

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

162

Business Responsibility and Sustainability Reporting (BRSR) is the practice of companies disclosing information about their Environmental, Social, and Governance (ESG) performance. It goes beyond financial reporting to provide stakeholders with a comprehensive view of a company's non-financial impacts and contributions to sustainable development. (BRSR covers topics such as environmental impact, social responsibility, and governance practices, aiming to promote transparency and accountability.)

## SECTION A ➤ GENERAL DISCLOSURES

### I. Details of the listed entity

1	Corporate Identity Number (CIN) of the listed entity	» L22200MH1984PLC034055
2	Name of the listed entity	» NAVNEET EDUCATION LIMITED
3	Year of incorporation	» 18 <sup>th</sup> September, 1984
4	Registered office address	» Navneet Bhavan, Bhavani Shankar Road, Dadar (West), Mumbai - 400 028
5	Corporate address	» Navneet Bhavan, Bhavani Shankar Road, Dadar (West), Mumbai - 400 028
6	E-mail	» <a href="mailto:secretarial@navneet.com">secretarial@navneet.com</a>
7	Telephone	» +91 22 66626565
8	Website	» <a href="https://www.navneet.com/">https://www.navneet.com/</a>
9	Financial year for which reporting is being done	» 2023-24
10	Name of the Stock Exchange(s) where shares are listed	» BSE Ltd. and NSE
11	Paid-up capital	» ₹ 452,426,362/-
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR Report	» Smt. Sneha Sriram E-mail: <a href="mailto:bsr@navneet.com">bsr@navneet.com</a> Telephone: +91 22 66626565
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	» Standalone
14	Name of assurance provider	» BRSR Not Assured
15	Type of assurance obtained	» BRSR Not Assured

## II. Products/services

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

Description of main activity	Description of business activity	% of turnover of the entity
 Publication	We engage in the publication of educational and non-educational books.	» <b>41%</b>
 Stationery	We manufacture both paper and non-paper stationery products.	» <b>59%</b>

164

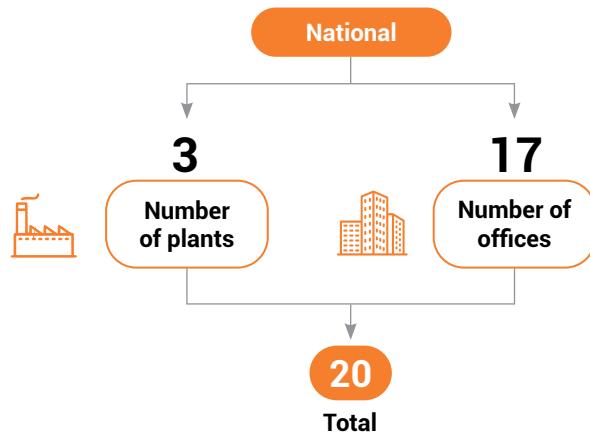
### 17. Products/services sold by the entity (accounting for 90% of the entity's Turnover):

Product/service	NIC code	% of total turnover contributed
1 Publication	58111	» <b>41%</b>
2 Stationery	47613; 46496	» <b>59%</b>



### III. Operations

#### 18. Number of locations where plants and/or operations/offices of the entity are situated:



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

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

##### a. Number of locations

Locations	Number
National (No. of states)	16
International (No. of countries)	35

\* Navneet exclusively operates within India and has successfully exported its products to 35 countries throughout the year.

165

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

» 35%

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

Navneet takes immense pride in its mission to offer high-quality study materials, scholastic paper, and non-paper stationery at affordable prices. Serving a diverse customer base that spans from schoolchildren to young adults worldwide, Navneet is committed to meeting the needs of students and educators, alike, across schools and offices. As a leading global supplier of scholastic and office stationery products, we hold a prominent position in markets such as India, the Middle East, parts of Africa, USA, and Europe.

#### IV. Employees

##### 20. Details as at the end of financial year:

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

Employees	Sr. no.	Particulars	Total (A)	Male		Female	
				No. (B)	% (B/A)	No. (C)	% (C/A)
	1.	Permanent (D)	2,194	1,982	90.34%	212	9.66%
	2.	Other than permanent (E)	125	108	86.40%	17	13.60%
	3.	<b>Total employees (D + E)</b>	<b>2,319</b>	<b>2,090</b>	<b>90.13%</b>	<b>229</b>	<b>9.87%</b>

Workers	Sr. no.	Particulars	Total (A)	Male		Female	
				No. (B)	% (B/A)	No. (C)	% (C/A)
	4.	Permanent (F)	902	886	98.23%	16	1.77%
	5.	Other than permanent (G)	511	479	93.76%	32	6.24%
	6.	<b>Total workers (F + G)</b>	<b>1,413</b>	<b>1,365</b>	<b>96.61%</b>	<b>48</b>	<b>3.39%</b>

###### b. Differently abled employees and workers:

166 Differently abled employees	Sr. no.	Particulars	Total (A)	Male		Female	
				No. (B)	% (B/A)	No. (C)	% (C/A)
	1.	Permanent (D)	7	6	85.71%	1	14.29%
	2.	Other than permanent (E)	0	0	0%	0	0%
	3.	<b>Total differently abled employees (D + E)</b>	<b>7</b>	<b>6</b>	<b>85.71%</b>	<b>1</b>	<b>14.29%</b>

Differently abled workers	Sr. no.	Particulars	Total (A)	Male		Female	
				No. (B)	% (B/A)	No. (C)	% (C/A)
	4.	Permanent (F)	4	4	100%	0	0%
	5.	Other than permanent (E)	3	3	100%	0	0%
	6.	<b>Total differently abled workers (F + G)</b>	<b>7</b>	<b>7</b>	<b>100%</b>	<b>0</b>	<b>0%</b>

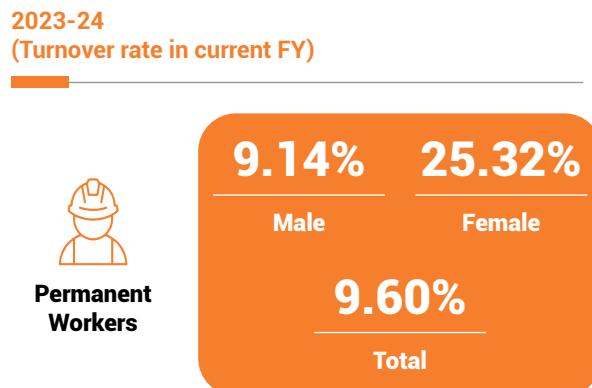
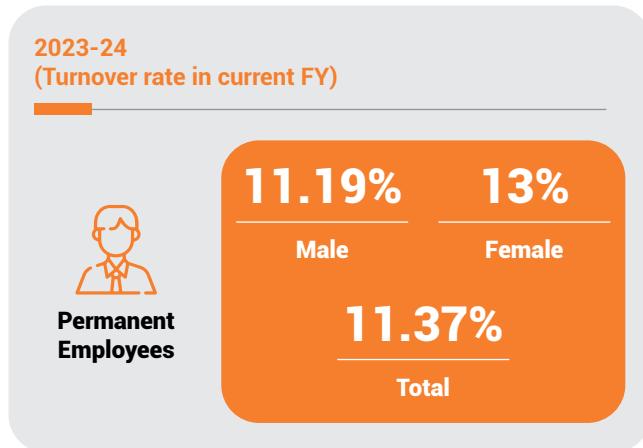


## 21. Participation/inclusion/representation of women

Particular	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
 Board of Directors*	11	1	9.09%
 Key Management Personnel	7	0	-

\*The Board of Directors has, based on the recommendation of the Nomination and Remuneration Committee, appointed Smt. Drushti R. Desai, Smt. Nirma Bhandari, and Shri Hemal Patel as Additional Directors in the category of Independent Directors for a period of 5 (five) consecutive years with effect from 22<sup>nd</sup> May, 2024. As this appointment occurred after 31<sup>st</sup> March, 2024, it has not been reflected in the BRSR for 2023-24.

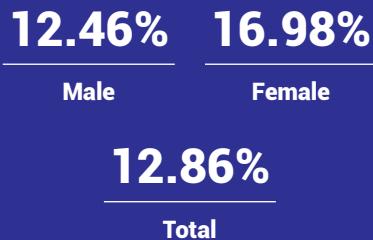
## 22. Turnover rate for permanent employees and workers



**2022-23  
(Turnover rate in previous FY)**



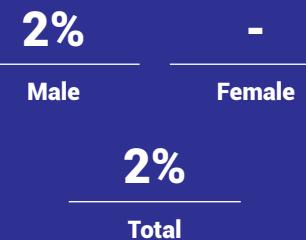
**Permanent Employees**



**2022-23  
(Turnover rate in previous FY)**



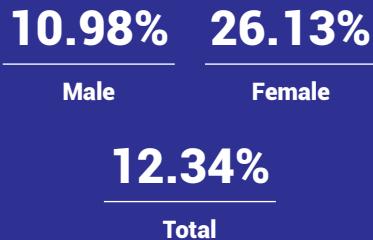
**Permanent Workers**



**2021-22  
(Turnover rate in the year prior to the previous FY)**



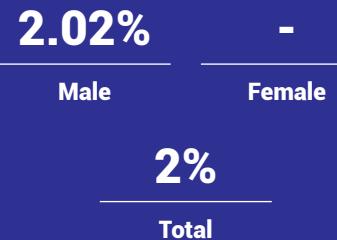
**Permanent Employees**



**2021-22  
(Turnover rate in the year prior to the previous FY)**



**Permanent Workers**



168

**V. Holding, subsidiary and associate companies (including joint ventures)**

**23. (a) Names of holding/subsidiary/associate companies/joint ventures**

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 Navneet Futuretech Limited	Subsidiary	<b>100.00%</b>	No
2 Indiannica Learning Private Limited	Subsidiary	<b>100.00%</b>	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)
3 Navneet Tech Ventures Private Limited	Subsidiary	<b>100.00%</b>	No
4 Navneet Learning LLP	Subsidiary	<b>93.00%</b>	No
5 Navneet (HK) Limited	Subsidiary	<b>70.00%</b>	No
6 Carveniche Technologies Private Limited	Associate	<b>46.84%</b>	No
7 K12 Techno Services Private Limited	Associate	<b>20.25%</b>	No

169

## VI. CSR details

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

**YES**

a. Turnover (in ₹)

» **₹ 1,69,310 Lakhs**

b. Net worth (in ₹)

» **₹ 1,37,207 Lakhs**

## VII. Transparency and disclosures compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in place (Yes/ No) *	2023-24 Current financial year			2022-23 Previous financial year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
 Communities	Yes*	0	0	NA	0	0	NA
 Investors (other than shareholders)	Yes*	0	0	NA	0	0	NA
 Shareholders	Yes*	0	0	NA	0	0	NA
 Employees and Workers	Yes*	0	0	NA	0	0	NA
 Customers	Yes*	65	0	NA	35	0	NA
 Value chain partners	Yes*	0	0	NA	0	0	NA
 Other (please specify)							

\* Grievance redressal mechanism in place (Yes/No) (If yes, then provide web-link for grievance redress policy)

Stakeholder group from whom complaint is received	Web link for grievance policy
Communities	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>
Investors (other than shareholders)	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>
Shareholders	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>
Employees and workers	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>
Customers	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>
Value chain partners	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>

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

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

Opportunity Risk Negative Positive 

Sr. 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.	Emission and climate change 		Electricity is the main source of fuel consumption in the manufacturing process, which is drawn mostly from conventional grids, resulting in high emissions. Additionally, physical distribution and the mid- and last-mile delivery of physical books and stationery have a significant carbon footprint. Misalignment with the global climate change targets can negatively impact business, as several B2B export customers may expect Navneet to go carbon neutral.	<ul style="list-style-type: none"> <li>» Investing in solar power with a capacity of 724 KWp and wind power plants with a capacity of 4.8 MW offsetting close to 70% of our scope 2 emissions</li> <li>» Developing a green zone within the manufacturing locations. Currently, trees are absorbing 460 tonnes of CO<sub>2</sub> per year, offsetting close to 16% of our scope 1 emissions</li> <li>» Energy optimisation measures include periodic energy audits</li> <li>» Active stack monitoring</li> </ul>	 171
2.	Transition to clean energy 		By embracing renewable energy, Navneet not only reduces its carbon footprint but also demonstrates its commitment to sustainability and environmental responsibility. This transition aligns perfectly with Navneet's customers' sensitivity towards clean energy concepts, enhancing its reputation as a socially responsible and environmentally conscious company.	<ul style="list-style-type: none"> <li>» Installation of solar and wind power plants with a capacity of 4.8 MW</li> </ul>	

Sr. 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)
3.	Water and wastewater management		Water is one of the components in the production process, and due to rising water stress across the country, Navneet may experience operational disruptions due to water scarcity. Additionally, the manufacturing process produces wastewater that must be treated before it can be disposed of. Failure to comply with water quality regulations may result in additional costs related to regulatory compliance and mitigation efforts.	<ul style="list-style-type: none"> <li>» Implementation of wastewater treatment plants to efficiently process water and mitigate environmental repercussions</li> <li>» Integration of rainwater harvesting and storage systems in our primary manufacturing facilities</li> </ul>	
4.	Waste & hazardous materials management		Improper waste management, including hazardous and non-hazardous waste, poses health and safety risks to workers and the community. Failure to comply with waste management regulations can have negative economic implications for organisations	Authorised vendors for the proper handling of hazardous waste, including e-waste.	
5.	Diversity & inclusion		Embracing diversity and inclusion at Navneet unlocks opportunities, fostering creativity, innovation, and broader perspectives. It enriches our content, attracts diverse audiences, and strengthens our reputation as an inclusive and progressive organisation.		





Sr. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	 <b>Employee welfare and engagement</b>		<p>Employee engagement fosters emotional ties to the organisation, boosting commitment and loyalty. Prioritising employee well-being leads to higher retention rates, productivity, and a nurturing work environment. Motivated employees deliver superior customer service, driving business success, decreasing retention costs, and reducing the risk of losing critical talent.</p>	<ul style="list-style-type: none"><li>» Employee feedback surveys</li><li>» Yearly training and development calendar focussing on skill development.</li><li>» Regular team-building activities</li></ul>	
7.	 <b>Human rights</b>		<p>Human rights violations can lead to severe consequences such as legal penalties, tarnished reputations, and consumer boycotts. Exploitative labour practices or unsafe working conditions can diminish employee morale, trigger lawsuits, and erode trust, adversely affecting profitability and market competitiveness. Inadequate training and awareness regarding human rights among employees exacerbate these risks, underscoring the need for comprehensive education and compliance measures.</p>	<ul style="list-style-type: none"><li>» Conduct trainings on human rights periodically</li><li>» Carry out due diligence and third-party audits, including several export customer audits</li></ul>	 173

Sr. 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)
8.	Sustainable sourcing	⚠	Failing to follow sustainable sourcing practices can have detrimental consequences for the Company and beyond. Sourcing from unsustainable suppliers may result in reputational damage as customers and stakeholders increasingly prioritise eco-friendly practices. Moreover, neglecting to ensure ethical standards in the supply chain, such as preventing human rights abuses, child labour, and bribery, can tarnish the Company's image and result in legal liabilities.	<ul style="list-style-type: none"> <li>» Adoption of a supplier Code of Conduct</li> <li>» Declaration of acceptance of the Code of Conduct before onboarding</li> <li>» Periodic supplier site assessments</li> <li>» Document validation, including importance certifications such as FSC, and ISO, among others</li> </ul>	
9.	Community development	💡	Operating within the education sector, which offers numerous positive externalities, we have a valuable opportunity to engage with the local community, organise events, support educational initiatives, and foster relationships with customers and stakeholders. These efforts can elevate Navneet's brand reputation, attract a wider customer base, and cultivate a loyal and supportive community network.		
10.	Anti-corruption & bribery	⚠	Failure to effectively address anti-corruption and bribery risks exposes us to legal and regulatory violations, reputational damage, and financial penalties, among others.	<ul style="list-style-type: none"> <li>» Implementation of a strong ESG Policy, upholding ethical standards and providing clear guidelines.</li> <li>» Grievance redressal mechanisms ensure prompt resolution of complaints, fostering transparency and accountability.</li> </ul>	



Sr. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
11.	 <b>Data protection &amp; privacy</b>	⚠	Inadequate data protection and privacy measures could expose Navneet to data breaches, regulatory fines, and reputation damage. Breaches compromise sensitive information, harm customer trust, and result in legal consequences, which can further hinder operations, erode consumer confidence, and affect long-term competitiveness in the market.	Implemented a data protection policy that is shared with its stakeholders and hosted on its website.	
12.	 <b>Corporate governance</b>	⚠	Poor governance can impact management, and result in ethical breaches, and financial fraud. It erodes investor confidence, triggers legal issues, and damages the Company's reputation. As a result, decreased access to capital, reduced profitability, and a loss of competitiveness in the industry can be suffered.	<ul style="list-style-type: none"><li>» Diverse board of directors</li><li>» Robust internal control systems to prevent fraud and ensure compliance.</li><li>» Dedicated ESG Committee and defined ESG Charter</li></ul>	 175
13.	 <b>Responsible content</b>	⚠	Navneet's educational books are used by students and schools in various languages across the country. Failure to maintain responsible and quality content standards can lead to serious consequences. It can damage the reputation of the Company, resulting in a loss of trust from parents, schools, and the public. Moreover, it may lead to legal issues, including lawsuits or fines for disseminating inappropriate or inaccurate information.	<ul style="list-style-type: none"><li>» Employ rigorous editorial standards and guidelines, ensuring accuracy, fairness, and ethical practices</li><li>» Conduct the content review process, including fact-checking and adherence to industry best practices.</li><li>» Facilitate open channels of communication to receive feedback and promptly address any concerns or complaints, including those of teachers</li></ul>	

Sr. 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)
14.	 <b>Sustainable product, innovation and quality</b>		<p>In a competitive landscape like that of Navneet, innovation provides a competitive edge. Introducing new, improved, and sustainable products helps stay ahead, capturing market share. Innovative companies are perceived as dynamic and forward-thinking. Navneet's B2C products, focussing on sustainability, can attract eco-conscious customers, fostering a competitive advantage in both domestic and export markets.</p>		
15.	 <b>Safeguarding intellectual property</b>		<p>Intellectual property (IP) is a valuable asset for Navneet as it includes the original works and creative ideas that are the basis of the Company's products. Safeguarding IP is essential to protecting the industry's financial interests as well as maintaining the integrity and reputation of their brands.</p>	<ul style="list-style-type: none"> <li>» Review and update IP filings regularly</li> <li>» Ensure monitoring systems are in place to detect potential IP infringements or violations</li> </ul>	
16.	 <b>Compliance and business ethics</b>		<p>Embracing ethical behaviour and strict compliance with laws and regulations yields numerous positive impacts for the Company. It fosters trust and credibility among stakeholders and by consistently adhering to ethical standards and legal requirements, the Company mitigates the risk of reputational damage and legal liabilities, safeguarding our long-term viability and market standing.</p>	<ul style="list-style-type: none"> <li>» Ensure compliance monitoring</li> <li>» Conduct periodic internal audits covering various businesses and functions.</li> </ul>	



## 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.

Sr. no	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
1. a	Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No/NA)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b	Has the policy been approved by the Board? (Yes/No/NA)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c	Web link of the policies, if available	<a href="https://navneet.com/download/#CGP">https://navneet.com/download/#CGP</a>								
2.	Whether the entity has translated the policy into procedures. (Yes/No/NA)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No/NA)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
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	ISO 9001:2015; WAREX; FSC	ISO 45001:2018; Sedex; BSCI	NA	NA	ISO 14001:2015	NA	NA	NA
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Navneet is dedicated to establishing ambitious goals and targets. Throughout the year, the Company has undertaken numerous initiatives to progress towards these objectives. A comprehensive materiality assessment was conducted, encompassing input from both internal and external stakeholders to ascertain key priorities. Furthermore, Navneet has effectively established both an ESG board committee and a working-level committee, reinforcing a steadfast commitment to integrating sustainability into our daily operations.								
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
<b>Governance, leadership and oversight</b>										
7.	<b>Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements</b>	I am delighted to present our second Business Responsibility and Sustainability Report (BRSR), reflecting on the recent advancements and initiatives at Navneet. At Navneet, We remain steadfast in our commitment to Environmental, Social, and Governance (ESG) principles, recognising their pivotal role in driving sustainable business growth and resilience.  Over the past year, we have implemented several strategic changes to enhance our ESG practices and performance. One notable development is the establishment of an ESG Board Committee and an ESG Working Committee, tasked with overseeing our sustainability efforts and ensuring alignment with our business objectives. These committees are guided by a newly adopted ESG Charter, which sets forth our commitment to integrating ESG considerations into every facet of our operations.								

Sr. no	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	To further deepen our understanding of key ESG risks and opportunities, we have conducted a thorough materiality assessment in accordance with Global Reporting Initiative (GRI) requirements. This assessment has provided valuable insights into our stakeholders' priorities and informed the development of targeted strategies to address them effectively.									
	In line with our commitment to responsible sourcing and procurement practices, we have adopted a Supplier Code of Conduct to uphold ethical standards throughout our supply chain. Additionally, we have expanded our emission calculations to include Scope 3 emissions and have initiated detailed carbon offset measures to mitigate our environmental impact.									
	I feel immensely proud to announce that we at Navneet are able to make a remarkable journey on the path of establishing and garnering the benefits of renewable energy. We could offset 55% of total emissions with investments in plantations and renewable energy sources like wind and solar. It proves that we have aligned ourselves with the country's goal of replacing 50% of conventional energy sources with renewable energy by 2030, in the year 2023 itself. Nevertheless, we will continue the journey towards carbon neutrality with determination and in a technology-savvy manner.									
	Recognising the importance of dedicated leadership in driving ESG initiatives, we are pleased to announce the appointment of a dedicated Environmental, Health, Safety and Sustainability (EHSS) Head. This appointment underscores our commitment to embedding sustainability into our organisational DNA and underscores our resolve to pursue continuous improvement in our ESG performance.									
	Furthermore, we have conducted a comprehensive analysis of the training programmes conducted within our organisation, with a particular focus on human rights awareness and compliance. This analysis has enabled us to identify areas for improvement and refine our training initiatives to ensure alignment with our values and commitments.									
178	As we reflect on our progress, we are proud of the strides we have made in advancing our sustainability agenda. However, we recognise that our journey is ongoing, and we remain dedicated to raising the bar for ESG excellence. Moving forward, we will continue to set ambitious targets, innovate sustainable solutions, and collaborate with our stakeholders to create shared value for all.									
	Name: Mr. Raju Gala Designation: Joint Managing Director									
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).									
	ESG Committee									
9.	Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No/NA)									Yes
	If yes please provide details									
	ESG Committee Details of members: 1. Mr. Raju Gala – Joint Managing Director 2. Mr. Dilip Sampat – Whole-Time Director									



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

10.1	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
a.	Performance against above policies and follow up action	Committee of the Board								
b.	Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Director								

10.2	Subject for review	Frequency (Annually/half yearly/quarterly/any other-please specify)								
		P1	P2	P3	P4	P5	P6	P7	P8	P9

a.	Performance against above policies and follow up action	Yearly								
b.	Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Quarterly								

11.	<b>Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No).</b>	No	Yes	Yes	No	Yes	Yes	No	No	No
	If yes, provide name of the agency.	-	ISO 9001- DNV WAREX – CII FSC- Russian Register	ISO 45001 – DNV Sedex – Intertek BSCI – UL Solutions	-	-	ISO 14001- DNV	-	-	-

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

## SECTION C ➔ PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE 1

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

(This principle focuses on the importance of ethical conduct and transparency in business operations. Companies should follow ethical business practices and adhere to high standards of integrity. They should also be transparent about their activities, operations, and financial reporting, as well as be accountable for their actions)

#### Essential Indicators

- Percentage coverage by training and awareness programs 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	4	Regular compliance update, and BRSR awareness session	100%
Key Managerial Personnel	4	Regular compliance update, and BRSR awareness session	100%
Employees other than BOD and KMPs	160	Awareness on POSH, BCI Policy, ETI, ISO Standards, and soft skill trainings, among others	100%
Workers	174	Awareness on POSH, BCI Policy, ETI, ISO Standards, AML, and technical trainings including shop floor training, and soft skill trainings, among others	100%



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

Monetary					
Particular	NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (in ₹) (For monetary cases only)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/fine	-	-	-	-	-
Settlement	-	-	-	-	-
Compounding fee	-	-	-	-	-

Non-monetary				
Particular	NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	-	-	-
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 anti-corruption or anti-bribery policy? (Yes/No)

Yes

If yes, provide details in brief

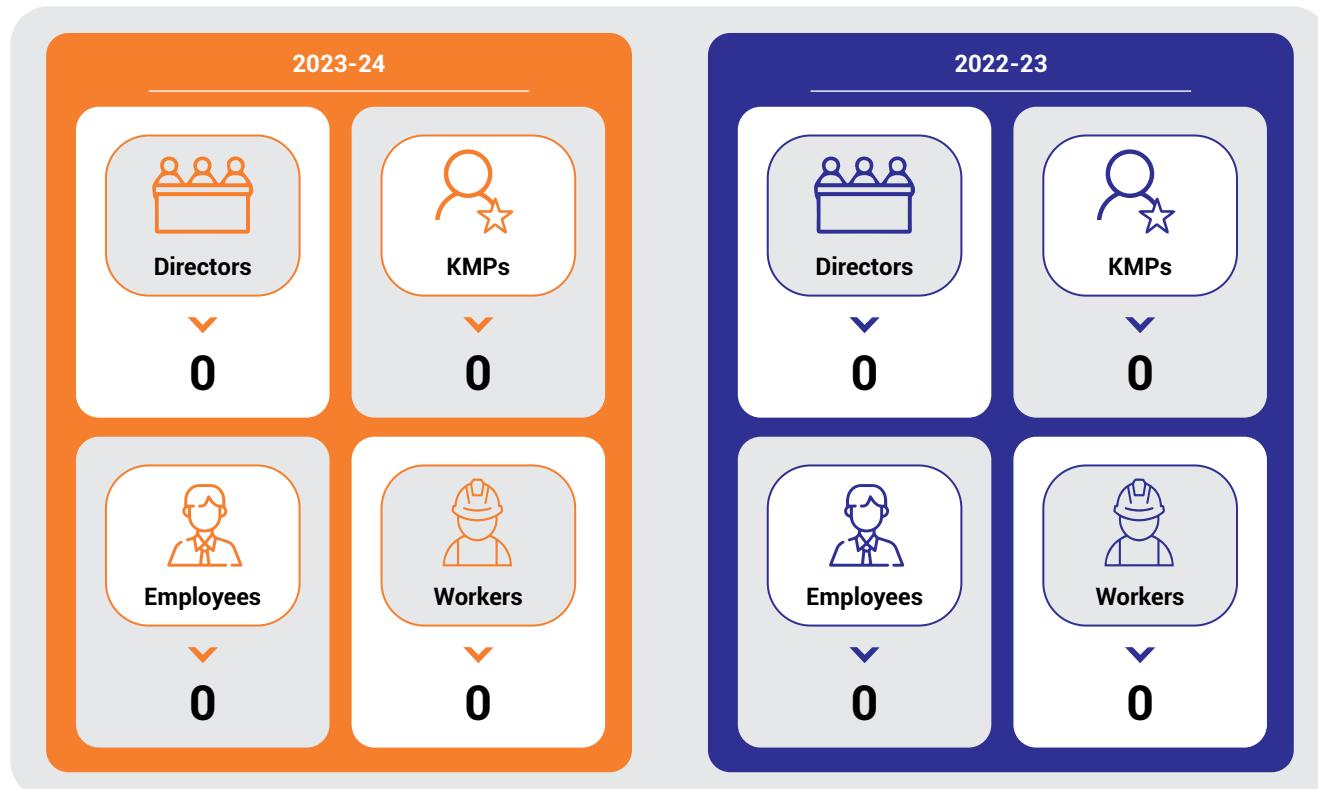
Yes, the entity has adopted an ESG policy that covers anti-corruption and anti-bribery measures. The ESG Policy encompasses a commitment to promoting ethical business practices, transparency, and integrity throughout the organisation.

If yes, provide a web link to the policy, if available -Web link anti corruption or anti bribery policy is place

<https://navneet.com/download/#CGP>



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



182

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

Case Details	2023-24		2022-23	
	Number	Remark	Number	Remark
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 in the following format:**

Particular	2023-24	2022-23
Number of days of accounts payables	55	66

## 9. Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	2023-24	2022-23
Concentration of purchases	a. Purchases from trading houses as % of total purchases	0%	0%
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0%	0%
Concentration of sales	a. Sales to dealers/distributors as % of total sales	69%	69%
	b. Number of dealers/distributors to whom sales are made	15103	14711
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	19%	17%
Share of RPTs in	a. Purchases (Purchases with related parties/total purchases)	1%	0%
	b. Sales (Sales to related parties/total sales)	0.09%	0.02%
	c. Loans & advances (Loans & advances given to related parties/total loans & advances)	68%	93%
	d. Investments	33%	39%

### Leadership Indicators

1. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No)

Yes

If yes, provide details of the same.

Each year, Navneet requests that its Directors provide a formal declaration affirming their adherence to the Code of Conduct for the Board of Directors and Senior Management Personnel. Additionally, routine internal audits are conducted to verify and uphold compliance with these standards.

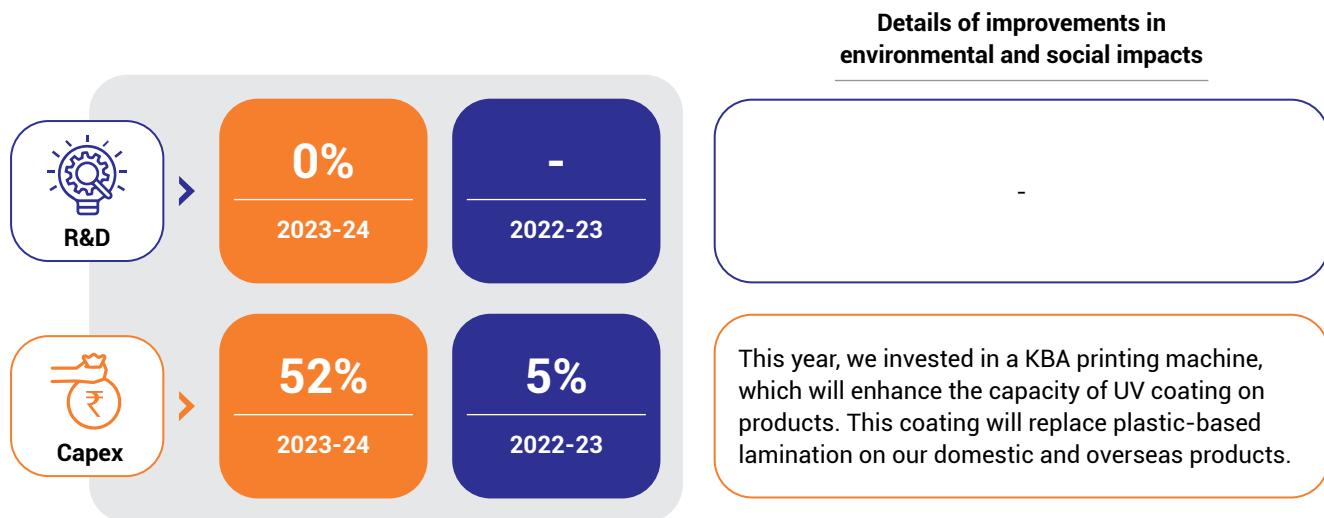
## PRINCIPLE 2

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

(This principle highlights the importance of sustainable and safe production practices. Companies should strive to minimise the environmental impact of their activities and ensure that their products and services are safe for consumers and the environment.)

#### Essential Indicator

- 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.



184

- a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)  
Yes
- b. If yes, what percentage of inputs were sourced sustainably?  
51%
- Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for
  - Plastics (including packaging)  
NA
  - E-waste\*  
NA
  - Hazardous waste\*  
NA



**(d) other waste**

The predominant product offerings of the Company consist of paper-based goods, such as notebooks and books.

Our publication division recalls books that become obsolete, primarily due to changes in educational curricula. Once the books are recalled, they are subsequently disposed of by being sold to scrap dealers who specialise in the sale of wastepaper to paper mills for the purpose of recycling.

\* Our Company does not sell any products under the category of electronic goods or hazardous goods.

**4. a Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No)**

No

**b If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards?**

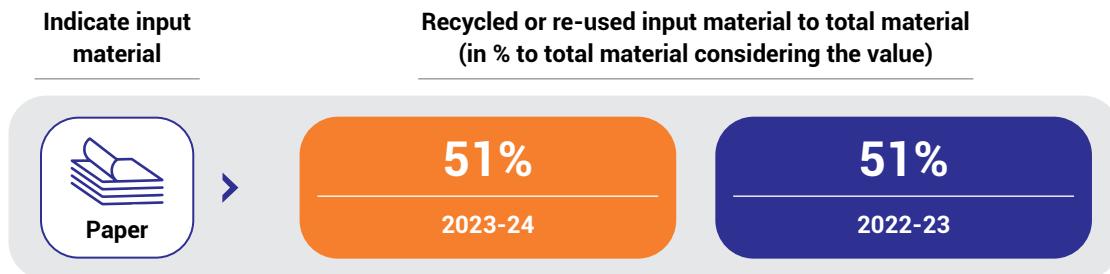
As of now, the importer's EPR is not required, as we do not import any equipment with plastic parts or plastic packaging. The Company does not print its name on any plastic material, such as packaging, packing strips, or lamination. Hence, the brand owner's EPR is not required.

**c If not, provide steps taken to address the same**

NA

**Leadership Indicators**

**1. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**



\*In 2023-24, out of the total paper procured, 16% was recycled paper and 35% was agro-based paper.

**2. 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:**

Sr. no.	Particular	2023-2024			2022-2023		
		Re-used (in MT)	Recycled (in MT)	Safely disposed (in MT)	Re-used (in MT)	Recycled (in MT)	Safely disposed (in MT)
1.	Plastics (including packaging)	0	0	0	0	0	0
2.	E waste	0	0	0	0	0	0
3.	Hazardous waste	0	0	0	0	0	0
4.	Other waste*	0	6	0	0	0	0

\* Recall and recycling (by a third party) of books that become obsolete, primarily due to changes in educational curricula.

### PRINCIPLE 3

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

(This principle emphasises the importance of employee well-being. Companies should provide safe and healthy working conditions, fair wages, and opportunities for career development to all employees in their value chains, including suppliers, contractors, and temporary workers.)

#### 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)	
Male	1982	602	30.37%	1960	98.89%	-	-	0	0%	345	17%
Female	212	76	35.85%	203	95.75%	212	100%	-	-	177	83%
Total	2194	678	30.90%	2163	98.59%	212	100%	0	0%	522	24%

186



#### Permanent employees

Male	108	48	44%	79	73%	-	-	0	0%	88	81%
Female	17	9	53%	11	64%	17	100%	-	-	14	82%
Total	125	57	46%	90	72%	17	100%	0	0%	102	82%



#### Other than permanent employees

Male	108	48	44%	79	73%	-	-	0	0%	88	81%
Female	17	9	53%	11	64%	17	100%	-	-	14	82%
Total	125	57	46%	90	72%	17	100%	0	0%	102	82%

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

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)	
Male	886	128	14%	758	85%	-	-	0	0%	648	73%
Female	16	9	56%	7	44%	0	0	-	-	15	94%
Total	902	137	15%	765	85%	0	0	0	0%	663	74%



#### Permanent employees

Male	886	128	14%	758	85%	-	-	0	0%	648	73%
Female	16	9	56%	7	44%	0	0	-	-	15	94%
Total	902	137	15%	765	85%	0	0	0	0%	663	74%



#### Other than permanent employees

Male	479	130	27%	349	73%	-	-	0	0%	325	68%
Female	32	16	50%	16	50%	0	0%	-	-	22	69%
Total	511	146	29%	365	71%	0	0%	0	0%	347	68%



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

	2023-24	2022-23
Cost incurred on well-being measures as a % of total revenue of the Company	0.48%	0.42%

2. Details of retirement benefits, for current financial year and previous financial year.



PF

2023-24			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.)
<b>99.59%</b>	<b>100%</b>	<b>Y</b>	<b>99.57%</b>	<b>100%</b>	<b>Y</b>



Gratuity

2023-24			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.)
<b>100%</b>	<b>100%</b>	<b>NA</b>	<b>100%</b>	<b>100%</b>	<b>NA</b>



ESIC

2023-24			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.)
<b>9.39%</b>	<b>15.30%</b>	<b>Y</b>	<b>17.25%*</b>	<b>15.90%*</b>	<b>Y</b>


**Others – please specify**

2023-24			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.)
-	-	-	-	-	-

\* The ESI benefit is applicable to all eligible employees.

### 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?**

No

**If not, whether any steps are being taken by the entity in this regard.**

Navneet values the inclusivity and has taken several initiatives to ensure accessibility to differently abled:

» **Sensitisation of Security Personnel and Back-Office Staff**

Training programmes have been introduced to raise awareness among security personnel and back-office staff on assisting differently abled individuals within company premises.

» **Provision of Wheelchairs**

Wheelchairs have been acquired and are accessible at all company locations to support differently abled employees and workers.

» **Installation of Signboards**

Signboards highlighting accessible routes and facilities for differently abled individuals have been prominently placed throughout the premises.

» **Aligned Usage of Lift Facilities**

The use of lift facilities at office locations has been standardised to ensure smooth accessibility for 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.**

<https://navneet.com/download/#CGP>

**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	NA	NA	NA	NA
Female	87.50	87.50	100%	100%
Total	87.50	87.50	100%	100%

\*Currently, parental benefits are only applicable to female employees.

**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.**



Permanent workers



Other than permanent workers



Permanent employees



Other than permanent employees

Yes/No If yes, then give details of the mechanism in brief

YES

With regards to addressing issues, doubts, complaints, or grievances, employees and workers are encouraged to first reach out to their supervisor or manager for clarification or resolution.

If the matter remains unresolved, employees can escalate it to the Head of Department (HOD), and if they are still not satisfied, they can approach the HR Department.

Navneet maintains an open-door policy, allowing employees and workers to freely communicate with the HR Department at any time regarding grievances.

Additionally, employees have the option to submit complaints or suggestions through a designated complaint/suggestion box. The HR Department conducts weekly checks of the box, reviewing and recording the received complaints or suggestions.

Suitable action is taken on all suggestions/complaints, with any unresolved issues being handled by the Department Head or Head of HR.

It is important to note that employees who raise complaints are protected against any form of retaliation or adverse consequences.

Furthermore, this year, the Company conducted an employee feedback survey at its manufacturing sites. This survey, which was anonymous, received responses from over 70% of the employees.

The feedback collected was carefully analysed by the local management committee, leading to the development of an action plan to address any concerns raised by the employees.

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

Category	2023-24			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						
Male	2,024	0	0%	1,893	0	0%
Female	218	0	0%	200	0	0%
Total permanent workers						
Male	1,077	0	0%	827	0	0%
Female	22	0	0%	3	0	0%

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

Category	2023-24				2022-23					
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (C/D)


**Employees**

Male	2,071	1,263	61%	808	39%	1,893	298	15.74%	408	21.55%
Female	226	201	89%	127	56%	200	59	29.50%	125	62.50%
Total	2,297	1,464	64%	935	41%	2,093	357	17.06%	533	25.47%


**Workers**

Male	1,211	926	76%	404	33%	827	515	62.27%	440	53.20%
Female	38	24	63%	10	26%	3	2	66.67%	2	66.67%
Total	1,249	950	76%	414	33%	830	517	62.29%	442	53.25%

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

Category	2023-24			2022-23		
	Total (A)	No. (B)	% (B/A)	Total (D)	No. (E)	% (E/D)
Male	2,071	1,336	65%	1,893	1,231	65.03%
Female	226	186	82%	200	164	82.00%
Total	2,297	1,522	66%	2,093	1,395	66.65%



Category	2023-24			2022-23		
	Total (A)	No. (B)	% (B/A)	Total (D)	No. (E)	% (E/D)
 <b>Workers</b>						
Male	1,367	865	63%	827	544	65.78%
Female	48	22	46%	3	2	66.67%
Total	1,415	887	63%	830	546	65.78%

## 10. Health and safety management system

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

Yes

If yes, the coverage such systems?

Navneet has effectively rolled out the Occupational Health and Safety (OHS) Management System across all its plants and offices. The Head Office and two major sites have achieved ISO 45001 certification, demonstrating their commitment to industry-leading safety standards.

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

Our organisation is highly committed to ensuring and improving the workplace safety of its employees. Each site has the presence of a local EHS Manager, who tirelessly works towards improving workplace safety through various means.

Site-specific EHS trainings, Hazard Identification and Risk Assessment, Toolbox Talk, and the Permit to Work System, among others, are the preventive means to establishing an incident-free workplace. The Company follows all of these practices on a regular basis. Navneet prioritises accurate and timely reporting of incidents. Incident investigation, root cause analysis and corrective actions are defined by the core team, and timely, effective action is ensured.

The manufacturing sites have a Safety Committee, which meets every quarter to address employee-related health and safety issues. The Committee has worker representation as per the Maharashtra Factory Rules.

A detailed PPE assessment was carried out to identify and address the work- or task-specific hazards. The PPEs had been procured and issued to the concerned employees. Plant supervisors and line managers have been made responsible for ensuring its proper usage.

Guards on the rotating parts of the machine, limit switches, relay switches, and sensors, among others, have been placed as an engineering control to prevent the direct access of employees to the machine where there is a probability of body parts encountering the rotating part.

Identification and correction of unsafe acts and unsafe conditions is a daily exercise. EHS Samvad is conducted on a monthly basis, where the EHS performance of the site is reviewed and an improvement plan is formed.

EHS training is an integral part of the overall training programme. Internal and external training programmes are conducted for every level of employee in the Company. Moreover, every business decision is inclusive of the EHS perspective.

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

Yes

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

Yes

\* Periodic health checkup camps are conducted at all the sites.

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

Safety incident/number	Category*	2023-24	2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	 	1 0	0 3
Total recordable work-related injuries	 	2 0	0 3
No. of fatalities	 	0 0	0 0
High-consequence work-related injury or ill health (excluding fatalities)	 	0 2	0 0

\*Including in the contract workforce

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

Navneet is committed to providing a safe and healthy work environment for all employees. The Company has implemented a range of measures to ensure that its workplace remains secure and conducive to employee well-being. The following are:

- 1** ➤ Conducts periodic trainings on machinery handling, hazardous material handling, and other relevant topics.
- 2** ➤ Develops risk-free machinery through the installation of guards, sensors, and other safety features to prevent accidents.
- 3** ➤ Holds quarterly employee health and safety meetings to review PPE usage, accidents, incidents, and other related matters.
- 4** ➤ Displays health and safety information on notice boards and conducts periodic training on topics such as AIDS awareness and machinery handling to raise worker awareness.
- 5** ➤ Establishes a Health & Safety Committee with mandatory worker representation to oversee employee health and safety-related issues. The Committee's meeting minutes are recorded and monitored during half-yearly audits.
- 6** ➤ Maintains first-aid boxes in all areas, monitoring stock and expiration dates regularly. Conducts periodic first-aid and firefighting training for workers, ensuring first aiders and firefighters are present in all shifts and areas.
- 7** ➤ Conducts mock drills addressing health and safety issues like falls and snake bites according to a predetermined schedule. Findings are displayed on notice boards to raise worker awareness.
- 8** ➤ Manages fire equipment maintenance by third-party AMCs, with fire safety procedures and equipment overseen internally by the Health & Safety Committee, local supervisors, and coordinated with the Manager of Services and the Manager of Maintenance.

By implementing these measures, we aim to create a safe and healthy work environment for all employees.

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

**2023-24**



**Working conditions**

**0**

**0**

**-**

**Filed  
during  
the year**

**Pending  
resolution  
at the end of  
year**

**Remarks**

**2023-24**



**Health &  
safety**

**0**

**0**

**-**

**Filed  
during  
the year**

**Pending  
resolution  
at the end of  
year**

**Remarks**

**2022-23**



**Working  
conditions**

**0**

**0**

**NA**

**Filed  
during  
the year**

**Pending  
resolution  
at the end of  
year**

**Remarks**

**2022-23**



**Health &  
safety**

**0**

**0**

**NA**

**Filed  
during  
the year**

**Pending  
resolution  
at the end of  
year**

**Remarks**

194

**14. Assessment for the year:**



**Health  
and safety  
practices**



**100%**

**% of your plants and offices that were assessed  
(by entity or statutory authorities or third parties)**



**Working  
conditions**

\*Our internal EHS team conducts comprehensive site assessments annually at each of our locations. Additionally, given our adherence to ISO 45001 standards, we undergo periodic third-party assessments.

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

To mitigate safety-related incidents and significant risks, we have introduced driver safety training programmes aimed at raising awareness and improving road safety skills. Furthermore, the Health, Safety, and Welfare Committee conducts monthly inspections to evaluate and enhance health, safety practices, and working conditions. These initiatives ensure ongoing monitoring and enhancement of our safety standards, promptly and effectively addressing any concerns that arise.



### Leadership Indicators

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

For our supply chain partners, our Company undertakes a thorough onboarding process to ensure compliance with statutory dues requirements. We conduct reviews periodically to maintain continuous adherence and uphold financial integrity.

- 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:

Particular	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	
	2023-24	2022-23	2023-24	2022-23
Employees	0	0	0	0
Workers	0	0	0	0

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

In response to identifying significant social impacts within our supply chain, Navneet has implemented a robust Supplier Code of Conduct this year to uphold our sustainability standards. We have carefully categorised our supply chain partners to enhance prioritisation and efficiency in our efforts. Beginning in the upcoming fiscal year, we intend to initiate on-site assessments of our supply chain to directly evaluate and address specific social concerns like health and safety practices and working conditions.

195

### PRINCIPLE 4

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

(This principle highlights the importance of stakeholder engagement. Companies should consider the interests and perspectives of all stakeholders, including shareholders, employees, customers, suppliers, and the communities in which they operate. They should also be responsive to stakeholder concerns and feedback.)

### Essential Indicators

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

The identification of relevant stakeholders is led by the Senior Management in conjunction with Board members and various departments. Stakeholders are selected based on their potential impact on or influence over the Company, including both internal and external stakeholders pertinent to the organisation.

We appreciate the support extended by all stakeholders in enabling the execution of our strategies and the achievement of our objectives. Valuing their input and feedback, we endeavour to maintain strong relationships with stakeholders. Through continuous engagement and effective communication, we aim to address the needs and expectations of all stakeholders.

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

Stakeholder group	Whether identified as vulnerable & marginalised group	Channels of communication (E-mail, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website, other - please specify)	Frequency of engagement (Annually, half-yearly, quarterly, others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
 <b>Employees</b>	No	E-mail, intranet website, trainings, face to face meetings, and employee satisfaction survey	Periodic	Trainings, feedback, reviews, performance appraisals, and HR connects
 <b>Author and illustrators</b>	No	Email, and face to face meetings	Periodic	Discuss and review the content
 <b>Supplier</b>	No	E-mail, face to face meetings, and supplier Code of Conduct	Periodic	Review the delivery status, validating compliance requirements, and raising concerns
 <b>Delivery channel partners</b>	No	E-mail, and face to face meetings	Periodic	Feedback on sales, feedback on the products and collection process.
 <b>Customers</b>	No	E-mail, newspaper, website, and telephonic calls	Periodic	Information of product, understanding feedbacks and concerns



Stakeholder group	Whether identified as vulnerable & marginalised group	Channels of communication (E-mail, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website, other - please specify)	Frequency of engagement (Annually, half-yearly, quarterly, others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
 Community	Yes	Engagement through project teams	Periodic	Drive CSR projects, interact with the local community for concerns and issues, if any
 Shareholders	No	E-mails, SMS, general meetings, website, stock exchange websites, newspaper advertisements, and investors calls	Periodic	Update the progress of Navneet, approve agenda items, Board meeting intimations, and other Company disclosures

#### 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.**

Navneet has commenced stakeholder engagement and materiality assessment processes. Critical impacts have been identified, and the Company is currently engaging stakeholders through surveys to address these impacts. Upon completion of the surveys, the results will be analysed and integrated into the validation of our material topics.

2. **Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes/No).**

Yes

**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.**

Navneet has not yet received the responses and is in the process of analysing the critical inputs received from the surveys.

## PRINCIPLE 5

### Businesses should respect and promote human rights.

(This principle focuses on the importance of human rights. Companies should respect and promote human rights, including the rights to freedom of expression, association, and privacy. They should also prevent and address human rights violations in their operations and value chains.)

#### Essential Indicators

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

Benefits	2023-24			2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)

#### Employees

Permanent	2,194	280	13%	2,093	1,404	67.08%
Other than permanent	125	56	45%	141	140	99.29%
Total employees	2,319	336	15%	2,234	1,544	69.11%

#### Workers

Permanent	904	478	53%	830	587	70.72%
Other than permanent	511	248	49%	508	343	67.52%
Total workers	1,415	726	51%	1,338	930	69.51%

- Details of minimum wages paid to employees and workers

Category	2023-24				2022-23					
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No.(B)	% (B/A)	No.(C)	% (C/A)		No.(E)	% (E/D)	No.(F)	% (F/D)

#### Employees

##### Permanent

Male	1,982	4	0.2%	1,978	99.8%	1,893	2	0.1%	1,891	99.89%
Female	212	0	0%	212	100%	200	0	-	200	100%
Total	2,194	4	0.1%	2,190	99.9%	2,093	2	0.1%	2,091	99.99%

##### Other than permanent

Male	108	21	19%	87	81%	119	27	22.69%	98	82.35%
Female	17	4	24%	13	76%	22	6	27.27%	16	72.73%
Total	125	25	20%	100	80%	141	33	23.40%	114	80.58%



Category	2023-24				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)
Workers										

### Permanent

Male	886	2	0.2%	884	99.8%	827	0	-	827	100 %
Female	16	6	37%	10	63%	3	0	-	3	100%
Total	902	8	0.9%	894	99.1%	830	0	-	830	100%

### Other than permanent

Male	481	171	36%	310	64%	482	101	20.95%	381	79.05%
Female	32	15	47%	17	53%	26	11	42.31%	15	57.69%
Total	513	186	37%	327	63%	508	112	22.05%	396	77.95%

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

#### a. Median remuneration/wages:

##### Male



Board of  
Directors  
(BoD)

**5\***

Number

**1,83,37,391**

Median remuneration/  
salary/wages of  
respective category

##### Female

**0**

Number

**0**

Median remuneration/  
salary/wages of  
respective category

##### Male



Key  
Managerial  
Personnel

**2**

Number

**63,39,873**

Median remuneration/  
salary/wages of  
respective category

##### Female

**0**

Number

**0**

Median remuneration/  
salary/wages of  
respective category

##### Male



Employees  
other than BoD  
and KMP

**1,975**

Number

**4,81,934**

Median remuneration/  
salary/wages of  
respective category

##### Female

**212**

Number

**4,58,015**

Median remuneration/  
salary/wages of  
respective category

	Male		Female
	<b>886</b>	<b>3,30,762</b>	<b>16</b>
Workers	Number	Median remuneration/ salary/wages of respective category	Number

\*Executive Directors receiving remuneration are included. Directors receiving sitting fees are not listed in the above table.

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

Particulars	2023-24	2022-23
Gross wages paid to females as % of total wages	7.15%	6.75%

- 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

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

200

Navneet is committed to fostering a positive and professional workplace that prioritises and safeguards fundamental human rights for all employees. As a part of this dedication, we explicitly prohibit any form of human rights violation. To uphold this commitment, various human rights aspects are detailed in the 'Company's Code of Conduct and Ethics of Employees' and the 'Prevention of Sexual Harassment Policy'. An awareness session has been conducted for top management and department heads to educate them about human rights principles.

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

2023-24			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
<b>0</b>	<b>0</b>	-		<b>0</b>	<b>0</b>



2023-24

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-



2022-23

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-

2023-24

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-



2022-23

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-

2023-24

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-



2022-23

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-

2023-24

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-



2022-23

Filed during the year	Pending resolution at the end of year	Remarks
0	0	-

2023-24			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
0	0	-	0	0	-

 Other human rights related issues

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

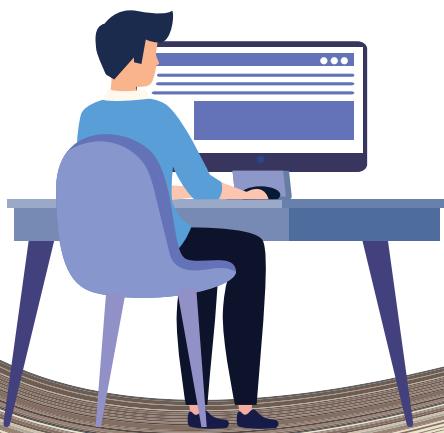
Particulars	2023-24	2022-23
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees/workers	0%	0%
Complaints on POSH upheld	0	0

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

Any individual who has experienced sexual harassment in the workplace may file a written complaint to the POSH Committee. This can be submitted either in hardcopy or via E-mail, detailing the incidents of harassment within three months from the date of the incident. In cases of repeated incidents, the complaint should be lodged within three months from the date of the last incident. The Internal Complaints Committee may extend this period by an additional three months if circumstances warrant such an extension.

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

Yes



**10. Assessments for the year:**

% of your plants and offices that were assessed (by entity or statutory authorities or third parties)

**Child labour****100.00%****Forced/  
involuntary  
labour****100.00%****Sexual  
harassment****100.00%****Discrimination  
at workplace****100.00%****Wages****100.00%****Others –  
please specify****-****11. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 10 above.**

No significant risk was identified in the assessment.

**Leadership Indicators**

- Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.**  
No significant risks were identified during the assessment.

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

Our commitment to human rights due diligence includes periodic social audits conducted internally. These audits comprehensively cover multiple aspects: Social Management System, Workers' Involvement and Protection, Rights of Freedom of Association and Collective Bargaining, Non-Discrimination, Fair Remuneration, Decent Working Hours, Occupational Health and Safety, Prohibition of Child Labour, Special Protection for Young Workers, Prevention of

Precarious Employment, Elimination of Bonded Labour, Environmental Protection, and Ethical Business Behaviour. These audits are instrumental in ensuring adherence to human rights principles and identifying opportunities for improvement. They underscore our dedication to maintaining high standards of social responsibility and ethical practices across all our operations.

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/No)

Yes

4. Details on assessment of value chain partners:

Name of the assessment				
Sexual harassment	Discrimination at workplace	Child labour	Forced labour/involuntary labour	Wages
% of value chain partners (by value of business done with such partners) that were assessed				
0%				

204

\* The Supplier Code of Conduct has been introduced from 2023-24 which covers all the provisions in the above indicators. We conducted a few assessments last year in order to test the process. This year, Navneet plans to roll out the complete assessment process at scale.

## PRINCIPLE 6

### Businesses should respect and make efforts to protect and restore the environment.

(This principle emphasises the importance of environmental stewardship. Companies should minimise their impact on the environment, conserve natural resources, and promote environmental sustainability. They should also take steps to restore and rehabilitate degraded ecosystems.)

#### Essential Indicators

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

Parameter	2023-24	2022-23
<b>From renewable sources</b>		
Total electricity consumption (A)- Megajoules	27,64,648.44	21,54,759.48
Total fuel consumption (B)	-	-
Energy consumption through other sources (C.)	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>27,64,648.44</b>	<b>21,54,759.48</b>



Parameter	2023-24	2022-23
<b>From non-renewable sources</b>		
Total electricity consumption (D) - Megajoules	3,55,75,070.73	3,64,81,104.00
Total fuel consumption (E)	1,51,45,767.93	1,83,55,618.97
Energy consumption through other sources (F)		
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>5,07,20,838.66</b>	<b>5,48,36,722.97</b>
<b>Total energy consumed (A+B+C+D+E+F)*</b>	<b>5,34,85,487.10</b>	<b>5,69,91,482.45</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumed/revenue from operations)	0.00315903	0.00350140
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed/revenue from operations adjusted for PPP)	0.00087208	0.00101196
<b>Energy intensity in terms of physical output</b> (Total energy consumed in MJ/production in tonne)	628	578
Energy intensity (optional) – the relevant metric may be selected by the entity		
<b>Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?</b>		No

If yes, name of the external agency.

\*In 2023-24, we generated 2,47,27,280.38 MJ of wind energy, which was fed back into the grid. This amounted to 53% of our total energy consumption, totalling 2,87,58,206.72 MJ for the year.

205

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? (Yes/No)

No

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

NA

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

Parameter	2023-24	2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	98,731.25	84,871.00
(iii) Third party water	20,899	28,543.00
(iv) Seawater/desalinated water	-	-
(v) Others	-	1,256.00
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>1,19,630.25</b>	<b>1,14,670.00</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>1,19,630.25</b>	<b>1,14,670.00</b>

Parameter	2023-24	2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
<b>Water intensity per rupee of turnover</b> (Total water consumption/Revenue from operations)	0.00000707	0.00000705
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption/revenue from operations adjusted for PPP)	0.00000195	0.000002034
<b>Water intensity in terms of physical output</b> (Total water consumed in KL/production in tonne)	1.40	1.16
Water intensity (optional) – the relevant metric may be selected by the entity		
<b>Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No)</b>		No
<b>If yes, name of the external agency.</b>		

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

Parameter	2023-24	2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) To surface water</b>	-	-
No treatment		
With treatment – please specify level of treatment		
<b>(ii) To groundwater</b>	-	-
No treatment		
With treatment – please specify level of treatment		
<b>(iii) To seawater</b>	-	-
No treatment		
With treatment – please specify level of treatment		
<b>(iv) Sent to third-parties</b>	-	-
No treatment		
With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>	-	-
<b>Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)</b>		No
<b>If yes, name of the external agency.</b>		

**5. Has the entity implemented a mechanism for Zero Liquid Discharge?**

Yes

**If yes, provide details of its coverage and implementation.**

Yes, at all our manufacturing sites, we have implemented a Zero Liquid Discharge mechanism, mandated by the State Pollution Control Board. This commitment ensures that water treated by our Sewage Treatment plants and Effluent Treatment plants is reused for gardening, aligning with our environmental stewardship.



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

Parameter	Please specify unit	2023-24	2022-23
NOx*	mg/nm3	30.73	-
SOx*	mg/nm3	1.70	-
Particulate matter (PM)*	mg/nm3	36.30	-
Persistent organic pollutants (POP)	NA		-
Volatile organic compounds (VOC)	NA		-
Hazardous air pollutants (HAP)	NA		-
<b>Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)</b>			No

If yes, name of the external agency.

\*The latest stack report is crucial as it aggregates data from all emission points, providing an averaged snapshot of Navneet's environmental impact.

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

Parameter	Unit	2023-24	2022-23
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	2,928.97	2,656.46
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	7,809.56	8,005.58
<b>Total Scope 1 and 2 emission</b> (Break-up of the GHG into CO <sub>2</sub> , CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	10,738.53	10,662.04
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	Metric tonnes of CO2 per rupee of turnover	0.00000063	0.00000066
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)		0.00000018	0.00000019
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	Metric tonnes of CO2 per tonne of production	0.12615	0.10828
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			
<b>Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)</b>			No

If yes, name of the external agency.

\*As part of our persistent commitment to environmental sustainability, we have effectively offset approximately 5,929.8 metric tonnes of CO<sub>2</sub> equivalent (TCO<sub>2</sub>e) through strategic investments in wind and solar energy, along with biodiversity initiatives. Consequently, our net emissions have been reduced to 4,808.73 metric tonnes (MT) of CO<sub>2</sub>. Currently, our overall carbon offset rate stands at 55%. Specifically, our Scope 1 emissions have been mitigated by 16% primarily through plantation efforts, while our Scope 2 emissions have seen a substantial reduction of 70% due to our proactive investments in renewable energy sources. These initiatives underscore our dedication to advancing sustainable practices and reducing our carbon footprint.

**8. Does the entity have any project related to reducing Green House Gas emission? (Yes/No)**

**Yes**

**If yes, then provide details.**

Navneet has implemented a number of initiatives aimed at reducing greenhouse gas emissions, which include:

**Renewable Energy Generation**

The Company has installed 724 KW of solar panels at two of its manufacturing facilities, replacing traditional power consumption with renewable solar energy. This move has resulted in directly substituting 7% of non-renewable energy consumption for renewable sources of electricity.

In addition, the Company also installed a wind power capacity of 4.8 MW, generating 68,68,689 units of power annually. By utilising wind and solar power, it is able to significantly reduce its reliance on fossil fuels and cut down on its greenhouse gas emissions.

**Solar Heaters in Canteen Operations:** Navneet is harnessing the power of the sun not only for its manufacturing needs but also for its everyday operations. Solar heaters are used to heat water and for cooking in the Company's canteens, further emphasising its commitment to sustainable energy use.

In total, approximately 70% of total electricity requirements are offset by renewable sources of energy, i.e., windmills and solar power plants. We have achieved the country's carbon neutral target of producing energy from renewable sources by 50% in 2030 and in 2023 itself.

**Carbon Emission Reduction**

208

The Company's effort to reduce its carbon footprint has been recognised by its prime customer in their Gigaton project, earning it the title of 'Giga-guru'. So far, its initiatives have led to a significant reduction of CO<sub>2</sub> emissions, with savings of 19,244.2 metric tonnes to date.

By incorporating renewable energy sources and reducing its greenhouse gas emissions, Navneet is actively contributing to the global fight against climate change. The Company remains committed to exploring and implementing more sustainable practices across its operations to further reduce its environmental impact.

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

Parameter	2023-24	2022-23
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste (A)	406.46	450.88
E-waste (B)	1.28	0.69
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
<b>Other hazardous waste. Please specify, if any. (G)</b>	3.682	8.38
<b>Other non-hazardous waste generated (H).</b>	9,739.81	8,516.691
<b>Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)</b>		
Paper	9,434.62	8,277.716
Other	15.79	238.97
Wood	123.75	-



Parameter	2023-24	2022-23
Metal	165.64	-
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>10,151.23</b>	<b>8976.64</b>
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations)	0.00000060	0.00000055
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/revenue from operations adjusted for PPP)	0.00000017	0.00000016
Waste intensity in terms of physical output (Total waste generated/production in tonne)	0.11925	0.09117
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	2023-24	2022-23
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	9,434.62	8,327.716
<b>Total</b>	<b>9,434.62</b>	<b>8,327.716</b>

**For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)**

Category of waste	2023-24	2022-23
(i) Incineration	0.1	0
(ii) Landfilling	0	448.88
(iii) Other disposal operations	736.58	199.674
<b>Total</b>	<b>736.68</b>	<b>648.554</b>

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)

If yes, name of the external agency.

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

Navneet is dedicated to minimising its environmental footprint through responsible waste management practices and a commitment to reducing the use of hazardous chemicals. Here are our key initiatives:

#### **Responsible Hazardous Waste Disposal**

All hazardous waste generated during our operations is disposed of by authorised vendors in strict compliance with regulations to ensure environmental and workforce safety.

#### **Safety First: Solvent-Based Ink and PVC-Based Adhesives**

We prioritise employee and environmental safety when handling solvent-based ink and PVC-based adhesives. This includes:

Material Safety Data Sheet (MSDS) Display and Training: MSDS information is readily available, and employees undergo training on safe handling procedures to mitigate the risks associated with these substances.

**Wastewater Treatment:** Ink-mixed wastewater undergoes treatment before discharge to safeguard water resources.

**Personal Protective Equipment (PPE):** Employees are equipped with appropriate PPE to prevent inhalation or skin contact with these materials, prioritising both employee and environmental safety.

**Spill Prevention Measures:** We implement protocols to prevent soil contamination from accidental spills.

### **Minimising Waste Generation**

**Reusable Water-Based Ink Carboys:** To decrease plastic waste, water-based ink carboys are lined with polybags for reuse by the manufacturer, significantly reducing plastic consumption.

**Wiro Product Packaging Return Programme:** Customers are encouraged to return product packaging materials such as boxes, rings, and cores to manufacturers for reuse, thereby minimising waste and conserving resources.

**PET Strap Reuse:** Prioritise the reuse PET straps for palletisation of export and internal material movements instead of purchasing new ones. This promotes a circular economy, reduces waste generation, and leads to cost savings.

### **Optimising Resource Use**

**Improved Adhesive Carboy Design:** Redesigned adhesive carboys with wider mouths and liners maximise adhesive usage and minimise waste. Transitioning from 50 kg carboys to smaller 5 kg ones eliminates approximately 1 kg of waste per carboy.

**Reusable Antiskid Grip Sheets:** Substituting single-use stretch wrap film with reusable antiskid grip sheets for internal mobility of finished goods and work-in-progress items reduces plastic waste and encourages sustainable packaging practices.

**Higher-Micron Plastics:** Moving away from lower-micron plastics (BOPP, PP bags, and shrink film) to higher-micron alternatives minimises environmental risks associated with plastic usage, demonstrating a commitment to reducing the environmental footprint.

Navneet Education Limited extends its commitment to responsible waste management beyond its facilities by registering under the Extended Producer Responsibility (EPR) programme for imported plastics and implementing a comprehensive Plastic Waste Management plan at its site.

These initiatives demonstrate Navneet's commitment to minimising its environmental impact through responsible waste management practices and a proactive approach to reducing hazardous chemicals in our products and processes.

- 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: -**

Sr. 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:**

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/NA).**

Yes

If not, provide details of all such non-compliances, in the following format:

Specify the law/regulation/guidelines which was not complied with

Provide details of the non-compliance

Any fines/penalties/action taken by regulatory agencies such as pollution control boards or by courts

We adhere rigorously to all environmental laws and regulations in India.

Corrective action taken, if any

#### Leadership Indicators

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

Parameter	Unit	2023-24	2022-23
Total Scope 3 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	TCO <sub>2</sub> e	92,476.14 *	-
Total Scope 3 emissions per rupee of turnover	TCO <sub>2</sub> e per rupees of turnover	0.00000546	-
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)

No

If yes, name of the external agency.

\*The scope 3 emissions profile includes emission from category-1(purchased goods-paper), category 5 (waste generated) and category 7 (employee commute) in its calculation.

211

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

Manufacturing sites are not present in ecologically sensitive areas.

- 3. 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.**

In response to identifying significant adverse environmental impacts within our value chain, Navneet has taken decisive action this year by implementing a Robust Supplier Code of Conduct to uphold our sustainability standards. We have strategically categorised our supply chain partners to optimise and strengthen our initiatives. Beginning our next fiscal year, we will conduct onsite assessments of our supply chain to directly evaluate and address specific environmental concerns. These measures are designed to boost transparency, enforce stringent environmental criteria, and drive continuous improvement in our mitigation and adaptation strategies throughout our value chain.

## PRINCIPLE 7

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

(This principle highlights the importance of responsible advocacy. Companies should engage in policy advocacy in a responsible and transparent manner and avoid engaging in activities that could undermine the public interest or the democratic process.)

### Essential Indicators

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

6

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

Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (state/national/international)
1 The Federation of Educational Publishers in India	➤ National
2 Indian Wind Power Association	➤ National
3 The Federation of Indian Publishers	➤ National
4 CAPEXIL	➤ National
5 Gujarat Chamber of Commerce & Industry	➤ State
6 Paper Merchants Association - Ahmedabad	➤ 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.

Name of authority	Brief of the case	Corrective action taken
NA	NA	NA

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

(This principle emphasises the importance of promoting inclusive and equitable economic development. Companies should create economic opportunities for all, including disadvantaged and marginalised groups. They should also contribute to the development of local communities and support social and economic empowerment.)

**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:

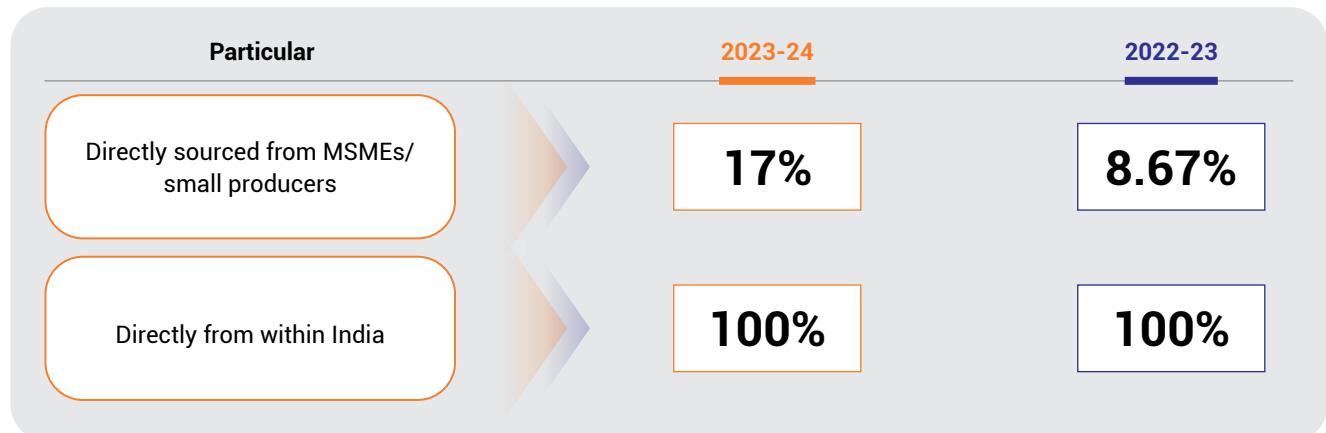
Sr. no.	Name of project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (in ₹)
NA						

213

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

Navneet prioritises community feedback with a robust grievance mechanism in place. We offer a dedicated E-mail address, [grievance@navneet.com](mailto:grievance@navneet.com), for written complaints and maintain a suggestion/feedback box outside our factory premises. Our CSR team proactively gathers feedback on our initiatives to ensure the resolution of community concerns.

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



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

	CSR project	2023-24	2022-23
1	Rural	> <b>39%</b>	> <b>39%</b>
2	Semi-urban	> <b>5%</b>	> <b>4%</b>
3	Urban	> <b>2%</b>	> <b>2%</b>
4	Metropolitan	> <b>53%</b>	> <b>54%</b>

214

### Leadership Indicators

1. Details of beneficiaries of CSR projects:

Sr. no.	CSR project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalised groups
1.	Education Aid and Support	14,028	100%
2.	Promoting Healthcare and Preventing Health	1,33,447	100%
3.	Animal Welfare	20,912	0%
4.	Community Development	7,674	100%
5.	Sports	3	100%





## PRINCIPLE 9

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

(This principle highlights the importance of responsible consumer engagement. Companies should provide safe, high-quality products and services, and ensure that they are marketed and sold ethically and responsibly. They should also be transparent about their products and services and provide consumers with the information they need to make informed choices.)

#### Essential Indicators

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

Navneet operates in three main categories: domestic stationery, export stationery (B2B), and publication business within India. The Company prioritises customer satisfaction and has established a robust grievance mechanism to address any concerns or complaints.

#### Domestic Stationery Business

- » Each product is labelled with the customer care E-mail ([Stationery@navneet.com](mailto:Stationery@navneet.com)) and information about dedicated social media handles
- » Customers can reach out via email or social media for any complaints or grievances
- » Upon receiving a complaint, our dedicated customer relationship cell acknowledges it and assigns it to the relevant teams within the Company
- » The concerned teams ensure a timely resolution of the complaint
- » The progress of complaints is continuously monitored until they are successfully resolved

215

#### Export Stationery Business

- » In the export stationery segment, primarily serving B2B customers, Navneet has a dedicated sales team that interacts with customers for feedback and concerns
- » The sales teams actively collect and address any complaints or grievances raised by the customers
- » The assigned teams work closely with the customers to resolve the issues in a satisfactory manner
- » Regular follow-up is conducted to ensure the resolution of complaints

#### Publication Business

- » For the Company's publication business, each product features a dedicated E-mail : ([cbd@navneet.com](mailto:cbd@navneet.com))
- » Customers can contact the provided channels to register any complaints or grievances
- » Upon receiving a complaint, the customer relationship cell promptly assigns it to the appropriate teams within the organisation
- » The concerned teams take the necessary actions to resolve the complaint efficiently
- » The progress of each complaint is tracked and monitored until its successful resolution

Throughout all categories, Navneet remains committed to addressing customer concerns promptly and efficiently. The Company continuously strives to enhance its products and services based on the feedback received from its valued customers. By maintaining open lines of communication and diligent resolution processes, Navneet aims to ensure customer satisfaction and loyalty.

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

Particular	As a percentage to total turnover
Environmental and social parameters relevant to the product	52%
Safe and responsible usage	0%
Recycling and/or safe disposal	0%

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

Particular	2023-24		Remark	2022-23		Remark
	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	65	0	NA	35	0	NA

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

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

## 5. Does the entity have a framework/policy on cyber security and risks related to data privacy? (Yes/No)

Yes

If available, provide a web link of the policy

<https://navneet.com/privacy-policy/>



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

Not Applicable

7. Provide the following information relating to data breaches

- a. Number of instances of data breaches along-with impact 0
- b. Percentage of data breaches involving personally identifiable information of customers 0%
- c. Impact, if any, of the data breaches NA

#### Leadership Indicators

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

<https://navneet.com/rise/>  
<https://navneet.com/grafalco/>  
<https://youvaworld.com/>  
<https://navneet.com/international-business/>  
<https://navneet.com/children-book/>  
<https://navneet.com/general-book/>  
<https://navneet.com/navneet/>  
<https://navneet.com/vikas/>

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

To inform and educate consumers about the safe and responsible usage of our products, Navneet meticulously outlines their benefits in our publications. Moreover, we highlight eco-friendly features like plastic-free components and UV technology lamination, ensuring consumers are aware of the environmental and safety aspects of our offerings.

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

Navneet specialises exclusively in non-essential services.

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

- a. If yes, provide details in brief.

To empower consumers with knowledge about the safe and responsible usage of our products, Navneet provides detailed descriptions of their benefits in our publications. Additionally, we emphasise features like plastic-free components and UV technology lamination to underscore the environmental and safety standards upheld in our products.

- b. 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) Yes

\* Our sales team maintains constant communication with dealers and distributors to gather valuable feedback on our products. Additionally, we engage with teachers and students regularly to gather insights and feedback on various publications.