

HEIL/SE-34/2024-25

August 17, 2024

To, The Manager (Listing), The BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001 Script Code No. : **543600**

To,

The Manager (Listing),

National Stock Exchange of India Limited

"Exchange Plaza", C-l, Block - G, Bandra - Kurla Complex, Bandra (E)

Mumbai – 400 051 Symbol: HARSHA

Dear Sir/Madam,

Sub: Business Responsibility and Sustainability Report For the Financial Year 2023-24

Ref: Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report of the Company for the Financial Year ended on March 31, 2024.

The Annual Report containing the Business Responsibility and Sustainability Report also uploaded on the Company's website and can be accessed at https://www.harshaengineers.com/InvestorRelations/financialinformation.php#.

You are requested to take the same on your record.

Thanking You,

Yours faithfully,

FOR HARSHA ENGINEERS INTERNATIONAL LIMITED

Kiran Mohanty Company Secretary and Chief Compliance Officer

MEM NO.: F9907

Encl.: As Above

Harsha Engineers International Limited

(formerly known as Harsha Engineers International Private Limited and Harsha Abakus Solar Private Limited) CIN: L29307GJ2010PLC063233



INDEPENDENT ASSURANCE ON VERIFICATION OF SUSTAINABILITY INFORMATION

Growlity/AR/2324-46
Reporting Period - April 01, 2023 to March 31, 2024
The Management and Board of Directors
Harsha Engineers International Limited
Sarkhej-Bavla Road,
PO Changodar, Ahmedabad — 382213

Independent Assurance Report

Growlity, Inc. (hereinafter referred to as "The Service Provider" or "Growlity") have been engaged by Harsha Engineers International Limited (hereinafter referred to as "The Company") to conduct a limited assurance engagement on the sustainability information presented in the Company's Annual Sustainability Report (hereinafter referred to as "ASR") and Business Responsibility and Sustainability Reporting (hereinafter referred to as "BRSR") for the specified reporting period. This critical task involved a thorough examination to verify the accuracy and reliability of the sustainability data disclosed in the report. The sustainability information provided within the report adheres to the comprehensive guidelines set forth by the Global Reporting Initiative's (hereinafter referred to as "GRI") Universal Standards 2021, ensuring that the reported data aligns with globally recognized sustainability reporting frameworks. This engagement by Growlity underscores the Company's commitment to transparency and accountability in its sustainability practices, highlighting its dedication to adhering to international principles for reporting on its Environmental, Social, and Governance (hereinafter referred as "ESG") initiatives.

Assurance Standard

The verification engagement has been planned and performed in accordance with the verification methodology developed by Growlity, which is based upon the "AA1000 Assurance Standard (AA1000AS v3)".

Scope of Assurance and Methodology

The verification was conducted to provide limited assurance conclusion on select non-financial sustainability disclosures whether the sustainability information the mentioned reporting period and to verify its alignment with reference to GRI Universal Standards 2021. Growlity conducted, on a sample basis, review and verification of data collection / calculation methodology and general review of the logic on inclusion / omission of necessary relevant information / data and this was limited to:

- Onsite and remote verification of data, on a selective test basis, for the following units / locations, through consultations with the site team and ESG committee members of the company:
 - 1. Changodar (Gujarat, India)
 - 2. Moraiya (Gujarat, India)
- Execution of audit trail of claims and data streams, on a selective test basis, to determine the level of accuracy in collection, transcription and aggregation processes followed;
- Review of company's plans, policies and practices, pertaining to their Environmental, Social & Governance Strategy, so as to be able to make comments on the fairness of sustainability reporting or disclosures.
- Review of company's approach towards materiality assessment disclosed in the report to identify relevant issues.
- Review of company's disclosures related to Business Responsibility & Sustainability Reporting (BRSR) Disclosures to SEBI, India for FY 2023-24.

Company's Accountability

The ESG Committee representative at the company is responsible for preparing the ASR that is free from material misstatement in reference with the GRI and for the information contained therein. This entails specifically choosing and applying suitable methodologies for sustainability reporting, gathering and organizing data, and making well-founded assumptions or estimates as needed. Additionally, these representatives must ensure the implementation of adequate internal controls to facilitate the development of a sustainability report devoid of any significant errors, whether deliberate or accidental. The ESG Committee representatives at the company are also responsible for preparing the designed report using graphics and relevant and responsible content.

Our Observations

The Company has demonstrated its commitment to sustainable development by reporting its performance on various material topics for FY 2023-24. The Company has prepared report having sustainability information with reference to GRI Universal Standards 2021. The ASR includes a description of the Company's stakeholder engagement process, materiality assessment





INDEPENDENT ASSURANCE ON VERIFICATION OF SUSTAINABILITY INFORMATION (Contd.)

and relevant performance disclosures on the identified material topics. There is further scope to strengthen data/information management system to ensure uniform and accurate reporting or disclosures. Areas of further improvement wherever identified have been brought before the attention of the management & ESG Committee representatives of the company. These observations do not affect our conclusion presented in this statement.

Guidelines for Utilization of This Statement

The Company is obligated to replicate the Growlity's Independent Assurance statement along with any attachments in their entirety, ensuring no alterations, deletions, or supplements are made.

This statement is specifically designed to convey the outcomes of the commissioned evaluation to the Company, defining the boundaries of the engagement. It is important to note that Growlity has not taken into account the potential interests of any third parties regarding the chosen sustainability information, this assurance report, or the conclusions drawn by Growlity. Consequently, nothing within the scope of this engagement or statement grants any third-party entities any form of rights or entitlements.

Limitations

The assurance engagement outlined herein does not encompass the following areas:

- 1. Our assurance does not cover any data or information pertaining to the financial performance of the Company.
- 2. Our role is strictly limited to providing assurance services as detailed in this letter. We will not undertake any management functions or make decisions on behalf of the Company. It is the responsibility of the Company's management to make all decisions, including those related to the acceptance and implementation of our services.
- 3. Any data or information that falls outside the specified reporting period is not covered by our assurance scope.
- 4. Our assurance is limited to the operations and locations explicitly mentioned within the defined Assurance Boundary. Any data or information pertaining to operations outside of this boundary is excluded, unless specifically stated otherwise in this report.
- 5. The Company's statements expressing opinions, beliefs, aspirations, expectations, or future intentions, as well as assertions related to Intellectual Property rights and competitive matters, are beyond the scope of our assurance.
- 6. We do not cover the Company's strategy and any related disclosures expressed in the report.
- 7. Our assurance does not extend to the mapping of the report with any reporting frameworks other than those specified above.

Our Assurance Team and independence:

Our assurance team, comprising of multidisciplinary professionals, has been drawn from our climate change and sustainability network and undertakes similar engagements with a number of significant global businesses. As an assurance provider, Growlity is required to comply with the independence requirements set out in "AA1000 Assurance Standard (AA1000AS v3)". Growlity's independence policies and procedures ensure compliance with this standard.

Conclusion

On the basis of our procedure for this limited assurance, nothing has come to our attention that causes us not to believe that the company has reported on material sustainability issues relevant to its business.

Dr. Nitin Dumasia President & CEO Date: June 29th, 2024

Place: USA







SECTION A: GENERAL DISCLOSURE

I. Details of the Listed Entity

1	Corporate Identity Number (CIN) of the Listed Entity	L29307GJ2010PLC063233 (U29307GJ2010PLC063233)
2	Name of the Listed Entity	HARSHA ENGINEERS INTERNATIONAL LIMITED
3	Year of incorporation	2010
4	Registered office address	Sarkhej - Bavla Road, Changodar, Ahmedabad, Sanand-382213,
		Gujarat, India.
5	Corporate address	Sarkhej - Bavla Road, Changodar, Ahmedabad, Sanand-382213,
		Gujarat, India.
6	E-mail	sec@harshaengineers.com
7	Telephone	91-2717-618200
8	Website	https://www.harshaengineers.com
9	Financial year for which reporting is being done	2023-24
10	Name of the Stock Exchange(s) where shares	BSE Limited and the National Stock Exchange of India Limited
	are listed	
11	Paid-up Capital	₹ 910,441,050

Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report

Name of the Person	Kiran Mohanty
Telephone	91-2717-618200
Email address	sec@harshaengineers.com

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

Standalone Basis

There are certain restatements and re-computation of certain attributes in this report. The effects have been included under the following sections and principles of the BRSR report - Section C Principle 6 (Essential Indicator: question 1, 3 and 5) and (Leadership Indicator: question 1). These restatements would enable completeness and comparability of information for the current year and previous year.

II. Product/Services

14	Details of business activities (accounting for 90% of the turnover):	SI. No.	Description of Main Activity	Description of Business Activity	% Turnover of the Entity
		1	Manufacturing	Metal and metal products	84.69%
		2	Electricity, gas, steam and air condition supply	Electric power generation, transmission and distribution	15.31%
15	Products/Services sold by the entity (accounting	SI.	Product/Service	NIC Code	% of Total
	for 90% of the entity's Turnover):	No.			Turnover contributed
		1	Bearing cages, Brass Casting and Automotive Components	28140	84.69%
		2	EPC and 0 & M of Solar Power Plant	42201	15.31%



III. Operations

16	Number of locations where plants and/or operations/offices of the entity are situated	Location	Number of plants^	No. of Offices*	Total
		National	2	1	3
		International	-	-	-
17	Market served by the entity	Locations		Numbers	
	a. No. of Locations	National (No. of States)		10	
		International (No. of Countries)		30	
	b. What is the contribution of exports as a percentage of the total turnover of the entity?		41.95%		
	c. A brief on types of customers	The Company supplies domestic and international bearing management	tional. The e		

[^]The Company has Solar plants and Windmills which has not been considered as plants

IV. Employees

18.	Details as at the end of Financial Year					
SI.	Particulars	Total (A)	М	ale	Fen	nale
No.			No. (B)	% (B/A)	No. (C)	% (C/A)
a.	Employees and workers (including different	y abled)				
		Employees				
1	Permanent Employees (D)	607	588	96.86%	19	3.1%
2	Other than Permanent Employees (E)	0	0	0	0	0
3	Total Employees (D+E)	607	588	96.86%	19	3.1%
		Workers				
4	Permanent (F)	1124	1106	98.40%	18	1.60%
5	Other than Permanent (G)	1472	1423	96.67%	49	3.33%
6	Total Workers (F+G)	2596	2529	97.42%	67	2.58%
b.	Differently abled employees and workers	·				
		Employees				
1	Permanent Employees (D)	3	3	100%	0	0
2	Other than Permanent Employees (E)	0	0	0	0	0
3	Total Employees (D+E)	3	3	100%	0	0
		Workers				,
4	Permanent (F)	14	14	100%	0	0
5	Other than Permanent (G)	3	3	100%	0	0
6	Total Differently Abled Employees (F+G)	17	17	100%	0	0

19. Participation/Inclusion/Representation of women

SI.	Category	Total (A)	No. and %	of females
No.			No. (B)	% (B/A)
1	Board of Directors	10	2	20%
2	Key Management Personnel	7	1	14%

^{*}The Company has more than 15 warehouses which has not been considered



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

Category	(Turnov	2023-24 er rate in cur	rent FY)	(Turnov	2022-23 er rate in prev	ious FY)	(Turnov	2021-22 er rate in t	the year
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	13%	12%	13%	11%	27%	11%	16%	34%	16%
Permanent Workers	9%	0%	9%	9%	30%	9%	14%	32%	14%

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

21	Names of holding / subsidiary / associate companies / joint ventures	SI. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether it is a 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.	Harsha Precision Bearing Components (China) Co., Limited	Subsidiary	100%	No
		2.	Harsha Engineers Europe SRL	Subsidiary	100%	No
		3.	Harsha Engineers Advantek Limited	Subsidiary	100%	No
		4.	Cleanmax Harsha Solar LLP	Joint Venture	50%	No

Note:

M/s HASPL Americas Corporation, a wholly owned subsidiary of the Company, has been officially terminated in accordance with the applicable laws. This has been confirmed by the certificate issued by the State Corporation Commission of Virginia on February 29, 2024.

The Company has transferred its equity investment of 3,297,050 shares, equivalent to a 25.9999% stake, in Sunstream Green Energy One Private Limited, an associate of the Company. The transfer was made to Sunstream Green Energy Private Limited ("Transferee") as per the Agreement for Sale of Shares dated February 16, 2024, at a price of ₹ 10 per share. As of March 31, 2024, the Company owns 10 equity shares in Sunstream Green Energy One Private Limited. Under the provisions of Companies Act 2013, the Company no longer holds the status of being an associate with said company.

VI. CSR Details

22	(i)	Whether CSR is applicable as per section 135 of Companies Act, 2013	Yes
	(ii)	Turnover (in lakhs)	108,094
	(iii)	Net worth (in lakhs)	124,662





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

Stakeholder group from whom	Grievance Redressal Mechanism in Place	J	2023-24 Current Financial Year		ā	2022-23 Previous Financial Year	
complaint is received	(Yes/No) If yes, then provide web- link for grievance redress policy	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	Ē	Ē	ΞZ	Ē	Ē	Ē
Investors (other than shareholders) *	Yes, https://www. harshaengineers.com/ InvestorRelations/ company-policies.php	Ξ̈̈́Z	Ē	ΞZ	1,574	Ē	Ī
Shareholders*	Yes https://www. harshaengineers.com/ InvestorRelations/ company-policies.php	ΞZ	Ē	Ē	Ē	Ē	: <u>-</u> Z
Employees and workers	Yes, HR representative available for every dept. HR SPOCs for every function.	ΞZ	Ē	Ē	Ē	Ē	Ē
Customers	Yes	0.13 (PPM** sales)	Ē	Ë	0.29 (PPM** sales)	쿨	Ē
Value Chain Partners	Yes	ΞZ	ΞZ	ΞZ	Ē	ËZ	ΞZ
Other (please specify)	ΥN	ΞŻ	Ë	Ë	Ē	Ë	Ē

^{*}The Company got listed on September 26, 2022. Most of the complaints mentioned as part of investor complaints are related to IPO (non-receipt of funds). Further, investor complaints also include shareholder complaints.

^{**} PPM: Part per million



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 24

Material Issue Identified	Indicate whether risk or opportunity	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)
Employee Advancement & Development	Risk & Opportunity	The Company's operations are mainly driven by To mitigate the risk of losing top talent, it is its employees. It is crucial to ensure employees' important to continuously analyses the best HR wellbeing to further enable the Company's growth. Practices in the industry and make necessary The Company aims to provide ample opportunities enhancements. This can be achieved by implementing performance incentives on a timely basis and evaluating performance at every stage of the work process.	crucial to ensure employees' important to continuously analyses the best HR enable the Company's growth. practices in the industry and make necessary to provide ample opportunities enhancements. This can be achieved by implementing performance incentives on a timely basis and evaluating performance at every stage of the work process.	Negative
Compliance and Integrity	Risk	At the heart of the Company's reputation and stakeholder confidence is its ability to ensure monitor changes in the regulatory framework and regulatory compliance. Regulations to report on accordingly ensure compliance. This will allow the ESG performance including climate related risks, targets and progress pose compliance risks to the organisation. Further, carbon tax may also materialise in medium term. It is crucial for the Company to maintain transparent and ethical business practices and manage and disclose its ESG performance, which in turn contribute to the Company's continued success.	The Company can conduct regular reviews and monitor changes in the regulatory framework and accordingly ensure compliance. This will allow the Company to mitigate any compliance related risks.	Negative
Occupational Health and Safety	Risk	Due to factors such as machinery breakdown and human negligence, the labour-intensive nature of the industry puts workers at risk of accidents, as well as health and injury hazards.	The risk associated with the industry can be mitigated by developing and implementing critical safety standards across all project locations and identifying the training needs of employees at every level.	Negative



Material Issue Identified	Indicate whether risk or opportunity	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)
Product Design and Lifecycle Management	Opportunity	Effective product design allows the Company to create innovative and customer-centric solutions. By understanding market needs and trends, the Company can develop products that resonate with consumers, leading to increased demand and market relevance. Further, analyzing environmental impact of products throughout its life will help the organisation in taking steps to mitigate the negative impact which in turn will help in boosting customer demand as customers have also started considering life cycle impact of products.		Positive
Energy and Emissions Management	Risk & Opportunity	Implementing effective energy management, strategies can lead to more efficient operations. By the Company is proactively investing in energy-optimising energy usage, adopting energy-efficient echnologies, and investing in renewable energy sources. sources have cost saving potential. However, noncompliance with emissions standards, pollution limits, or energy efficiency requirements can result in fines, penalties, and damaged relationships with regulatory authorities.	To mitigate risks of emissions management, the Company is proactively investing in energy-efficient technologies and renewable energy sources.	Positive
Water & Wastewater Management	Risk	Water scarcity is a growing global concern. As competition for water resources increases, the recompany may struggle to secure a reliable and affordable water supply. Moreover, improper handling or discharge of wastewater can result in legal repenalties, fines, and reputational damage.	The Company should adopt sustainable water management practices, invest in water-efficient technologies, monitor and control wastewater discharges. By managing water resources responsibly, the Company can reduce risks, enhance their reputation, and contribute to a more sustainable future.	Negative
Corporate Governance	Opportunity	Effective corporate governance ensures that ethical standards and values are upheld throughout the organisation. Strong and effective corporate governance can increase stakeholder confidence in the organisation which helps in creating value.		Positive

Note: Details about the materiality procedure and all the material topics can be found in ESG section of HEIL's annual report.





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.

icy a	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9	
	and Management Processes										
a.	Whether your entity's policy/polici cover each principle and its core element of the NGRBCs. (Yes/No)		s Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
b.	b. Has the policy been approved by the Board? (Yes/No)		s Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C.	Web Link of the Policies, if available	1.	Code of Com/Inve		-				arshaen	gineer	
		2.	Whistle E InvestorR		-				enginee	rs.com	
		3.	Risk Mar InvestorR	-					enginee	rs.con	
		4.	CSR I	Policy, elations,	P8 /compa			v.harsha)	enginee	rs.con	
			Code for com/Inve						arshaen	gineer	
		6.	Sexual Ha	ırassme	nt Policy	,, P5 (av	ailable c	on intran	net)		
		7.	7. Forced Labour Policy, P5 (available on intranet)								
			8. Contract Labour Management Policy, P3 (available on intranet)								
		9.									
		10.	General p supplier, F		_			nability	requirer	nent f	
		11.	Policy for intranet)	use of	emails/	internet,	/social ı	media, F	P9 (avai	lable (
		12.	Supplier harshaen		_	-	-				
		11			1		\/	Yes	Yes		
	nether the entity has translated the poli o procedures. (Yes / No)	y Yes	Yes	Yes	Yes	Yes	Yes	162	165	Yes	
inte						Yes	Yes	165	165	Yes	
Do cha Na cer	o procedures. (Yes / No) the enlisted policies extend to your valuation partners? (Yes/No) time of the national and international code rtifications/labels/ standards (e.g., Fore	ue Yes,		applicab	le						
Do cha Na cer Ste Alli	o procedures. (Yes / No) the enlisted policies extend to your valuain partners? (Yes/No) me of the national and international code	Yes, ISO st st o,	wherever a	applicab	le						
Do cha Nai cer Ste Alli OH ma	o procedures. (Yes / No) the enlisted policies extend to your valuain partners? (Yes/No) time of the national and international code rtifications/labels/ standards (e.g., Fore ewardship Council, Fairtrade, Rainfore iance, Trustee) standards (e.g., SA 800 ISAS, ISO, BIS) adopted by your entity an	ue Yes, s/ ISO st st o, nd et Hars	wherever a	applicab 16949, I	le SO 1400	01, ISO 4	5001 ar	nd NVG	principle	es	
into Do cha Nai cer Ste Alli OH ma Spo	to procedures. (Yes / No) the enlisted policies extend to your valuatin partners? (Yes/No) time of the national and international code rtifications/labels/ standards (e.g., Fore ewardship Council, Fairtrade, Rainfore iance, Trustee) standards (e.g., SA 800 ISAS, ISO, BIS) adopted by your entity at apped to each principle. ecific commitments, goals and targets s the entity with defined timelines, if any.	yes, s/sst st o, ad Hars carb Zerc	wherever a 9001, IATF sha Engine oon neutral o accidents	applicab 16949, I ers Inter and war , zero fir	national nts to rea	D1, ISO 4 Limitec ach 100	25001 ar I commi % by 203	nd NVG tted to v 30 and n	principle vorking et zero	es toward	
Into Do cha Nai cer Ste Alli OH ma Spo by	to procedures. (Yes / No) the enlisted policies extend to your valuating partners? (Yes/No) time of the national and international code rtifications/labels/ standards (e.g., Forewardship Council, Fairtrade, Rainfore iance, Trustee) standards (e.g., SA 800 ISAS, ISO, BIS) adopted by your entity at apped to each principle. The ecific commitments, goals and targets so the entity with defined timelines, if any.	Jule Yes, st ISO st st st O, and et Hars carb Zerc HEIL	wherever a 9001, IATF sha Engine oon neutral accidents has achie	ers Inter and war , zero fir	national nts to rea	Limited ach 100° nt ral by 45°	1 commi % by 203	nd NVG tted to v 30 and n	principle vorking et zero	es towar by 205	
into Do chamber Na Cer Stee Allii OH ma Spby	to procedures. (Yes / No) the enlisted policies extend to your valuatin partners? (Yes/No) time of the national and international code rtifications/labels/ standards (e.g., Fore ewardship Council, Fairtrade, Rainfore iance, Trustee) standards (e.g., SA 800 ISAS, ISO, BIS) adopted by your entity at apped to each principle. ecific commitments, goals and targets s the entity with defined timelines, if any.	yes, s/ ISO st st st 0, nd Hars carb Zerc ic HEIL th achi	wherever a 9001, IATF sha Engine oon neutral o accidents	ers Inter and war , zero fir ved carb Net Zer	national national e incide on neuto Emiss	Limited ach 100° nt ral by 48 ion journ	15001 ar 1 commi % by 203 5% are oney	nd NVG tted to v 30 and n ur Key g	principle working et zero	es toward by 205	



Governance, Leadership and Oversight

Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets

The effects of climate change have highlighted the urgency of implementing resilient practices, and sustainability is now crucial for organisations to tackle the challenges ahead. Our primary objective is to provide our customers with topquality products in an environmentally sustainable manner. Our journey of growth is marked by our commitment to ethical and fair practices, a culture of diversity and inclusivity, operations that contribute to social progress, and environmental conservation through measures such as reducing energy consumption, preserving water, and recycling electronic waste. Our Company fully acknowledges the importance of incorporating environmental, social, and governance practices into our operations. We are dedicated to upholding high standards of quality across all these areas, and we have numerous policies in place to oversee our activities. We will continue to introduce new policies and adapt to changing regulations and trends to ensure we meet our objectives and overcome any obstacles. In the future, we intend to establish a clearly defined ESG strategy and set targets accordingly.

Details of the highest authority responsible Board of Directors for implementation and oversight of the Business Responsibility policy (ies).

the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

Does the entity have a specified Committee of | The Company has constituted Environmental, Social and Governance Management Committee (ESG Committee) to support the Company ongoing commitment to environmental stewardship, stakeholder's health and safety, community development, corporate social responsibility, ethical and corporate governance, and other public policy matters (collectively "ESG Material issues") relevant to the Company

10. Details of Review of NGRBCs by the Company:

Subject for Review		Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee					Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)											
	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р
	1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against above policies and follow up action					Yes							As a	and v	wher	n nee	eded		
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances																		
11. Has the entity carried out independent as	sses	sme	nt/ o	evalu	ıatio	n of	the	worl	king	Р	Р	Р	Р	Р	Р	Р	Р	Р
of its policies by an external agency? (Yes/	'No).	If y	es,	prov	ide ı	nam	e of	the	1	2	3	4	5	6	7	8	9
agency														Yes*	ŀ			
										Saf		áudi				r to med		

^{*} As part of due-diligence process following SEBI guidelines, the Company has carried out independent assessment of all statutory policies as part of IPO through the IPO legal advisor.





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 categorised 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 programmers on any of the principles during the financial year.

Segment	Total number of training and awareness programmers held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmers
Board of Directors	5	Refresher training Sexual Harassment, Business Code of Conduct, Whistle blower policy,	100%
Key Management Personnel	5	Refresher training Sexual Harassment, Business Code of Conduct, Whistle blower policy, Antibribery	100%
Employees other than BODs and KMPs	41	Sexual Harassment, Business Code of Conduct, Whistle blower policy, Antibribery, Health and safety, Environment Management System, Human Rights and working condition, Tisax, and other training programmes	Percentage varies with type of training
Workers	79	Technical Training for Skill Development	Percentage varies with type of training

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:

a. Monetary

Туре	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Principle 1	Good and Service tax	2896	Paid against GST Notice under section 73 against Cancel dealer GST Credit for the year 2017-18.	
			1660	Paid against GST Notice under section 73 against Cancel dealer GST Credit for the year 2018-19.	No
Settlement	Nil	Nil	Nil	Nil	Nil
Compounding fee	Nil	Nil	Nil	Nil	Nil





b. Non-Monetary

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

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
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, the entity has an Anti-Bribery Policy. Harsha Engineers has built its reputation on the basis of its values and principles. The Company treats customers, employees, suppliers and other stakeholders with honesty, integrity, fairness, and trust. Governing principles of this policy provides a framework to deal with cases of corruption. Moreover, the Company has zero tolerance for corruption. The policy is available on the intranet.

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

Category	2023-24	2022-23
	(Current Financial Year)	(Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

Торіс	202	3-24	2022	2-23
	(Current Fir	ancial Year)	(Previous Fir	nancial Year)
	Number	Remarks	Number	Remarks
Number of complaints received in relation to	Nil	Nil	Nil	Nil
issues of Conflict of Interest of the Directors				
Number of complaints received in relation to	Nil	Nil	Nil	Nil
issues of Conflict of Interest of KMPs				

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 as there were no cases relating to corruption or conflict of interest.

LEADERSHIP INDICATORS

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

Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	Understanding of BRSR and its requirements from Vendors	60%





 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.

Company has a policy of "Code of Conduct for Directors & Senior Management Personnel". This policy prohibits Directors and Senior Management Personnel of the Company to enter into any transaction or engage in any practice, directly or indirectly, that would tend to influence him/her to act in any manner other than in the best interests of the Company. This policy also provides procedures when a conflict of interest arises between Company and its Directors & Senior Management Personnel. Also, the Company receives a declaration (changes from time to time) from its Board members on the entities they are interested in and ensures requisite approvals as required under the statute as well as the Company's policies are in place before transacting with such entities / individuals.

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.

	•	•	
Туре	2023-24	2022-23	Details of improvement in social and
	(Current Financial Year)	(Previous Financial Year)	environmental aspects
Research & Development	NA	NA	NA
(R&D)			
Capital Expenditure	0.68%	49.46%	The CAPEX was utilised on projects
(CAPEX)			such as IOT implementation, adoption
			of renewable energy (solar and windmill
			projects), STP plant, Recharging Well,
			Filtration Module-Existing Tube well,
			Desilting Machine on Three Wheeler,
			Road Sweeping Machine, Auto
			Scrubber Cum Drier Floor Cleaning
			Machine, Scrubber Single Disc Floor
			Cleaning Machine, Life Line for Roof
			Тор.

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

Yes, the Company currently has a supplier code of conduct in place which was established in November 2022. The policy entails sustainable practices the suppliers are expected to adhere by. The objective of the policy is to ensure that suppliers are aware and in compliance with requirements in relation to hazardous chemical content of purchased materials and to restrict the use of raw materials from prohibited countries (smelters). The policy mainly applies to materials ranging from raw materials to sub systems (materials that would require further work by the Company). The Company's supplier policy also strives to ensure that materials are sourced from Registration, Evaluation, Authorisation and Restriction of Chemicals-Regulation (REACH) and Restriction of Hazardous Substances Directive (ROH) certified suppliers.

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

The Company strives to track and report the percentage in near future.





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.

	Product	Process to safely reclaim the product
a.	Plastics (including packaging)	Disposed to registered recyclers as per EPR norms
b.	E-Waste	Disposed to registered recyclers as per E-waste norms
C.	Hazardous Waste	Disposed to the cement plant for co-processing. ETP sludge & other hazardous
		waste is sent to registered recyclers as per hazardous waste norms.
d.	Other Waste	Disposed to registered recyclers

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, Applicable. CPCB registration done, Plan is submitted but portal is not working.

LEADERSHIP INDICATORS

 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, the entity hasn't conducted life cycle assessments for its products as on date.

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.

Not applicable as the entity hasn't conducted life cycle assessments for its products as on date.

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).

The Company strives to track the percentage and report in near future.

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:

	(Curr	2023-24 ent Financial	Year)	(Previ	2022-23 ious Financial	Year)
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastics (including packaging)	0	11.8	0	0	0	70
E-waste	0	0	0.645	0	0	0
Hazardous waste	0	0	197.50	0	0	0
Other waste	0	0	546.91	0	0	0

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

The Company strives to track the percentage and report in near future.







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)		alth rance		dent ance		ernity efits		rnity efits		Care lities		
		No. (B)	% (B/A)	No. (C)	%(C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)		
	·			Perma	anent Em	ployees	·						
Male	588	58	10%	588	100%	0	0%	588	100%	0	0%		
Female	19	0	0%	19	100%	19	100%	0	0	0	0%		
Total	607	58	10%	607	100%	19	3%	588	97%	0	0%		
			Ot	her than	Permaner	nt Employ	/ees						
Male	0	0	0	0	0	0	0	0	0	0	0		
Female	0	0	0	0	0	0	0	0	0	0	0		
Total	0	0	0	0	0	0	0	0	0	0	0		

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

Category				% of workers covered by											
	Total	Hea	alth	Acci	dent	Mate	ernity	Pate	rnity	Day	Care				
	(A)	Insu	rance	Insurance		Benefits		Benefits		Facilities					
		No. (B)	% (B/A)	No. (C)	%(C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)				
				Pern	nanent W	orkers									
Male	1106	0	0%	1106	100%	0	0%	1106	100%	0	0%				
Female	18	0	0%	18	100%	18	100%	0	0%	0	0%				
Total	1124	0	0%	1124	100%	18	2%	1106	98%	0	0%				
			C	ther thar	Perman	ent Worke	ers								
Male	1423	0	0%	1423	100%	0	0%	0	0%	0	0%				
Female	49	0	0%	49	100%	49	100%	0	0%	0	0%				
Total	1472	0	0%	1472	100%	49	3%	0	0%	0	0%				

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

SI.	Benefits		2023-24			2022-23			
No.		(Cui	rent Financial	year)	(Previous Financial year)				
		No. of employees	No. of workers	Deducted and deposited	No. of employees	No. of workers	Deducted and deposited		
		covered as	covered as	with the	covered as	covered as	with the		
		a % of total	a % of total	authority	a % of total	a % of total	authority		
		employees	worker	(Y/N/N.A.)	employees	worker	(Y/N/N.A.)		
1	PF	100%	100%	Yes	100%	100%	Yes		
2	Gratuity	100%	100%	Yes	100%	100%	Yes		
3	ESI	34.45	65.55%	Yes	37.75%	54%	Yes		
4	Others-NPS	-	_	-	-	_	-		



Accessibility of workplaces: Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes, workplace is accessible to differently abled employees.

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's Code of Conduct envelopes the Equal Opportunity Policy, the entity does not have a separate policy. The code of conduct encourages employees to treat everyone fairly, equally and without discrimination.

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%	NA	100%	NA		
Female	NA	NA	NA	NA		
Total	100%	NA	100%	NA		

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.

Category	Yes/No	Details of the mechanism in brief				
Permanent Workers	Yes	There is an HR single point of contact for every department and				
Other than Permanent Workers	Yes	all functions that are responsible for addressing any grievances				
Permanent Employees	Yes	employees and workers.				
Other than Permanent Employees	Yes	Additionally, employees can report their genuine concerns and grievances to the Chairperson of the Audit Committee through vigil mechanism.				

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

Category		2023-24		2022-23			
	(C	urrent Financial year)		(P i	revious Financial year)		
	Total employees/ workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	%(D/C)	
		, ,	t Employee	S			
Male	0	0	0	0	NA	NA	
Female	0	0	0	0	NA	NA	
Others	0	0	0	0	NA	NA	
Total	0	0	0	0	NA	NA	
		Permane	nt Workers				
Male	0	0	0	0	NA	NA	
Female	0	0	0	0	NA	NA	
Others	0	0	0	0	NA	NA	
Total	0	0	0	0	NA	NA	







8. Details of training given to employees and workers:

Category		2023-24 (Current Financial year)			2022-23 (Previous Financial year)					
	Total (A)		On Health and afety measures				On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
				I	mployees					
Male	588	137	23.30%	438	74%	586	66	11%	435	74%%
Female	19	2	0%	14	74%	16	3	19%	10	63%
Total	607	139	23.30%	452	74%	602	69	11%	445	74%
					Workers					
Male	1106	775	70%	1017	92%	1179	203	20%	848	72%
Female	18	10	56%	18	100%	18	0	0	18	100%
Total	1124	785	70%	1035	92%	1197	203	20%	866	72%

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

Category		2023-24		2022-23 (Previous Financial year)			
	(Cu	rrent Financial y	ear)				
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)	
		Perm	nanent Employee	s			
Male	588	485	82%	586	556	95%	
Female	19	13	68%	16	16	100%	
Total	607	498	82%	602	572	95%	
		Per	manent Workers				
Male	1106	1083	98%	1179	1077	92%	
Female	18	18	100%	18	18	100%	
Total	1124	1101	98%	1197	1095	92%	

10. Health and safety management system:

a.	Whether an occupational health and safety management system has been implemented by the entity? (Yes/No)					
a.	What is the coverage of such system?	HEIL places great emphasis on maintaining and improving its employees' health and safety. Workplace safety of employees forms the foundation of the Company's strategy to attain sustainability.				
		HEIL is committed to create and maintain a safe and healthy workplace in the organisation and its achieved by developing and implementing the occupational health, safety, and environmental management system conforming to Standards and driving excellence in operations and support functions. It covers both our plants.				
b.	What are the processes used to identify work- related hazards and assess risks on a routine and non-routine basis by the entity?	EHS team identifies and assesses hazard prone activities with the help of workers in the plants and educates them regarding health and safety. The group carries out assessments and derives a risk value based on the HIRA register. Countermeasures are				

and HIRA register are in place.

developed for the risk values derived from the assessment based on likelihood and severity of risk. Other safety processes include Safety Patrolling, Near Miss reporting, Safe workstation mapping



 Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Yes/No)

Yes, regular safety checks are conducted during which workers report unsafe working conditions and potential hazards to their supervisors and action are taken accordingly.

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

Yes, HEIL believes in creating an environment for employees in which their financial needs are met beyond their salary. Such as there are ambulances available at plant sites for emergencies and the entity has connections with local hospitals which are usually located 10-15 mins away from the vicinity.

ESIC is applicable to certain employees who are eligible for free treatment in government hospitals. In the HEIL, internal occupational health centre is available having nurse available for 24 hours and centre is fully equipped with medical facilities.

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

Safety Incident/Number	Category	2023-24 Current Financial Year	2022-23 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one	Employees	0	0
million-person hours worked)	Workers	0	0.38
Total recordable work-related injuries	Employees	0	0
	Workers	0	1
No. of fatalities	Employees	0 - NIL	0
	Workers	0 - NIL	1
High consequence work-related injury or ill-health	Employees	0	0
(excluding fatalities)	Workers	0	0

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

The Company is committed to provide a safe and healthy workplace by minimising injuries, exposure to health risks, accidents and complies with all applicable laws and regulations with respect to safety at workplace. HEIL's goal is to achieve Zero accidents, zero fire incidents and to become an industry leader in Safety & Health so to achieve this safety policies are provided for clear direction, established robust management & reporting systems and training and communication mechanisms, along with well-defined performance measures and indicators, to track the Safety & Health performance.

The entity takes the following key measures to ensure a safety and health workplace:

- Danger Prediction Activity- a team of 5-6 members conduct risk assessments and educate workers in plants. They
 derive a risk value based on the HIRA register and create countermeasure solutions to the problems.
- · Safety Kaizen
- Safety Patrolling
- Near missing reports
- Safe workstation mapping

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

Topic	2023-24 (Current Financial Year)			2022-23 (Previous Financial Year)			
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks	
Working Conditions	Nil	Nil	Not Applicable	Nil	Nil	Not Applicable	
Health & Safety	Nil	Nil	Not Applicable	Nil	Nil	Not Applicable	





14. Assessments for the year.

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

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.

The entity hasn't identified any significant risks or concerns arising from these assessments. However, corrective measures are taken throughout the year in plants as and when any unsafe conditions are identified.

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)?

Yes, the Company extends Group Personal Accident to staff category and Term Plan to all on roll employees

- a. Employees (Yes/No): Yes
- b. Workers (Yes/No): 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 entity has a mechanism in place to ensure the labour contractors associated with the entity pay all legal dues on time. The entity regularly monitors PF, ESIC, PT and GST details of the contractor.

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:

Category	Total no. of affected	l employees/ workers	and placed in suitable family members have	ers that are rehabilitated e employment or whose been placed in suitable byment
	2023-24	2022-23	2023-24	2022-23
	(Current Financial Year)	(Previous Financial Year)	(Current Financial Year)	(Previous Financial Year)
Employees	0	0	0	0
Workers	0	1	0	0

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

No, the entity currently doesn't provide transition assistance programmers to facilitate continued employability.

5. Details on assessment of value chain partners:

Topic	% of value chain partners (by value of business done with such partners) that were assessed			
Health and safety practices	46%			
Working Conditions	46%			

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 significant risks or concerns were identified through the assessment.





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:

Stakeholders play an integral role in the entity's journey, and we are privileged to share a strong relationship with investors based on a deep understanding of their expectations and our commitment to consistently fulfil them. Our process of stakeholder engagement involves identifying key internal and external stakeholders followed by analyzing the impact of each stakeholder groups on our business and vice versa. We have identified investors that contribute capital, customers, employees who enable us to create value, suppliers who help us deliver business value, community and government regulators as important stakeholders.

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

Stakeholder	Whether	Channels of communication	Frequency of	Purpose and scope of	
Group	identified as	(Email, SMS, Newspaper,	engagement	engagement including key	
	Vulnerable &	Pamphlets, Advertisement,	(Annually/ Half yearly/	topics and concerns raised	
	Marginalised	Community Meetings, Notice	Quarterly /Others –	during such engagement	
	Group (Yes/No)	Board, Website, Other)	please specify)		
Employees	No	Emails, Internal Meetings,	Need basis	Employee wellbeing, career	
		Engagement Activities, Internal		development, business	
		Portal, Townhall Meeting,		plans	
		One-to-one interaction			
Shareholders	No	Email, Teleconference, Investor	Quarterly, Annually and	Financial performance,	
		Presentation, Plant Visits,	on need basis	Prospective Investment,	
		Website, AGM		Investor relationship,	
				Dividend, Profitability and	
				financial stability	
Investors	No	Email, Teleconference, Investor	Quarterly and on need	Financial performance,	
		Presentation, Plant Visits,	basis	Prospective Investment,	
		Website, Roadshows		investor relationship,	
				Dividend, Profitability and	
				financial stability	
Suppliers	No	Email, Meetings	Need basis	Commercial, Quality, On-	
				time delivery	
Customers	No	Email, Exhibitions, Meetings,	Need basis	Business enhancement,	
		Plant visits		customer satisfaction	
Suppliers/	No	Email	Need basis	Quality	
Contractors					
Community	Yes	One-to-one interactions	Need basis	CSR Projects, community	
				needs	

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.

Harsha has a presence across multiple geographies, products. Consultation with stakeholders on economic, environmental, and social topics are delegated to the department within an organisation who are also responsible for engaging with stakeholders on continuous basis. Feedback received from stakeholders are communicated to senior management and the Board as and when deemed needed through Review meetings, Board meetings.





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, stakeholder groups including employees, customers, investors and local communities are consulted through relevant mechanism. The Company uses the inputs or feedback received through stakeholder consultations to develop/update the relevant policies as and when deemed needed. Further, the continuous feedback from these stakeholder groups also helps the Company in identifying key risks and opportunities and plan actions to mitigate the risks.

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

'The Company has demonstrated a commitment to supporting vulnerable groups by engaging in various initiatives. The Company have partnered with an independent NGO, Aastha Charitable Trust, to provide a residential complex called "ANAND DHAM" for the mentally challenged and those with aging or posthumous parental care needs. In the similar manner the Company has made a Corporate Social Responsibility (CSR) contribution to the Dr. Jeet Mehta Balshala Trust, which is dedicated to renovating essential physiotherapy centres and providing equipment for students with mental challenges.

So far the Company has contributed approximately ₹ 6.72 crores towards the welfare of vulnerable groups, ensuring that their outreach programs address the unique needs of these individuals.

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		2023-24		2022-23 Previous Financial Year			
		Current Financial Year					
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)	
		Emplo	oyees				
Permanent	588	137	23%	602	121	20%	
Other than permanent	19	0	0%	0	0	0%	
Total Employees	607	137	23%	602	121	20%	
	•	Wor	kers				
Permanent	1124	84	7%	1197	18	2%	
Other than permanent	1472	70	5%	1434	147	10%	
Total Workers	2596	154	5.93%	2631	165	6.27%	





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

Category		2023-24 Current Financial Year				2022-23 Previous Financial Year				
	Total (A)			More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	%	No. (C)	%		No. (E)	%	No. (F)	%
			(B / A)		(C / A)			(E / D)		(F / D)
				Employee	es					
			Perma	anent em	ployees					
Male	588	0	0%	588	100%	586	0	0%	586	100%
Female	19	0	0%	19	100%	16	0	0%	16	100%
			Other	than Peri	manent					
Male	0	0	NA	0	NA	0	0	NA	0	NA
Female	0	0	NA	0	NA	0	0	NA	0	NA
	·			Workers	;					
				Permane	nt					
Male	1106	65	6%	1041	94%	1179	600	51%	579	49%
Female	18	5	28%	13	72%	18	5	28%	13	72%
		C	ther thar	Perman	ent Worke	ers				
Male	1448	663	46%	785	54%	1397	588	42%	883	63%
Female	49	36	73%	13	27%	37	15	41%	22	59%

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

		Male	Female		
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category	
Board of Directors (BoD)	8	2,965,004	2	3,690,002	
Key Managerial Personnel	6	7,873,512	1	7,300,004	
Employees other than BoD and KMP	581	551,424	14	500,004	
Workers	1179	292,656	18	229,320	

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, we have HR - (SPOC) for each division who is responsible for addressing any grievances in regard to human rights issues caused by the business.

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

HR SPOC is responsible for addressing the Human Rights issues for each division of the Company.







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

	2023-24 Current Financial Year			2022-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
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

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

HR SPOC is responsible for the Implementation of the policies and practices pertaining to Sexual Harassment, Discrimination at work place also responsible for addressing the issues related to this.

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

Yes

9. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	0%
Discrimination at workplace	0%
Wages	100%
Others – please specify	-

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

No corrective actions were taken as there were no significant risks/concerns arising from the assessment.

LEADERSHIP INDICATORS

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

The Company tracks human rights grievances/complaints regularly and initiates necessary actions as and when needed. No business process was modified/introduced as a result of addressing human rights complaints during the reporting period.

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

While the Company hasn't conducted a Human Rights due diligence, the entity has adopted multiple policies that ensure correct practices are undertaken by the entity. All policies are reviewed each year and appropriate committees have been designated for handling any such cases.

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

Yes.





4. Details on assessment of value chain partners:

The entity aims to include assessments of their value chain partners mainly suppliers the following year.

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	0%
Forced/involuntary labour	0%
Sexual harassment	0%
Discrimination at workplace	0%
Wages	0%
Others – please specify	-

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

Not applicable

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:

Parameter	2023-24 (Current Financial Year)	2022-23 (Previous Financial Year)
Total electricity consumption (A) (GJ)	107,900	106,523
Total fuel consumption (B) (GJ)	110,780	107,000
Energy consumption through other sources (C) (GJ)	0	0
Total energy consumption (A+B+C) (GJ)	218,680	213,523
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees) (GJ per crores)	202.30	208.37
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

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

Yes (Changodar & Moraiya Plant). Growlity,Inc.

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.

Ambica Associates







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

Parameter	2023-24	2022-23
	(Current Financial Year)	(Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Ground water	26,228	25,199
(iii) Third party water	1870	0
(iv) Sea water / desalinated water	0	0
(v) Others (Rainwater storage)	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	28,098	25,199
Total volume of water consumption (in kilolitres)	28,000	25,000
Water intensity per rupee of turnover (Water consumed /	25.90	24.39
turnover) (kl per crores ₹ of revenue)		
Water intensity (optional) – the relevant metric may be selected	-	-
by the entity		

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

Yes. Growlity,Inc.

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

Yes, Reuse of treated water is being reused for toilet flushing, solar panel cleaning, cooling tower makeover, gardening & plantation.

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

Parameter	Please specify	2023-24	2022-23
	unit	(Current Financial Year)	(Previous Financial Year)
NOx	μg/m3	2.5	1.8
SOx	μg/m3	33	25
Particulate matter (PM)	μg/m3	PM ₁₀ - 65	PM ₁₀ - 59
		PM _{2.5} - 42	PM _{2.5} - 38
Persistent organic pollutants (POP)	-		
Volatile organic compounds (VOC)	-		
Hazardous air pollutants (HAP)	-		
Others – please specify	-		

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. Growlity,Inc.

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

Parameter	Unit	2023-24 (Current Financial Year)	2022-23 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into $CO_{2'}$ $CH_{4'}$ N_2O , HFCs, PFCs, SF _{6'} $NF_{3'}$ if available)	tCO2e	6,617.71	6,749.6
Total Scope 2 emissions (Break-up of the GHG into ${\rm CO_{2^{\prime}}}$ ${\rm CH_{4^{\prime}}}$ ${\rm N_2O}$, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO2e	20,272.84	20,282.35





Parameter	Unit	2023-24	2022-23
		(Current Financial Year)	(Previous Financial Year)
Total Scope 1 and Scope 2 emissions per crore rupee of turnover	tCO2e/INR crore	24.87	26.37
Total Scope 1 and Scope 2 emission intensity (optional)— the relevant metric may be selected by the entity		1.81	2.05

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. Growlity,Inc.

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

Yes, 'CAPEX investment in energy efficient equipment or project for energy consumption reduction

1. New IE-04 efficient 132 KW air compressor installed in Moraiya Plant

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

Parameter	2023-24 (Current Financial Year)	2022-23 (Previous Financial Year)					
Total Waste generated (in	Total Waste generated (in metric tonnes)						
Plastic waste (A)	11.88	16.16					
E-waste (B)	0.645	0.835					
Bio-medical waste (C)	0	0					
Construction and demolition waste (D)	24.68	0					
Battery waste (E)	0	0					
Radioactive waste (F)	0	0					
Other Hazardous waste. Please specify, if any. (G)	197.5	115.98					
Other Non-hazardous waste generated (H). Please specify, if any.	546.91						
(Break-up by composition i.e., by materials relevant to the sector)							
Wastepaper or Paperboard	19.56	20.4					
Used Waste Oil		25.74					
Office waste	35.8	0					
Unsorted waste and scrap	356.51	431.6					
Wooden Waste	129.93	142.5					
Glass Waste	0.33	0					
Polyamide Scrap	4.76	0					
Empty disc. Cont		52.92					
Total (A + B + C + D + E + F + G + H)	781.60	806.12					

	Waste	Other	Other	Waste	Other	Other
	Recycled in	Recovery in	Disposal in	Recycled in	Recovery in	Disposal in
	2023-24	2023-24	2023-24 MT	2021-22	2021-22	2021-22 MT
Plastic waste (A)	11.88	0	0	16.16	0	0
E-waste (B)	0.645	0	0	0.835	0	0
Bio-medical waste (C)	0	0	0	0	0	0





	Waste Recycled in 2023-24	Other Recovery in 2023-24	Other Disposal in 2023-24 MT	Waste Recycled in 2021-22	Other Recovery in 2021-22	Other Disposal in 2021-22 MT
Construction and demolition waste (D)	24.68	0	0	0	0	0
Battery waste (E)	0	0	0	0	0	0
Radioactive waste (F)	0	0	0	0	0	0
Other Hazardous waste. Please specify if any (G)	0	197.5	0	0	115.98	0
Other Non-hazardous waste generated (H). Please specify, if any.	546.91	0	0	673.16	0	0
Total Waste Recovered (A + B + C + D + E + F + G + H)	584.11	197.5	0	690.16	115.98	0

For each category of waste generated, total waste disposed by nature of disposal method (MT)

S. No.	Parameter	Waste Incinerated in 2023-24	Waste in Landfill in 2023-24	Other Disposal in 2023-24 MT	Total Disposed in 2023-24	Waste Incinerated in 2022-23	Waste in Landfill in 2022-23	Other Disposal in 2022-23	Total Disposal in 2022-23
1	Plastic waste (A)	0	0	11.88	11.88	0	0	0	0
2	E-waste (B)	0	0	0.645	0.645	0	0	0.835	0.835
3	Bio-medical waste (C)	0	0	0	0	0	0	0	0
4	Construction and demolition waste (D)	0	0	24.68	24.68	0	0	0	0
5	Battery waste (E)	0	0	0	0	0	0	0	0
6	Radioactive waste (F)	0	0	0	0	0	0	0	0
7	Other Hazardous waste. Please specify if any (G)	0	0	197.5	197.5	0	0	115.98	115.98
8	Other Non-hazardous waste generated (H). Please specify, if any.	0	35.8	511.11	546.907	0	0	673.16	673.16
9	Total Waste Disposed (A + B + C + D + E + F + G + H)	0	35.8	745.81	781.612	0	0	789.975	789.975

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, Growlity,Inc.

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.

As per ISO 14001: 2015, Waste Disposal SOP document no. HEO810000010. Optimisation of Hazardous waste generation during manufacturing process and being dispose through register recycler or co-processor.





10. 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:

The entity does not have operations/plants in/around ecologically sensitive areas.

SI. 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	NA	NA

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

EIA was not required to be carried out in the current financial year, based on applicable laws.

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

12. 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.

SI.	Specify the law / regulation	Provide details	Any fines / penalties / action taken by	Corrective action
No.	/ Guidelines which was not	of the non-	regulatory agencies such as pollution	taken,if any
	complied with	compliance	control boards or by courts	
	oomphea man			

LEADERSHIP INDICATORS

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	2023-24	2022-23
	(Current Financial Year)	(Previous Financial Year)
From renewable sources (GJ)		
Total electricity consumption (A)	5,827.28	6,953.89
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	5,827.28	6,953.89
From non-renewable sources (GJ)		
Total electricity consumption (D)	102,073.03	99,569.24
Total fuel consumption (E)	110,780.55	107,000.90
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	212,853.58	206,570.14

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, Growlity,Inc.







2. Provide the following details related to water discharged:

	Parameter	2023-24 (Current Financial Year)	2022-23 (Previous Financial Year)
	Water discharge by destination and le		
(i)	To Surface water	NA	0
	- No treatment	NA	0
	- With treatment – please specify level of Treatment	NA	0
(ii)	To Ground water	YES	0
	- No treatment	NA	0
	- With treatment – please specify level of Treatment	Primary, Secondary and	0
		Tertiary Treatment	
(iii)	To Sea water	NA	0
	- No treatment	NA	0
	- With treatment – please specify level of Treatment	NA	0
(iv)	Sent to third-parties	NA	0
	- No treatment	NA	0
	- With treatment – please specify level of Treatment	NA	0
(v)	Others	NA	0
	- No treatment	NA	0
	- With treatment – please specify level of Treatment	NA	0
	Total water discharged (in kilolitres)	NA	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. Growlity, Inc.

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

Not Applicable as the Company's plant are not in water stressed areas.

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

- a. Name of the area NA
- b. Nature of operations NA
- c. Water withdrawal, consumption and discharge in the following format:

	Parameter	2023-24	2022-23
		(Current Financial Year)	(Previous Financial Year)
	Water withdrawal by so	urce (in kilolitres)	
(i)	Surface water	NA	NA
(ii)	Ground water	NA	NA
(iii)	Third party water	NA	NA
(iv)	Sea water / desalinated water	NA	NA
(v)	Others	NA	NA
Tota	al volume of water withdrawal (in kilolitres)	NA	NA
Tota	al volume of water consumption (in kilolitres)	NA	NA
	er intensity per rupee of turnover (Water consumed / over)	NA	NA
	er intensity (optional) – the relevant metric may be cted by the entity	NA	NA



	Parameter	2023-24 (Current Financial Year)	2022-23 (Previous Financial Year)				
Water discharge by destination and level of treatment (in kilolitres)							
(i)	Into Surface water	NA	NA				
-	No treatment	NA	NA				
-	With treatment – please specify level of treatment	NA	NA				
(ii)	Into Ground water	NA	NA				
-	No treatment	NA	NA				
-	With treatment – please specify level of treatment	NA	NA				
(iii)	Into Sea water	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 (in kilolitres)	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

NA

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

The organisation is in the process of calculating scope 3 emissions

Parameter	Unit	2023-24	2022-23
		(Current Financial Year)	(Previous Financial Year)
Total Scope 3 emissions (Break-up of the	tCO2e	6,844,007.22	-
GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ ,			
NF ₃ , if available)			
Total Scope 3 emissions per rupee of	tCO2e /Turnover	6,331.53	
turnover	(in crore ₹)		
Total Scope 3 emission intensity (optional)			
– the relevant metric may be selected by			
the entity			

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

Yes, Growlity,Inc.

5. 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, as the Company does not operate around ecologically sensitive areas.







6. 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	Corporate Office-Auto "ON & OFF" Centralise	Digital timer installed to reduce energy	Saving:7,818 kwh/
	AC (VRV) System and Lights of corporate office	consumption by time setting	month
2	Cooling Tower (180TR Chiller)- VFD installation	Installed PID VFD with Thermocouple to	Saving:5,429 kwh/
	in cooling tower motor to reduce energy	reduce energy consumption	month
	consumption		
3	SRB-Pulse blow valve installation in presses to	Installed Pulse blow valve to reduce the Air	Saving:13,104
	reduce air compressor consumption	Consumption during operation	kwh/month
4	ETP-VFD installation to reduce energy	Installed VFD in all ETP plant motor	Saving:1,710 kwh/
	consumption		month
5	DGBB- Belt conveyor motor was running	On/Off Interlock done through programming	Saving:728 kwh/
	continuous in idle condition		month
6	Taper Auto-Shop Floor Conveyor continue "ON"	Loader conveyor of Vibrator is "ON"	Saving:186.73
	(Loader & Zebra)	continuously if not required in actual	kwh/month
		condition (19 nos.), so interlock with	
		programme	
7	UTILITY (Mor.)-Water level sensor type drain	Install water level senser type drain valve to	Saving:5,406 kwh/
	valve to be install	reduce loss of compressed air during auto	month
		drain process	
8	Taper Auto-Push bar conveyor working in	Install VFD for push bar conveyor hydraulic	Saving:624 kwh/
	contactor base	pump & motor	month
9	Taper Auto-Extol Pump	Modify pressure in programme 2.5 bar from	Saving:702 kwh/
		3 bar	month

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

Yes, the Company has contingency plan in place. The plan has the risks identified, severity of it and contingency plan in case it occurs. The plan is communicated to all function heads and employees.

7. 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 through its existing assessment has not come across any significant adverse impact of its value chain on the environment.

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

46% of value chain partners (by value of business done with value chain partners) comply with ISO 1400 management system requirements to address environmental impacts.





PRINCIPLE 7: BUSINESSES WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT



ESSENTIAL INDICATORS

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

Sr. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	GCCI	State
2	CII	National
3	AMA	State
4	ACMA	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
	Nil	

LEADERSHIP INDICATORS

1. Details of public policy positions advocated by the entity

Sr. No	Public policy advocated	Method resort for such advocacy	Whether the information is available in public domain? (Yes/No)	Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify)	Web Link, if available	
	No such public policy advocated by the Company					

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT









ESSENTIAL INDICATORS

 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	Relevant Web Link
Not applicable as the Company's CSR projects does not fall under SIA obligation based on applicable laws					

Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity:

None of the entity's projects undertaken required rehabilitation and resettlement.

Sr. No	Name of project for which R&R is ongoing	State	District	No of Project Affected Families	% of PAF covered by RAR	Amount Paid to PAFs in the FY (in ₹)
				Niil		·



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

Grievance Redressal Mechanism (GRM) is an important aspect of assuring the Company's strong relation with the community as it provides a social license to operate and execute community initiative projects. As part of the Company's grievance redressal mechanism, the organisation has deployed local employees who regularly visit the community and interact with people to gauge and address community concerns. Based on these interactions, the Company has not encountered any specific grievances from the community so far.

The Company records all external complaints related to health, safety & environment on the Company's intranet and takes suitable and sufficient actions to address all such complaints. The Company ensures timely closure with follow ups to avoid reoccurrence of such complaints.

4. Percentage of input material (inputs to total inputs by value) sourced from local or small-scale suppliers:

	2023-24	2022-23
	Current Financial Year	Previous Financial Year
Directly sourced from MSMEs/ Small producers	7.19%	7.56%
Sourced directly from within the district and neighbouring	79%	68%
districts		

LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken	
Not applicable as the Company's CSR projects does not fall under SIA obligation based on applicab		

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

Sr. No	State	Aspirational District	Amount spent	
NA				

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

No, the entity does not have preferential procurement policy in place but on needs basis the Company sources paper cutting activities from Aastha Charitable Trust for Welfare of the Mentally Challenged

(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

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





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

Name of authority	Brief of case	Corrective action taken	
Except Trademark, the Company has no other intellectual property and hence not applicable			

6. Details of beneficiaries of CSR Projects.

Sr.no	CSR Project	No of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalised group
1	Essential physiotherapy centre renovation and equipment for mentally challenged students	1,452	100%

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN RESPONSIBLE MANNER





ESSENTIAL INDICATORS

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

Our product is part and parcel of a bearing assembly which cannot be seen separately. Also end Consumer exposure is limited to bearing manufacturers and not to Harsha.

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

NA as the entity's customers design and approve the end product.

	As a percentage to total turnover
Environment and Social parameters relevant to product	0
Safe and responsible usage	0
Recycling and/or safe disposal	0

3. Number of consumer complaints

	2023-24 Current Financial Year		2022-23 Previous Financial Year	
	Received during the year	Pending resolution at the end of year	Received during the year	Pending resolution at the end of year
Data privacy	0	0	0	0
Advertising	0	0	0	0
Cyber-security	0	0	0	0
Delivery of essential services	0	0	0	0
Restrictive Trade Practices	0	0	0	0
Unfair Trade Practices	0	0	0	0
Others	0	0	0	0

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

	Number	Reason for recall
Voluntary recalls	0	0
Forced recalls	0	0



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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 entity has a policy on cyber security and risks related to data privacy. The policy is available on the intranet.

 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.

The Company did not receive any complaint in this regard during the reporting period.

LEADERSHIP INDICATORS

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

Product information is available on the Company's website. Website link: www.harshaengineers.com

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

We are not product design owner

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

NA

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)

Since Harsha is manufacturing parts as per the drawing/design provided by the its customer any additional marking on product is not allowed, so it is not applicable to Harsha.

We do conduct survey with our customers who are bearing manufacturers, but no direct exposure of end consumers.

- 5. Provide the following information relating to data breaches: There were no such instances.
 - a. Number of instances of data breaches along-with impact: 0
 - b. Percentage of data breaches involving personally identifiable information of customers: 0

