

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, RC Dutt Road, Vadodara, Gujarat - 390 007, India
5	Corporate address	'APAR House', Bldg. No. 5, Corporate Park, Sion-Trombay Road, Chembur, Mumbai – 400 071, 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 2024-25
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange, Bombay Stock Exchange
11	Paid-up Capital	₹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 E-mail 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	TUV SUD South Asia Private Limited
15	Type of assurance obtained	BRSR Core Reasonable Assurance

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	48.50%
2	Transformer & Speciality Oils	Manufacturing	25.74%
3	Power/Telecom Cable	Manufacturing	25.03%
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	27320	48.50%
2	Transformer & Speciality Oils	1920	25.74%
3	Power/Telecom Cable	2732	25.03%
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 Oil Business: * Maharashtra: 1 (Rabale) Cable Business: Gujarat: 2 (Khatalwada, Umbergaon) Conductor Business: Orissa: 2 (Jharsuguda & Sambalpur) Dadra and Nagar Haveli: 5 (Silvassa) – [Athola Unit-3, Athola Unit-5, Khutli Unit-6, Khutli Unit-7, and Rakholi] * In addition, one Oil plant is co-located with Conductor plant in Silvassa	16 Mumbai: 4 Mumbai (Bezolla), Mumbai (CP4), Mumbai (CP5), Mumbai (Nariman Point) Pune: 1 Vadodara: 1 Bangalore: 1 Bhopal: 1 Chennai: 1 Delhi: 3 Delhi (301), Delhi (302-304), Delhi (306 & 307) Gurgaon: 1 Hyderabad: 1 Kolkata: 2 Kolkata, Kolkata (Merlyn)	26
International	Oil Business: 1 [Sharjah, Hamriyah]	2 [Singapore & USA]	3

19 Markets served by entity:

a) Number of Locations

Location	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?

32.8%

c) A brief on types of customers

Our customers include:

- Industries/Corporates (includes Cosmetics, Pharma, Rubber, Plastics, Lubricants, Rail, Defence, Shipping, Mining, Telecom etc.)
- OEMs
- EPC – Transmission Companies
- Utilities – Transmission & Distribution Companies
- Renewables
- Export customers
- Distributors/Channel Partners

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)
EMPLOYEES						
1.	Permanent (D)	2056	1829	88.96%	227	11.04%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total employees (D + E)	2056	1829	88.96%	227	11.04%
WORKERS						
4.	Permanent (F)	99	99	100%	0	0%
5.	Other than Permanent (G)	7581	7501	98.94%	80	1.06%
6.	Total workers (F + G)	7680	7600	98.96%	80	1.06%

b) Differently abled Employees and workers:

Sl	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	4	2	50%	2	50%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	4	2	50%	2	50%
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0%	0	0%
5.	Other than Permanent (G)	4	4	100%	0	0%
6.	Total differently abled workers (F + G)	4	4	100%	0	0%

21. Participation/ Inclusion/ Representation of women:

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	6	1	16.7%
Key Management Personnel	4	0	0%

22. Turnover rate for permanent employees and workers:

Particulars	FY 2024-25 (Turnover rate)			FY 2023-24 (Turnover rate)			FY 2022-23 (Turnover rate)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	13.43%	15.72%	13.66%	12.24%	9.46%	12.00%	8.60%	8.00%	8.60%
Permanent Workers	4.81%	0%	4.81%	0%	0%	0%	0.74%	0.00%	0.74%



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
9	Apar Industries LATAM LTDA, Brazil	Wholly-Owned Subsidiary of the Company	100	No

VI. CSR Details

24	(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 ₹)	1,75,52,26,31,297.75
	(iii) Net worth (in ₹)	42,53,42,66,509.82

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 2024-25			FY 2023-24		
		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
Shareholders	Yes. Please refer Note A4 below	28	6	Pending cases of March 31, 2025 were disposed off as on the date of signing of BRSR.	13	1	Redressed except 1 Complaint

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2024-25			FY 2023-24		
		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
Employees and workers	Yes. Please refer Note A5 below	0	0	0	0	0	NA
Customers	Yes. Please refer Note A6 below	178	0	NA	55	0	NA
Value Chain Partners	Yes. Please refer Note A7 below	28	0	NA	22	2	NA
Other (please specify)				

Notes:

*We have no investors apart from shareholders

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.

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

Designated Officials	Address	Contact Details
Mr. Harish Malsatter	301, Panorama Complex R.C. Dutt	Telephone: 0265 2339906
Ms. Mahati MS	Road Vadodara - 390 007 Gujarat India	E-mail ID: com.sec@apar.com
Mr. Jaydeepsinh Rathod		
Mr. Scophild Christian		
Mr. H. B. Trivedi		

The web-link is as follows: <https://apar.com/investor/>

A4: Yes. Shareholder can register their grievances at <https://scores.sebi.gov.in>

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

A6: 178 complaints were received (113 in Cable business, 61 in Oil business and 4 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

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

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 4 complaints related to unloading of the material due to space constraints.



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:

Sl.	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. <u>Increasing share of Renewable Energy (RE)</u>:</p> <p>Our RE consumption has increased from 3.7% in FY 2022-23 to 7.3% in FY 2023-24 to 9.9% in FY 2024-25, despite increased electricity requirement.</p> <p>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. Another two similar projects are being commissioned which will ensure significant increase in share of renewable energy consumption in FY 2025-26.</p> <p>B. In addition, we had conducted energy audit at all our plants during FY 2023-24, and most of the recommendations have been implemented. This will help in reduction of energy intensity.</p>	Negative

Sl.	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.	Climate Change	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. Some recent cyclones were as follows:</p> <p>Severe Cyclonic Storm: REMAL Affected: West Bengal Period: May 2024</p> <p>Cyclonic Storm: ASNA Affected: Gujarat, Rajasthan and Madhya Pradesh Period: Aug - Sep 2024</p> <p>Severe Cyclonic Storm: DANA Affected: West Bengal & Odisha Period: Oct 2024</p> <p>Two of our conductor plants are situated in Odisha - Jharsuguda & Sambalpur. Both of our cable plants are situated in Gujarat (Khatalwada, Umbergaon) & Five conductor plants are situated in nearby Dadra and Nagar Haveli (Silvassa)</p>	<p>The Company has taken mitigations steps like (a) design-strengthening during construction phase, (b) covered sheds and (c) higher capacity pumps for water evacuation at most of its plants.</p> <p>Additionally, we had conducted scenario analysis (in alignment with TCFD guidelines, SSP1-RCP2.6 and NGFS Net-Zero by 2050 were considered for low-emission scenarios, and SSP5-RCP8.5 considered for a high-emission scenario) to assess the potential long-term impacts under different climate futures and assigned identified climate risks to relevant business functions to ensure accountability and integration across the organisation. This holistic approach underscores APAR's commitment to climate resilience and sustainable business practices. Our TCFD (Task Force on Climate-Related Financial Disclosures) Report can be accessed from the link https://apar.com/apar-esg-report/ under 'TCFD Report' tab.</p>	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.	Product Stewardship	Opportunity	<p>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.</p> <p>Some of APAR's new offerings include products such as MVCC (Medium Voltage Covered Conductor), Fire Protekt, Alum AnuShakti etc.</p>		Positive



Sl.	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)
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"> 1. Rising urbanisation and growing infrastructure worldwide 2. Increasing demand for renewable energy generation 3. Increased investments in smart upgrading of the power transmission and distribution systems and the development of smart grid 4. Increasing need for grid interconnection 5. escalating demand from IT facilities and data centres <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 220 GW installed as of Mar 2025). 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 & Conductors, and with a wide and diversified product portfolio, we anticipate significant growth in our business and market share.</p>		Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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"> The web-link and mapping of Company's policies against each Principle is provided in Note B1 at the end of this section. The policies are categorised in 5 tabs namely: Environment Policies, Social Policies, Governance Policies, Procurement Policies and IT Policies. 								
2 Whether the entity has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3 Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes**	Yes
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"> All plants of APAR have ISO 9001 (Quality Management System) certification. All key plants of APAR are certified under ISO 14001 (compliance to environmental management system). All key plants of APAR are certified under ISO 45001/OHSAS 18001 (Occupational Health & Safety Management Systems). APAR's Cable, Oil & Conductor division have state-of-the-art laboratories with more than 2000+ testing facilities as per various national & international standards and are certified by NABL (National Accredited Board for Laboratories) as per ISO 17025:2017. 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, UL-62, UL-444 etc.) from India. <p>ISO 9001, ISO 14001, ISO 45001, and NABL certificates are available under the 'certificate' tab at https://apar.com/apar-esg-report/</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. In addition, specific ESG commitments are also publicly available in its ESG reports at the url: https://apar.com/apar-esg-report/</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. In addition, key ESG parameters are set, monitored and disclosed publicly in its ESG report at the url: https://apar.com/apar-esg-report/</p>								

** We have a Supplier Code of Conduct which covers multiple aspects of this Principle. We also conduct supplier outreach programme through in-person meetings as well as webinars. 12 such webinars, covering 187 suppliers, were conducted in FY 2024-25, through this out-reach programme.



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 & Managing Director, Mr. Kushal Desai, is as follows:</p> <p>I am pleased to present our progress on key Environmental, Social, and Governance (ESG) parameters. We have made notable strides in areas like reducing absolute water consumption and water intensity, identification and quantification of climate risks and inclusion into Enterprise Risk Management (ERM) system, increasing share of renewable energy in the overall electricity mix, improving the gender diversity, increasing the use of scrap as input material, enhancing employee well-being, and increased transparency through reporting at global platforms such as CDP and EcoVadis.</p> <p>Looking ahead, we remain focused on achieving our ESG targets, including a reduction in emissions and strengthening our community engagement initiatives. Our commitment to sustainability remains central to our long-term value creation strategy.</p>
8	Details of the highest authority responsible for implementation and oversight	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&S) Committee for overseeing and managing APAR's key sustainability-related issues, as detailed below:</p> <p>The CSR&S committee of the Board governs and reviews the Corporate Social Responsibility and Sustainability activities of the Company. It 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 capitalise 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, programmes, and initiatives etc.</p>
10	Subject for Review	<p>Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee</p> <p>Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)</p>
		<p>P1 P2 P3 P4 P5 P6 P7 P8 P9 P1 P2 P3 P4 P5 P6 P7 P8 P9</p>
	Performance against above policies and follow up action	<p>Yes</p> <p>Reviews are done on a regular basis</p>
	Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	<p>Yes</p> <p>Reviews are done on a need basis</p>

	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 recognised as Great Place to Work successively for the second year in row, till the period ending January 2026. This certification is given to organisations post assessment and anonymous feedback from employees regarding their workplace experience, covering areas such as trust, camaraderie, fairness, respect, and credibility.									
\$APAR is getting its facilities audited for Human Rights Excellence under the standard BEC 1500:2024									
^TUV SUD South Asia Private Limited has done the assessment of GHG scope-1 and scope-2 emissions for FY 2024-25.									
*Our financial auditor has assessed our CSR spends as per the policy, as part of annual report									
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.									

	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	✓			✓	✓		✓			https://apar.com/sustain_envt_policies_social/
Employee H&S Policy			✓							
Health Care Coverage Policy			✓							
Working Condition Policy			✓							
APAR Human Rights Policy					✓					
Child & Forced Labour Policy					✓					https://apar.com/sustain_envt_policies_environment/
Prevention of Workplace Harassment					✓					
Policy on POSH					✓					
Diversity, Equity and Inclusion Policy			✓					✓		
Employee Relation Policy			✓					✓		
Goods & Services Policy		✓							✓	
Water Policy						✓				
Air Pollution Policy						✓				
Materials, Chemicals and Waste Policy						✓				
Biodiversity Policy						✓				
Climate Change Policy						✓				
Environment Policy						✓				



Mapping with APAR's policy	P1	P2	P3	P4	P5	P6	P7	P8	P9	Website Link
Anti-Corruption & Anti Bribery Policy	✓									https://apar.com/sustain_envt_policies_governance/
Fraud Prevention & Detection Policy	✓									
Policy on Related Party Transaction	✓									https://apar.com/sustain_envt_policies_procurement/
Supplier Code of Conduct	✓		✓	✓	✓					

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 essential to APAR's long-term success. The APAR Code of Conduct (CoC) underpins the Company's dedication to ethical behaviour and integrity. It provides a framework for acting lawfully, honourably, and respectfully, ensuring fair treatment of all individuals and safeguarding those who raise concerns. **The CoC applies not only to employees but also to suppliers, partners, and customers**, all of whom are encouraged to voice concerns at any level within the organisation.

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. No POSH related complaint was made in FY 2024-25.

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 programmes
Board of Directors	<p>13. 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.</p> <p>In addition, as part of the familiarisation programme for Independent Directors, (i) Code for Independent Directors, (ii) Code of Conduct under Corporate Governance, and (iii) Code of Conduct under Insider Trading are also shared with Independent Directors. For convenience of the Directors of the Company, all the familiarisation programme activities are merged with the Board Meetings, Audit Committee Meetings and Risk Management Committee Meetings. Also, individual programmes are being conducted separately for them, as and when required.</p> <p>In addition, the Chairman of APAR had completed a specialised course on 'Business and Climate Change: Towards Net Zero Emissions' from Cambridge Institute for Sustainability Leadership (CISL) in 2024.</p>	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 programmes
Key Managerial Personnel	Over one thousand training programmes were organised for employees (including KMPs), workers and value chain partners on various environmental, social and other aspects, during FY 2024-25, as per the following details:	Principles 1,2,3,4,5,6,7,8,9	100%
Employees other than BoD and KMPs			
Workers			
	Sl	Topic	# of Training programmes
	1	APAR values/Code of Conduct	# 38
	2	Soft Skill	# 130
	3	ESG: Social	# 60
	4	ESG: Environment	# 71
	5	Occupational Health & Safety (OH&S)	# 439
	6	IT Awareness	# 12
	7	Procurement Capability Building	# 12
	8	Skill Upgradation	# 120
	9	Quality Management System (QMS)	# 73
	10	Supplier Code of Conduct (for Suppliers)	# 12
	11	Human Rights Certification	# 5
	12	GPTW Action Planning Workshop	# 12
	13	Team Building	# 31

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

Principle	Description	Topics Covered in training
Principle 1	Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable	<ul style="list-style-type: none"> • APAR Code of Conduct • Anti-Corruption & Anti Bribery Policy • Fraud Prevention & Detection Policy • Supplier Code of Conduct
Principle 2	Business should provide goods and services in a manner that is sustainable and safe	<ul style="list-style-type: none"> • Goods & Services Policy
Principle 3	Businesses should respect and promote the well-being of all employees, including those in their value chains	<ul style="list-style-type: none"> • Employee H&S Policy • Health Care Coverage Policy • Working Condition Policy • Diversity, Equity and Inclusion Policy • Employee Relation Policy • Supplier Code of Conduct
Principle 4	Businesses should respect the interests of and be responsive to all its stakeholders	<ul style="list-style-type: none"> • APAR Code of Conduct • Supplier Code of Conduct
Principle 5	Businesses should respect and promote human rights	<ul style="list-style-type: none"> • APAR Human Right Policy • Child Labour/Forced Labour • Prevention of Workplace Harassment • Policy on POSH • APAR Code of Conduct • Supplier Code of Conduct
Principle 6	Businesses should respect and make efforts to protect and restore the environment	<ul style="list-style-type: none"> • Water Policy • Air Pollution Policy • Materials, Chemicals and Waste Policy • Biodiversity Policy • Climate Change Policy • Environment Policy

Principle	Description	Topics Covered in training
Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	<ul style="list-style-type: none"> • APAR Code of Conduct
Principle 8	Businesses should promote inclusive growth and equitable development	<ul style="list-style-type: none"> • Diversity, Equity and Inclusion Policy • Employee Relation Policy
Principle 9	Businesses should engage with and provide value to their consumers in a responsible manner	<ul style="list-style-type: none"> • 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	Regional office of CGWB (Odisha)	2,00,000	Refer Note 1	No
Penalty/ Fine	NA	Directorate General of Goods and Services Tax Intelligence (DGGI)	1,15,47,372	Refer Note 2	No
Penalty/ Fine	NA	Federal Tax Authority, Abu Dhabi, UAE	AED 2,000 (INR 45,982.50)	Refer Note 3	No
Settlement					
Compounding Fees					
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

Note 1: While obtaining NOC for ground water abstraction, authority observed non installation/installation of faulty digital water flow meter with telemetry system and NOC was granted subject to payment of penalty.

Note 2: Rule 89 (4) of the CGST Act, 2017 allows refund of accumulated ITC when such accumulation arises due to export made without payment of IGST under Bond/ LUT. We had imported inputs under Advance Authorisation claiming exemption of customs duty (including IGST). However, the contention of DGGI/authority was when exemption of IGST was claimed under Notification No.79/2017-Cus. on imports made under Advance Authorisation, the refund of IGST paid on other inputs and packing materials used therein can only be claimed under sub-rule (4B) of Rule 89 of CGST Rules, 2017 not based on formula given in Rule 89(4). If fact, there is no such non-obstante clause given in statute [or Rule 89(4B)] which takes precedence over any conflicting provision Rule 89(4). Principle Section 54 also does not make any distinction & confusion. This issue was agitated for the prior period in our case up to March 2022, and on representation to Govt. now this confusing rule 89(4A), 89(4B) and 96(10) got deleted from CGST Rules, 2017 vide Notification No.20/2024-C.T. dated 08.10.2024. Though we have strong *prima facie* case in favour, we calculated the differential amount between Rule 89(4) & Rule 89 (4B) and reversed the credit due to which the penalty has been levied. As we have now paid the interest and penalty, we are eligible to reclaim the credit that we had to reverse.

Note 3: Excess claim of a VAT input credit of AED 12,344.81, which has been corrected Suo-motto by the Subsidiary company by filing a revised return.



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 organisation 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 is 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

Whistle-Blower Policy:

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

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 2024-25	FY 2023-24
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	1
Workers	Nil	Nil

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

KMPs	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

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

Not Applicable

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

	FY 2024-25	FY 2023-24
Number of days of accounts payables	133.49	[*] 135.65

[*] number of FY 2023-24 updated

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 2024-25	FY 2023-24
Concentration of Purchases	a) Purchases from trading houses as % of total purchases	13.9%	9.3%
	b) Number of trading houses where purchases are made from	877	1540
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	81.8%	62.9%
Concentration of Sales	a) Sales to dealers / distributors as % of total sales	2.66%	[*] 2.39%
	b) Number of dealers / distributors to whom sales are made	917	[*] 809
	c) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	21.65%	[*] 22.90%
Share of RPTs in	a) Purchases (Purchases with related parties / Total Purchases)	0.04%	[*] 0.02%
	b) Sales (Sales to related parties / Total Sales)	0.03%	0.04%
	c) Loans & advances (Loans & advances given to related parties / Total loans & advances)	2.23%	[*] 0.19%
	d) Investments (Investments in related parties / Total Investments made)	5.04%	68.55%

[*] number of FY 2023-24 updated



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 programmes
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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). 12 awareness programmes were conducted for our supply chain partners during FY 2024-25. The details of training and number of participants are provided below:

#	Webinar Date	Cable	Conductor	Oil
1	17 Jan 2025	9	-	-
2	29 Jan 2025	-	13	-
3	30 Jan 2025	-	11	-
4	04 Feb 2025	30	-	-
5	07 Feb 2025 (Batch 1)	-	-	7
6	07 Feb 2025 (Batch 2)	-	-	7
7	25 Feb 2025	21	-	-
8	13 Mar 2025 (Batch 1)	-	18	-
9	13 Mar 2025 (Batch 2)	-	16	-
10	20 Mar 2025 (Batch 1)	-	-	8
11	20 Mar 2025 (Batch 2)	-	-	13
12	25 Mar 2025	34	-	-
Total		94	58	35

We had covered following topics during the webinar/workshops:

- ESG overview
- Cause of Climate Change
- Global Warming Potential
- Emission Scopes
- Sustainability Initiatives @ APAR
- GHG Emissions @ APAR and various emission reduction initiatives taken
- Water Footprint @ APAR and various water footprint reduction initiatives
- Human Rights initiatives @ APAR
- Supplier Code of Conduct
- Questionnaire for Suppliers to assess their readiness
- NGRBC Principles
- Open forum to discuss how the emission reduction initiative can result in lowering the costs

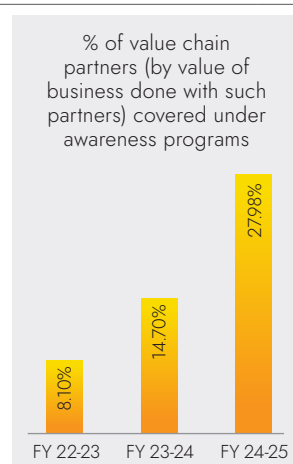
Please see note P1a below

187 suppliers were covered through these awareness programmes in FY 2024-25.

Note: P1a

28% of supply chain partners were covered (by value of business done with such partners) under the awareness programmes during FY 2024-25.

Majority of our procurement is from large suppliers including Vedanta, S-Oil, Ergon Refining Inc., HPCL, JSW Steel, Sumitomo Metal Mining Co. Ltd., etc. They do not need any awareness programme and hence we did not reach out to them for such programmes.



- 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

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 speciality 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/.

ESSENTIAL INDICATORS

- 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 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D revenue expenses	0.09%	0.11%	Our R&D investments, supported by our in-house NABL-accredited laboratories with a testing scope covering over 2000 parameters across various national and international standards, have led to the development of sustainable and high-performance products. Notable products include HR FR EBXL wires, MVCC conductors, energy-efficient AL59 conductors, and natural ester-based insulating fluids known for their high biodegradability and superior fire safety performance. These products not only align with global sustainability benchmarks but also enable our clients—particularly in the infrastructure and utility sectors—to meet green procurement norms, thereby amplifying environmental and social value across the value chain.
R&D CapEx	0.03%	0.02%	Our capital expenditure has played a key role in scaling up sustainable manufacturing practices, minimising environmental impact, and promoting employee and community wellbeing. Key initiatives include large investments in renewable energy and replacement of existing machinery with more productive and energy efficient machineries, and CapEx on industry 2.0 initiatives to further improve the productivity. Significant investment in water conservation measures has resulted in 46% reduction in water intensity over the last two years. Additionally, the rainwater harvesting system implemented at our cable manufacturing facility has contributed to recharging the local groundwater table, thus benefiting the surrounding community while enhancing APAR's water resilience.
Total CapEx	2.90%	2.19%	



Segment	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D revenue expenses	₹15.87 crore	₹15.97 crore	
R&D CapEx	₹4.78 crore	₹3.50 crore	
Total CapEx	₹509.65 crore	₹330.67 crore	

2. a) Does the entity have procedures in place for sustainable sourcing? (Yes/ No)	<p>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. No supplier is on-boarded till they agree and sign the APAR's SCoC. It focusses on the following four principles for sustainable sourcing:</p> <ul style="list-style-type: none"> • 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 https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Sustainability-Report-FY2024.pdf</p> <p>Hindalco https://www.hindalco.com/integrated-annual-report2022-23/index.html</p> <p>S-Oil https://www.s-oil.com/en/sustainability/Report.aspx</p> <p>Ergon https://www.flipsnack.com/ergoncomm/ergon-doing-right-report-2023-flipsnack/full-view.html</p> <p>We also have a focused Supplier out-reach programme for MSMEs and smaller Suppliers where we train them about aspects of sustainability that are necessary for their journey of ESG. Total 12 (online webinars & offline workshops) awareness programmes were conducted during FY 2024-25, and 187 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>
b) If yes, what percentage of inputs were sourced sustainably?	75%. Bulk of our sourcing is done through suppliers who have their own internal system of sustainability, which is followed and reported by them.

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 minimise 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 unorganised sector where it is burnt in an uncontrolled manner for its inherent calorific value which causes the attendant emissions. 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 authorised 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 micronised 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 specialise 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.

5503 MT of plastic waste (3691 MT category-1 waste as Brand Owner, 1722 MT category-2 waste as Brand Owner, and 90 MT category-2 waste as Importer), as per the target provided, was recycled through authorised vendor during FY 2024-25.



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.
27320	AL 59 Conductors	48.50%	Boundary: Cradle to gate with options, A4-A5, and modules C1-C4, D	Yes	Provided below the table
	Aluminium EC Wire Rod Grade 1350				
	Aluminium Alloy Wire Rod Grade 6201		Ref. standard: EN 15804+A2:2019 and ISO 14025		
	Aluminium EC Wire Rod Grade 8176				
	ACSR CURLEW Conductor				
	ACSR DOTTEREL Conductor				
	AACSR 703 SQ.MM Conductor				
	ACSR FA95 Conductor				
	ACSR FA 240 Conductor				
	PV Solar Cable		Boundary: Cradle to gate with modules C1-C4, D Ref. standard: EN 15804+A2:2019 and ISO 14025		

Web-links:

AL 59 Conductors:

https://apar.com/wp-content/uploads/2022/11/declaration_epd_signed_Environmental_Product_Declaration_APAR_1668157279.pdf

Aluminium EC Wire Rod Grade 1350:

[https://apar.com/wp-content/uploads/2023/07/Aluminium_EC_Wire_Rod_Grade_1350_\(H12\)_HUB-0570_2023-07-09.pdf](https://apar.com/wp-content/uploads/2023/07/Aluminium_EC_Wire_Rod_Grade_1350_(H12)_HUB-0570_2023-07-09.pdf)

Aluminium Alloy Wire Rod Grade 6201:

https://apar.com/wp-content/uploads/2023/07/Aluminum_Alloy_Wire_Rod_Grade_6201_HUB-0569_2023-07-09.pdf

Aluminium EC Wire Rod Grade 8176:

https://apar.com/wp-content/uploads/2023/07/Aluminum_EC_Wire_Rod_Grade_8176_HUB-0568_2023-07-09.pdf

ACSR CURLEW Conductor: <https://apar.com/wp-content/uploads/2024/12/ACSR-CURLEW-Conductor.pdf>

ACSR DOTTEREL Conductor: <https://apar.com/wp-content/uploads/2024/12/ACSR-DOTTEREL-Conductor.pdf>

AACSR 703 SQ.MM Conductor:

https://apar.com/wp-content/uploads/2025/03/EPD_APAR_Industries_Limited_AACSR-703-SQ.MM-Conductor_EPD_HUB-3029_2025-03-13.pdf

ACSR FA95 Conductor:

https://apar.com/wp-content/uploads/2025/03/EPD_APAR_Industries_Limited_ACSR-FA95-Conductor_EPD_HUB-3030_2025-03-13.pdf

ACSR FA 240 Conductor:

https://apar.com/wp-content/uploads/2025/03/EPD_APAR_Industries_Limited_ACSR-FA-240-Conductor_EPD_HUB-3031_2025-03-13.pdf

PV Solar Cable: <https://apar.com/wp-content/uploads/2025/01/EPD-PV-Solar-Cable-4-6-Sqmm-18-12-2024.pdf>

APAR has successfully developed and published the EPDs (Environmental Product Declarations) on EPD HUB for our various products as detailed above. The report covers carbon footprint computation, verification, validation and certification over its lifetime by EPD Hub as per EN 15804+A2 & ISO 14025 / ISO 21930 standards.

Additionally, these EPD report can also be downloaded from <https://manage.epdhub.com/> and search for 'APAR Industries'

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 unorganised sector where it is burnt in an uncontrolled manner for its inherent calorific value which causes the attendant emissions. 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 2024-25	FY 2023-24
Some of the input materials re-cycled/ reused in production process were as follows:		
<ul style="list-style-type: none"> Pinewood Pallets – Grade I Reconditioned IBC – 1000 Litre PVC Lumps and Chips HDPE on drum non virgin LDPE on drum non virgin PVC Strap Refurbish lagging Recycled Drum Recycled PP Sheet Recycled PVC Filler Aluminium & Copper metal scraps etc. 	Total 3% of recycled or reused input material (by value) was used in production.	Total 4.1% of recycled or reused input material (by value) was used in production.

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 2024-25			FY 2023-24		
	Re-used	Re-cycled	Safely disposed	Re-used	Re-cycled	Safely disposed
Plastic (including packaging)		100% (5503 MT as per EPR) *			100% (3797 MT) as per EPR	
E-waste						
Hazardous waste						
Other waste						

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

*3691 MT category-1 waste as Brand Owner, 1722 MT category-2 waste as Brand Owner, and 90 MT category-2 waste as Importer, as per the target provided, was recycled through authorised vendor during FY 2024-25.

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 unorganised sector where it is burnt in an uncontrolled manner for its inherent calorific value which causes the attendant emissions. We expect that over next few years, the infrastructure and required regulation will ensure adequate collection of used-oil for re-refining.

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.

Great place to work



APAR Industries has completed the assessment conducted by GPTW (Great Place to Work), India and is re-certified as a Great Workplace for the second year in row, till the period ending January 2026.

This certification is given to organisations 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 helps attract and retain top talent.

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 nurtures a cohesive team culture that inspires employees to actively participate in all organisational 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 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 labour 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
- 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 organisation.

Mentorship programme

The Company has a mentorship programme 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 organisation further in the long run. Unlike similar learning initiatives like training programmes or online courses, mentoring utilises 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 training
- Training on Human Right and other social issues
- Specialised training on procurement
- Training on Sustainability
- IT awareness & Cyber Security programme

In addition, the Company had designed and implemented rigorous training programme 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.



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	1829	1829	100%	1829	100%	NA	NA	1829	100%	NA	NA
Female	227	227	100%	227	100%	227	100%	NA	NA	111	49%
Total	2056	2056	100%	2056	100%	227	100%	1829	100%	111	49%
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%
Total	0	0	0%	0	0%	0	0%	0	0%	0	0%

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	99	99	100%	99	100%	NA	NA	99	100%	NA	NA
Female	0	0	0%	0	0%	0	0%	NA	NA	0	0%
Total	99	99	100%	99	100%	0	0%	99	100%	0	0%
Other than Permanent Workers											
Male	7501	7501	100%	7501	100%	NA	NA	0	0%	NA	NA
Female	80	80	100%	80	100%	80	100%	NA	NA	41	51%
Total	7581	7581	100%	7581	100%	80	100%	0	0%	41	51%

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

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the Company	0.11%	0.11%

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

Benefits	FY 2024-25			FY 2023-24		
	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.



Wheelchair ramp @ APAR
Umbergaon Cable Plant
office entrance



Washroom for specially-abled
persons @ APAR Khatalwada
Cable Plant



Wheelchair for specially-abled
persons @ APAR Umbergaon
Cable Plant

All our facilities have ramps at entry locations and lobbies to facilitate movement through wheelchairs. In addition, provision for special toilets is made for specially-abled persons.

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

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
Total	100%	100%	100%	100%



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

	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	Mechanism:
Permanent Employees	a) Employees are encouraged to share their concerns with their reporting manager. An answer is expected within 48 hours from the reporting manager.
Other than Permanent Employees	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.
	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.
	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.
	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.
	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
	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
	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
	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
	Over and above, the Company has works committee, safety committee, and canteen committee to manage and ensure a conducive work environment. Employee Satisfaction Survey was conducted to gauge the level of satisfaction of employees.

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

Gender	FY 2024-25			FY 2023-24		
	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	1829	0	0%	1761	0	0%
Female	227	0	0%	180	0	0%
Total Permanent Workers						
Male	99	0	0%	104	0	0%
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 Sub-section (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 programmes. Various trainings are identified and conducted as per the training calendar, including operational/functional training, six sigma, soft skills and leadership development programmes which are derived from the performance appraisals and competency matrix.

Category	FY 2024-25					FY 2023-24				
	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	1829	1401	77%	1059	58%	1761	1527	87%	979	56%
Female	227	165	73%	121	53%	180	147	82%	73	41%
Total	2056	1566	76%	1180	57%	1941	1674	86%	1052	54%
Workers										
Male	7600	7600	100%	1134	15%	6516	6516	100%	1868	29%
Female	80	80	100%	34	43%	38	38	100%	28	74%
Total	7680	7680	100%	1168	15%	6554	6554	100%	1896	29%

In addition, specialised training programmes were conducted for all procurement personnel in the Company, facilitated by top-tier external consultants. The training covered a range of topics including Strategic Sourcing, Business Partnering, Spend Analysis, Category Management, Supply Planning, Data Analytics, Innovation, P2P Procurement, Negotiations, Governance, and MIS. A total of 1,253 man-hours were delivered, with 172 participants attending the sessions.

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

All employees participate in regular Performance and Career Development Reviews, facilitated through the Company's comprehensive Human Resource Management System (HRMS) portal. These reviews include structured discussions and periodic feedback sessions aimed at fostering individual growth and development. Additionally, High Potential (HiPo) employees are systematically identified to receive targeted support and opportunities for accelerated career progression.

To promote internal mobility and career advancement, APAR has implemented a well-defined Internal Job Posting (IJP) policy that encourages employees to explore new roles and opportunities within the organisation.

As per the 2022 Employee Satisfaction Survey, a significant majority of employees expressed high levels of satisfaction and a strong sense of belonging to APAR. This positive sentiment is further supported by a variety of employee-centric initiatives, including career development programmes and structured suggestion schemes, both of which contribute meaningfully to personal and professional growth.

APAR remains committed to nurturing talent, recognising potential, and creating a dynamic workplace that aligns employee aspirations with business goals.



Category	FY 2024-25			FY 2023-24		
	Total (A)	No (B)	% (B/A)	Total (A)	No (B)	% (B/A)
Employees						
Male	1829	1829	100%	1761	1761	100%
Female	227	227	100%	180	180	100%
Total	2056	2056	100%	1941	1941	100%
Workers						
Male	7600	7600	100%	6516	6516	100%
Female	80	80	100%	38	38	100%
Total	7680	7680	100%	6554	6554	100%

10 Health and safety management system:

- a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No)

Yes, we have implemented a robust health and safety management system across our business.

All APAR's manufacturing locations have been certified for OHSAS-18001/ ISO 45001 for Occupational Health & 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:

<https://apar.com/apar-esg-report/> under the 'Certificates' tab.

We are also implementing a modern EHS platform which will offer automated workflows and immediate notifications to the relevant parties, seamless data flows across the organisation, organisation wide standardisation of processes, enhanced transparency and quick actions. It will have following modules:

- Incident management
- Risk Management, Safety Inspection & Audits
- Change Management
- Maintenance Safety
- Health & Hygiene, and
- Training & Documentation

Key Highlights:

- No fatal accidents during FY 2024-25
- Reduction in LTIFR (workers) from 1.94 (FY 2022-23) to 1.27 (FY 2023-24) to 1.13 (FY 2024-25)
- ISO 45001 certification at all manufacturing locations
- Regular conduct of safety audits at plants
- Each manufacturing unit of APAR has its own unit-level safety committee, led by the unit or facility heads.
- Each APAR plant has been equipped with the (a) safety & 5S committee (b) suggestion scheme (c) Kaizen (d) Safety engagement activities, and (e) a team of qualified H&S professionals at each manufacturing location.



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>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 programme enables employees to understand how to identify potential risks and hazards in their daily work environment. Through this and other programmes, we are able to increase awareness and implement a sense of ownership in maintaining a safe workplace for everyone.</p>
c) Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)	Yes, all our plant locations have incident and hazard reporting procedures laid down to assist the workforce to highlight unsafe working conditions.
d) Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/No)	<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 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.36	0.31
	Workers	1.13	1.27
Total recordable work-related injuries	Employees	1	1
	Workers	26	20
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	1
	Workers	1	4

Key Highlights

- No fatal accidents during FY 2024-25
- Reduction in LTIFR (workers) from 1.94 (FY 2022-23) to 1.27 (FY 2023-24) to 1.13 (FY 2024-25)

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

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.

- e) Suggestion and feedback scheme deployed at all levels for further improvement towards safe & healthy workplace.



Demonstration of Fire & Safety equipment @ APAR Khatalwada Plant

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0		1	0	
Health & Safety	0	0		1	0	

During the reporting period, the Company did not receive any formal complaints related to Health & Safety (H&S) or working conditions from employees or workers. However, we recognise that continuous improvement is key to maintaining a safe and supportive work environment.

Formal feedback (through employee satisfaction surveys) and Informal feedback and suggestions for enhancing H&S practices and workplace conditions are encouraged through various internal communication channels and are reviewed regularly to identify and implement potential improvements.

APAR is re-certified as a Great Workplace for the second year in row, till the period ending January 2026. The GPTW (Great Place To Work) survey findings are studied, and action plans are made based on these findings. One such finding was the need to strengthen work-life balance, and 5-days workweek was implemented for all employees based in Offices including all the Branch Offices.

At the plant level, we are implementing a modern EHS platform which will offer automated workflows and immediate notifications to the relevant parties, seamless data flows across the organisation, organisation wide standardisation of processes, enhanced transparency and quick actions. It will have following modules:

- Incident management
- Risk Management, Safety Inspection & Audits
- Change Management
- Maintenance Safety
- Health & Hygiene, and
- Training & Documentation

Additionally, suggestions are encouraged at our regular safety committee meetings at the plants on issues such as working conditions and health & safety.

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.

During the reporting period, no major safety-related incidents were reported.

However, as part of APAR's proactive approach to health and safety, periodic risk assessments and safety audits, such as Fatal & Serious Injury (FSI) prevention system, HIRA and incident reporting system are in-place. Accordingly, the corrective & preventive actions are implemented to mitigate the risk within the stipulated time frame.

The following initiatives are implemented to address safety-related risks:

- 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, approx. 400 numbers of safety Kaizen has been implemented under the suggestion schemes to make our people safe.
- Implementation of Flood management system to prevent plant property, including (i) construction of water collection pit (ii) 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.
- Regular training on safety: 439 training programmes on Occupational Health & Safety (OHS) were imparted during FY 2024-25.

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

The Company had taken following measures to ensure that statutory dues have been deducted and deposited by the value chain partners:

- 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.
- PF & ESIC of Contract Labours employed by our supply chain partners within APAR premises is checked thoroughly and monitored by APAR HR team.
- Majority of our sourcing is through top suppliers, who have their own internal checks and balances to ensure compliance and payment of all the statutory dues in time.
- 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 sensitised on this topic through regular webinars.



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 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	0	1	NA	NA
Workers	1	4	NA	NA

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

4. Does the entity provide transition assistance programmes 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 organisation. These employees with their rich experience help the organisation 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 & Marginalised Group (Yes/No)	Channels of communication (E-mail, 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, E-mail Communications, Letters, Press Release, Complaints and Resolutions	<ul style="list-style-type: none"> • AGM - Annual • H/ Y Results - Half yearly • Q/ Y Results - Quarterly • Others - Ongoing 	Financial Results, Dividends, Induction of Board members, Changes in shareholding, Company's growth plan etc.
Employees	No	Training & Awareness programmes, In-house APAR Engage magazines, Goal setting, Performance appraisal, Meetings, Exit interviews, Wellness initiatives, Grievance Mechanism Functioning, E-mail, Intranet, Circulars etc.	Regular	KRA setting, Performance Management, Improvement areas, Training and awareness, Brand communication, Health & Safety engagement etc.
Customers	No	Awareness Programmes, 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 Programmes, 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.

Yes. We engage with our stakeholders regularly on sustainability related issues.

- Employees are actively encouraged to give their suggestions and participate in the implementation thereof.
- Awareness programmes on environmental and social topics are conducted regularly for our employees and suppliers. These awareness programmes 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.
- 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.
- Platforms such as CDP and EcoVadis give us a clear indication of the expectations from a global standpoint, which enable us to fine-tune our policies and practices.

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

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.

- 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.

Employment Generation: We have tied up with Sri Nityanand Educational Trust Sanchalit Govardhan Skill Development Centre, Wada (District: Palghar, Maharashtra). The Centre is dedicated to generating employment opportunities for tribal youth by equipping them with technical skills through various short-term courses affiliated with the National Institute of Open Schooling (NIOS).

Over the past three years, 81 tribal youths (24, 39 and 18 students in years 2022, 2023 and 2024 respectively) have been trained and are now employed across different companies. Notably, 13 youths are currently employed with APAR's Cable Division, contributing across multiple departments.

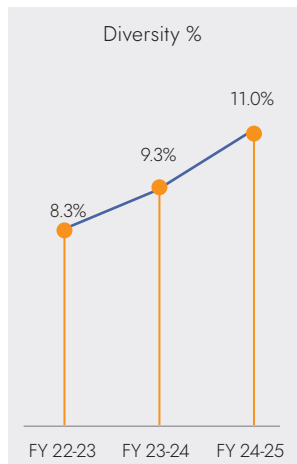
Additionally, 18 trainees are presently undergoing industrial training with APAR, gaining hands-on experience and preparing for future employment opportunities.

In addition, 84% 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.

92% of our contract workforce, and 45% of our employees are from rural and/ or semi-urban areas.

Inclusion of person with disabilities (PwDs): APAR is committed to including persons with disabilities in our employment ecosystem and workforce. Presently, there are four differently abled employees (two men and two women), and four differently abled workers at APAR.

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) to 80 (in FY 2024-25).



The overall employee diversity has increased from 8.3% (in 22-23) to 9.3% (in 23-24) to 11.0% (in 24-25).

- Procurement: APAR is responsible member of the local communities where it has its plants, and the focus is on increasing local procurement where possible.
- Water security: 61,616 KL of RWH (Rainwater Harvesting) was done during FY 2024-25 through aquifer recharge. It will improve the water table and ensure water security for both APAR and the neighbourhood communities.

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 Labour 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/ 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 behaviours, 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 labour (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 2024-25			FY 2023-24		
	Total (A)	No. of persons covered (B)	% (B/A)	Total (C)	No. of persons covered (D)	% (D/C)
Employees						
Permanent	2056	2056	100%	1941	1941	100%
Other than Permanent	0	0	0%	0	0	0%
Total Employees	2056	2056	100%	1941	1941	100%
Workers						
Permanent	99	99	100%	104	64	62%
Other than Permanent	7581	7581	100%	6554	4297	66%
Total Workers	7680	7680	100%	6658	4361	66%

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 2024-25					FY 2023-24				
	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	1829	0	0%	1829	100%	1761	0	0%	1761	100%
Female	227	0	0%	227	100%	180	0	0%	180	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	99	0	0%	99	100%	104	0	0%	104	100%
Female	0	NA	NA	NA	NA	0	NA	NA	NA	NA
Other than Permanent										
Male	7501	0	0%	7501	100%	6516	0	0%	6516	100%
Female	80	0	0%	80	100%	38	0	0%	38	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)	5	7,50,000	2*	4,62,500
Key Managerial Personnel	4	72,985,403	0	NA
Employees other than BoD and KMP	1829	₹900,000 CTC p.a.	227	₹578,000 CTC p.a.
Workers	99	₹518,219 CTC p.a.	0	NA

*Note: Smt. Nina Kapasi's (Independent Director – Non-Executive) term expired on May 29, 2024.

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

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	6.44%	5.93%

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 organisation 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, victimisation, 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 Sub-section (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

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



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

Category	FY 2024-25			FY 2023-24		
	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 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0%	0%
Complaints on POSH upheld	0	0

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

APAR has implemented various policies to ensure prevention of adverse consequences to the complainant. These are

(a) Whistle-Blower Policy:

APAR's Whistle-Blower Policy provides for the following protection:

- Whistle-Blower complaint is a protected disclosure and the complainant can choose to remain anonymous.
- The investigating officer has to protect the identity of the Whistle-Blower.
- The Whistle-Blower is protected against any adverse action not limited to harassment, unfair termination of employment, demotion, suspension and biased behaviour on account of Whistle-Blower.

(b) POSH policy

It provides following protection:

- The POSH Committee has a women member to provide additional comfort to the victim.
- 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.
- The Company is determined to prevent retaliation, victimisation, 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.

(c) Policy for Prevention of Workplace Harassment:

It provides the following protection:

- 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.

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

Yes.

Human rights requirement is a part of APAR Supplier Code of Conduct, which makes it integral to all agreements & contracts.

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:

https://apar.com/wp-content/uploads/2023/03/APAR_Supplier_Code_of_Conduct.pdf

10. Assessments for the year:

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

Approx. 33% 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.

In addition, APAR is also getting its facilities audited for *Human Rights Excellence* under the standard BEC 1500:2024. One facility at Rabale is already certified.

11. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 9 above.

We have not found any major concern

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.

In addition, APAR is also getting its facilities audited for *Human Rights Excellence* under the standard BEC 1500:2024. One facility at Rabale is already certified.

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

Yes.

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



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	100% suppliers were assessed on these 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.
Forced Labour/Involuntary Labour	
Sexual Harassment	
Discrimination at workplace	Additionally, we sensitise the suppliers through regular awareness webinars (12 webinars/ workshops were conducted for suppliers during FY 2024-25 covering a total of 187 suppliers) on key social & environmental issues.
Wages	
Other human rights related issues	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.

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.

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:

- 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 3.7% in FY 2022-23 to 7.3% in FY 2023-24 to 9.9% in FY 2024-25. Another two similar projects are being commissioned which will ensure significant increase in share of renewable energy consumption by FY 25-26.
- Focus to reduce water consumption, increasing re-cycling of water through ETP/ STP, and augmenting the RWH (Rain Water Harvesting) efforts. Due to this, not only the water footprint intensity, but our absolute water footprint also has been coming down since last two years despite significant increase in production.
- Working to reduce Energy Intensity through various productivity measures, six sigma trainings, efficiency improvement initiatives etc.
- Focusing on electrification -- shifting away from fossil-fuel based energy.
- Reduction of wastes -- plastic waste management through EPR, and minimising waste, re-cycling of waste, and safe disposal through proper channels.

APAR has implemented a range of environmental management policies, including those addressing air pollution, biodiversity, climate change, environmental protection, goods and services, materials, chemicals and waste, and water. These policies reflect APAR's commitment to responsible and sustainable operations, and can be accessed at Company's website at https://apar.com/sustain_envt_policies_environment/ under 'Environment Policies' tab.

APAR has published its Task Force on Climate-related Financial Disclosures (TCFD) report, demonstrating a comprehensive approach to managing climate-related risks and opportunities. The report includes a thorough review of both physical and transition risks associated with climate change.

We conducted scenario analysis (in alignment with TCFD guidelines, SSP1-RCP2.6 and NGFS Net-Zero by 2050 were considered for low-emission scenarios, and SSP5-RCP8.5 considered for a high-emission scenario) to assess the potential long-term impacts under different climate futures and assigned identified climate risks to relevant business functions to ensure accountability and integration across the organisation. This holistic approach underscores APAR's commitment to climate resilience and sustainable business practices. Our TCFD (Task Force on Climate-Related Financial Disclosures) Report can be accessed from the link <https://apar.com/apar-esg-report/> under 'TCFD Report' tab.

APAR is also inspiring its supply chain partners by conducting regular sustainability awareness webinars for them. 12 such webinars/ workshops were conducted during FY 2024-25 covering 187 suppliers.

ESSENTIAL INDICATORS

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

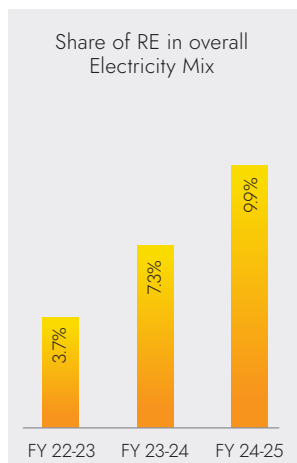
Parameter	Unit	FY 2024-25	FY 2023-24
From renewable sources			
Total electricity consumption (A) – wind-solar hybrid	MWH	12,571	5,267
Total fuel consumption (B)	MWH	-	-
Energy consumption through other sources (C) – solar	MWH	6,067	5,713
Total energy consumed from renewable sources (A+B+C)	MWH	18,638	10,980
From non-renewable sources			
Total electricity consumption (D)	MWH	168,839	138,620
Total fuel consumption (E)	MWH	150,444	100,258
Energy consumption through other sources (F)	MWH	-	-
Total energy consumed from non-renewable sources (D+E+F)	MWH	319,283	238,878
Total energy consumed (A+B+C+D+E+F)	MWH	337,921	249,858
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	MWH/₹ Cr	18.19	15.47
Energy intensity per million USD adjusted for PPP (Total energy consumed / Revenue from operations adjusted for PPP)	MWH/ million USD	[*3] 37.57	[*4] 35.39
Energy intensity in terms of physical output [*1]	MWH/ MT	0.54	[*2] 0.49

[*1] 98% of APAR's scope-1 & scope-2 emissions are on account of our Cable & Conductor businesses. Hence these numbers are considered.

[*2] Cable production numbers updated to reflect the production of Al & Cu conductors.

[*3] PPP rate taken from <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND> as per SEBI guidelines. PPP value as of May 12, 2025 for India is 20.66.

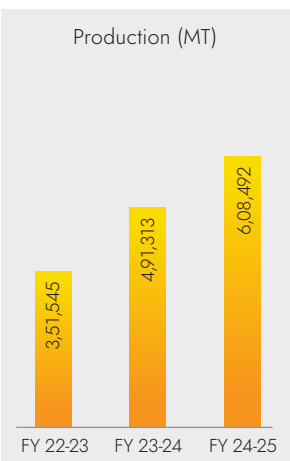
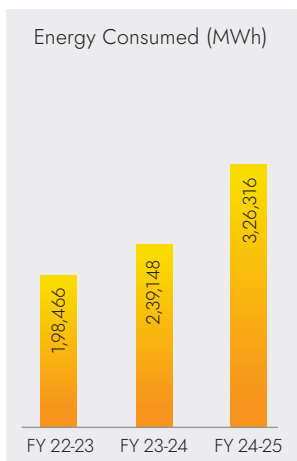
[*4] Denominator converted to USD million.



Renewable Energy (RE):

Significant increase in RE consumption in the overall electricity mix from 3.7% in FY 2022-23 to 7.3% in FY 2023-24 to 9.9% in FY 2024-25, despite increased electricity requirement due to increase in production.

Another two similar projects are being commissioned which will ensure significant increase in share of renewable energy consumption by FY 2025-26.



Overall Energy Consumption:

Increase in energy consumption was on account of increased production. The intensity increase was due to change in product mix.



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 are assessed by external independent third-party assurance agency (part of GHG Scope-1 and Scope-2 emission assurance), every year including FY 2023-24 (by M/s DNV Business Assurance India Private Limited, India), and FY 2024-25 (by TUV SUD South Asia Private Limited).

2. Does the entity have any sites/ facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N).

If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any

No

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

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in KL)		
(i) Surface water	40,094	38,261
(ii) Groundwater	319,941	324,351
(iii) Third party water	3,658	13,527
(iv) Seawater/ desalinated water		
(v) Others		
Total volume of water withdrawal (KL) (i + ii + iii + iv + v)	363,693	376,139
Total volume of water consumption (KL)	363,693	376,139
Water intensity per Crore Rupee of turnover (Water consumed/ turnover)	19.6	23.3
Water footprint intensity (KL/ ₹Cr. turnover)	16.26	19.48
Water footprint intensity (KL/ Product in MT)	[*1] 0.43	[*1] 0.55
Water intensity per million USD adjusted for Purchasing Power Parity (PPP) (Total water consumption/ Revenue from operations adjusted for PPP) (KL/ USD million)	[*3] 40.4	[*4] 53.3
Water intensity in terms of physical output (KL water/ MT production) [*1]	0.53	[*2] 0.67

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

[*1] 89% of APAR's water withdrawal is on account of our Cable & Conductor businesses. Hence these numbers are considered.

[*2] Cable production numbers updated to reflect the production of Al & Cu conductors.

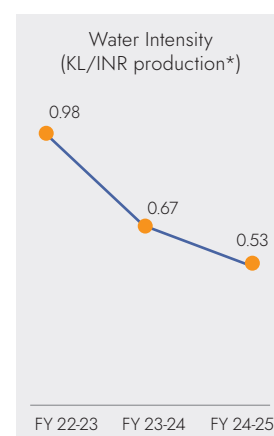
[*3] PPP rate taken from <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND> as per SEBI guidelines. PPP value as of May 12, 2025 for India is 20.66.

[*4] Denominator converted to USD million.



Owing to the various sustained initiatives implemented by APAR, including demand reduction through process improvements, increased recycling through Sewage and Effluent Treatment Plants (ETP and STP) and Rainwater Harvesting (RWH),

- the overall absolute water consumption has gone down from 376139 KL to 363693 KL in FY 2024-25
- the water intensity in terms of APAR's turnover has gone down from 26.9 to 23.3 to 19.6 (see chart on left side), and
- the water intensity in terms of output (MT) has gone down from 0.98 to 0.67 to 0.53 (see chart on right side).



[*] 89% of APAR's water withdrawal is on account of our Cable & Conductor businesses. Hence these numbers are considered.

Over the past three years, APAR has made consistent progress in reducing water intensity through dedicated efforts and continuous improvement. Although achieving further reductions is becoming increasingly challenging, APAR remains committed to sustainability and has set an target of an additional 2% reduction for the upcoming year.

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 2024-25	FY 2023-24
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.

No

05. 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.
- 61,616 KL of RWH was done during FY 2024-25.



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

Parameter ^	unit	FY 2024-25	FY 2023-24
NOx (NO ₂)	µg/ m ³	23.9	34.5
Sox (SO ₂)	µg/ m ³	32.6	27
Particulate matter (PM)			
PM10	µg/ m ³	89	94
PM2.5	µg/ m ³	41.8	50.4
Persistent organic pollutants (POP)	µg/ m ³	NA	NA
Volatile organic compounds (VOC)			
Benzene (C ₆ H ₆)	µg/ m ³	BDL(MDL: 1:0)	BDL(MDL: 1:0)
Benzo(a)pyrene (C ₂₀ H ₁₂)	µg/ m ³	BDL(MDL<1)	BDL(MDL: 0.1)
Hazardous air pollutants (HAP)			
Lead (Pb)	µg/ m ³	BDL(MDL: 0.5)	BDL(MDL: 0.5)
Arsenic (As)	µg/ m ³	<8	BDL(MDL: 1:0)
Nickel (Ni)	µg/ m ³	<8	BDL(MDL<7)
Others			
Carbon Monoxide (CO)	mg/ m ³	0.82	0.79
Amonia (NH ₃)	µg/ m ³	29.4	BDL(MDL: 5.0)
Ozone (O ₃)	µg/ m ³	21.4	BDL(MDL<19.6)

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

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: (a) Unistar Environmental & Research Labs Pvt. Ltd.; (b) Idma Laboratories Limited; (c) Sadekar Enviro Engineers Pvt. Ltd.

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

Our organisational boundary covers all our manufacturing plants in India and in UAE, our offices, and warehouses, and all such emission sources under our operational control.

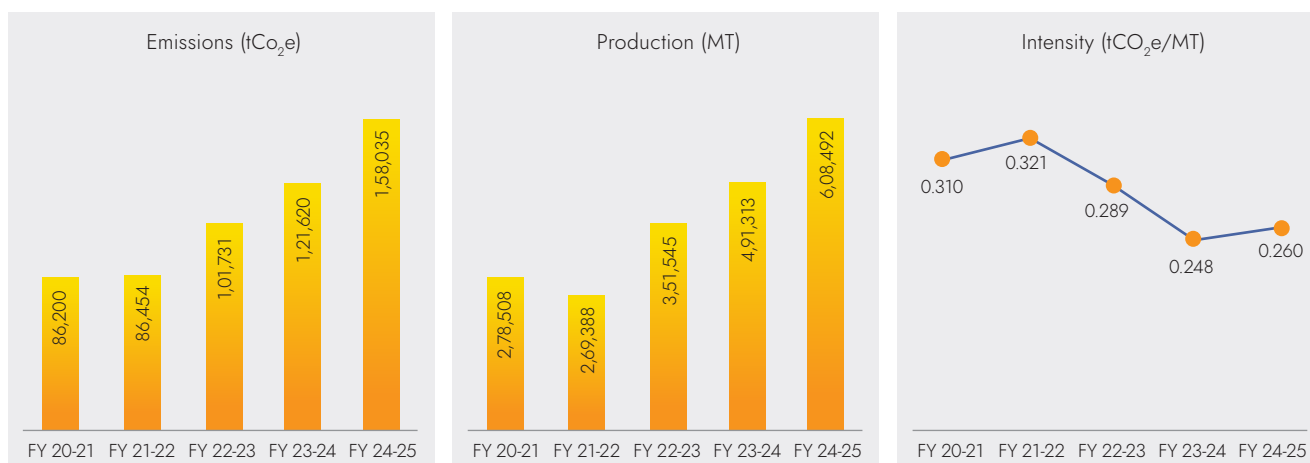
Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	39,329	25,998
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	122,479	98,910
Total Scope 1 and Scope 2 emissions per rupee of turnover	tCO ₂ e/₹ Cr	8.71	7.73
Total Scope 1 and Scope 2 emission intensity per million USD turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	tCO ₂ e/ million USD	[*3] 17.99	[*4] 17.69
Total Scope 1 and Scope 2 emission intensity in terms of physical output [*1]	tCO ₂ e/ MT	0.260	[*2] 0.248

[*1] 98% of APAR's scope-1 & scope-2 emissions are on account of our Cable & Conductor businesses. Hence these numbers are considered.

[*2] Cable production numbers updated to reflect the production of Al & Cu conductors.

[*3] PPP rate taken from <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND> as per SEBI guidelines. PPP value as of May 12, 2025 for India is 20.66.

[*4] Denominator converted to USD million.



98% of APAR's scope-1 & scope-2 emissions are on account of our Cable & Conductor businesses. Hence these numbers are considered. The intensity has increased slightly due to the change in product mix.

APAR has undertaken a target of 5% reduction in GHG emissions intensity for FY 25-26 w.r.t. FY 2024-25.

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

Yes. The Scope-1 and Scope-2 emissions are assessed by external independent third-party assurance agency each year, including FY 2023-24 and FY 2024-25.

The name of the agency for FY 2024-25 is TUV SUD South Asia Private Limited.

08 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 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 3.7% in FY 2022-23 to 7.3% in FY 2023-24 to 9.9% in FY 2024-25. Another two similar projects are being commissioned by 2nd quarter of FY 25-26, which will ensure significant increase in share of renewable energy consumption in FY 25-26.
- Working to reduce Energy Intensity through various productivity measures, six sigma trainings, efficiency improvement initiatives etc.
- Focusing on electrification -- shifting away from fossil-fuel based energy
- Conducting detailed energy audits at all the manufacturing facilities in India and implementation of the findings.

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

Parameter	FY 2024-25	[*2] FY 2023-24
Total waste generated in MT		
Plastic waste (A)	714.99	499.07
E-waste (B)	2.27	0.29
Bio-medical waste (C)	0.02	0.02
Construction and demolition waste (D)	16.03	152.83
Battery waste (E)	0.02	1.13
Radioactive waste (F)	Nil	Nil



Parameter	FY 2024-25	[*2] FY 2023-24
Other Hazardous waste, if any (G)	Effluent Sludge 12.36	Effluent Sludge 9.65
	Waste Oil 77.10	Waste Oil 173.22
	Oil – Soaked Cotton/ Spent Clay 244.74	Oil – Soaked Cotton/ Spent Clay 235.08
	Aluminium Dross/ Tin/ Enamel Residual 95.90	Aluminium Dross/ Tin/ Enamel Residual 1381.03
	Druid (Cable) 1251.53	Druid (Cable) 22.86
	Fly-ash 6.76	Fly-ash 5.24
Other Non-hazardous waste generated, if any (H)	MS scrap 2119.18	MS scrap 1848.54
	Paper waste 807.49	Paper waste 478.21
	Electrical waste 43.81	Electrical waste 7.03
	Wooden waste 2215.27	Wooden waste 1367.99
	Copper waste 333.52	Copper waste 166.38
	Alu. Cond. waste 2933.04	Alu. Cond. waste 393.44
	XLPE/ PVC/ PE 1453.05	XLPE/ PVC/ PE 1071.18
Total (A+B+C+D+E+F+G+H)	12330 MT	7814 MT
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.66 MT/ INR Cr. turnover	0.49 MT/ INR Cr. turnover
Waste intensity per million USD turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (MT/ USD million)	[*3] 1.37	1.11
Waste intensity in terms of physical output Waste intensity (optional) – the relevant metric may be selected by the entity *	[*1] 0.02	0.02
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in MT)		
Category of waste		
(i) Recycled	12050	7410
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	12050	7410
For each category of waste generated, total waste disposed by nature of disposal method (in MT)		
Category of waste		
(i) Incineration	245	235
(ii) Landfilling	35	168
(iii) Other disposal operations		
Total	280	403

[*1] 98% of APAR's scope-1 & scope-2 emissions are on account of our Cable & Conductor businesses. Hence these numbers are considered.

[*2] Waste numbers for FY 2023-24 changed slightly to reflect accurate picture.

[*3] PPP rate taken from <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND> as per SEBI guidelines. PPP value as of May 12, 2025 for India is 20.66.

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.

APAR's waste management practices focus on minimising waste generation at the source, promoting reuse and recycling, and ensuring safe disposal of residual waste. We have implemented segregation at source, partnered with authorised recyclers, and adopted circular economy principles wherever feasible.

Hazardous waste: Hazardous waste is managed in compliance with applicable regulations, and as per the limits prescribed in the CTO (Consent To Operate) at respective plant locations, including secure storage, proper labelling, and disposal through certified agencies to ensure minimal environmental impact.

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. 5503 MT of plastic was recycled during the reporting period as per EPR target.

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 authorised recyclers for further processing, in our Cable division.

E-Waste: We have tie-ups with certified e-waste recyclers who specialise 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.

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 2024-25	FY 2023-24
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) 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, 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: (WIP)

Parameter	unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions [*1] (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	46,67,283	44,48,196
Total Scope 3 emissions per Crore rupee of turnover	tCO ₂ e/₹ Cr.	251.19	275.38

[*1] Scope-3 emissions are on account of emissions from Category-1 (Purchased Goods & Services), which constitutes over 80% of our overall Scope-3 emissions.


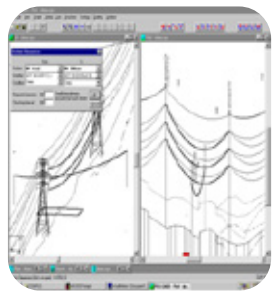
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. Independent Assessment by external agency was done for Scope-3 Category-1 emission for FY 2023-24 by M/s DNV Business Assurance India Private Limited, India.

3. With respect to the ecologically sensitive areas reported at Question 10 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: WIP

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 resource efficiency, extended life, reduction in absolute water footprint and water footprint intensity etc.
2	Soil Biotechnology (SBT) Wastewater Treatment	<p>As part of our sustainability initiatives, APAR had installed a 75 KLD Soil-Based Sewage Treatment Plant (STP) at our Khatalwada facility. This eco-friendly and energy-efficient system uses natural processes to treat wastewater and offers the following key benefits:</p> <ul style="list-style-type: none"> • Environmentally friendly technology with no chemical usage • Zero operational cost – no need for aeration or chemical dosing • Natural pollutant reduction through soil filtration • Minimal energy use, only for pump operation • Aerobic BOD reduction with no excess sludge generation • No GHG emissions during the treatment process • Low maintenance and long-term reliability <p>APAR was able to save approximately 18300 KL of fresh water annually, significantly reducing our freshwater water footprint.</p>	
3	Software based simulation	We use advanced software for simulations and calculation of critical transmission line parameters for new product development and validation.	



Sl	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
4	Irradiation curing Technology -Electron beam	Electron beam cross-link technology enables us to enhance insulation material performance by changing thermoplastic material to thermoset. Our five irradiation units (one number each of 1.2 MeV, 1.5 MeV and 3.0 MeV and two numbers of 2.5 MeV e-Beam facilities) are capable of cross-linking wire from 0.2 sq mm to 400 sq mm and cables with diameters up to 60 mm. Apart from other cross-linking technologies, irradiation cross-link products are easy to cut and strip. Other benefits include: (a) higher temperature resistance (b) increased mechanical strength (c) Increased abrasion and cut through resistance/ chemical and oil resistance/ crush resistance (d) increased shear and compressive strength	
5	Natural Ester-Based & Synthetic Ester-Based Transformer Fluids	APAR's natural ester-based fluids offer high biodegradability and exceptional fire safety, ideal for fire-sensitive applications. APAR's synthetic ester-based alternatives provide higher biodegradability compared to mineral oils and provide extended service life and high temperature resistance, suitable for demanding environments, reducing losses through better heat transfer and simplifying disposal. These newly developed T-oils are ideal for environmentally sensitive installations of solar and wind on the water or near water bodies. They also provide superior performance in traction transformers used to power locomotives.	

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 minimise 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?

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.

APAR conducts regular webinars for its suppliers to sensitise them towards the environment by showcasing its own journey, achievements, and initiatives taken towards environmental protection. 12 such webinars were conducted covering 187 suppliers during FY 2024-25.

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 Category-1 (Purchased Goods & Services). Towards that we are steadily increasing the use of aluminium and copper scrap to reduce embedded emissions. We also started procurement of green aluminium from Vedanta (RESTORA) in small quantities during FY 2024-25.

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.

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

- (a) vendor assessment at the time of vendor on-boarding, and
- (b) self-declaration by the vendor by signing APAR's Supplier Code of Conduct.

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

At APAR, we recognise that long-term business success is closely linked to the well-being of the communities in which we operate. As a manufacturing company with multiple plants across India, APAR is committed to promoting inclusive growth by ensuring that its operations contribute meaningfully to the social and economic development of surrounding regions.

We actively recruit local talent including from marginalised and underrepresented communities, and invest in skilling initiatives to enhance their employability. We have tied up with Sri Nityanand Educational Trust Sanchalit Govardhan Skill Development Centre, Wada (District: Palghar, Maharashtra). The Centre is dedicated to generating employment opportunities for tribal youth by equipping them with technical skills through various short-term courses affiliated with the National Institute of Open Schooling (NIOS). Over the past three years, 81 tribal youths (24, 39 and 18 students in years 2022, 2023 and 2024 respectively) have been trained and are now employed across different companies. Notably, 13 youths are currently employed with APAR's Cable Division, contributing across multiple departments.

We generate employment in rural and semi-urban areas. 92% of our contract workforce, and 45% of our employees are from rural and/ or semi-urban areas. In addition, 84% 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.

APAR has undertaken several initiatives that demonstrate our commitment to equitable development. For instance, during FY 2024–25, rainwater harvesting (RWH) of 61,000 KL was done at our Khatalwada plant. This initiative was driven by a dual objective: to reduce our dependence on freshwater withdrawal and to enhance the local water table, thereby contributing to long-term water security for both APAR and the surrounding communities.



Plantation drive at Khatalwada Gram Panchayat

Additionally, 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.

Dharmsinh Desai Memorial Methodist (DDMM) Heart Institute is a super speciality hospital in Nadiad, dedicated for Cardiovascular care. It combines state-of-the-art facilities with compassionate care and makes this available to people of all walks of life - both from Gujarat and the surrounding regions.



Set-up in 1993, 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.

APAR has also set up Dharmsinh Desai University (DDU) at Nadiad, which provides education in technical and other areas (diploma and degree courses) to students at a nominal cost.



The highlights are:

- First autonomous technical college of Gujarat in 1990
- Integrated BE + MBA programme was started in 1994
- First autonomous college to become deemed university and then university through this evolution
- Our first NBA accreditation was in 1998
- ISO:9001 standard certified

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 programme. Please refer our CSR spending for FY 2024-25.

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

Sl	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

03. 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



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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	4.5%	4.5%
Sourced directly from within India	61.4%	58.3%

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 2024-25	FY 2023-24
Rural	34%	25%
Semi-urban	20%	5%
Urban	3%	3%
Metropolitan	43%	67%

(Place categorised 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
--	-------------------------

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:

Sl	Entity Name	District	Amount spent (INR)
1	Annam, Mumbai	Maharashtra, Mumbai	10,00,000
2	Vishwanidam Public Charitable Trust, Rajkot	Gujarat, Rajkot	3,50,000
3	Sanskritik Vikas Mandal, Umargam	Gujarat, Valsad	3,00,000
4	Shree Kutch Kathiawar Rajput Seva Samaj, Gandhinagar	Gujarat, Gandhinagar	4,00,000
5	Moritha Lions Charitable Trust, Surat	Gujarat, Surat	50,000
6	Annamrita Foundation	Maharashtra, Mumbai	55,00,000
7	Human Capital for Third Sector (Katalyst Project)	Maharashtra, Mumbai	5,23,430
8	Rotary Club of Bombay Pier (Rotary Foundation (India))	Maharashtra, Mumbai	26,06,210
9	Office of The Chief Medical Officer Health & Family Welfare, Kathua District, Government of Jammu & Kashmir	Jammu & Kashmir, Kathua	19,02,200
10	Rawa Academy, Odisha (Adruta Children Home)	Odisha, Khorda	20,00,000
11	Muktangan Education Trust, Mumbai	Maharashtra, Mumbai	10,00,000
12	Rotary Club of Bombay Pier (Rotary Foundation (India))	Maharashtra, Mumbai	1,04,16,667
13	Rotary Club of Bombay Pier (Rotary Foundation (India))	Maharashtra, Mumbai	25,20,000
14	Sri Nityanand Educational Trust, Wada	Maharashtra, Palghar	36,00,000
15	Sri Nityanand Educational Trust, Wada	Maharashtra, Palghar	13,73,000
16	Federation of Industries Association (FIA), Silvassa	Dadra & Nagar Haveli	10,00,000
17	Federation of Industries Association (FIA), Silvassa	Dadra & Nagar Haveli	5,00,000
18	Gram Panchayat Office, Raghunathpali	Odisha, Jharsuguda	5,66,406
19	Gram Panchayat Office, Lapanga	Odisha, Sambalpur	5,47,520
20	Gram Panchayat Khatalwada	Gujarat, Valsad	12,00,000
21	Gram Panchayat Dhodipada, Tal. Umargam	Gujarat, Valsad	12,00,011
22	Gram Panchayat Manekpur, Tal. Umargam	Gujarat, Valsad	15,00,000
23	Shri Sanstha, New Delhi	NCT, New Delhi	2,51,000
24	Adimahesh Seva Foundation, Ahmedabad	Gujarat, Ahmedabad	5,00,000
25	DDMM Heart Institute (GMCC Care & Research Society), Nadiad	Gujarat, Kheda	2,20,00,000
26	Sri Nityanand Educational Trust, Wada	Maharashtra, Palghar	16,80,000
27	Sri Nityanand Educational Trust, Wada	Maharashtra, Palghar	7,55,000
28	Sri Nityanand Educational Trust, Wada	Maharashtra, Palghar	16,50,000
29	Dharmsinh Desai University (DDU), Nadiad	Gujarat, Kheda	8,35,00,000
TOTAL			15,03,91,444

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

Not Applicable.

- (b) From which marginalised/ 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:

Sl	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:

Sl	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalised groups
1	Dharmsinh Desai University (DDU)	5,000	100%
2	ND Desai Faculty of Medical Science and Research	4,175	100%
3	Dharmsinh Desai Methodist Memorial Hospital	28,958	100%
4	Govardhan Skill Centre	2,234	100%
5	Annamrita Foundation	5,500	90%

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:

- 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.
- 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 speciality 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 business, 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/.

In accordance with the above, some of our customised 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

APAR is the first Indian company to manufacture E-beam (HR FR EBXL) wires which can take 40% extra loading for continuous use as compared to the competing products. In case of over-load during emergencies, our HR FR EBXL wires are safer. These cables have improved fire-retardancy due to high oxygen & temperature index, and also self-extinguishing and does not spread fire. These are provided with highly improved insulation, incl. cross linking by electron beam radiation, which causes our cables to have extended life span, thereby future-proofing houses with 'fix and forget' for 50 years period (up to approx. 2 times of normal cable).

APAR is the first Indian manufacturer to produce MVCC (Medium Voltage Covered Conductors). These are insulated by a covering made of speciality polymer insulating material(s) as protection against accidental contacts with grounded parts such as tree branches etc. Such covered conductors reduce interruptions by contact of tree branches or creepers, cause negligible leakage current on surface, provide increased safety in high density populated locations, protect big birds and animals like peacocks, flamingos, elephants etc., increase the power distribution network reliability, reduce power interruptions and outages.

Some of APAR's new offerings include products such as Fire Protekt, Alum AnuShakti etc.

- c) Sustainability: We are committed to minimise 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

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.

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

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

	FY 2024-25			FY 2023-24		
	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 178 complaints received: (Conductor business: 4 complaints, Oil business: 61 and Cable business: 113 complaints) All the complaints were resolved, and nothing is pending at the end of year.			Total 55 complaints received: Conductor – 11 complaints Oil – 22 Cable – 22 All the complaints were resolved, and nothing is pending at the end of 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

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy (Yes/No). If available, provide a web-link of the policy.

Yes. APAR has a comprehensive framework in place to address cybersecurity and risks related to data privacy.

APAR has implemented robust measures to strengthen its cybersecurity infrastructure, including:

- **Vulnerability Assessment and Penetration Testing (VAPT)** to identify and mitigate potential security threats.
- **Network strengthening** initiatives to ensure secure connectivity across all operational sites.
- **Advanced Endpoint and Perimeter Security:** Use of enterprise-grade firewalls, intrusion detection/ prevention systems, and antivirus/ EDR solutions ensures protection against both known and zero-day threats.
- **Integrated ERP with Role-Based Access Controls (RBAC):** The ERP platform enforces access controls and encryption of sensitive business data, enhancing governance over digital operations.
- **Data Protection and Privacy Compliance:** Internal policies and technical controls are designed to safeguard personal and sensitive data in line with applicable regulations.

These efforts reflect the Company's commitment to safeguarding its digital assets and maintaining data privacy.

APAR has implemented the policies on Cyber Security and Data Privacy. The web-link to these policies are:

Cyber Security Policy:

https://apar.com/wp-content/uploads/2023/04/01_Cyber_Security_Policy-WS.pdf

Data Privacy Policy:

https://apar.com/wp-content/uploads/2023/04/03_Data_Privacy_Policy-WS.pdf

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

Not Applicable

7. Provide the following information relating to data breaches:

- | | |
|---|-----|
| a) Number of instances of data breaches | Nil |
| b) Percentage of data breaches involving personally identifiable information of customers | Nil |
| c) Impact, if any, of the data breaches | NA |

LEADERSHIP INDICATORS

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

Product information can be accessed at –

(a) website links:

<https://apar.com/speciality-oils/>
<https://apar.com/conductors/>
<https://apar.com/cable-solutions/>
<https://apar.com/telecom-solutions/>
<https://apar.com/polymers/>
<https://apar.com/lubricant/>
<https://apar.com/speciality-automotive/>

(b) Leaflets & Brochures

https://apar.com/apar_brochures/

(c) YouTube

APAR Anushakti Wires & Cables
https://www.youtube.com/watch?v=N7hNjF6Ql_I&t=160s
Speciality Polymers for Automotive Industry
<https://www.youtube.com/watch?v=VZH4Vqcc4cg>
Polymer APARPRENE TPE in Irrigation Industry
<https://www.youtube.com/watch?v=gsiVcjULUZW>

Elastomers

<https://www.youtube.com/watch?v=a0PnhPVM6vk>
<https://www.youtube.com/watch?v=gAINEa-zGBc>
Poweroil Product Range
<https://www.youtube.com/watch?v=YHXlUIR6Khs>
<https://www.youtube.com/watch?v=VBF5Ngn59y4>
<https://www.youtube.com/watch?v=xVHEfM4RpHg>
<https://www.youtube.com/watch?v=sgO8YYEDQDE>

(d) Digital platforms such as IndiaMart

<https://www.indiamart.com/apar-oil-lubricants/lubricants-oils.html>
<https://www.indiamart.com/aparindustries/cable-wire.html>

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

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.

Details about MSDS are mentioned under Q2 of Essential Indicator above.

The MSDS for one of the product in Oil business can be accessed from

<https://www.apar.com/wp-content/uploads/2021/02/1.SDS-TO-1020-60-U.pdf>

We have MSDS for our Cable & Conductor businesses as well, which we share with our customers to inform and educate them about safe and responsible usage of our products.

In addition, we also provide soft copies of drum handling, loading, unloading and storage guidelines, installations manual etc. to our customers on demand.



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 & responsible usage is often a part of those engagements.

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

Sine we are a B2B company, we have constant interactions with our customers. Any risk of disruption or disruption is immediately communicated to them, as service levels are specified in every contract.

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.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/ No/ Not Applicable).

If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/ services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/ No)

Not Applicable

For and on behalf of Board of Directors

Sd/-

Mumbai, May 14, 2025

Kushal N Desai

Chairman & Managing Director

DIN: 00008084



Add value.
Inspire trust.

TÜV SÜD South Asia Pvt. Ltd. • 373-374, Udyog Vihar • Phase-II, Sector-20 • Gurgaon – 122016 • Tel.: +91 0124 6199699

Independent Assurance Statement to Apar Industries Limited on their selected non-financial sustainability disclosures in the Business Responsibility and Sustainability Report for the financial year 2024-2025

Introduction and Engagement

Apar Industries Limited (the Company¹) has developed its Business Responsibility and Sustainability Report (BRSR) (the Report¹) based on the BRSR reporting guidelines including the BRSR Core indicators prescribed by SEBI for listed entities. The Company's sustainable performance reporting criteria have been derived from the Principles of National Guidelines on Responsible Business Conduct (NGRBC), Regulation 34(2)(f) of the Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) (the "LODR Regulations"), Guidance note for BRSR format issued by SEBI, and Greenhouse Gas (GHG) Protocol - A Corporate Accounting and Reporting Standard.

TÜV SÜD South Asia Pvt. Ltd. ('TÜV SÜD') has been engaged by the Company to conduct and provide independent assurance on the BRSR Core indicators of the Report those includes the Company's sustainability performance for the period April 1, 2024, to March 31, 2025.

The Company's Responsibility

The content of the Reports and their presentation are the sole responsibilities of the Management of the Company. The Company Management is also responsible for the design, implementation, and maintenance of internal controls relevant to the preparation of the Reports, so that it is free from material misstatement.

The Company is responsible for ensuring that its business operations and activities comply with the applicable statutory and regulatory requirements. The Reports and disclosures have been approved by and remain the responsibility of the Company.

TÜV SÜD's Responsibility

TÜV SÜD, in performing assurance work, is responsible for carrying out an assurance engagement and to provide independent Reasonable assurance on the non-financial information of the BRSR Core indicators as described in the 'Scope & boundary of assurance' section below. We do not accept or assume any responsibility for any other purpose or to any other person or organization. Any reliance a third party may place on the Report is entirely at its own risk.

Assurance standard and criteria

- We applied the criteria of 'Reasonable' Assurance for non-financial Core Indicators of BRSR¹ (Business Responsibility & Sustainability Report). Our reasonable assurance engagement for only non-financial Core indicators of BRSR was with respect to the financial year ended March 31, 2025.
- We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", and ISAE 3410, "Assurance Engagements on Greenhouse Gas Statement", issued by the International Auditing and Standards Board.

¹ SEBI vide Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023

PAN No.: AABCT0716G
TAN No.: MUMT09385F
Gurgaon GSTIN: 06AABCT0716G1ZR
Maharashtra GSTIN: 27AABCT0716G1ZN
CIN No.: U74220MH1999PTC121330

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Corporate Office:
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Pune – 411007, India.

www.tuv-sud.in



**Scope and boundary of assurance**

We have assured non-financial information of the BRSR Core Indicators² in the Report, pertaining to the Company's non-financial performance for the period April 1, 2024, through March 31, 2025. We understand that the financial information in the BRSR Core is derived from the Company's audited financial statements.

The boundary of verification included:

- Manufacturing Plants across three business verticals of Apar namely Oil, Conductor and Cables-including manufacturing plants in India (located at Khatalwada & Umbergaon in Gujarat; Rabale in Maharashtra; Sambalpur & Jharsuguda in Odisha; and Rakholi, Athola, Khanvel & Chandra in Dadra and Nagar Haveli) and one in the United Arab Emirates (UAE) (located at Sharjah).
- Offices (Sixteen across India)
- Warehouses/Depots (eight across India)

Verification of non-financial sustainability performance data, based on our professional judgement, was conducted by multidisciplinary team including assurance practitioners, engineers, environmental & social experts of TÜV SÜD in the month of May 2025, in line with the principle of materiality, at the following sites:

- Rabale (Oil Business), Maharastra
- Khatalwada (Cable Business), Gujarat; and
- Rakholi (Conductor Business), Dadra and Nagar Haveli

In addition, all non-financials sustainability performance data of the company was verified virtually through desktop verification.

Assurance Methodology

We conducted a review and verification of data collection, collation and calculation methodologies, and a general review of the logic of inclusion/omission of relevant information/data in the Report. Our review process included:

- Evaluate and assess the appropriateness of the quantification methods used to arrive at the non-financial sustainability information of the BRSR Core indicators in the Report
- Engagement through discussions with departmental heads, external stakeholders and corporate teams to understand the process for collecting, collating, and reporting as per Assurance Engagements (ISAE) 3000 (Revised), Guidance Note on BRSR.
- Review of the sustainability initiatives, practices, on ground establishment, implementation, maintenance, and performance described in the Report.
- Review of data collection and management procedures, and related internal controls.
- Assessment of the reporting mechanism and consistency with the reporting criteria.
- Review of appropriateness of various assumptions, estimations and thresholds used by the Company for data analysis.
- Execution of an audit trail of claims and data streams, to determine the level of accuracy in collection, transcription, and aggregation.
- Verification of the fact that no material distortion has been done at any stage.

Inherent Limitations and Exclusions

There are inherent limitations in assurance engagement, including, for example, the use of judgement and selective testing of data. Accordingly, there are possibilities that material misstatements in the sustainability information of the Report may remain undetected.

TÜV SÜD has relied on the information, documents, records, data, and explanations provided to us by the Company for the purpose of our review.

The Assurance scope excludes the following:

- Data and information falling outside the defined reporting period (April 1, 2024, to March 31, 2025).

² As set out under Appendix 1 to this statement.



- Review of the 'economic and/or financial performance indicators' included in the Report or on which reporting is based; we have been informed of by the Company that these are derived from the Company's audited financial records.
- The Company's statements that describe qualitative/quantitative assertions, expression of opinion, belief, inference, aspiration, expectation, aim or future intention.
- Any disclosures beyond those specified in the Scope section above.

Our observations

Based on the procedures we have performed and the evidence we have obtained, the Identified Sustainability Information included in the BRSR for the reporting period April 1, 2024 to March 31, 2025 is prepared, in all material respects, in accordance with the Criteria.

Conclusion

Our statements do not extend to any disclosures or assertions relating to future performance plans and/or strategies disclosed in the Report.

Our Independence, Ethical Requirements and Quality Control

Our team comprises subject matter experts of multidisciplinary professionals, have complied with independence policies of TÜV SÜD, which address the requirements of the ISAE 3000 (Revised) in the role as independent Verifier. TÜV SÜD states its independence and impartiality and confirms that there is "no conflict of interest" regarding this assurance engagement. In the reporting year, TÜV SÜD did not work with the Company on any engagement that could compromise the independence or impartiality of our findings, conclusions, and recommendations. TÜV SÜD was not involved in the preparation of any content or data included in the Reports, except for this assurance statement.

TÜV SÜD maintains complete impartiality towards any individuals interviewed during the assurance engagement. We have complied with the relevant applicable requirements of the International Standard on Quality Control ("ISQC") 1, Quality.

Statement of Independence, Impartiality and Competence

TÜV SÜD South Asia Pvt. Ltd is an independent professional services company that specializes in Health, Safety, Social and Environmental & Sustainability services including assurance with over 150 years history in providing these services.

No member of the assurance team has a business relationship with the Company, its directors or Managers beyond that of verification and assurance of sustainability data and reporting. We have conducted this assurance independently and we believe there has been no conflict of interest.

TÜV SÜD has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

Attestation,

Dr. Ashish Rawat, Technical Reviewer
General Manager -Environment, Social & Sustainability Advisory Services
TÜV SÜD South Asia Pvt. Ltd.
374, Udyog Vihar, Phase II,
Sector – 20, Gurugram – 122016
Haryana, India.

Date: 28th May 2025



Appendix 1

Identified Sustainability Information

A. BRSR Core Indicators

SI	Attribute	Parameter	Measurement	FY 2024-25	FY 2023-24
1	Green-house gas (GHG) footprint <i>Greenhouse gas emissions may be measured in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard</i>	Total Scope 1 emissions	tCO ₂ e	39,329	25,998
		Total Scope 2 emissions	tCO ₂ e	122,479	98,910
		GHG Emission Intensity (Scope 1 + 2)	Total Scope 1 and Scope 2 emissions (tCO ₂ e) / Total Revenue from Operations adjusted for PPP (tCO ₂ e/ USD Million)	[*3] 17.99	[*4] 17.69
			Total Scope 1 and Scope 2 emissions (tCO ₂ e) / Total Output of Product	[*1] 0.260	[*1] 0.248
2	Water footprint	Total water consumption	KL	363,693	376,139
		Water consumption intensity	KL/ Turnover adjusted for PPP (KL/ USD Million)	[*3] 40.4	[*4] 53.3
			KL / Product or Service (MT)	[*1] 0.43	[*1] 0.55
		Water Discharge by destination and levels of Treatment	KL	Nil	Nil
3	Energy footprint	Total energy consumed	MWh	337,921	249,858
		% of energy consumed from renewable sources	%	5.52%	4.39%
		Energy intensity	MWh/ Turnover adjusted for PPP (MWh/ USD Million)	[*3] 37.57	[*4] 35.39
			MWh / Product or Service (MT)	[*1] 0.54	[*1] 0.49
4	Embracing circularity - details related to waste management by the entity [*2]	Plastic waste (A)	MT	714.99	499.07
		E-waste (B)	MT	2.27	0.29
		Bio-medical waste (C)	MT	0.02	0.02
		Construction and demolition waste (D)	MT	16.03	152.83
		Battery waste (E)	MT	0.02	1.13
		Radioactive waste (F)	MT	Nil	Nil
		Other Hazardous waste. Please specify, if any. (G)	MT	440.03	1827.07
		Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	MT	11156.88	5332.77
		Total waste generated (A+B + C + D + E + F + G + H)	MT	12330	7814
		Waste intensity	MT/ Turnover adjusted for PPP	[*3] 1.37	[*4] 1.11



SI	Attribute	Parameter	Measurement	FY 2024-25	FY 2023-24
			(MT/ USD Million)		
			MT / Unit of Product or Service (MT)	[*1] 0.02	[*1] 0.02
		Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations	MT	12050	7410
			Intensity (MT of Waste Recycled Recovered /Total Waste generated)	0.98	0.95
		For each category of waste generated, total waste disposed by nature of disposal method	MT	280	403
			Intensity (MT of Waste disposed /Total Waste generated)	0.02	0.05
5	Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company	%	0.11%	[*5] 0.11%
		Details of safety-related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites)	Number of Permanent Disabilities	Employee: 0 Worker: 0	Employee: 0 Worker: 2
			Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employee: 0.36 Worker: 1.13	Employee: 0.31 Worker: 1.27
			No. of fatalities	0	0
6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	%	6.44%	5.93%
		Complaints on POSH		0	0
7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – <i>Directly sourced from MSMEs/ small producers and from within India</i>	%	MSME: 4.5% In India: 61.4%	MSME: 4.5% In India: 58.3%
		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost	%	Rural: 34% Semi-urban: 20% Urban: 3% Metropolitan: 43%	Rural: 25% Semi-urban: 5% Urban: 3% Metropolitan: 67%
8	Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	%	Nil	Nil
		Number of days of accounts payable		133.49	[*5] 135.65



SI	Attribute	Parameter	Measurement	FY 2024-25	FY 2023-24
9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	Purchases from trading houses as % of total purchases	13.9%	9.3%
			Number of trading houses where purchases are made from	877	1540
			Purchases from top 10 trading houses as % of total purchases from trading houses	81.8%	62.9%
			Sales to dealers / distributors as % of total sales	2.66%	[*5] 2.39%
			Number of dealers / distributors to whom sales are made	917	[*5] 809
			Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	21.65%	[*5] 22.90%
			Purchases (Purchases with related parties / Total Purchases)	0.04%	[*5] 0.02%
			Sales (Sales to related parties / Total Sales)	0.03%	0.04%
			Loans & advances (Loans & advances given to related parties / Total loans & advances)	2.23%	[*5] 0.19%
			Investments (Investments in related parties / Total Investments made)	5.04%	68.55%

Note

[*1]

(a) 98% of APAR's scope-1 & scope-2 emissions are on account of our Cable & Conductor businesses. Hence these numbers are considered.

(b) Cable production numbers updated to reflect the production of Al & Cu conductors for both the years.

[*2] Waste numbers for FY 23-24 changed slightly to reflect accurate picture.

[*3] PPP rate taken from <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND> as per SEBI guidelines. PPP value as of 12th May 2025 for India is 20.66

[*4] Denominator converted to USD Million

[*5] Updated