NIRLON

Annexure 8 to the Directors' 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	L17120MH1958PLC011045
2	Name of the Listed Entity	Nirlon Limited
3	Year of incorporation	12-03-1958
4	Registered office address	Pahadi Village, off the Western Express Highway, Goregaon (East), Mumbai 400063.
5	Corporate address	Pahadi Village, off the Western Express Highway, Goregaon (East), Mumbai 400063.
6	E-mail	info@nirlonltd.com
7	Telephone	+91 (022) 4028 1919 / 2685 2257/ 58/ 59
8	Website	www.nirlonltd.com
9	Financial year for which reporting is being done	April 1, 2023 to March 31, 2024
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited
11	Paid-up Capital	₹90,11,80,400.00
12	Name and contact details (telephone, email ad- dress) of the person who may be contacted in case of any queries on the BRSR report	Name: Jasmin K. Bhavsar Contact : 9820291310 E-mail ID : jasminbhavsar@nirlonltd.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 consoli- dated financial statements, taken together)	Standalone basis
14.	Whether the Company has undertaken reasonable assurance of the BRSR Core?	No
15.	Name of assurance provider	NA
16.	Type of assurance obtained	NA

II. Products/services

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

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Development and Management of the Industrial Park/ Information Technology **(IT)** Park	Development and Management of Industrial Park/Information Technology **(IT**) Park i.e. Nirlon Knowledge Park **(NKP)** , Goregaon (East), Mumbai 400 063.	99.04%

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

Sr. No.	Product/Service	NIC Code	% of total Turnover contributed
1	As per the NIC code - Industrial Park	42901	99.04%

III. Operations

19 Number of locations where plants and/or operations/offices of the entity are situated

Location	Number of plants	Number of offices	Total
National	0	2	2
International	0	0	0

20 Markets served by the entity

a.	**Number of locations**	
	Locations	**Number**
	National (No. of States)	1
	International (No. of Countries)	0
b.	What is the contribution of exports as a percentage of the total turnover of the entity?	*0.00%*
c.	A brief on types of customers	*The Company's Nirlon Knowledge Park consists primarily of customers who are licensees in the business of providing IT/ITes, Banking and Financial Services as per the Maharashtra Government's IT/ITes Policy.*

IV. Employees

21 a. Details as at the end of Financial Year i.e. March 31, 2024

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1	Permanent (D)	3	3	100.00%	0	0.00%
2	Other than permanent (E)	0	0	0.00%	0	0.00%
3	**Total employees(D + E)**	**3**	**3**	**100.00%**	**0**	**0.00%**
WORKERS						
4	Permanent (F)	0	0	0.00%	0	0.00%
5	Other than permanent (G)	0	0	0.00%	0	0.00%
6	**Total workers (F + G)**	**0**	**0**	**0.00%**	**0**	**0.00%**

b. Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1	Permanent (D)	0	0	0.00%	0	0.00%
2	Other than Permanent (E)	0	0	0.00%	0	0.00%
3	**Total differently abled employees (D + E)**	**0**	**0**	**0.00%**	**0**	**0.00%**
DIFFERENTLY ABLED WORKERS						
4	Permanent (F)	0	0	0.00%	0	0.00%
5	Other than Permanent (G)	0	0	0.00%	0	0.00%
6	**Total differently abled workers (F + G)**	**0**	**0**	**0.00%**	**0**	**0.00%**

22 Participation/Inclusion / Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	5	1	20.00%
Key Management Personnel	3	0	0.00%

23 Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)

	Turnover rate in current F.Y. (2023-24)				Turnover rate in previous F.Y. (2022-23)				Turnover rate in the year prior to the previous F.Y.(2021-22)			
	Male	Female	Other	Total	Male	Female	Other	Total	Male	Female	Other	Total
Permanent Employees	0.00.%	0.00%	0.00. %	0.00%	33.33%	0.00%	33.33.%	33.33%	0.00%	0.00%	0.00%	0.00%
Permanent Workers	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

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

24 (a) Names of holding / subsidiary / associate companies / joint ventures

Sr. No.	Name of the holding / subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Reco Berry Pvt. Ltd.	Holding Company	63.92%	No

VI. CSR Details

25	(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
	(ii) Turnover (in ₹)	603,11,97,747.00
	(iii) Net worth (in ₹)	373,05,04,371.00

VII. Transparency and Disclosures Compliances

26 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/NA) (If Yes, then provide web-link for grievance redress policy)	F.Y. (2023-24)			P.Y. (2022-23)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes https://www.nirlonltd.com/pdf/whistle_blower_policy_ feb_21_v3.pdf	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes https://www.nirlonltd.com/pdf/whistle_blower_policy_ feb_21_v3.pdf	0	0	NA	0	0	NA
Shareholders	Yes The shareholders register their complaints through SEBI portal i.e. https:// scores.gov.in/scores/complaintRegister. html . The Company has also designated an e-mail address: share@nirlonltd.com for registering complaints by its shareholders	38	0	NA	25	0	NA
Employees and workers	Yes https://www.nirlonltd.com/pdf/whistle_blower_policy_ feb_21_v3.pdf	0	0	NA	0	0	NA
Customers (Licensees)	Yes various email addresses as per defined matrix. https://www.nirlonltd.com/pdf/whistle_blower_policy_ feb_21_v3.pdf	0	0	NA	0	0	NA
Value Chain Partners	NA	NA	NA	NA	NA	NA	NA

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	**Environmental** Gold and Platinum Leeds Certified Sustainable Green Buildings, NKP Phase I-V. Phases I-IV Buildings are certified for LEED Zero Water for sustainable water practices and Platinum level TRUE certificate for Waste Management in F.Y. 2023-24.	Opportunity	The development of Gold/ Platinum Certified Sustainable Green Buildings for NKP Phases I-V, NKP Phase I-IV Buildings certified for LEED Zero Water for sustainable water practices and Platinum level TRUE certificate for Waste Management in F.Y. 2023-24 are, and will continue to be, a significant opportunity for the Company towards reducing its carbon footprint as a matter of responsible environmental business conduct.	NA	Positive Implication The financial impact of this opportunity is higher capital costs initially at the project development stage, but improved marketability of the Development post completion with a larger profile of potential clients who are also committed to the same goal of environmentally responsible business practices

2	**Social** CSR initiatives targeted toward the local community: the Company is committed to supporting local CSR initiatives in the areas of healthcare, education, the environment and for improving the quality of life for disadvantaged sections of society.	Opportunity	The Company's focus on improving social infrastructure, the environment and disadvantaged sections of society is an opportunity to help/support the local community in its neighborhood in a direct, meaningful and expeditious manner.	NA	Positive Implication Financial implications are the cost of these CSR initiatives which are approx. 2% of the Company's average profits for the last 3 years as required to be calculated under the Act.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	No	Yes	No	No	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
c. Web Link of the Policies, if available	https:// www. nirlonltd. com/ pdf/ whistle_ blower_ policy_ feb_21_ v3.pdf https:// www. nirlonltd. com/pdf/ ccbe_ Nov_18_ v1.pdf	https://www. nirlonltd.com/ pdf/risk_mgmt_ policy_mar_16. pdf	https://www. nirlonltd.com/ pdf/whistle_ blower_policy_ feb_21_v3.pdf https://www. nirlonltd.com/pdf/ ccbe_Nov_18_ v1.pdf	https://www. nirlonltd.com/ pdf/dvidend%20 distribution%20 policy_jun_2020. pdf https://www. nirlonltd.com/pdf/ ccbe_Nov_18_ v1.pdf	NA	https://www. nirlonltd.com/ pdf/ risk_mgmt_ policy_ mar_16. pdf	NA	NA	https://www. nirlonltd. com/ pdf/risk_mgmt_ policy_mar_16. pdf
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA

4. Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	NA	1. LEEDS Certification- U.S. Green Building Council (USGBC) and Green Building Council of India (GBCI) 2. WELL Building Standards (WELL) – Health and Safety Certification 3. LEED Zero Water Certification for sustainable water practices. 4. Platinum level TRUE (Total Resource Use and Efficiency) Certificate" for Waste Management.	1. LEEDS Certification - U.S. Green Building Council (USGBC) and Green Building Council of India (GBCI) 2. WELL Building Standards (WELL) – Health and Safety Certification 3. LEED Zero Water Certification for sustainable water practices. 4. Platinum level TRUE (Total Resource Use and Efficiency) Certificate" for Waste Management.	1.LEEDS Certification - U.S. Green Building Council (USGBC) and Green Building Council of India (GBCI) 2. WELL Building Standards (WELL) – Health and Safety Certification 3. LEED Zero Water Certification for sustainable water practices. 4. Platinum level TRUE (Total Resource Use and Efficiency) Certificate" for Waste Management.	NA	1.LEEDS Certification - U.S. Green Building Council (USGBC) and Green Building Council of India (GBCI) 2. WELL Building Standards (WELL)– Health and Safety Certification 3. LEED Zero Water Certification for sustainable water practices. 4. Platinum level TRUE (Total Resource Use and Efficiency) Certificate" for Waste Management.	NA	NA	1. LEEDS Certification- U.S. Green Building Council (USGBC) and Green Building Council of India (GBCI) 2. WELL Building Standards (WELL) – Health and Safety Certification 3. LEED Zero Water Certification for sustainable water practices. 4. Platinum level TRUE (Total Resource Use and Efficiency) Certificate" for Waste Management.
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	NA	NA	NA	NA	NA	NA	NA	NA	NA
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are Not met.	NA	NA	NA	NA	NA	NA	NA	NA	NA

Governance, leadership and oversight

7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements *(listed entity has flexibility regarding the placement of this disclosure)*	*The Company engaged in the development and management of an Industrial Park / IT Park that provides office premises on a leave and license basis. The ESG areas of focus are as described below:* ***Environment - Key focus areas :*** • **Energy Efficiency**: To continue to implement and improve energy-efficient technologies and practices within the park, such as LED lighting, smart energy management systems etc., and to increase renewable energy sourcing and use. • **Waste Management:** To continue to implement and improve waste management systems, including widening the scope and quantity of recycling and responsible disposal of electronic and other waste etc. • **Water Conservation**: to continue to Implement and improve water-saving measures, such as the use of STP for the maximum amount of water consumed in the Campus, rainwater harvesting, water-efficient fixtures, and landscape irrigation systems etc. ***Targets:*** To identify areas for reduction of the Company's Carbon Footprint.

		Social - Key focus areas: • To Identify CSR initiatives targeted toward the local community • To support local CSR initiatives in the areas of healthcare, education, the environment and improving the quality of life for disadvantaged sections of society. ***Targets:*** • To implement the areas of focus in a transparent, direct, meaningful and expeditious manner. • To annually allocate at least 2% of the Company's average profits for the last 3 years towards CSR objectives ***Governance - Key focus areas:*** • Ethical Business Practices: Adhere to high ethical standards in all business operations, promoting transparency, integrity, and responsible decision-making. • Compliance and Risk Management: Ensure compliance with applicable laws and regulations, manage risks effectively, and implement robust governance frameworks. • Board Diversity: Strive for diversity within the board of directors, including gender, age, and expertise, to bring diverse perspectives and improve decision-making. • Data Privacy and Security: Implement strong data privacy measures to protect the personal and sensitive information of employees, tenants, and clients. ***Targets:*** To successfully consistently implement and improve the above listed key focus areas.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Rahul V. Sagar Executive Director & C.E.O.
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No/ NA). If yes, provide details.	Yes, The Risk Management Committee (RMC) of the Board of Directors is responsible for monitoring ESG related issues.

10. Details of Review of NGRBCs by the Company

Subject for Review	Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Committee of the Board	Committee of the Board	Committee of the Board	Committee of the Board	NA	Committee of the Board	NA	NA	Committee of the Board
Compliance with statutory requirements of relevance to the principles, and, rectification of any Non-compliances	Committee of the Board	Committee of the Board	Committee of the Board	Committee of the Board	NA	Committee of the Board	NA	NA	Committee of the Board
Frequency (Annually / Half yearly /Quarterly/ Any other-please specify)									
Performance against above policies and follow up action	Annually	Annually	Annually	Annually	NA	Annually	NA	NA	Annually
Compliance with statutory requirements of relevance to the principles and rectification of any Non- compliances	Annually	Annually	Annually	Annually	NA	Annually	NA	NA	Annually

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

P1	P2	P3	P4	P5	P6	P7	P8	P9
Yes, The processes and compliances may be subject to scrutiny by external Auditors / agencies / regulatory bodies etc., as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the Management or Board, in accordance with best practices and risk management principles.	Yes, The processes and compliances may be subject to scrutiny by external Auditors / agencies / regulatory bodies etc., as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the Management or Board, in accordance with best practices and risk management principles.	Yes, The processes and compliances may be subject to scrutiny by external Auditors / agencies / regulatory bodies etc., as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the Management or Board, in accordance with best practices and risk management principles.	Yes, The processes and compliances may be subject to scrutiny by external Auditors / agencies / regulatory bodies etc., as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the Management or Board, in accordance with best practices and risk management principles.	NA	Yes, The processes and compliances may be subject to scrutiny by external Auditors / agencies / regulatory bodies etc., as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the Management or Board, in accordance with best practices and risk management principles.	NA	NA	Yes, The processes and compliances may be subject to scrutiny by external Auditors / agencies / regulatory bodies etc., as applicable. Policies are periodically evaluated and updated by various department heads, business heads, and approved by the Management or Board, in accordance with best practices and risk management principles.

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	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	NA	NA	NA	NA	NA	NA	NA	NA
The entity does not have the financial or/human and technical resources available	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	5	Throughout the Financial Year, the Company organized multiple meetings with its Directors and Key Management Personnel (KMPs) to discuss and provide updates on the overall performance of the organization. These presentations encompassed various aspects of the business, such as a review of the macroeconomic and market conditions, evaluation of financial performance, outlook on earnings, examination of the Company's strategy and business model, assessment of operational activities, overview of service and product offerings, as well as the allocation and utilization of Corporate Social Responsibility (CSR) funds. These meetings served as a platform to delve into the intricacies of the Company's performance and explore opportunities for improvement and growth.	100%
Key Managerial Personnel	5	Throughout the Financial Year, the Company organized multiple meetings with its Directors and Key Management Personnel (KMPs) to discuss and provide updates on the overall performance of the organization. These presentations encompassed various aspects of the business, such as a review of the macroeconomic and market conditions, evaluation of financial performance, outlook on earnings, examination of the Company's strategy and business model, assessment of operational activities, overview of service and product offerings, as well as the allocation and utilization of Corporate Social Responsibility (CSR) funds. These meetings served as a platform to delve into the intricacies of the Company's performance and explore opportunities for improvement and growth.	100%

Employees other than BoD and KMPs	0	NA	0.00%
Workers	0	NA	0.00%

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

Monetary					
	NGRBC Principle	**Name of the regulatory/ enforcement agencies/ judicial institutions**	**Amount (In ₹)**	**Brief of the Case**	**Has an appeal been Preferred? (Yes/No)**
Penalty/ Fine	NA				
Settlement					
Compounding fee					
Non-Monetary					
Imprisonment	NA				
Punishment					

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	

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

Yes, it forms part of the Company's Code of Conduct. The link of the same is as follows: https://www.nirlonltd.com/pdf/ccbe_Nov_18_v1.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:

	F.Y. 2023-24	**P.Y. 2022-23**
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	F.Y. (2023-24)		**P.Y. (2022-23)**	
	Number	**Remarks**	**Number**	**Remarks**
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

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

	F.Y. (2023-24)	P.Y. (2022-23)
i) Accounts payable *365	**4870,77,90,000**	**6081,70,30,000**
ii) Cost of goods/services procured	188,92,15,838	658,08,73,544
iii) Number of days of accounts payables	26	9

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: NA

Parameter	Metrics	F.Y. (2023-24)	P.Y. (2022-23)
Concentration of Purchases	a. i) Purchases from trading Houses	NA	
	ii) Total Purchases		
	iii) Purchases from trading houses as % of total purchases		
	b. Number of trading houses where purchases are made from		
	c. i) Purchases from top 10 trading houses as % of total purchases from trading houses		
	ii) Total Purchases from Trading Houses		
	iii) Purchases from top 10 trading houses as % of total purchase from trading houses.		
Concentration of Sales	a) i) Sales to Dealers/Distributors	NA	
	ii) Total Sales		
	iii) Sales to dealers distributors as % of total sales		
	b. Number of dealers / distributors to whom sales are mad		
	c. i) Sales to top 10 dealers /distributors		
	ii) total sales to dealers / distributors		
	iii) Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors		
Share of RPTs in (NA -as only services are being provided between related parties)	a. i) Purchases (Purchases with related parties)	NA	
	ii) Total Purchases		
	iii) Purchases (Purchases with related parties as % of Total Purchases)		

	b. i) Sales (Sales to related parties)	NA
	ii) Total Sales	
	iii) Sales (Sales to related parties / Total Sales)	
	c. i) Loans & advances given to related parties	
	ii) Total loans & advances	
	iii) Loans & advances given to related parties as % of Total loans & advances	
	d. i) Investments in related parties	
	ii) Total Investments made	
	iii) Investments in related parties as % of Total Investments made)	

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
0	NA	0.00%

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

   Yes, https://www.nirlonltd.com/pdf/ccbe_Nov_18_v1.pdf

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

Essential Indicators

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

	F.Y. 2023-24	P.Y. 2022-23	Details of improvements in environmental and social impacts
R&D	0.00%	0.00%	The Company is engaged in the business of providing Office premises on a leave and license basis. It has no R & D activities. Hence, NA
Capex	0.00%	0.00%	The Company is engaged in the business of providing Office premises on a leave and license basis. It has no Capex for R & D activities. Hence, NA

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

   Yes

   b) If yes, what percentages of inputs were sourced sustainably?

   65% (estimated)

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): Recycling of dry waste includes paper, plastic, cardboard, wood etc. disposed as per MPCB guidelines.*

   (b) *E-waste: E Waste, & hazardous waste is disposed as per the MPCB guidelines*

   (c) *Hazardous waste: E Waste, & hazardous waste is disposed as per the MPCB guidelines*

   (d) *Other waste: On site state of the art STP Plants to ensure maximum recycling/reuse of waste water • On site organic waste convertors to sustainably process all organic waste generated in the Campus.*

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.

   NA

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?

   No

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.

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

Name of Product / Service	Description of the risk / concern	Action Taken
Licensing of Office Premises to various companies whose business activities are relating to IT/ITes, Banking and Finance	E-Waste, Used Oil, Batteries, Waste water etc. due to office operations.	Waste/waste water generated as per the risks listed in the previous column due to office occupation is disposed as per MPCB guidelines.

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	
	F.Y. (2023-24)	P.Y. (2022-23)
NA	0.00%	0.00%

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:

	F.Y. (2023-24) (In tons)			P.Y. (2022-23) (in tons)		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	0.00	9.33	0.00	0.00	267.22	0.00
E-waste	0.00	0.53	0.00	0.00	0.64	0.00
Hazardous waste	0.00	4.71	0.00	0.00	0.60	0.00
Other waste: Wet waste like food waste, horticultural waste etc. considered which is fully converted to Manure	11.25	0.00	0.00	279.18	0.00	0.00

Please note: F.Y. 2023-24 figures for plastics & wet waste are not comparable to F.Y. 2022-23. F.Y. 2023-24 figures include waste from NKP common areas only, whereas F.Y. 2022-23 figures include total NKP waste (Common areas & licensees) for which no bifurcation is available. The bifurcation for F.Y. 2023-24 has been possible because of improved processes adopted due to the requirements of the TRUE Platinum Certificate for waste management.

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
NA	

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	3	2	66.66%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	3	2	66.66%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other than Permanent employees											
Male	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B /A)	Number (C)	% (C /A)	Number (D)	% (D /A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	**0**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**

Other than permanent workers											
Male	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	**0**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**

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

	F.Y. (2023-24)	P.Y. (2022-23)
i) Cost incurred on well-being measures (well- being measures means well-being of employees and workers including male and female, permanent and other than permanent employees and workers)	48,17,065	24,35,797
ii) Total revenue of the Company	6,03,11,97,747	5,72,64,79,819
iii) Cost incurred on well-being measures as a % of total revenue of the company	0.08%	0.04%

2. Details of retirement benefits, for Current F.Y. and Previous F.Y.

Benefits	F.Y. (2023-24)			P.Y. (2022-23)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a %of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100.00%	0.00%	Yes	100.00%	0.00%	Yes
Gratuity	100.00%	0.00%	Yes	100.00%	0.00%	Yes
ESI	0.00%	0.00%	NA	0.00%	0.00%	NA

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 has ensured access to differently abled employees and workers. The company is taking steps to further improve accessibility to differently abled employees and workers.

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.

The Company does not maintain an independent policy specifically focused on equal opportunity. However, its Code of Conduct encompasses Fair Employment Practices prohibits all forms of discrimination or harassment. The Code of Conduct is available on the website and its link is: https://www.nirlonltd.com/pdf/ccbe_Nov_18_v1.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	0.00	0.00	0.00	0.00
Female	0.00	0.00	0.00	0.00
Total	**0.00**	**0.00**	**0.00**	**0.00**

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	No	NA
Other than Permanent Workers	No	NA
Permanent Employees	Yes	The Company has a vigil mechanism system called the Whistle Blower Policy to deal with instances of fraud and mis-management. It is intended to ensure that the Directors and Employees or any other person report their genuine concerns.
Other than Permanent Employees	No	NA

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

Category	F.Y. (2023-24)			P.Y. (2022-23)		
	Total employees/ workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	**3**	**0**	**0.00%**	**2**	**0**	**0.00%**
Male	3	0	0.00%	2	0	0.00%
Female	0	0	0.00%	0	0	0.00%
Total Permanent Workers	**0**	**0**	**0.00%**	**0**	**0**	**0.00%**
Male	0	0	0.00%	0	0	0.00%
Female	0	0	0.00%	0	0	0.00%

8. Details of training given to employees and workers:

Category	F.Y. (2023-24)					P.Y. (2022-23)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	3	3	100.00%	3	100.00%	2	2	100.00%	2	100.00%
Female	0	0	0.00%	0	NA	0	0	0.00%	0	0.00%
Total	**3**	**0**	**100.00%**	**3**	**100.00%**	**2**	**2**	**100.00%**	**2**	**100.00%**
Workers										
Male	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Total	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%

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

Category	F.Y. (2023-24)			P.Y. (2022-23)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	3	3	100.00%	2	2	100.00%
Female	0	0	0.00%	0	0	0.00%
Total	3	3	100.00%	2	2	100.00%
Workers						
Male	0	0	0.00%	0	0	0.00%
Female	0	0	0.00%	0	0	0.00%
Total	0	0	0.00%	0	0	0.00%

10. Health and safety management system:

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

Yes. The Company has taken proactive measures to ensure the health, well-being and security of its employees by implementing a range of safety protocols, including the installation of emergency exits, fire alarms, fire extinguishers, and smoke detectors.

These measures are integral components of the Company's occupational health and safety management system.

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

The Company in question, being service-based, does not involve any work-related hazards. It takes diligent measures to ensure the safety and well-being of all its employees.

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

No. The Company does not have any workers

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

Yes

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

Safety Incident/Number	Category	F.Y. (2023-24)	P.Y. (2022-23)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0	0
Total Recordable work related injuries	Employees	0	0
	Workers	0	0
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

    - *Measures include regular inspections and maintenance of fire extinguishers, fire alarms, sprinkler and other systems related to fire prevention, detection and suppression throughout the premises.*
    - *The Company conducts regular safety inspections of the premises to identify and correct any potential hazards.*
    - *The Company has an established and detailed SOP's in the event of a fire, natural disaster, or other emergency.*

    Overall, these measures contribute to creating a secure environment, minimizing the risk of incidents and ensuring the well-being of everyone within the workplace.

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

	F.Y. (2023-24)			P.Y. (2022-23)		
	Filed during the year	**Pending resolution at the end of year**	**Remarks**	**Filed during the year**	**Pending resolution at the end of year**	**Remarks**
Working Conditions	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	0.00%
Working Conditions	0.00%

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

    NA

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).

   (A) Employees – *Yes*

   (B) Workers – *NA*

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 ensures that statutory dues as applicable to the transactions within the remit of the Company are deducted and deposited in accordance with extant regulations.

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

	Total No. of affected employees/ workers		**No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment**	
	F.Y. (2023-24)	**P.Y. (2022-23)**	**F.Y. (2023-24)**	**P.Y. (2022-23)**
Employees	0	0	0	0
Workers	0	0	0	0

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

   Yes

5. Details on assessment of value chain partners:

   NA

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

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.

   No corrective action plan has been necessitated on the above-mentioned parameters

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

Essential Indicators

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

   The Company evaluates the impact of its business activities on stakeholders and proactively takes steps to regularly engage with them, understand their concerns, and meet their expectations. It has adopted a strategic approach to identify key stakeholders and determine the relevant information they require through appropriate communication channels. Through various channels, the Company enables stakeholders to connect, share feedback, and report any grievances they may have.

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

Stakeholder Group	**Whether identified as Vulnerable & Marginalized Group (Yes/No)**	**Channels of communication**	**Frequency of engagement (Annually/ Half yearly/Quarterly/ others – please specify)**	**Purpose and scope of engagement including key topics and concerns raised during such engagement**
Employees	No	Direct & other communication mechanisms	Regularly	Addressing Employees' Benefits/compensations, their professional expectations, career growth, professional development and continuing education and re- skilling training etc.
Investors/ Shareholders	No	Investors'/Analyst calls / conferences, personal meetings, E-mails, SMS, newspaper advertisements, Notice board, the Company website, Annual General Meetings, intimation to stock exchange, annual/ quarterly financials	Frequently and on a need basis	To understand Investors'/ Shareholders' objectives and expectations in relation to the Company's business and to transparently and regularly communicate information in this regard. Key topics are the Company's financial performance, future plans , market outlook, ESG performance etc.
Government and regulators	No	The Company website, Email, concalls, video-conference, personal meetings	As prescribed and need based	Reporting requirements, Statutory compliances etc. Approval/ permissions as required for the Company's Business, support from authorities.

Lender	No	E-mails, telephones, conference calls, personal meetings etc.	As prescribed and as when required	Statutory, as per the Loan documents and as per Business requirements
Communities	Yes	CSR organizations	Regularly	CSR Activities
Customers/ Consumers	No	Business interaction, through conference calls, personal meetings, e-mails, client satisfaction surveys etc.	Regularly	To understand customer requirements, satisfaction and Feedback and to keep them informed about the Company's future plans, planned improvements 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.

   The Company believes that maintaining consistent and proactive interaction with its stakeholders allows effective communication of its strategies and performance. By continuously engaging with them it ensures that their expectations are aligned, which ultimately helps serve them better. The Board stays informed about relevant developments, and Directors are encouraged to provide feedback on such matters.

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. The Company's Board is currently engaged in collaborative efforts with Management and stakeholders to identify significant factors related to environmental, social, and governance (ESG) matters.

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

   The Company has recognized disadvantaged, vulnerable, and marginalized stakeholders within its community, and actively focuses on such groups in Corporate Social Responsibility (CSR) projects. The Company has provided assistance to various community healthcare, education, and environmental sustainability initiatives benefiting individuals from vulnerable and marginalized communities.

PRINCIPLE 5 Businesses should respect and promote human rights

Essential Indicators

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

Category	F.Y. (2023-24)			P.Y. (2022-23)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	3	0	0.00%	2	0	0.00%
Other than permanent	0	0	0.00%	0	0	0.00%
Total Employees	3	0	0.00%	2	0	0.00%
Workers						
Permanent	0	0	0.00%	0	0	0.00%
Other than permanent	0	0	0.00%	0	0	0.00%
Total Workers	0	0	0.00%	0	0	0.00%

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

Category	F.Y. (2023-24)					P.Y. (2022-23)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B /A)	No. (C)	% (C /A)		No. (E)	% (E /D)	No. (F)	% (F /D)
Employees										
Permanent	0	0	0.00%	3	0.00%	0	0	0.00%	2	0.00%
Male	0	0	0.00%	3	0.00%	0	0	0.00%	2	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Other than Permanent	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Male	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Workers										
Permanent	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Male	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Other than Permanent	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Male	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%

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

a. Median Remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	5	19,00,000	1	19,00,000
Key Managerial Personnel	3	1,40,32,042	0	0
Employees other than BoD and KMP	0	0	0	0
Workers	0	0	0	0

The remuneration of Non-Executive Directors consists of sitting fees only.

b. Gross wages paid to females

	F.Y. (2023-24)	P.Y. (2022-23)
Gross wages paid to females	0	0
Total wages	0	0
Gross wages paid to females (Gross wages paid to females as % of total wages)	0	0

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)**

No

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

The POSH Committee and Whistle Blower Policy are available in this regard.

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

	F.Y. (2023-24)			P.Y. (2022-23)		
	Filed during the year	**Pending resolution at the end of year**	**Remarks**	**Filed during the year**	**Pending resolution at the end of year**	**Remarks**
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/ Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

	F.Y. (2023-24)	**P.Y. (2022-23)**
i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
ii) Female employees / workers	0	0
iii) Complaints on POSH as a % of female employees / workers	0	0
iv) Complaints on POSH upheld	0	0

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

*The Company has implemented a policy for the Prevention of Sexual Harassment (**POSH**) to ensure that individuals who experience discrimination or harassment are protected. The Company actively promotes ethical conduct and transparency as core principles in its operations. The Company also has a Whistle Blower Policy.*

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

(Yes/No)

No. The Company has not entered into any agreement or Contract where human rights are affected.

10. Assessments for the year:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	0.00%
Discrimination at workplace	0.00%
Child Labour	0.00%
Forced Labour/Involuntary Labour	0.00%
Wages	0.00%
Others – please specify	0.00%

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

Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances / complaints.
   NA
2. Details of the scope and coverage of any Human rights due-diligence conducted.
   NA
3. Is the premise / office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?
   Yes. The Company's infrastructure is designed to be accessible to people with disabilities, and it is constantly working to improve its infrastructure to remove any barriers to accessibility.
4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	0.00%
Discrimination at workplace	0.00%
Child Labour	0.00%
Forced Labour / Involuntary Labour	0.00%
Wages	0.00%
Others – please specify	0.00%

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

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

Essential indicators

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

Weather total energy consumption and energy intensity is applicable to the Company	**Yes**	
	F.Y. (2023-24)	**P.Y. (2022-23)**
Revenue from Operations (in ₹)	603,11,97,747.00	572,64,79,819.00
Parameter	**F.Y. (2023-24)**	**P.Y. (2022-23)**
From renewable sources (Mega Joules)		
Total electricity consumption (A)	8,74,587.60	75,96,662.40
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	**8,74,587.60**	**75,96,662.40**
From non-renewable sources (Mega Joules)		
Total electricity consumption (D)	2,46,96,416.60	13,12,46,744.40
Total fuel consumption (E)	1,82,106.0	90,633.60
Energy consumption sources (F) through other	0	0
Total energy consumed from non- renewable sources (D+E+F)	**2,48,78,522.60**	**13,13,37,378.00**
Total energy consumed (A+B+C+D+E+F)	**2,57,53,110.20**	**13,89,34,040.40**
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.00427	0.02426

Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.095647613	0.543461708
Energy intensity in terms of physical output	11.01317	59.4144
Energy intensity *(optional)* – the relevant metric may be selected by the entity		

Please note: F.Y. 2023-24 figures for energy consumption are not comparable to F.Y. 2022-23. F.Y. 2023-24 figures include energy consumption from NKP common areas only, whereas F.Y. 2022-23 figures include total NKP energy consumption (Common areas + licensees cooling energy consumption). Further the figures of both financial years in this annual report are stated in **mega joules (MJ)** as against kWh is last years annual report. Both these changes have been carried out to better align with industry practice.

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 Company engaged Schneider Electric India Pvt. Ltd. for the energy audit.

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	F.Y. (2023-24)	P.Y. (2022-23)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0.00	0.00
(ii) Groundwater	45575.00	39449.00
(iii) Third party water (Municipal Water)	51153.00	50277.06
(iv) Seawater / desalinated water	0.00	0.00
(v) Others	0.00	0.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	**96728.00**	**89726.06**
Total volume of water consumption (in kilolitres)	**96728.00**	**89726.06**
Water intensity per rupee of turnover *(Water consumed / turnover)*	0.000016	0.0000157
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.00035925	0.00035098
Water intensity in terms of physical output (Total Water Consumed, KL/ sq ft of area managed (Total constructed area minus carpet area)	0.041365	0.0383708
Water intensity *(optional)* – the relevant metric may be selected by the entity		

Please note: For F.Y. 2023-24 the heading" Third party water" has been populated to reflect the total quantum for municipal water consumed in NKP common areas. F.Y. 2022-23 figures for water consumption are therefore restated to make them comparable to F.Y. 2023-24. This change has been carried out to better align with industry practice.

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 Company has engaged Environmental Design Solutions (**EDS**) for guidance to adapt to sustainable water practices*

4. Provide the following details related to water discharged:

Parameter	F.Y. (2023-24)	P.Y. (2022-23)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	0	0
- No treatment		
- With treatment – please specify level of treatment		
(ii) To Groundwater	0	0
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater	0	0
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties	0	0
- No treatment		
- With treatment – please specify level of treatment		
(v) Others	0	0
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)	0	0

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.

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

*Yes. The Company has a net zero sewage discharge policy. The entire waste water generated through washrooms & pantries is treated in sewage treatment plants (**STP's**). The treated water is reused in flushing & chiller cooling towers.*

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

Parameter	Please specify unit	F.Y. (2023-24)	P.Y. (2022-23)
NOx	µg/M³	36.9	38.6
SOx	µg/M³	32.8	30.5
Particulate matter	µg/M³ PM 10	73.7	60.2
Persistent organic pollutants (POP)	0	0	0
Volatile organic compounds (VOC)	0	0	0
Hazardous air pollutants (HAP)	0	0	0
Others – please specify	0	0	0

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. **Expert Polycon Services Environment Consultants** carried out Ambient Air Quality Assessment as per MPCB norms*

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

Parameter	Unit	F.Y. (2023-24)	P.Y. (2022-23)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	*Metric tonnes of CO2 equivalent*	103.80	1085.12
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, FCs, PFCs, SF6, NF3, if available)	*Metric tonnes of CO2 equivalent*	5625.30	31646.09
Total Scope 1 and Scope 2 emissions per rupee of turnover	*Metric Tonnes of CO2 equivalent*	0.00000095	0.00000572
Total Scope 1 and Scope 2 emission intensity *(optional)* – the relevant metric may be selected by the entity			
Parameter	**Unit**	**F.Y. (2023-24)**	**P.Y. (2022-23)**
for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	*Metric tonnes of CO2 equivalent*	0.00002128	0.00012803
Total Scope 1 and Scope 2 emission intensity in terms of physical output (Total GHG emission/ sq ft of area managed (Total constructed area minus carpet area)	*Metric tonnes of CO2 equivalent*	**0.00245002**	**0.01399732**
Total Scope 1 and Scope 2 emission intensity *(optional)* – the relevant metric may be selected by the entity			

Please note: - F.Y. 2023-24 figures for greenhouse gas emissions are not comparable to F.Y. 2022-23.

Scope 1 – F.Y. 2023-24 figures include greenhouse gas emissions for Nirlon Ltd only. F.Y. 2022-23 figures include greenhouse gas emissions for Nirlon Ltd. as well as Nirlon Management Services Pvt. Ltd.

Scope 2 – F.Y. 2023-24 figures include greenhouse gas emissions from electricity consumption in NKP common areas only, whereas F.Y. 2022-23 figures include greenhouse gas emissions from total NKP electricity consumption (Common areas + licensees cooling consumption).

Both these changes have been carried out to better align with industry practice.

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 Company is guided by M/s Environmental Design Solutions (**EDS**)*

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

Yes. The Company is actively pursuing measures to reduce its carbon foot print including the reduction of Greenhouse gas emissions and support an environmentally- friendly ecosystem. Measures include utilizing renewable energy sources and implementing energy-efficient equipment and processes. Numerous initiatives have been implemented in this regard. NKP's Design Philosophy and Master Plan have incorporated sustainability and a 'Green' ethos since inception. The design incorporates extensive green recreational spaces with water bodies, and approx.1000 trees, many of which are old growth.

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

Parameter	F.Y. (2023-24)	P.Y. (2022-23)
Total Waste generated (in metric tonnes)		
Plastic waste ***(A)***	9.33	267.22
E-waste ***(B)***	0.79	0.64
Bio-medical waste ***(C)***	0	0

Construction and demolition waste ***(D)***	0	0
Battery waste ***(E)***	1.83	12.54
Radioactive waste ***(F)***	0	0
Other Hazardous waste. Please specify, if any. ***(G) (Waste Oil)***	4.71	0.60
Other Non-hazardous waste generated ***(H).*** *Please specify, if any.* Wet waste like food waste, horticultural waste etc. considered which is fully converted to Manure (Break-up by composition i.e. by materials relevant to the sector)	11.25	279.18
Total (A+B + C + D + E + F + G + H)	**27.91**	**560.18**
Parameter	**F.Y. (2023-24)**	**P.Y. (2022-23)**
Waste intensity per rupee of turnover *(Total waste generated / Revenue from operations)*	0.0000000046	0.0000000978
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) *(Total waste generated / Revenue from operations adjusted for PPP)*	0.0000001037	0.0000021912
Waste intensity in terms of physical output *(Total Waste generated, MT/ sq ft of area managed (Total constructed area minus carpet area)*	0.0000119356	0.0002395578
Waste intensity *(optional) –* the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	16.66	281.00
(ii) Re-used	11.25	279.18
(iii) Other recovery operations	0.00	0.00
Total	**27.91**	**560.18**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	27.91	560.18
Total	**27.91**	**560.18**

Please note: F.Y. 2023-24 figures for plastics & wet waste are not comparable to F.Y. 2022-23. F.Y. 2023-24 figures include waste from NKP common areas only, whereas F.Y. 2022-23 figures include total NKP waste (Common areas & licensees) for which no bifurcation is available. The bifurcation for F.Y. 2023-24 has been possible because of improved processes adopted due to the requirements of the TRUE Platinum Certificate for waste management.

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. Environmental Design Solutions (**EDS**) is guiding the Company to Reducing, Reusing and Recycling waste generated.*

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

The Company has adopted elaborate waste management process to handle various kinds of waste generated from the office complex. The Company follows a process of Re-Use, Reduce and Re-Cycle to cut down on waste production. Wet waste is converted into manure and used in gardens maintained at the office complex.

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:

NA

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

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

NA

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					

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:

Yes

Leadership Indicators

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

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

(i) Name of the area

(ii) Nature of operations

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

Parameter	F.Y. (2023-24)	P.Y. (2022-23)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	0	0
(ii) To Groundwater	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0

Total volume of water withdrawal (in kilolitres)	0	0
Total volume of water consumption (in kilolitres)	0	0
Water intensity perrupee of turnover (Water consumed / turnover)	0	0
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment	0	0
- With treatment –please specify level of treatment.	0	0
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment. (Potential through rain water harvesting pits)	0	0
(iii) Into Seawater		
−No treatment	0	0
−With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

No

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

Parameter	Unit	F.Y. (2023-24)	P.Y. (2022-23)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	NA	NA	NA
Total Scope 3 emissions per rupee of turnover	NA	NA	NA
Total Scope 3 emission intensity *(optional)* – the relevant metric may be selected by the entity	NA	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

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.

NA

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Rain Water harvesting	The Company has invested in an elaborate rain water harvesting system to charge the ground water. Rain water is channelized into rain water harvesting pits and only the overflow from the recharging pits is designed to overflow into the storm water drains.	Results in effective water conservation and sustainable management practices, contributing to environmental stewardship and reducing reliance on external water sources.
2.	Organic Waste Management Convertor	Wet waste generated due to office operations is segregated. This wet waste is converted into manure by using organic waste convertor machines. Manure produced is used in the green areas maintained by the Company	Reducing Landfill of waste, Organic waste is converted in to the form of green manure.
3.	Sewage Treatment Plant	The Company has installed Sewage Treatment Plants so that all waste water generated in the office premises is treated. This treated water is used for the flushing & gardening needs and in the cooling towers for the office operations.	Reduces the discharge of sewage into the municipal sewers and reuses the treated water thus reducing water demand
4.	Power from renewable sources	The Company has ties with renewable power generators to provide green power to the Company through Power Purchase Agreements. This helps to reduce the usage of conventional power provided by utility companies.	Reduce the demand from conventional sources thus reducing the carbon foot print of the Company

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

Yes. The Company has developed emergency preparedness plans to address emergency situations like Fire, Flood, Earth Quake etc. These plans cover communication mechanism during the emergency. These plans also include procedures for preventing and mitigating hazards, risks, and environmental impacts that may arise from emergency situations, as well as first aid provisions. If an emergency does occur, it will be investigated and appropriate preventive measures will be taken to avoid future occurrences.

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?

NA

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

NA

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

Essential Indicators

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

4 (Four)

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

Sr. No.	Name of the Trade & Industry Chambers/ Association	Reach of Trade & Industry Chamber/ Association (State /National)
1	Maharashtra Chamber of Housing Industry (MCHI)	State
2	RICS India Pvt.Ltd membership	National
3	Federation of Indian Chamber of Commerce and Industry	National
4	Mumbai Cricket Association	State

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.

NA

Leadership Indicators

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

None

PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

Essential Indicators

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

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

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

S. No.	Name of 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 F.Y. (In ₹)
NA						

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

The Company ensures it is responsive to the grievances of the Community.

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

	F.Y. (2023-24)	P.Y. (2022-23)
Directly sourced from MSMEs/ small producers	1.56%	1.23%
Directly from within India	98.44%	98.77%

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: NA

Give full details in below table:

	F.Y. (2023-24)	P.Y. (2022-23)
1. Rural		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)		
ii) Total Wage Cost		
iii) % of Job creation in Rural areas		
2. Semi-urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)		
ii) Total Wage Cost		
iii) % of Job creation in Semi-Urban areas		
3. Urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or		
ii) Total Wage Cost		
iii) % of Job creation in Urban areas		
4. Metropolitan		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis)		
ii) Total Wage Cost		
iii) % of of Job creation in Metropolitan area		

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

Leadership Indicators

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

   NA

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

   The Company has not undertaken any CSR projects in the designated aspirational districts in the current financial year.

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

   No

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

NA

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

NA

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
NA				

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.

NA

Name of Authority	Brief of the case	Corrective action taken
NA		

6. Details of beneficiaries of CSR Projects:

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Health Care	8,178	100.00%
2	Education	668	100.00%
3	Social Inclusion	1,978	100.00%
4	Environment Sustainability	1,80,213	57.00%

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

Essential Indicators

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

The Company periodically carries out surveys with its Licensees to understand their level of satisfaction with the overall occupant/customer experience in NKP. Licensee feedback is taken seriously, and the Company engages with Licensees post such surveys to follow through on the feedback provided.

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

As a percentage to total turnover: NIL

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

	F.Y. (2023-24)		Remarks	P.Y. (2022-23)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA

Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Other	0	0	NA	0	0	NA

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

	Number	Reasons for recall
Voluntary recalls	0	0
Forced recalls	0	0

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

   Yes, The Company has implemented appropriate and effective IT controls to mitigate cyber security malpractice.

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.

   None

7. Provide the following information relating to data breaches:

   a. Number of instances of data breaches: 0

   b. Percentage of data breaches involving personally identifiable information of customers: 0.00%

   c. Impact, if any, of the data breaches**:** None

Leadership Indicators

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

   https://www.nirlonltd.com/location.html

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

   NA

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

   The Company has various SOP's for business continuity & crisis management in an event of natural disaster or infrastructure risks. These SOP's cover communication mechanisms during the crisis/disruption.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/ NA) 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)

   NA

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

   No