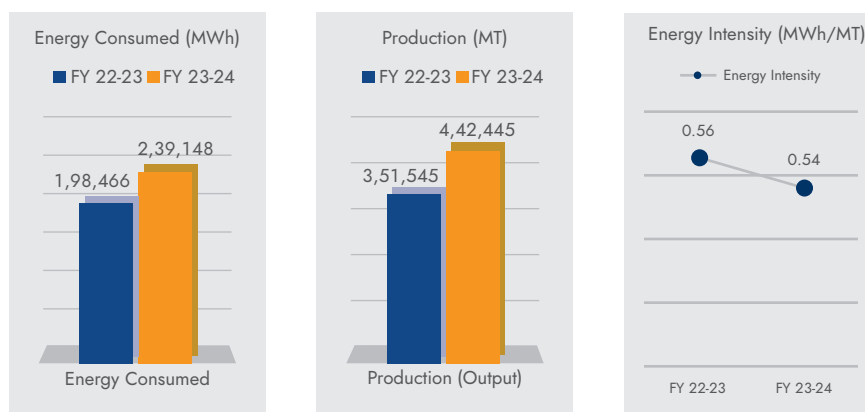
1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

Parameter	Unit	FY 23-24	FY 22-23
From renewable sources			
Total electricity consumption (A) – wind-solar hybrid	MWH	5,267	-
Total fuel consumption (B)	MWH	-	-
Energy consumption through other sources (C) – solar	MWH	5,713	4,450
Total energy consumed from renewable sources (A+B+C)	MWH	10,980	4,450
From non-renewable sources			
Total electricity consumption (D)	MWH	138,620	115,259
Total fuel consumption (E)	MWH	100,258	89,100
Energy consumption through other sources (F)	MWH	-	-
Total energy consumed from non-renewable sources (D+E+F)	MWH	238,878	204,358
Total energy consumed (A+B+C+D+E+F)	MWH	249,858	208,808
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	MWH/ Rs Cr	15.47	14.55
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	MWH/ USD Cr	353.98	332.91
(Total energy consumed / Revenue from operations adjusted for PPP) ^	MWH/ MT	0.54	0.56
Energy intensity in terms of physical output *			
Energy intensity (optional) – the relevant metric may be selected by the entity			

^ The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by OECD data for India which is 22.882.

<https://data.oecd.org/conversion/purchasing-power-parities-ppp.htm>

\* Conductor & Cable business is considered for computation because 97% of our Scope-1 and Scope-2 emission is on account of these two businesses. The other business, Oil business, contribute only 3% to the Scope-1 & Scope-2 emission.



4% reduction in energy intensity was observed, from 0.56 MWH/ MT to 0.54 MWH/ MT of production, due to various measures undertaken at the plants, including energy audits and implementation of energy audit findings.

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

The energy consumption, fuel consumption, and other energy consumptions were assessed by external independent third-party assurance agency (part of GHG Scope-1 and Scope-2 emission assurance), both during FY 22-23 and FY 23-24.

The name of the agency is M/s DNV Business Assurance India Private Limited, India.

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). No
- 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

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

Parameter	FY 23-24	FY 22-23
Water withdrawal by source (in KL)		
(i) Surface water	38,261	82,478
(ii) Groundwater	324,351	297,667
(iii) Third party water	13,527	5,829
(iv) Seawater/ desalinated water		
(v) Others		
Total volume of water withdrawal (KL) (i + ii + iii + iv + v)	376,139	385,974
Total volume of water consumption (KL)	376,139	385,974
<b>Water intensity per Crore Rupee of turnover (Water consumed/ turnover)</b>	<b>23.29</b>	<b>26.89</b>
<b>Water footprint intensity (KL/ Rs. Cr. turnover)</b>	<b>19.48</b>	<b>22.88</b>
Water intensity per Crore rupee of turnover adjusted for Purchasing Power Parity (PPP) ^	532.83	615.37
(Total water consumption/ Revenue from operations adjusted for PPP)		
Water intensity in terms of physical output (KL water/ MT production *)	0.75	0.98
Water intensity (optional) – the relevant metric may be selected by the entity		

Water footprint = Water withdrawal minus Rainwater Harvesting (RWH) done by the Company

Owing to substantial investments that the Company has made in RWH, the water footprint intensity has reduced.

^ Water intensity per rupee of turnover has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by OECD data for India which is 22.882.

<https://data.oecd.org/conversion/purchasing-power-parities-ppp.htm>

\* Conductor & Cable business is considered for computation because 88% of our water withdrawal is on account of these two businesses. The other business, Oil business, contribute only 12% to the overall water withdrawal.

Reduction of over 13% achieved — from 26.89 KL/ Rs. Cr. turnover to 23.29 KL/ Rs. Cr. turnover in water intensity in FY 2023-24.

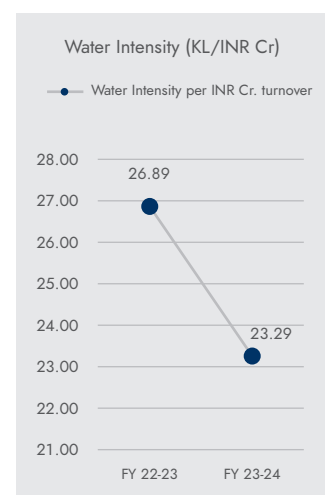
APAR has set the targets of reduction in water footprint intensity by 5% by FY 24-25 across all its plants.

Water footprint reduction has been a top priority for APAR. We have taken various initiatives at all our facilities, which include reduction in demand through process improvement, recycling through increased usage of Sewage and Effluent Treatment Plants (ETP and STP) and Rainwater Harvesting (RWH). Consequently, there has been a significant reduction in our water footprint intensity over the past two years.

In the case of our largest facility at Khatalwada, we expect to achieve water neutrality by December 2024. Additionally, APAR has decided to integrate water neutrality in the plant design considerations for its upcoming facilities.

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

No.





4. Provide the following details related to water discharged:

Parameter	FY 23-24	FY 22-23
Water discharge by destination and level of treatment (in KL)		
(i) To Surface water	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(ii) To Groundwater	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(iii) To Seawater	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(v) Others	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
Total water discharged (KL)	NA	NA

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

Not Applicable

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

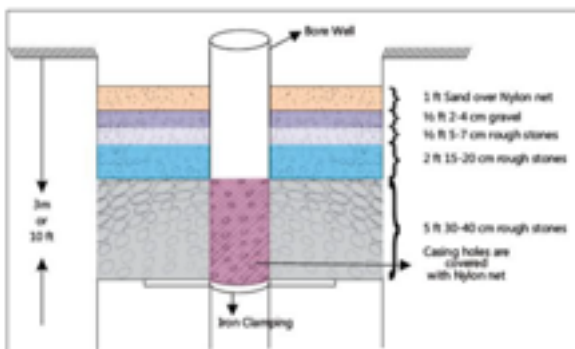
Yes. All units of APAR are ZLD (Zero Liquid Discharge). We manage and ensure zero liquid discharge through demand side and supply side management of water.

**Demand Side Management**

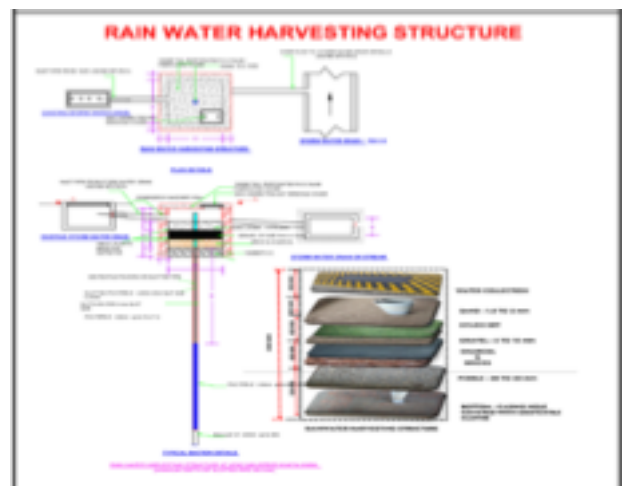
- ◆ Treatment and management of wastewater is done through ETP and STP across the plants. Industrial wastewater generated in the plant is treated in Effluent Treatment Plant (ETP) and reused in the plant as feed to the cooling towers and domestic effluent in Sewage Treatment Plant (STP) which is further used in toilets flushes & gardening inside the plant.
- ◆ All the plants of APAR operate in line with the CTO (Consent to Operate) conditions.
- ◆ With these advanced water treatment and wastewater management systems, we ensure no industrial wastewater is discharged into the environment

**Supply Side Management**

- ◆ APAR has created rainwater harvesting potential through extensive investments in its Rainwater Harvesting (RWH) initiatives.
- ◆ 61,497 KL of RWH was done during FY 2023-24.
- ◆ We are expecting to achieve water neutrality for our largest facility at Khatalwada, by December 2024. It will improve the water table and ensure water security for both APAR and the neighbourhood communities.
- ◆ Additionally, APAR has decided to integrate water neutrality in the plant design considerations for its upcoming facilities



Conceptualized schematic depicting the Recharge Injection bore well & pit



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

Parameter ^	unit	FY 23-24	FY 22-23 *
NOx (NO <sub>2</sub> )	µg/ m3	34.5	25.5
Sox (SO <sub>2</sub> )	µg/ m3	27	19.5
Particulate matter (PM)			
PM10	µg/ m3	94	27.4
PM2.5	µg/ m3	50.4	35.6
Persistent organic pollutants (POP)	µg/ m3	NA	NA
Volatile organic compounds (VOC)			
Benzene (C <sub>6</sub> H <sub>6</sub> )	µg/ m3	BDL(MDL: 1:0)	BDL(MDL: 1:0)
Benzo(a)pyrene (C <sub>20</sub> H <sub>12</sub> )	µg/ m3	BDL(MDL: 0.1)	BDL(MDL: 0.1)
Hazardous air pollutants (HAP)			
Lead (Pb)	µg/ m3	BDL(MDL: 0.5)	BDL(MDL: 0.5)
Arsenic (As)	µg/ m3	BDL(MDL: 1:0)	BDL(MDL: 1:0)
Nickel (Ni)	µg/ m3	BDL(MDL<7)	BDL(MDL<1.0)
Others			
Carbon Monoxide (CO)	mg/ m3	0.79	1.134
Amonia (NH <sub>3</sub> )	µg/ m3	BDL(MDL: 5.0)	BDL(MDL: 5.0)
Ozone (O <sub>3</sub> )	µg/ m3	BDL(MDL<19.6)	23.7

^ The emissions values stated above, are the highest concentration of parameters among our all plants.

\* Data for FY 2022-23 refined and corrected.

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. Data measured by approved laboratories of respective Pollution Control Boards (PCBs). Name of external certifying agencies are: Unistar Environmental & Research Labs Pvt. Ltd.; Sadekar Enviro Engineers Pvt. Ltd.; Sophisticated Industrial Materials Analytic (SIMA) Labs Pvt. Ltd.

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

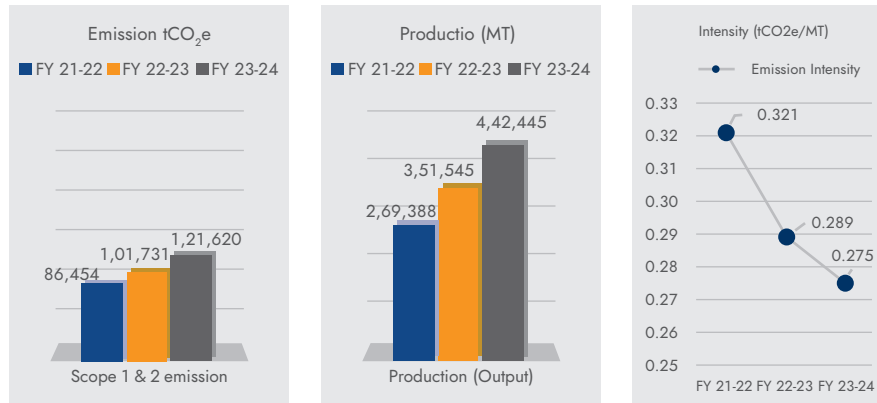
Our organizational boundary covers all our manufacturing plants, offices, warehouses, and all such emission sources under our operational control. It includes our manufacturing plants in India at (1) Gujarat: Khatalwada & Umbergam (2) Maharashtra: Rabale (3) Orissa: Jharsuguda & Sambalpur (4) Dadra and Nagar Haveli: Rakholi & Athola; and our manufacturing plant in UAE at (5) Sharjah: Hamriyah.

Parameter	unit	FY 23-24	FY 22-23
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	25,998	22,717
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	98,910	82,212
Total Scope 1 and Scope 2 emissions per rupee of turnover	tCO <sub>2</sub> e/ Rs Cr	7.73	7.31
Total Scope 1 and Scope 2 emission intensity per Crore rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		176.94	167.29
Total Scope 1 and Scope 2 emission intensity in terms of physical output*	tCO <sub>2</sub> e/ MT	0.275	0.289
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

^ Scope-1 and Scope-2 emission intensity per Crore rupee of turnover has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by OECD data for India which is 22.882.

<https://data.oecd.org/conversion/purchasing-power-parities-ppp.htm>

\* Conductor & Cable business is considered for computation because 97% of our Scope-1 and Scope-2 emission is on account of these two businesses. The other business, Oil business, contribute only 3% to the Scope-1 & Scope-2 emission.



Scope-1 and Scope-2 emission intensity, in terms of physical output, has decreased from 0.289 tCO<sub>2</sub>e/ MT to 0.275 tCO<sub>2</sub>e/ MT (4.84%) due to various measures taken at the plants. This is in line with our journey following a low carbon pathway.

APAR has undertaken a target of 4% reduction in GHG emissions intensity for FY 2024-25 w.r.t. FY 2023-24.

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. The Scope-1 and Scope-2 emissions were assessed by external independent third-party assurance agency, both during FY 22-23 and FY 23-24.

The name of the agency is M/s DNV Business Assurance India Private Limited, India.

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.
- We have been working consistently towards lowering our carbon footprint through various initiatives. We have implemented several GHG reduction projects and many more are under implementation. Some of the examples are:
- Increasing share of RE (Renewable Energy) – a wind-solar hybrid (3.30 MW wind-turbine and 2.80 MWp of solar energy) project was commissioned in partnership with a leading supplier in June 2023 which has increased the share of renewable energy consumption from 4% to 7.3%. Another two similar projects are being commissioned which will ensure that the share of renewable energy consumption increases to 30% by June 2025 (exit rate). This has the potential of reducing our carbon footprint by 25000 tCO<sub>2</sub>e.
  - Focus on electrification (shifting away from fossil-fuel based energy)
  - Increasing productivity using various measures such as initiation of Industry 4.0, Six Sigma etc.
  - Conducting detailed energy audits at all the manufacturing facilities in India and most of the findings have been implemented.

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

Parameter	FY 23-24	FY 22-23
Total waste generated in MT		
Plastic waste (A)	489.94	600
E-waste (B)	150.14	3
Bio-medical waste (C)	0.02	0.03
Construction and demolition waste (D)	152.83	34
Battery waste (E)	1.13	0.1
Radioactive waste (F)	Nil	Nil

Parameter	FY 23-24		FY 22-23	
Other Hazardous waste, if any (G)	Effluent Sludge	9.65	Effluent Sludge	1
	Waste Oil	183.22	Waste Oil	42
	Oil – Soaked Cotton/ Spent Clay	200.02	Oil – Soaked Cotton/ Spent Clay	206
	Aluminium Dross/ Tin/ Enamel Residual	1381.03	Aluminium Dross/ Tin/ Enamel Residual	104
	Druid (Cable)	22.86	Druid (Cable)	-
	Fly-ash	5.24	Fly-ash	3
	Other Non-hazardous waste generated, if any (H)	MS scrap	1844.65	MS scrap
Paper waste		477.24	Paper waste	296
Electrical waste		7.03	Electrical waste	14
Wooden waste		1367.54	Wooden waste	752
Copper waste		166.38	Copper waste	228
Alu. Cond. waste		393.44	Alu. Cond. waste	10.2
XLPE/ PVC/ PE		1071.18	XLPE/ PVC/ PE	1165
<b>Total (A+B+C+D+E+F+G+H)</b>		<b>7924 MT</b>		<b>4415 MT</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.49 MT/ INR Cr. turnover		0.32 MT/ INR Cr. turnover	
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) ^ (Total waste generated / Revenue from operations adjusted for PPP)	11.22		7.04	
Waste intensity in terms of physical output Waste intensity (optional) – the relevant metric may be selected by the entity *	0.018		0.013	
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in MT)				
Category of waste				
(i) Recycled	7555.8		4170.3	
(ii) Re-used	-		-	
(iii) Other recovery operations	-		-	
<b>Total</b>	<b>7555.8</b>		<b>4170.3</b>	
For each category of waste generated, total waste disposed by nature of disposal method (in MT)				
Category of waste				
(i) Incineration	200.0		206.6	
(ii) Landfilling	167.7		38.0	
(iii) Other disposal operations	-		-	
<b>Total</b>	<b>367.8</b>		<b>244.6</b>	

^ Waste intensity per Crore rupee of turnover has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by OECD data for India which is 22.882.

<https://data.oecd.org/conversion/purchasing-power-parities-ppp.htm>

\* Conductor & Cable business is considered for computation because of materiality.

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

No.

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.
- Following initiatives are implemented and practiced at APAR:
- Waste reduction
- We manage waste reduction through implementation of various quality improvement processes, upgradation of the plant, regular trainings, six sigma implementation, and process monitoring.
- Waste disposal
- Plastic Waste - We ensure compliance with the Plastic Waste Management (PWM) Rules 2016, and follow the Extended Producer Responsibility (EPR) approach to manage the downstream operations' plastic packaging waste, and these are recycled through a certified re-cycler.
- Waste recycle & re-use
- Our conductor division re-cycles 100% aluminium waste. 100% of the plain copper scrap is directly recycled by the company, and the tinned copper scrap is sold to authorized recyclers for further processing, in our Cable division.
  - The waste of GI wire/ aluminium wire or strip which is used as an armouring material for the cable, is directly used as a re-manufacturing armouring material for the new cable.
  - The waste of copper tape which is used as a screening material for the MV/ HV cables is used as a re-manufacturing material for the new cable.
  - We have replaced the packaging wooden drum/ reels with steel/ hybrid (made of steel frame & PP sheet) drums/ reels. These are re-used 6-7 times, before being sold as MS scrap for further re-cycling.
  - PTFE additives and PTFE grease – PTFE pre-sintered scrap is converted into low molecular type PTFE additives by molecular scissoring using in-house E-beam and ultrahigh speed pulverisers. The PTFE micronized powders are used as additives in ink and resin industry and in grease applications for improving anti blocking and extreme pressure additives respectively.
- E-Waste: We have tie-ups with certified e-waste recyclers who specialize in safely dismantling and processing electronic devices. The recyclers extract valuable materials such as metals, plastics, and glass, which can be reused in the manufacturing of new products.
- Hazardous Waste: We are constantly exploring to reduce the amount of hazardous waste. All such waste is strictly kept under the limits prescribed in the CTO (Consent to Operate) of respective plant locations. The waste is provided to Govt. approved vendors for proper treatment.

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:

Sl	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.
NA	NA	NA	NA

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
NA	NA	NA	NA	NA	NA

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

Sl	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
NA	NA	NA	NA	NA

## 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
- (ii) Nature of operations

Not Applicable

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

Parameter	FY 23-24	FY 22-23
Water withdrawal by source (in KL)	NA	NA
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	NA	NA
(iv) Seawater/ desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (KL) - Sum of (i) to (v)	NA	NA
Total volume of water consumption (KL)	NA	NA
Water intensity per rupee of turnover (Water consumed / turnover)	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA
Water discharge by destination and level of treatment (in KL)	NA	NA
(i) Into Surface water	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(ii) Into Groundwater	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(iii) Into Seawater	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
(v) Others	NA	NA
No treatment	NA	NA
With treatment – please specify level of treatment	NA	NA
<b>Total water discharged (KL)</b>	<b>NA</b>	<b>NA</b>

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

Not Applicable, as none of our facility/ plant is located in areas of water stress

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

Parameter	unit	FY 23-24	FY 22-23
Total Scope 3 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	44,48,196 #	38,01,388 *
Total Scope 3 emissions per Crore rupee of turnover	tCO <sub>2</sub> e/ Rs Cr.	275.38	264.87

# APAR had computed Scope-3 emission for Category-1, Category -4 and Category -9 in FY 2023-24. We have tried to improve the quality of data this year, and got the Scope-3 Category-1 emission numbers verified for the first time by an independent third-party assurance provider, M/s DNV Business Assurance India Private Limited. Hence, we are disclosing only Category -1 numbers in FY 2023-24.

\* The emission number of FY 22-23 has been adjusted to show only Category -1 emission for the year for a like-to-like comparison.

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. Independent Assessment by external agency was done for Scope-3 Category-1 emission.

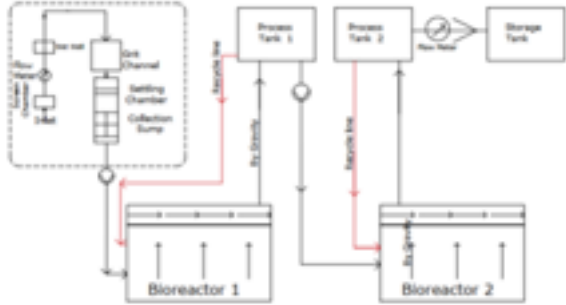



The name of the agency is M/s DNV Business Assurance India Private Limited, India.

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:

SI	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Industry 4.0 & Quality initiatives	Industry 4.0 is being implemented at our Cables facilities. It will result in a) increased productivity b) improved operational efficiency c) enhanced product quality d) reduce re-work and enhance employee safety	Cumulative outcome has resulted in reduction in GHG intensity and water footprint intensity, as mentioned in questions 1, 3 and 6 of Essential Indicator under Principle 6 above.
2	Soil Biotechnology (SBT) Wastewater Treatment	APAR is implementing a 75 KLD Soil Biotechnology (SBT) based STP (Sewage Treatment Plant) ♦ A SBT mimics terrestrial ecosystem functioning principles and harnesses the rock-soil geo-chemistry and soil-plant ecology to carry out biochemical transformations of both organic and inorganic pollutants for treatment of used water. ♦ A SBT process, by design, integrates with the natural bio-geochemical cycles of nature. It removes both organic and inorganic pollutants with very high efficiency. ♦ Organic wastewater is processed in an ecosystem consisting of soil-like media, bacterial culture, geophagus earthworms, natural mineral additives, and select plants. Purification takes place by adsorption, filtration, and biological reactions.	

SI	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
		<p><b>SBT Process Details:</b></p> <p>Following is typical process flow diagram of a SBT plant.</p> 	
	 		
3	Software based simulation	<p>We use advanced software for simulations and calculation of critical transmission line parameters for new product development and validation.</p> 	
4	Irradiation curing Technology - Electron beam	<p>Electron beam cross-link technology enables us to enhance insulation material performance by changing thermoplastic material to thermoset. Our four irradiation units are capable of cross-linking wire from 0.2 sq mm to 400 sq mm and cables with diameter up to 60 mm. Apart from other cross-linking technologies, irradiation cross-link products are easy to cut and strip. Other benefits include:</p> <ul style="list-style-type: none"> <li>(a) higher temperature resistance</li> <li>(b) increased mechanical strength</li> <li>(c) Increased abrasion and cut through resistance/ chemical and oil resistance/ crush resistance</li> <li>(d) increased shear and compressive strength</li> </ul>	



5.	Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.	We have a BCP to ensure continuity of our business operations during unforeseen disruptions. It outlines procedures to respond to a disaster situation and resources necessary to maintain critical business functions and minimize the impact of disruptions such as natural disasters or cyberattacks. Periodic risk assessments are undertaken to assess the probability of occurrence and impact of occurrence of a disaster situation. Based on this assessment, mitigating action is undertaken and emergency response plans, communication protocols, backup systems, and recovery strategies are put in place accordingly. By proactively identifying potential risks and developing contingency measures, we can mitigate financial losses, protect reputation, and sustain operations in adverse conditions. Regular testing, training, and updating of the BCP to ensure its effectiveness and adaptability to evolving circumstances is in place.
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?	<p>The Company has started evaluation of vendors on environmental parameters through vendor assessment/ audits, including ensuring implementation of ISO 14001:2015 by Supplier, for all new vendors.</p> <p>In addition, we have introduced questionnaire for existing vendors to assess them on environmental parameters.</p> <p>The Company conducts regular webinars for the suppliers to sensitize them towards the environment by showcasing its own journey, achievements, and initiatives taken by the Company towards environmental protection. 13 such webinars were conducted covering 310 suppliers during the FY 23-24.</p> <p>We have also started estimating our Scope-3 GHG emissions to try and manage these emissions. Most of the Scope-3 GHG emissions come from our supply chain, particularly Categories 1, 4 and 9. We got the Scope-3 Category-1 emission numbers verified for the first time by an independent third-party assurance provider, M/s DNV Business Assurance India Private Limited. Going forward, we will include more scope-3 categories into the scope of assurance.</p> <p>We have identified our top 100 suppliers in each of our three businesses, and have actively started engaging with them and taking action to reduce our Scope-3 emission in partnership with our supply chain.</p>
7.	Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.	100% of major suppliers (this does not include traders and manufacturing suppliers having insignificant supply values) are assessed for environmental impacts parameters through vendor assessment at the time of vendor on-boarding.

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

**Advocacy, aid and corporate responsibility bodies**

As the Company remains committed towards its vision, it maintains active memberships & collaborations with industry trade associations. APAR leverages this engagement to advance further initiatives aimed at making the industry even more sustainable.

**ESSENTIAL INDICATORS**

1. a. Number of affiliations with trade and industry chambers/ associations. 11
- 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:

Sl	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/ National)
1	Cable and Conductor Manufacturers Association of India (CACMAI)	National
2	EEPC India (Formerly Export Engineering Promotion Council)	National
3	Indian Electrical & Electronics Manufacturers' Association (IEEMA)	National
4	IMC Chamber of Commerce and Industry	National
5	Electrical Research & Development Association (ERDA)	National
6	BIS and IEC Technical Committee	National/ International
7	CIGRE (The International Council on Large Electric Systems)	International
8	Manufacturers of Petroleum Specialities Association (MPSA)	National
9	Confederation of Indian Industry	National
10	Indian Transformer Manufacturers Association (ITMA)	National
11	ICDC (Indian Copper Development Centre)	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
NA	NA	NA

**LEADERSHIP INDICATORS**

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

Sl	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain (Yes/ No) ?	Frequency of review by Board (Annually/ Half yearly/ Quarterly/ Others – please specify)	Web link, if available
	NA	NA	NA	NA	NA

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

The various Social Policies of APAR focus on human rights, employee development, health and safety, employee engagement, equal opportunity, harassment and disciplinary practices, community involvement and business ethics.

The company invests time and effort in training and other employee development activities to help them grow within the company. In turn the employees also focus on developing others within and outside the company.

We realize that one of the greatest social impacts is making the youth employable. APAR has been making a difference to communities across India through the following training, educational and medical outreach programs:

- a) We assist in employment generation through technical skill development of local tribal youth of Khatalwada, Umbergaon and surroundings areas. We enhance the technical skills of these youths and finally give them employment opportunities at our cable manufacturing facilities.

This is done at Bhakti Vedanta Kaushal Vikas Kendra, Govardhan Eco Village (Palghar, Maharashtra), which is India's 3<sup>rd</sup> largest skill development centre, specifically for rural youth & tribal women. Residential facility is being built.

- b) APAR Group has adopted about 25 Anganwadi and 4 Zilla Parishad Schools in Wada District, Maharashtra for providing good infrastructure, a positive environment, giving direction to right path, providing clean drinking water, teaching aides and teaching the teachers to nurture children's knowledge and values.
- c) In order to provide quality healthcare to all sections of society, APAR and its promoters have been involved in setting up hospitals and supporting accessible healthcare all across India. Few glimpses are as follows:
- Dharmsinh Desai Memorial Methodist Institute of Cardiology and Cardiovascular surgery, which was set-up in 1996, has benefited about 400,000 patients mainly from rural Gujarat. The institute carries out open heart surgeries, angiographies and angioplasties with a prolific success rate, and a focus to treating patients who are below the poverty line. 70% of the patients are from economically backward strata. It served as Covid ICU during 2<sup>nd</sup> wave of pandemic.
  - Dr. N D Desai Faculty of Medical Science and Research is the fifth Faculty to be started by the Dharmsinh Desai University of Nadiad (DDU) after Faculty of Technology, Faculty of Pharmacy, Faculty of Dental Science and Faculty of Management and Information Science.
  - Dr. N D Desai Faculty of Medical Science and Research is extending its hospital capacity to 750 beds for serving the community.
  - The Dental School of Dharmsinh Desai University, has since its inception in 2006, provided highly subsidized dental care to 15 lakhs patients, at an average of one lakh patients a year. All patients are treated at a token case fee of Rs 5 and Dentures at Rs. 50. The dental school also runs an oral cancer centre of excellence where oral cancer surgeries are done for Rs. 15,000 to Rs. 25,000 against a market price of Rs. 100,000 to Rs. 300,000. Since its inception the oral cancer centre has done 700 such cancer treatments.

## ESSENTIAL INDICATORS

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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Not Applicable, as there were no projects that required SIA as per law during the reporting period

However, we keep a track of the impact on beneficiaries of our CSR program. Please refer our CSR spending for FY 2023-24.

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

SI	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)
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Not Applicable

3. Describe the mechanisms to receive and redress grievances of the community.
- At all our manufacturing locations, we ensure that there is regular engagement on a pro-active basis with the local communities and their representatives.
- As such there are no long standing grievances at any of our locations.
- In addition, any stakeholder can also submit any grievance through email to [ethics.taskforce@apar.com](mailto:ethics.taskforce@apar.com)

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	4.5%	4.7%
Sourced directly from within India	58.3%	13.3% (*)

\* The data of FY 2022-23 is for sourcing from suppliers within the district and neighboring districts.

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 2023-24	FY 2022-23
Rural	25.27%	21.65%
Semi-urban	5.36%	9.02%
Urban	2.87%	5.92%
Metropolitan	66.50%	63.41%

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

## LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken
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There is no negative impact.

APAR and its promoters have been contributing to the society much before the mandatory requirement of CSR spend was enforced. In addition, the spend by the promoters far exceeds the 2% that APAR spends on CSR.

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

SI	State	Aspirational District	Amount spent (in INR)
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Pl. see the table below

SI	Name of the Trust/ Institution/ Foundation	CSR Amount (Rs.)	Project Undertaken
1.	Sanskrutik Vikas Mandal, Umbergaon	10,00,000	Construction of classrooms for Girl's Nursing College at Manekpur Village, Tal. Umbergaon, Dist. Valsad, Gujarat, India
2.	Sister Nivedita Foundation, Rajkot	10,00,000	(1) Scholarship for economically challenged bright rural Girl students to pursue Secondary and Higher Secondary school education of Standard 9-12. (2) Reading workshop for some SOW Schools (3) Environmental awareness and protection and health care education for SOW Students.
3.	DDMM Heart Institute (GMCC Care & Research Society), Nadiad	70,00,000	Installation of Solar energy at the hospital which caters the people from the lower economic and marginalized sections of society exclusively for the patients with cardiac ailments and providing of quaternary care to the rural and marginalized section of society.
4.	Rawa Academy, Orissa	15,00,000	Rehabilitation of abandoned, unclaimed, parentless and destitute children, for providing education, food & maintenance expenditure of the children.
5.	Sri Nityanand Educational Trust, Wada	33,00,000	Project undertaken for providing training to 50 students from the Backward/ Tribal/ SC/ ST communities to undergo skill development at Govardhan Skill Centre (GSC) at Wada.
6.	Sri Nityanand Educational Trust, Wada	30,00,000	Providing Anganwadi & Zilla Parishad Teachers' Training Programme to train and benefit 25 teachers and 2500 students for building their foundation al academic skills under Skill Development at Govardhan Skill Centre, Wada.
7.	Vishwanidam Public Charitable Trust, Rajkot	2,50,000	Project undertaken for construction of hall from bamboos of Vas for the slum children in and around Rajkot City of Gujarat for educational activities.
8.	Human Capital for Third Sector, Mumbai	6,00,000	Project undertaken to Liberate socio-economically disadvantaged women who have entered into professional education in Science Technology Engineering and Mathematics (STEM) despite various challenges and to provide sponsorship for 10 no. of students to complete their higher education successfully, become empowered, take leadership position.
9.	Anthodyaya Pratishtha, Mumbai	25,00,000	Mission to provide healthy and self-reliable life to economically backward people of community under promoting health care including preventive health care activities.

SI	Name of the Trust/ Institution/ Foundation	CSR Amount (Rs.)	Project Undertaken
10.	Sri Nityanand Educational Trust, Wada	7,65,000	Contribution under Skill Development at Govardhan Skill Centre, Wada.
11.	Shri Sanstha, New Delhi	1,25,000	Contribution made to Shri Sanstha for running Gau Shala under animal welfare activity.
12.	Collector Office Jharsuguda, Govt. of Odisha	47,000	Contribution made to District Office of Collector (R & R Cell), Jharsuguda and District Office of Collector (Red Cross Branch), Jharsuguda for their various rural development activities and assistance to the people in distress, health care, accident victims, disaster preparedness programs etc.
13.	Collector Office Jharsuguda, Govt. of Odisha (Rural Development)	2,00,000	Contribution made to District Office of Collector (R & R Cell), Jharsuguda and District Office of Collector (Red Cross Branch), Jharsuguda for their various rural development activities and assistance to the people in distress, health care, accident victims, disaster preparedness programs etc.
14.	Gram Panchayat Office Lapanga and Ghichamura for Rural Development Program at Dist. Sambalpur, Odisha	1,36,880	Contribution for Supply of drinking water at Banjiberna village of Lapanga GP
15.	Gram Panchayat Office (Sarpanch) Raghunathpali for Rural development at Jharsuguda, Odisha	1,41,600	Contribution for Supply of drinking water at Singhibahal Harijanpada & Gourpada of Raghunathpali G.P
16.	Gram Panchayat Office (Sarpanch) Raghunathpali for Rural Development at Jharsuguda, Odisha	15,57,600	Contribution for Supply, Erection of Octagonal High Mast light Pole at Kultapada, Sunaripada, Bazarpada, Paikpada, Singibahal and Butupali
17.	Gram Panchayat Office (Sarpanch) Raghunathpali for Rural Development at Jharsuguda, Odisha	12,86,188	Contribution for Supply, Erection of Octagonal G.I Streetlight Pole at RO ground premises.
18.	Gram Panchayat Office Lapanga and Ghichamura for Rural Development Program at Dist. Sambalpur, Odisha	2,36,000	Contribution for service charges for Tiles laying work (Temple renovation work) at Jagannath Temple, Gumkarama, Debra, Sambalpur.
19.	Gram Panchayat Office Lapanga and Ghichamura for Rural Development Program at Dist. Sambalpur, Odisha.	2,01,662	Contribution for Civil Works (Pond steps) at Kishanpada, Debra, Lapanga
20.	Gram Panchayat Office (Sarpanch) Raghunathpali for Rural Development at Jharsuguda, Odisha	14,33,346	Contribution for Supply, Erection of Octagonal G.I Streetlight Pole at Raghunathpali bus stand to Barakata.
21.	Gram Panchayat Office (Sarpanch) Raghunathpali for Rural Development at Jharsuguda, Odisha	94,439	Contribution for Painting work at Shree Jagannath Temple & Samaleswari Temple at Raghunath Pali
22.	Rotary Foundation (India), Mumbai	100,00,000	Contribution made to Rotary Foundation (India) for their project to provide eye care to thousands of under-privileged villagers through Bhaktivedanta Eye Hospital Barsana, Mathura District, UP

SI	Name of the Trust/ Institution/ Foundation	CSR Amount (Rs.)	Project Undertaken
23.	Sri Nityanand Educational Trust at Govardhan Skill Centre (GSC), Wada	40,00,000	Contribution made to SNET for construction of dormitory for 50 female students for ladies hostel, who are undergoing technical & non-technical skills at GSC, Wada, Maharashtra and encourage more no. of female/ women to undergo skill training and get educated from the tribal communities.
24.	Bombay Medical Aid Foundation (BMAF) Mumbai	15,00,000	Contribution made to BMAF for the expansion of their existing Palliative Care facility by 20 beds at Swami Shraddhanand Hospital (SSH) in the rural area of Nirmalgaon Village, Vasai in order to give quality care to more patients who are in need of palliation in their times of distress.
25.	Bhaktivedanta Research Center Trust (BRCT), Kolkata	25,00,000	Contribution made to BRCT for their project of Vaishnava Encyclopaedia and other activities in the field of preservation of precious Vaishnava literary heritage.
26.	Dharmsinh Desai Foundation (DDF)	4,15,00,000	Contribution made to DDF for their installation of Solar power generation facility at Dr. N D Desai Faculty of Medical Science and Research, a 650 Bed Hospital and unit of Medical Science as well as Medical College.
27.	District Collector Office Jharsuguda, Govt. of Odisha (Rural Development)	10,00,000	Contribution made for completion of Kalyan Mandap (Community Hall) at Jammal Keldamal G.P., Odisha for the welfare of the villagers in the said vicinity under Rural Development.
<b>Total</b>		<b>8,68,74,715</b>	

3. a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/ vulnerable groups? (Yes/No) Not Applicable.
- (b) From which marginalized/ vulnerable groups do you procure? Not Applicable
- (c) What percentage of total procurement (by value) does it constitute? Not Applicable
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:

SI	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/ No)	Benefit shared (Yes/ No)	Basis of calculating benefit share
	Not Applicable			

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.  
Not Applicable
6. Details of beneficiaries of CSR Projects:

SI	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
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Please refer to response against Q2 of Leadership Indicator, Principle 8.

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

This principle is part of APAR's corporate social responsibility (CSR) and governance frameworks, and it encompasses several key aspects, such as:

a) **Ethical Practices:** APAR provides clear, truthful information about our products and services, and avoid any misleading advertisements. We ensure pricing is fair and reflects the true value of our product or service.

b) **Product and Service Quality and Responsible Innovation:**

APAR's vision is to be a global leader in the energy infrastructure, transportation & telecommunication sectors by providing the best solutions & value creation for our stakeholders. The mission that drives us can be summed up in three words: 'tomorrow's solutions today'. APAR is committed to provide sustainable goods and services for a cleaner, greener tomorrow.

APAR's commitment is customer focused R&D. The Company's specialty lies in delivering product performance in extreme environments; the Company engineers and manufactures cable, conductor and speciality oil that consistently outlast and outperform the competitions.

The Company has state of the art laboratories, in each businesses, with more than 2000+ testing scope as per various national & international standards. All its laboratories are accreditation by NABL (National Accredited Board for Laboratories) as per ISO 17025:2017. 'Certificates' section at <https://apar.com/apar-esg-report/> can be referred for list of NABL certifications across the plants.

The Company has implemented 'Goods & Services' policy to provide guidelines on providing goods and services in a manner that is sustainable and safe. The policy can be accessed at the Company's website at [https://apar.com/sustain\\_envt\\_policies\\_environment/](https://apar.com/sustain_envt_policies_environment/).

In accordance with the above, some of our customized solutions include:

- ◆ Mareech cable/ Torpedo cable
- ◆ Tactical cable for army
- ◆ Pressure tight and non-pressure tight cables up to 60 BAR for ship building
- ◆ In-house development of 5xxx series aluminium alloy wire rods and wires
- ◆ Development of 8xxx series compact conductor
- ◆ First of its kind fire resistant biodegradable transformer oil "NE premium" with superior oxidation stability, having oxidative life 4 times more than any other product
- ◆ Nanofluids for engine oil applications in forklifts which extends the life of the engine oil by approx. 8% as compared to the conventional mineral oil-based engine oils of similar performance
- ◆ Fuel additives of biodegradable type for diesel applications with a fuel saving of 5 to 7% in field performance
- ◆ Turnkey solutions for re-conductoring with HTLS, live line installation with OPGW

c) **Sustainability:** We are committed to minimize negative environmental impacts through sustainable practices in production, packaging, and distribution. We track and report on various environmental and social impact indicators.

d) **Data Privacy & Security:** We safeguard consumers' personal data and use it responsibly, complying with relevant privacy laws and regulations. Please refer our Data Privacy policy at [https://apar.com/wp-content/uploads/2023/04/03\\_Data\\_Privacy\\_Policy-WS.pdf](https://apar.com/wp-content/uploads/2023/04/03_Data_Privacy_Policy-WS.pdf)

## ESSENTIAL INDICATORS

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.	Customer complaints and feedback are received by the business development/ sales team, and attended to by them and the respective manufacturing facility. Complaints are tracked till closure.  In the detailed monthly review meeting, the details of all the complaints and the resolution status is shared, and corrective actions discussed to eliminate such issues in future.
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2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

Name and brief details of project	As a percentage of total turnover
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	<p>We educate and inform our customers about environment precautions, handling &amp; storage, safe and responsible usage, and disposal through MSDS (Material Safety Data Sheet). It contains following information:</p> <ol style="list-style-type: none"> <li>1) Product and Company Identification</li> <li>2) Hazards Identification</li> <li>3) Composition, Information on Ingredients</li> <li>4) First Aid Measures</li> <li>5) Fire Fighting Measures</li> <li>6) Accidental Release Measures</li> <li>7) Handling And Storage</li> <li>8) Exposure Controls, Personal Protection</li> <li>9) Physical And Chemical Properties</li> <li>10) Stability And Reactivity</li> <li>11) Toxicological Information</li> <li>12) Ecological Information</li> <li>13) Disposal Considerations</li> <li>14) Transport Information</li> <li>15) Regulatory Information</li> <li>16) Other Information</li> </ol> <p>As an example, the MSDS for one of the product in Oil business can be accessed from: <a href="https://www.apar.com/wp-content/uploads/2021/02/1.SDS-TO-1020-60-U.pdf">https://www.apar.com/wp-content/uploads/2021/02/1.SDS-TO-1020-60-U.pdf</a></p>
Recycling and/or safe disposal	

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

	FY 23-24			FY 22-23		
	Received during the year	Pending resolution at the end of the year	Remarks	Received during the year	Pending resolution at the end of the year	Remarks
Data privacy	No consumer complaints received against these parameters during the reporting period.			No consumer complaints received against these parameters during the reporting period.		
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other (delivery time, transportation, perceived quality issues etc.)	Total 55 complaints received: Conductor – 11 Oil – 22 Cable – 22  All the complaints were resolved, and nothing is pending at the end of the year.	Total 185 complaints received: Conductor – 23 Oil – 95 Cable – 67  All the complaints were resolved, and nothing is pending at the end of the year.				

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

	Numbers	Reason for Recall
Voluntary recalls	0	NA
Forced recalls	0	NA



<p>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.</p>	<p>Yes. The Company has implemented the policies on Cyber Security and Data Privacy. The web-link to these policies are:  Cyber Security Policy: <a href="https://apar.com/wp-content/uploads/2023/04/01_Cyber_Security_Policy-WS.pdf">https://apar.com/wp-content/uploads/2023/04/01_Cyber_Security_Policy-WS.pdf</a>  Data Privacy Policy: <a href="https://apar.com/wp-content/uploads/2023/04/03_Data_Privacy_Policy-WS.pdf">https://apar.com/wp-content/uploads/2023/04/03_Data_Privacy_Policy-WS.pdf</a></p>
<p>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.</p>	<p>Not Applicable</p>
<p>7. Provide the following information relating to data breaches:</p> <p>a. Number of instances of data breaches</p> <p>b. Percentage of data breaches involving personally identifiable information of customers</p> <p>c. Impact, if any, of the data breaches</p>	<p>a. Nil</p> <p>b. Nil</p> <p>c. NA</p>

## LEADERSHIP INDICATORS

<p>1. Channels/ platforms where information on products and services of the entity can be accessed (provide web link, if available).</p>	<p>Product information can be accessed at –</p> <p><b>(a) website links:</b>  <a href="https://apar.com/speciality-oils/">https://apar.com/speciality-oils/</a>  <a href="https://apar.com/conductors/">https://apar.com/conductors/</a>  <a href="https://apar.com/cable-solutions/">https://apar.com/cable-solutions/</a>  <a href="https://apar.com/telecom-solutions/">https://apar.com/telecom-solutions/</a>  <a href="https://apar.com/polymers/">https://apar.com/polymers/</a>  <a href="https://apar.com/lubricant/">https://apar.com/lubricant/</a>  <a href="https://apar.com/speciality-automotive/">https://apar.com/speciality-automotive/</a></p> <p><b>(b) Leaflets &amp; Brochures</b>  <a href="https://apar.com/apar_brochures/">https://apar.com/apar_brochures/</a></p> <p><b>(c) YouTube</b></p> <p><b>APAR Anushakti Wires &amp; Cables</b>  <a href="https://www.youtube.com/watch?v=N7hNjF6QL_I&amp;t=160s">https://www.youtube.com/watch?v=N7hNjF6QL_I&amp;t=160s</a></p> <p><b>Speciality Polymers for Automotive Industry</b>  <a href="https://www.youtube.com/watch?v=VZH4Vqcc4cg">https://www.youtube.com/watch?v=VZH4Vqcc4cg</a></p> <p><b>Polymer APARPRENE TPE in Irrigation Industry</b>  <a href="https://www.youtube.com/watch?v=gsiVcjUIUzW">https://www.youtube.com/watch?v=gsiVcjUIUzW</a></p> <p><b>Elastomers</b>  <a href="https://www.youtube.com/watch?v=a0PnhPVM6vk">https://www.youtube.com/watch?v=a0PnhPVM6vk</a>  <a href="https://www.youtube.com/watch?v=gAINEa-zGBc">https://www.youtube.com/watch?v=gAINEa-zGBc</a></p> <p><b>Poweroil Product Range</b>  <a href="https://www.youtube.com/watch?v=YHXIUIR6Khs">https://www.youtube.com/watch?v=YHXIUIR6Khs</a>  <a href="https://www.youtube.com/watch?v=VBF5Ngn59y4">https://www.youtube.com/watch?v=VBF5Ngn59y4</a>  <a href="https://www.youtube.com/watch?v=xVHEfM4RpHg">https://www.youtube.com/watch?v=xVHEfM4RpHg</a>  <a href="https://www.youtube.com/watch?v=sgO8YYEDQDE">https://www.youtube.com/watch?v=sgO8YYEDQDE</a></p>
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	<p><b>(d) Digital platforms such as IndiaMart</b></p> <p><a href="https://www.indiamart.com/apar-oil-lubricants/lubricants-oils.html">https://www.indiamart.com/apar-oil-lubricants/lubricants-oils.html</a></p> <p><a href="https://www.indiamart.com/aparindustries/cable-wire.html">https://www.indiamart.com/aparindustries/cable-wire.html</a></p>
<p>2. Steps taken to inform and educate consumers about safe and responsible usage of products and/ or services.</p>	<p>We educate and inform our customers about safe and responsible usage through MSDS (Material Safety Data Sheet) for our all businesses including Oil, Cables and Conductors.</p> <p>Details about MSDS are mentioned under Q2 of Essential Indicator above.</p> <p>The MSDS for one of the product in Oil business can be accessed from</p> <p><a href="https://www.apar.com/wp-content/uploads/2021/02/1.SDS-TO-1020-60-U.pdf">https://www.apar.com/wp-content/uploads/2021/02/1.SDS-TO-1020-60-U.pdf</a></p> <p>We have MSDS for our Cable &amp; Conductor businesses as well, which we share with our customers to inform and educate them about safe and responsible usage of our products.</p> <p>In addition, we also provide soft copies of drum handling, loading, unloading and storage guidelines, installations manual etc. to our customers on demand.</p> <p>Also, most of our customers are large companies who has sophisticated processes for usage of our products, and as such do not require any specific interventions from our side. However, as a part of our stakeholder involvement process, we periodically engage with our value chain through webinars/ seminars and safe &amp; responsible usage is often a part of those engagements.</p>
<p>3. Mechanisms in place to inform consumers of any risk of disruption/ discontinuation of essential services</p>	<p>Sine we are a B2B company, we have constant interactions with our customers. Any risk of disruption is immediately communicated to them, as service levels are specified in every contract.</p> <p>However, as a part of our stakeholder involvement process, we periodically engage with our value chain through webinars/ seminars and risk of disruption/ discontinuance of products/ services is often a part of those engagements.</p>
<p>4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/ No/ Not Applicable).</p> <p>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)</p>	<p>Not Applicable</p>

For and on behalf of Board of Directors

Sd/-  
Kushal N Desai  
Chairman & Managing Director  
DIN: 00008084

Mumbai, May 14, 2024

## Annexure VII to the Board's Report

### Employee Stock Option Disclosures

Members' approval was obtained at the Annual General Meeting held on August 9, 2007 for the introduction of Employees Stock Option Scheme to issue and grant up to 16,16,802 options and it was implemented by the Company. The options have been granted to employees in accordance with the Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (SEBI Regulations) read with the Securities and Exchange Board of India (Employees Stock Option Scheme and Employees Stock Purchase Scheme) Guidelines, 1999 and amended to date (the SEBI Guidelines). The Nomination and Compensation-cum-Remuneration Committee, constituted in accordance with the SEBI Guidelines, administers and monitors the Scheme.

The disclosures stipulated under the SEBI Regulations and Guidelines are as follows:

a.	Options granted by the Compensation Committee	:	175,150
b.	Exercise price	:	₹207.05 per option
c.	Options vested	:	175,150
d.	Options exercised	:	26,338 (option exercised upto March 31, 2015 – 26,072 and on May 14, 2015 – 266 options)
e.	The total number of shares arising as a result of exercise of options	:	26,338
f.	Options lapsed	:	148,812
g.	Variation in terms of options	:	See note 1 below
h.	Money realised by exercise of options	:	₹5,453,282.90
i.	Total number of options in force	:	15,90,464 options yet to be granted
j.	Employee-wise details of options granted to:		
	i. Senior Management Personnel / Directors - Mr. Sanjaya Kunder, CS have exercised 133 options and equal number of shares were allotted. Balance options lapsed.		
	ii. Any other employee who received a grant in any one year of options amounting to 5% or more of options granted during that year.	:	Nil
	iii. Identified employees who were granted options, during any one year, equal to or exceeding 1% of the issued capital (excluding outstanding warrants and conversions) of the Company at the time of grant	:	Nil
k.	Diluted Earnings Per Share (EPS) pursuant to issue of shares on exercise of options.	:	Not Applicable (No options granted and exercised in Financial Year 2023-24).

#### Notes:

- 175,150 options at the exercise price of ₹259.75 granted on January 23, 2008 were cancelled on May 27, 2008. The cancellation was necessary due to substantial reduction in the price of shares in the secondary market and simultaneously therewith, the above detailed options were granted. The confirmation of the shareholders for the said cancellation and subsequent grant were sought at the 19<sup>th</sup> Annual General Meeting held on August 29, 2008.
- As the exercise of options would be made at the market linked price of ₹207.05, the issuance of equity shares pursuant to the exercise of options will not affect the profit and loss account of the Company.
- The Company obtained in-principle approval for the listing of the entire 1,616,802 equity shares to be issued and allotted on exercise of options as and when exercised under the scheme. The Company has also obtained listing and trading approvals from both the Stock Exchanges viz. BSE Limited (BSE) and the National Stock Exchange of India Limited (NSEIL) in respect of the entire 26,338 Equity Shares allotted to the employees under the scheme.
- The Company has received a certificate from Mr. Hemang Mehta, Proprietor of M/s. H. M. Mehta & Associates, Practicing Company Secretaries, Vadodara, Gujarat (Membership No. FCS - 4965 & Certificate of Practice No. 2554), the Secretarial Auditors of the Company, certifying that the Scheme has been implemented in accordance with the SEBI Guidelines and the resolution passed at the Annual General Meeting held on August 9, 2007. The Certificate would be placed at the Annual General Meeting for inspection by members.

For and on behalf of Board of Directors

Sd/-

Kushal N Desai

Chairman & Managing Director

DIN: 0008084

Mumbai, May 14, 2024

## Annexure VIII to the Board's Report

### Form AOC - 1

Statement containing salient features of the financial statement of subsidiaries companies and associate companies

#### Part A Subsidiaries

(Pursuant to first proviso to sub-section (3) of Section 129 read with Rule 5 of Companies (Accounts) Rules, 2014)

Sr. No.	Particulars	Petroleum Specialities Pte. Ltd., Singapore (Refer Notes 1,2,3)		Petroleum Specialities FZE, Sharjah (Refer Notes 1,2,3)		APAR Transmission & Distribution Projects Private Limited (Refer Note 1)	APAR Distribution & Logistics Private Limited (Refer Note 1)	CEMA Wires & Cables LLC, United States (Refer Note 1,2,3 & 6)	
		In USD	₹ in crore	In USD	₹ in crore	₹ in crore	₹ in crore	In USD	₹ in crore
(a)	The date since when subsidiary was acquired	March 17, 2004		November 18, 2014		August 26, 2016	March 02, 2020	April 26, 2022	
(b)	Share Capital	59,101	0.49	1,23,29,700	102.84	0.01	1.00	50,000	0.42
(c)	Reserve and surplus	1,51,68,760	126.52	(18,653)	(0.16)	50.56	4.69	(191)	(0.00)*
(d)	Total Assets	1,55,16,797	129.42	6,88,72,926	574.46	115.29	12.17	49,809	0.42
(e)	Total Liabilities	2,88,936	2.41	5,65,61,879	471.78	64.72	6.48	-	-
(f)	Details of Investment (Except in case of investment in Subsidiaries)	-	-	-	-	-	3.11	-	-
(g)	Turnover	-	-	13,11,91,649	1,094.27	139.63	11.42	-	-
(h)	Profit before taxation (Refer No.4)	2,124	0.02	(12,23,944)	(10.21)	14.66	3.02	(191)	(0.00)*
(i)	Provision for taxation	-	-	-	-	3.79	0.76	-	-
(j)	Profit after taxation (Refer Note 4)	2,124	0.02	(12,23,944)	(10.21)	10.87	2.27	(191)	(0.00)*
(k)	Proposed dividend	-	-	-	-	-	-	-	-
(l)	Extent of shareholding (% of shareholding)	100%		100%		100%	100%	100%	

\* denotes amounts less than ₹50,000

#### Notes:-

- 1) The reporting period for all the subsidiaries is April 1, 2023 to March 31, 2024
- 2) Reporting currency as on March 31, 2024 for subsidiaries viz. Petroleum Specialities Pte. Ltd., Petroleum Specialities FZE and CEMA Wires & Cables LLC is U.S. Dollar ("USD").
- 3) Exchange rate of USD as at March 31, 2024 is : 1 U.S. Dollar (USD) = ₹83.41.
- 4) Profit before taxation and profit after taxation does not include gains or losses recognised in the other comprehensive income.
- 5) The Company has incorporated a wholly owned subsidiary Apar Industries Middle East Limited in Saudi Arabia (WOS). As at March 31, 2024 pending certain regulatory formalities and compliances, the Company has not made any investment into the said WOS. Apar Industries Middle East Limited has not commenced any operation till March 31, 2024.
- 6) The financial statement of CEMA Wires & Cables LLC is unaudited financial statement, as audit is not mandatory.

## Part B Associates

### Statement pursuant to Section 129 (3) of the Companies Act, 2013 related to Associate Companies

Sr. No.	Name of Associates	Ampoil Apar Lubricants Private Limited	Clean Max Rudra Private Limited
1	Latest audited Balance Sheet Date	March 31, 2024	March 31, 2024
2	Date on which the Associate was associated or acquired	September 19, 2020	August 08, 2022
3	Shares of Associate held by the company on the year end		
	No. of Shares	4,00,000	49,889
	Amount of Investment in Associates	₹0.40 crores	₹7.59 crores
	Extent of Holding (in percentage)	40.00%	26.00%
4	Description of how there is significant influence	Holding more than 20% of voting power / ownership	Holding more than 20% of voting power / ownership
5	Reason why the associate is not consolidated.	Consolidated using equity method as per IND AS 28 - Investments in Associates and Joint Ventures	Consolidated using equity method as per IND AS 28 - Investments in Associates and Joint Ventures
6	Net worth attributable to shareholding as per latest audited Balance Sheet	₹0.48 crores	₹7.09 crores
7	Profit or Loss for the year		
	i. Considered in Consolidation	₹0.01 crores	₹(0.62) crores
	ii. Not Considered in Consolidation	-	₹0.12 crores

For and on behalf of the Board of Directors

Sd/-

**Kushal N. Desai**

Chairman & Managing  
Director & Chief  
Executive Officer  
DIN : 00008084

Sd/-

**Nina P. Kapasi**

Independent Director  
DIN : 02856816

Sd/-

**Ramesh S Iyer**

Chief Financial Officer

Sd/-

**Sanjaya R. Kunder**

Company Secretary

Mumbai, May 14, 2024

## Annexure IX to the Board's Report

### FORM AOC - 2

(Pursuant to clause (h) of Sub-Section (3) of Section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

Form for disclosure of particulars of contracts / arrangements entered into by the Company with related parties referred to in sub-section (1) of Section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto:

#### 1. Details of contracts or arrangements or transactions not at arm's length basis:

(a)	Name(s) of the related party and nature of relationship	:	Not Applicable
(b)	Nature of contracts/arrangements/transactions	:	Not Applicable
(c)	Duration of the contracts / arrangements/transactions	:	Not Applicable
(d)	Salient terms of the contracts or arrangements or transactions including the value, if any	:	Not Applicable
(e)	Justification for entering into such contracts or arrangements or transactions	:	Not Applicable
(f)	Date(s) of approval by the Board	:	Not Applicable
(g)	Amount paid as advances, if any	:	Not Applicable
(h)	Date on which the special resolution was passed in general meeting as required under first proviso to section 188	:	Not Applicable

#### 2. Details of material contracts or arrangements or transactions at arm's length basis:

(a)	Name(s) of the related party and nature of relationship	:	Not Applicable
(b)	Nature of contracts/arrangements/transactions	:	Not Applicable
(c)	Duration of the contracts / arrangements/transactions	:	Not Applicable
(d)	Salient terms of the contracts or arrangements or transactions including the value, if any	:	Not Applicable
(e)	Date(s) of approval by the Board, if any	:	Not Applicable
(f)	Amount paid as advances, if any	:	Not Applicable

#### Notes:

There are no material contract or arrangement or transaction entered into by the Company with related party as envisaged u/s 188 of the Companies Act, 2013. Related party transactions as per IND AS are reported on Note No. 49 of Audited Standalone Financial Statements annexed hereto.

On behalf of the Board of Directors

Sd/-

**(Kushal N. Desai)**

Chairman & Managing Director & Chief Executive Officer

(DIN : 00008084)

Mumbai, May 14, 2024