

# Business Responsibility & Sustainability Report



## INTRODUCTION

Since its establishment in 2002, Anand Rathi Wealth Limited (ARWL) has specialised in private wealth solutions, primarily catering to High-Net-Worth Individuals (HNIs) and Ultra-High-Net-Worth Individuals (UHNIs). Being a recently listed company, ARWL has solidified its presence in the wealth management sector. Registered with the Association of Mutual Funds in India (AMFI) as a Mutual Fund Distributor, ARWL currently manages Assets Under Management (AUM) of ₹ 57,807 Crores, serving 9,911 client families both domestically and internationally.

### Global and Local Reach

ARWL operates with a dedicated team of 332 relationship managers across 17 locations in India, including Ahmedabad, Bengaluru, Chandigarh, Chennai, Coimbatore, Delhi, Gurugram, Hyderabad, Kolkata, Mumbai, Nashik, Noida, Pune, Rajasthan, Visakhapatnam, Jabalpur, and Lucknow. Moreover, the Company extends its global footprint through a representative office in Dubai, thereby enhancing its capacity to cater to a diverse international clientele.

### Vision and Mission

**Vision:** ARWL is committed to being a client-centric company, focussed on delivering long-term value to its clients while upholding the highest standards of excellence, ethics, and professionalism.

**Mission:** The Company aims to lead in investment advisory by offering innovative financial solutions. ARWL strives to be the first choice for clients and employees by continuously adapting and responding to their evolving needs.

### Regulatory Compliance and Sustainability Reporting

Through its Gazette Notification dated June 14, 2021, and Circular dated May 10, 2021, the Securities and Exchange Board of India (SEBI) has mandated the top 1,000 listed entities to disclose their performance against the nine principles of the 'National Guidelines on Responsible Business Conduct' (NGBRCs) in their 'Business Responsibility and Sustainability Report' (BRSR). Adhering to the same, ARWL has prepared and published the Business Responsibility and Sustainability Report for 2023-24, thereby ensuring compliance with top governance standards, and reaffirming its commitment to responsible business practices and sustainability.

### Commitment to Sustainability and Responsible Business Conduct

The integration of NGBRCs into its business operations underscores ARWL's dedication to sustainability and ethical practices. The Company's endeavours are not solely focussed on achieving financial success but also on making positive contributions to society and the environment.

## SECTION A ► GENERAL DISCLOSURES

### I. Details of the listed entity

Sr. no.	Particulars	Details
1.	Corporate identity number (CIN)	L67120MH1995PLC086696
2.	Name of the listed entity	Anand Rathi Wealth Limited (ARWL)
3.	Year of incorporation	1995
4.	Registered office address	Express Zone, A Wing, 10 <sup>th</sup> Floor, Western Express Highway, Goregaon (E), Mumbai - 400 063
5.	Corporate address	Floor No. 2 & 3, Block B & C, E-wing, Trade Link, Kamala Mills Compound, Senapati Bapat Marg, Lower Parel, Mumbai – 400 013
6.	E-mail	csarwsl@rathi.com
7.	Telephone	022-62817000
8.	Website	<a href="https://anandrathiwealth.in">https://anandrathiwealth.in</a>
9.	Financial year (FY) for which reporting is being done	2023-24
10.	Name of the Stock Exchange(s) where shares are listed	a. National Stock Exchange of India Limited (NSE Ltd.) b. BSE Limited (BSE Ltd.)
11.	Paid-up capital	₹ 20,91,41,485/- comprising 4,18,28,297 equity shares of ₹ 5/- each (As of March 31, 2024)
12.	Name and contact details (telephone, e-mail address) of the person who may be contacted in case of any queries on the BRSR report	Ms Jaee Sarwankar Company Secretary & Compliance Officer E-mail: csarwsl@rathi.com Telephone: 022 62813214
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)	Disclosures made in this report are on a <b>standalone basis and pertain to the Company only.</b>
14.	Name of assurance provider	Not Applicable
15.	Type of assurance obtained	Not Applicable



## 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
Financial and insurance services	Other financial activities	<b>100%</b>

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

Product/service	NIC code*	% of total turnover contributed
Other financial service activities, except insurance and pension funding activities, n.e.c.: financial advisory, brokerage and consultancy services.	64990	<b>100%</b>

\*Source: National Industrial Classification for India 2008 (NIC-2008)

## III. Operations

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

	Number of plants*	Number of offices	Total
<b>National**</b>	-	17	17
<b>International</b>	-	1^	1



\*The Company is engaged in the business of providing wealth solutions and, hence, does not undertake any manufacturing activity.

\*\*The details related to the Company's distribution network are provided in the Management Discussion and Analysis Report, which forms part of the Annual Report.

^The Company has one representative office in Dubai.

### 19. Markets served by the entity:

#### a. Number of locations



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

Nil

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

The Company provides wealth solutions designed specifically for High-Net-Worth Individuals (HNIs) and Ultra-High Net-Worth Individuals (UHNIs).

#### IV. Employees

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

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

Sr. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	1,012	661	65%	351	35%
2.	Other than permanent (E)	-	-	-	-	-
3.	Total employees (D + E)	1,012	661	65%	351	35%
Workers						
4.	Permanent (F)	Not Applicable				
5.	Other than permanent (G)					
6.	Total workers (F + G)					

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

Sr. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	Not Applicable				
2.	Other than permanent (E)					
3.	Total employees (D + E)					
Workers						
4.	Permanent (F)	Not Applicable				
5.	Other than permanent (G)					
6.	Total workers (F + G)					

\* The Company does not have any differently abled employees or workers.

##### 21. Participation/inclusion/representation of women:

	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors <sup>§</sup>	7	1	14.29%
	3	1	33.33%

Key Management Personnel\*

<sup>§</sup> It includes Whole-Time Director & CEO (KMP).

\* Key Managerial Personnel are defined as per Section 2(51) of the Companies Act, 2013.

**22. Turnover rate for permanent employees and workers:**

	2023-24 (Turnover rate in current FY)			2022-23 (Turnover rate in previous FY)			2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	13.66%	16.81%	14.75%	17.6%	30.24%	22.15%	28.09%	38.5%	31.9%
Permanent workers	Not Applicable								

**V. Holding, subsidiary and associate companies (including joint ventures)****23.****(a) Names of holding/subsidiary/associate companies/joint ventures:**

Sr. no.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by listed entity	Does the entity, indicated at column A, participate in the business responsibility initiatives of the listed entity? (Yes/No)
1	AR Digital Wealth Private Limited	Subsidiary	75.51	No
2	Ffreedom Intermediary Infrastructure Private Limited	Subsidiary	100	No
3	Freedom Wealth Solutions Private Limited	Subsidiary	95	No







**VI. CSR details****24.**

<b>(i) Whether CSR is applicable as per Section 135 of the Companies Act, 2013:</b>	Yes. For more information on this, please refer to <b>Annexure II of the Board's Report.</b>
<b>(ii) Turnover</b>	₹ 69,467.63 Lakhs (represents total revenue from the operations of the Company on a standalone basis.)
<b>(iii) Net worth</b>	₹ 68,214.61 Lakhs

\*Turnover and net worth amount as of March 31, 2024.

## 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 the complaint is received	Grievance redressal mechanism in place (Yes/No) (If yes, then provide web-link for grievance redress policy)
 Communities	No
 Investors (other than shareholders)	Yes <a href="mailto:rnt.helpdesk@linkintime.co.in">rnt.helpdesk@linkintime.co.in</a>
 Shareholders	Yes, the Company provides a channel to address any issues or complaints raised by its shareholders. Link Intime India Private Limited serves as the appointed Share Transfer Registrars Agent, responsible for handling shareholder inquiries, requests, and grievances. For more information: <a href="http://www.scores.gov.in/admin">www.scores.gov.in/admin</a>
 Employees and workers	Yes, the Company's whistle-blower mechanism is readily accessible to all employees, offering multiple communication channels for expressing concerns such as utilising an e-mail address or submitting written complaints. These diverse channels effectively address any grievances raised through the whistle-blower mechanism.  <a href="https://www.anandrathiwealth.in/wealthpdf/13dec/13VigilMechanismWhistleBlowerPolicy.pdf">https://www.anandrathiwealth.in/wealthpdf/13dec/13VigilMechanismWhistleBlowerPolicy.pdf</a>
 Customers	Yes, customers have various avenues to voice their complaints, including sending an e-mail or using courier services. For complaints, please e-mail at: <a href="mailto:clientredressal@rathi.com">clientredressal@rathi.com</a> <a href="mailto:enquiry@rathi.com">enquiry@rathi.com</a> <a href="mailto:support.wm@rathi.com">support.wm@rathi.com</a>
 Value chain partners	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
	Nil	Nil	NA	Nil	Nil	NA
	Nil	Nil	NA	Nil	Nil	NA
	Nil	Nil	NA	3	Nil	NA
	Nil	Nil	NA	Nil	Nil	NA
	Nil	Nil	NA	Nil	Nil	NA
	Nil	Nil	NA	Nil	Nil	NA

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

The responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to the business, the rationale for identifying the same, and the approach to adapt or mitigate the risk, along with its financial implications, are indicated below:

Material issue identified*	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity
 Increasing financial literacy		Indians traditionally lean towards saving money and investing in secure instruments. However, increasing financial literacy can broaden horizons and provide new investment perspectives
 Digitisation		The demand for digital transactions is steadily increasing, driven by low-cost internet data, widespread smartphone penetration, and India's biometric identity card system
 Data security and customer privacy		The Company's technology infrastructure is expanding, heightening the risk of privacy breaches and data security vulnerabilities
 Corporate governance		The Company prioritises growth, while ensuring compliance, maintains asset quality through ethical and transparent practices, and provides necessary disclosures to regulators and stakeholders. This commitment upholds their trust and enhances the Company's reputation and goodwill
 Customer satisfaction		The Company serves a broad client base with financial products and services. Any undesirable customer experience could lead to customer attrition or reputational damage
 Human capital development		Managing the skills, capabilities and power of employees within an organisation is crucial  Everything from recruitment, development, retention, and rewards to enhancing performance contributes to the Company's talent management strategy  A well-directed talent management system, elevate the organisation to new heights and lay the groundwork for fostering leadership  The main objective of the talent management process is to hire the most talented individuals for the organisation
 Climate change	 	The emergence of climate change has created new material risks and heightened reputational risks for businesses  There is a significant untapped opportunity as the country strengthens its resilience to climate risks  Shareholder activism regarding governance practices is on the rise



**Risk****Opportunity****In case of risk, approach to adapt or mitigate****Financial implications of the risk or opportunity  
(Indicate positive or negative implications)**

- The Company aims to encourage financial savings and invest more in non-conventional/other instruments

**Positive**

- Enabling wealth creation for Indian investors
- Facilitating businesses to connect with wider audiences
- Fostering the potential for cross-selling different products to clients, aiming to increase the Company's business revenue

- The Company consistently invests in technology and has implemented a robust digital environment within the organisation to minimise reliance on paper-based transactions and communications

**Positive**

- Cost efficient
- Better service to customers

- The Company has implemented an extensive Information Security Management System to safeguard its systems and protect information. This helps mitigate potential material financial impacts

**Negative**

- Data breaches pose a threat to the Company's reputation and can result in litigation and financial risks

- The Company diligently complies with reviews by regulators and the Board, among others, ensuring compliance, succession plans and necessary discussions/notes are presented at periodic intervals

**Positive**

- A distinguished Board and transparent operations will increase confidence among investors and other stakeholders

- The Company has established a robust platform for promptly identifying and prioritising the resolution of customer grievances
- The Company addresses customer needs by conducting satisfaction surveys, aiming to retain the customer base and deliver timely solutions

**Positive**

- The more satisfied a customer is, the lower the churn rate and the higher the brand loyalty. The Company aims to provide a hassle-free, smooth wealth management experience to its customers

- The Company prioritises robust people practices aimed at fostering overall employee growth. This includes health and well-being initiatives, adherence to fair pay norms, equal opportunity for all and extensive training programmes

**Positive**

By focussing on human capital development, the Company can enhance operational efficiency and drive innovation

**Negative**

Neglecting human capital management can lead to higher turnover rates, increased recruitment costs, and elevated training expenses

- The Company investment team monitors ESG-related factors of investee companies
- The Company aligns with the regulatory requirements by adopting a stewardship code
- The Company remains committed to identifying and pursuing opportunities to minimise its environmental impact. Moreover, the Company continues to identify and act on opportunities to reduce its impact on the environment

**Positive**

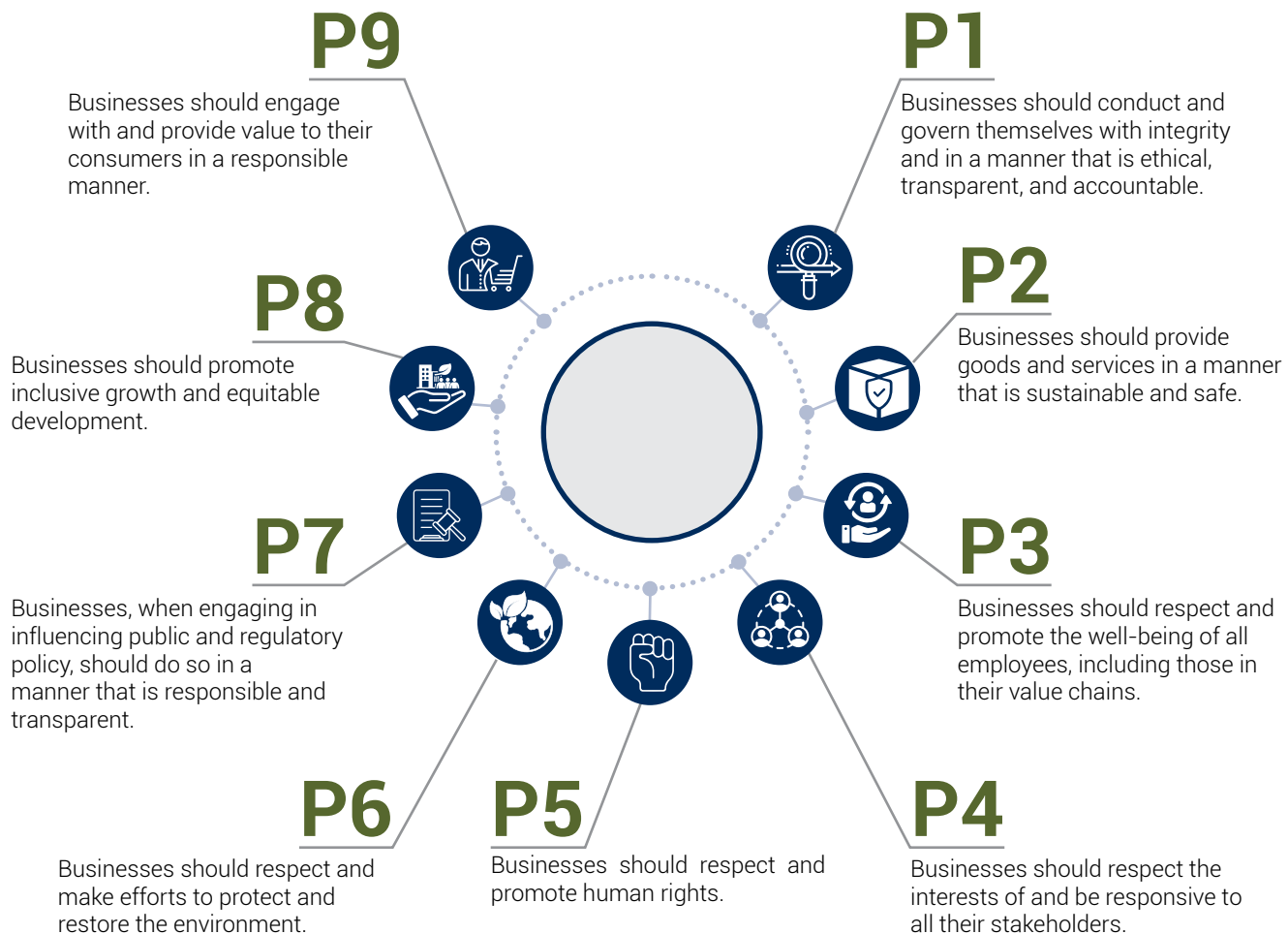
Drives better risk management and value creation

**Negative**

Physical and transition risks

## SECTION B ► MANAGEMENT AND PROCESS DISCLOSURES

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





Disclosure questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<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)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web link of the policies, if available	1, 2, 3, 4, 5, 6	-	7	7, 8, 9	7, 8	-	-	9	-
1. Code of Conduct for Board Members and Senior Management									
2. Policy on Prevention of Money Laundering Act									
3. Policy on Related Party Transaction									
4. Insider Trading Policy									
5. Familiarisation Policy									
6. Nomination and Remuneration Policy									
7. Vigil Mechanism and Whistle-Blower									
8. Anti-Sexual Harassment (ASH) Policy									
9. CSR Policy									
2. Whether the entity has translated the policy into procedures. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	N	N	N	N	N	N	N	N	N
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	N	N	N	N	N	N	N	N	N
Although the Company has not set any specific targets or goals, its commitment lies in creating a positive impact on communities through focussed CSR activities and investor awareness programmes. The Company prioritises a healthy workplace environment, advocating equality and merit-based hiring. Upskilling the workforce is key to navigating evolving business landscapes. Additionally, the Company is dedicated to inclusive development and reducing its carbon footprint, emphasising sustainable material sourcing and engaging stakeholders to strengthen its ESG proposition.									
6. Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met.	<ul style="list-style-type: none"> <li>The Company acknowledges its responsibility to make a positive impact on communities by identifying key focus areas and fulfilling these commitments through investor education initiatives and corporate social responsibility endeavours</li> <li>The Company fosters an inclusive workplace devoid of discrimination against individuals based on gender, race/caste, religion/belief, disability, marital status, or any other category. Additionally, the organisation prioritises hiring based on merit and qualifications</li> <li>The Company is dedicated to reducing its carbon footprint</li> </ul>								

Disclosure questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Governance, leadership and oversight</b>									
7. Statement by the Director responsible for the Business Responsibility Report, highlighting ESG-related challenges, targets and achievements.	The Company recognises the crucial link between sustainability and financial goals, thereby seamlessly integrating ESG factors into its business and operations. The Company is committed to implementing a robust ESG strategy in collaboration with all stakeholders.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr Rakesh Rawal – (Whole-Time Director & CEO) Telephone: 022-62817003 E-mail: rakeshrawal@rathi.com								
9. Does the entity have a specified Committee of the Board/Director responsible for decision-making on sustainability related issues? (Yes/No). If yes, provide details.	1. Mr Rakesh Rawal – (Whole-Time Director & CEO) 022-62817003, rakeshrawal@rathi.com 2. Mr Rajesh Bhutara – Chief Financial Officer Telephone: 022-62817003 E-mail: rajeshbhutra@rathi.com								

**10. Details of Review of NGRBCs by the Company:**

Subject for review	Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee									Frequency (Annually/half yearly/quarterly/any other)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow-up action	The Board of Directors and its Committees meet periodically to evaluate the Company's performance across various aspects, including adherence to NGRBC Principles where relevant.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Company complies with relevant statutory requirements aligned with its principles, proactively rectifying any instances of non-compliance.									Quarterly								

<b>11. Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.</b>	P1	P2	P3	P4	P5	P6	P7	P8	P9
Assessment is an ongoing process, with the senior management of the Company regularly reviewing the policy.									

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	Not Applicable								
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





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

### PRINCIPLE 1

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

#### Essential Indicators

#### 1. PERCENTAGE COVERAGE BY TRAINING AND AWARENESS PROGRAMS ON ANY OF THE PRINCIPLES DURING THE FINANCIAL YEAR:

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programs
 <b>Board of Directors (BoD)</b>	Throughout the year, the Independent Directors at the Company spent an average of 10 workforce hours participating in various familiarisation programmes.	Familiarisation programmes * For more details, please refer to the link below: <a href="https://www.anandrathiwealth.in/wealthpdf/05april24/NoteonfamiliarizationofProgrammee.pdf">https://www.anandrathiwealth.in/wealthpdf/05april24/NoteonfamiliarizationofProgrammee.pdf</a>	<b>100%</b>
 <b>Key Managerial Personnel (KMP)</b>	1	Insider Trading	<b>100%</b>
 <b>Employee other than BoD and KMPs</b>	1	Awareness of POSH Act	<b>100%</b>
 <b>Workers</b>		Not Applicable	

\* Note:

- When a new Independent Director is appointed, the Company holds a session with senior management, including the CEO and Deputy CEO, to discuss the business of the Company.
- Presentations are conducted during Board and Committee meetings to familiarise Independent and Non-Executive Directors with the Company's strategy, financial performance, business operations, regulatory compliance, and industry dynamics.

2. DETAILS OF FINES/PENALTIES/PUNISHMENT/AWARD/COMPOUNDING FEES/SETTLEMENT AMOUNT PAID IN PROCEEDINGS (BY THE ENTITY OR BY DIRECTORS/KMPS) WITH REGULATORS/LAW ENFORCEMENT AGENCIES/JUDICIAL INSTITUTIONS, IN THE FINANCIAL YEAR, IN THE FOLLOWING FORMAT (NOTE: THE ENTITY SHALL MAKE DISCLOSURES BASED ON MATERIALITY AS SPECIFIED IN REGULATION 30 OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE OBLIGATIONS) REGULATIONS, 2015 AND AS DISCLOSED ON THE ENTITY'S WEBSITE):

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

Nil

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

Nil

\*No fines/penalties/punishments/awards/compounding fees/settlement amounts were levied in 2023-24.

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	Not Applicable

4. DOES THE ENTITY HAVE AN ANTI-CORRUPTION OR ANTI-BRIBERY POLICY? IF YES, PROVIDE DETAILS IN BRIEF AND IF AVAILABLE, PROVIDE A WEB LINK TO THE POLICY.

The Company's Anti-Bribery and Anti-Corruption Policy is presently undergoing review and will be put into effect upon approval from the Management. Although not publicly disclosed, the Company has established a comprehensive policy to guide Directors and employees at all levels. Emphasising ethical practices and compliance with laws and regulations, the Company has implemented control systems aligned with these principles to uphold the highest standards of integrity. Additionally, these measures are put in place to promote professionalism across the organisation.



**5. NUMBER OF DIRECTORS/KMPS/EMPLOYEES/WORKERS AGAINST WHOM DISCIPLINARY ACTION WAS TAKEN BY ANY LAW ENFORCEMENT AGENCY FOR THE CHARGES OF BRIBERY/CORRUPTION:**

	2023-24 (Current financial year)		2022-23 (Previous financial year)	
	Number	Remarks	Number	Remarks
Directors	Nil	NA	Nil	NA
KMPs	Nil	NA	Nil	NA
Employees	Nil	NA	Nil	NA
Workers	Nil	NA	Nil	NA

**6. DETAILS OF COMPLAINTS WITH REGARD TO CONFLICT OF INTEREST:**

	2023-24 (Current financial year)		2022-23 (Previous financial year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of conflict of interest of the KMPs	Nil	NA	Nil	NA

**7. PROVIDE DETAILS OF ANY CORRECTIVE ACTION TAKEN OR UNDERWAY ON ISSUES RELATED TO FINES/PENALTIES/ ACTION TAKEN BY REGULATORS/LAW ENFORCEMENT AGENCIES/JUDICIAL INSTITUTIONS, ON CASES OF CORRUPTION AND CONFLICTS OF INTEREST.**

Not Applicable

**8. NUMBER OF DAYS OF ACCOUNTS PAYABLES ((ACCOUNTS PAYABLE \*365)/COST OF GOODS/SERVICES PROCURED) IN THE FOLLOWING FORMAT:**

	2023-24 (Current financial year)	2022-23 (Previous financial year)
No. of days of accounts payable	Nil	Nil



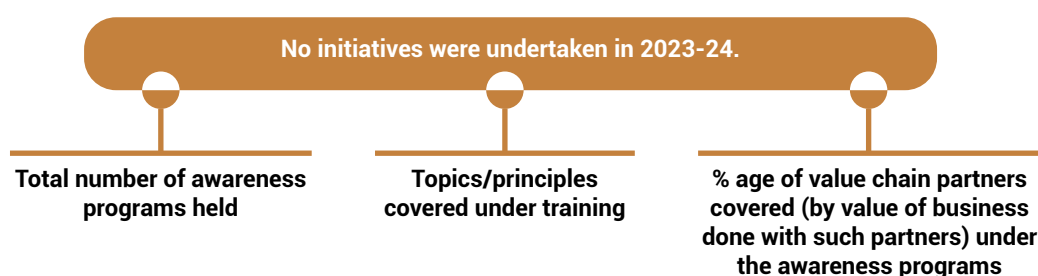
## 9. OPEN-NESS OF BUSINESS.

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 (Current financial year)	2022-23 (Previous financial year)
Concentration of purchases	a. Purchases from trading houses as % of total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Nil	Nil
Concentration of sales	a. Sales to dealers/distributors as % of total sales	Nil	Nil
	b. Number of dealers/distributors to whom sales are made	Nil	Nil
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	Nil	Nil
Share of RPTs in	a. Purchases (Purchases with related parties/total purchases)	0.44	0.39
	b. Sales (Sales to related parties/total sales)	0.02	0.007
	c. Loans & advances (Loans & advances given to related parties/total loans & advances)	Nil	Nil
	d. Investments (Investments in related parties/total investments made)	Nil	Nil

## Leadership Indicators

### 1. AWARENESS PROGRAMS CONDUCTED FOR VALUE CHAIN PARTNERS ON ANY OF THE PRINCIPLES DURING THE FINANCIAL YEAR:







**2. DOES THE ENTITY HAVE PROCESSES IN PLACE TO AVOID/MANAGE CONFLICT OF INTERESTS INVOLVING MEMBERS OF THE BOARD? (YES/NO) IF YES, PROVIDE DETAILS OF THE SAME.: YES**

The Company demonstrates its commitment to integrity and transparency through its Code of Conduct for the Board of Directors and Senior Management Personnel. This code mandates that Directors and Senior Management uphold a stringent avoidance of any engagements in business, relationships, or activities that could potentially lead to a conflict of interest conflicting with the Company's interests.

To uphold this principle, the Company diligently gathers disclosures from its Directors in accordance with Sections 149 and 184 of the Companies Act, 2013. These disclosures encompass details about any entities in which the Director has an interest or concern, including their shareholding, if applicable.

In accordance with the Company Policy on the materiality of related party transactions and their handling, entities in which a Director holds an interest or concern are categorised as related parties of the Company. Prior to engaging in transactions with such related parties, the Company Committee/Board ensures the necessary approvals are obtained.

Links to the policies:

- [Code of Conduct for Board Members and Senior Management](#)
- [Policy on Related Party Transactions](#)





## PRINCIPLE 2

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

### Essential Indicators

1. **PERCENTAGE OF R&D AND CAPITAL EXPENDITURE (CAPEX) INVESTMENTS IN SPECIFIC TECHNOLOGIES TO IMPROVE THE ENVIRONMENTAL AND SOCIAL IMPACTS OF PRODUCTS AND PROCESSES TO TOTAL R&D AND CAPEX INVESTMENTS MADE BY THE ENTITY, RESPECTIVELY.**

Current financial year	Previous financial year	Details of improvements in environmental and social impacts
 <b>R&amp;D</b>	Refer to note below.	 <b>Capex</b>

\*Given that the Company's core business revolves around providing financial services, capital investments in information technology take precedence. During the year, the Company invested ₹ 151.14 Lakhs towards enhancing its technological infrastructure, constituting 39.73% of its IT CAPEX. With a commitment to sustainability, the Company remains proactive in identifying and capitalising on opportunities to minimise its environmental footprint. Additionally, the Company consistently channels investments into technology, fostering a resilient digital ecosystem within the organisation.

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

No.

The Company's primary focus is to provide financial solutions to its customers. Though sustainable sourcing may not be directly pertinent to its business operations, the Company remains dedicated to energy conservation and resource consumption reduction through the implementation of advanced technologies.

Through extensive utilisation of technology, the Company actively minimises its paper and fuel consumption. This strategic approach not only enhances efficiency but also demonstrates a commitment to minimising environmental impact.

Some initiatives that exemplify the Company's efforts towards sustainable sourcing include:

- Transitioning from plastic pens to eco-friendly paper pens, thus reducing plastic usage and lessening the demand for plastic production, consequently leading to lower carbon dioxide emissions.
- Shifting from conventional notepads to recycled paper versions, to reduce the impact of tree depletion, decrease water usage, and reduce solid waste accumulation in landfills.

Moreover, these initiatives showcase the Company's commitment to sustainable practices and environmental stewardship. Additionally, sustainable sourcing may not align directly with its primary business focus.

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

Not Applicable



**3. DESCRIBE THE PROCESSES IN PLACE TO SAFELY RECLAIM YOUR PRODUCTS FOR REUSING, RECYCLING AND DISPOSING AT THE END OF LIFE FOR (A) PLASTICS (INCLUDING PACKAGING) (B) E-WASTE (C) HAZARDOUS WASTE AND (D) OTHER WASTE.**

Due to the specific nature of the Company's operations, opportunities for reclaiming, reusing, recycling, and disposing of products are somewhat constrained. However, the Company has established partnerships with renowned vendors to handle specific waste streams in a responsible manner.

For instance, e-waste generated by the data centre undergoes collection by an authorised vendor, which subsequently processes it at their recycling and recovery unit. Furthermore, the Company has partnered with an authorised vendor to oversee the management waste originating from its air conditioning systems. Through collaboration with an HVAC waste management company, regular visits are conducted to collect all types of HVAC waste. Moreover, this waste undergoes disposal via a designated channel aimed at minimising carbon emissions.

By working closely with these vendors, the Company ensures that the waste is handled in an environmentally conscious manner, aligning with its commitment to sustainable practices.

**4. WHETHER EXTENDED PRODUCER RESPONSIBILITY (EPR) IS APPLICABLE TO THE ENTITY'S ACTIVITIES (YES/NO). IF YES, WHETHER THE WASTE COLLECTION PLAN IS IN LINE WITH THE EXTENDED PRODUCER RESPONSIBILITY (EPR) PLAN SUBMITTED TO POLLUTION CONTROL BOARDS? IF NOT, PROVIDE STEPS TAKEN TO ADDRESS THE SAME.**

Given the nature of the Company's business, the above is not applicable.

## Leadership Indicators

**1. HAS THE ENTITY CONDUCTED LIFE CYCLE PERSPECTIVE/ASSESSMENTS (LCA) FOR ANY OF ITS PRODUCTS (FOR MANUFACTURING INDUSTRY) OR FOR ITS SERVICES (FOR SERVICE INDUSTRY)? IF YES, PROVIDE DETAILS IN THE FOLLOWING FORMAT?**

Since the Company operates in the financial services sector, this does not apply.

**2. IF THERE ARE ANY SIGNIFICANT SOCIAL OR ENVIRONMENTAL CONCERNS AND/OR RISKS ARISING FROM PRODUCTION OR DISPOSAL OF YOUR PRODUCTS/SERVICES, AS IDENTIFIED IN THE LIFE CYCLE PERSPECTIVE/ASSESSMENTS (LCA) OR THROUGH ANY OTHER MEANS, BRIEFLY DESCRIBE THE SAME ALONG-WITH ACTION TAKEN TO MITIGATE THE SAME.**

Name of product/service	Description of the risk/concern	Action taken
Not Applicable		

**3. PERCENTAGE OF RECYCLED OR REUSED INPUT MATERIAL TO TOTAL MATERIAL (BY VALUE) USED IN PRODUCTION (FOR MANUFACTURING INDUSTRY) OR PROVIDING SERVICES (FOR SERVICE INDUSTRY).**

Indicate input material	Recycled or re-used input material to total material	
	2023-24 (Current financial year)	2022-23 (Previous financial year)
Not Applicable		

**4. OF THE PRODUCTS AND PACKAGING RECLAIMED AT END OF LIFE OF PRODUCTS, AMOUNT (IN METRIC TONNES) REUSED, RECYCLED, AND SAFELY DISPOSED, AS PER THE FOLLOWING FORMAT:**

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Re-used	Recycled	Safely disposed	Re-used	Recycled	Safely disposed
Plastics (including packaging)	Due to the nature of the Company's business, this does not apply.					
E-waste						
Hazardous waste						
Other waste						

**5. RECLAIMED PRODUCTS AND THEIR PACKAGING MATERIALS (AS PERCENTAGE OF PRODUCTS SOLD) FOR EACH PRODUCT CATEGORY.**

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not Applicable	



**PRINCIPLE 3**

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

**Essential Indicators**

1.

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

% of employees covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	661	661	100%	661	100%	NA	NA	Nil	Nil	Nil	Nil
Female	351	351	100%	351	100%	351	100%	Nil	Nil	Nil	Nil
Total	1,012	1,012	100%	1,012	100%	351	35%	Nil	Nil	Nil	Nil
Other than permanent employees											
Male											
Female	Not Applicable										
Total											

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

Not Applicable

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

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Cost incurred on well-being measures as a % of total revenue of the Company	0.24%	0.20%

## 2. DETAILS OF RETIREMENT BENEFITS FOR THE CURRENT FINANCIAL YEAR AND PREVIOUS FINANCIAL YEAR.

Benefits	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	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/NA)	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/NA)
PF*	91%	NA	Yes	88%	NA	Yes
Gratuity	100%	NA	NA	100%	NA	NA
ESI	5%	NA	Yes	7%	NA	NA
NPS*	7%	NA	Yes	6%	NA	Yes

\* All employees have the option to opt for PF and NPS. However, the table above reflects the % of employees who have opted for the same.

## 3. ACCESSIBILITY OF WORKPLACES - ARE THE PREMISES/OFFICES OF THE ENTITY ACCESSIBLE TO DIFFERENTLY ABLED EMPLOYEES AND WORKERS, AS PER THE REQUIREMENTS OF THE RIGHTS OF PERSONS WITH DISABILITIES ACT, 2016? IF NOT, WHETHER ANY STEPS ARE BEING TAKEN BY THE ENTITY IN THIS REGARD.

The Company holds a profound dedication to promoting equal opportunity and human rights, striving to create a workplace that is safe, inclusive, and supportive for everyone. In its commitment to accessibility for individuals with disabilities, the Company has implemented initiatives such as ensuring easy access to elevators and ramps. These efforts mirror the Company's dedication to respecting and accommodating the needs of its employees, fostering an environment where everyone can feel comfortable and empowered. Additionally, the Company firmly believes in nurturing a workplace culture that celebrates diversity and offers equal opportunities for all to thrive.

## 4. DOES THE ENTITY HAVE AN EQUAL OPPORTUNITY POLICY AS PER THE RIGHTS OF PERSONS WITH DISABILITIES ACT, 2016? IF SO, PROVIDE A WEB-LINK TO THE POLICY.

The Company is dedicated to inclusivity, ensuring that candidates with disabilities have equal access to opportunities. In the Company's workplace, every employee is empowered to contribute to its achievements with their diverse skills, experiences, and perspectives. Furthermore, the Company believes in fostering an environment where each individual is acknowledged and respected for their unique contributions.

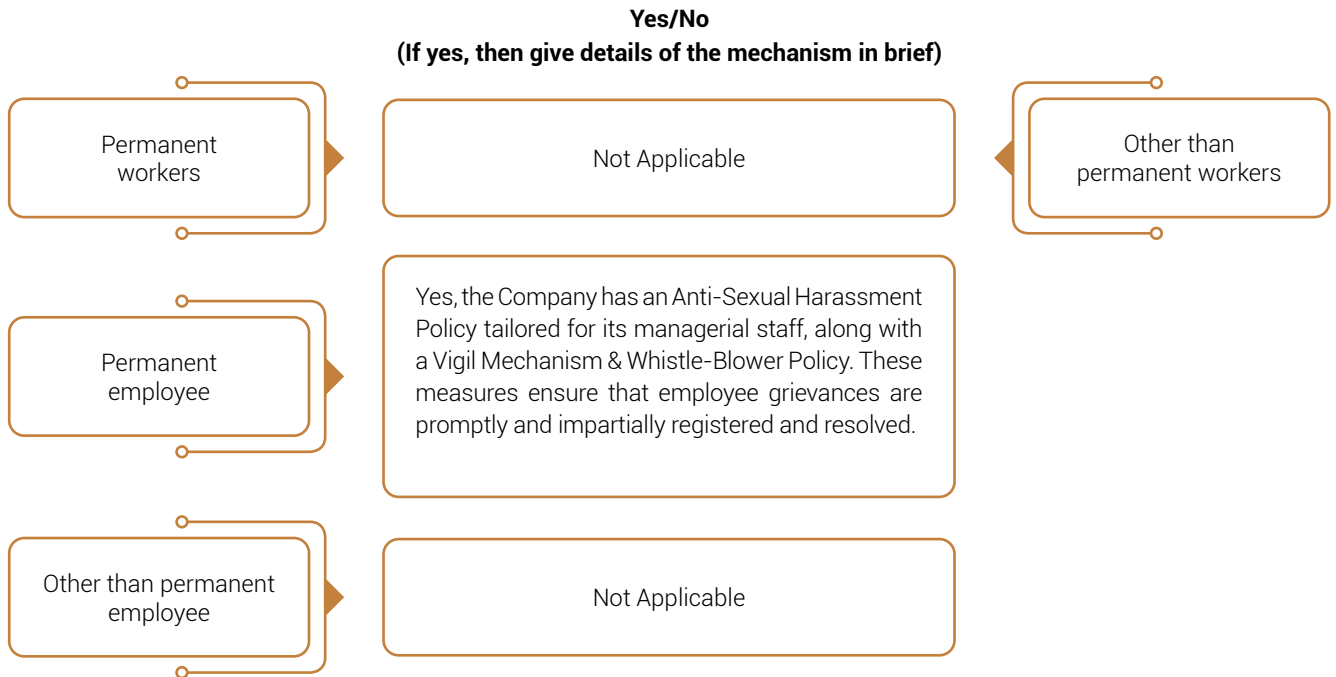
## 5. RETURN TO WORK AND RETENTION RATES OF PERMANENT EMPLOYEES AND WORKERS THAT TOOK PARENTAL LEAVE.

Gender	Permanent employee		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	Not Applicable		Not Applicable	
Female	3	100%	Not Applicable	
Total	3	100%		





**6. IS THERE A MECHANISM AVAILABLE TO RECEIVE AND REDRESS GRIEVANCES FOR THE FOLLOWING CATEGORIES OF EMPLOYEES AND WORKER? IF YES, GIVE DETAILS OF THE MECHANISM IN BRIEF.**



Note:

**Anti-Sexual Harassment Policy:** The Company has established a comprehensive policy for the Prevention and Redressal of Sexual Harassment in the workplace. A dedicated Internal Complaints Committee has been set up to address such issues, and employees can lodge complaints via a designated email address (ic-pwm@rathi.com). Additionally, as part of the Company employee induction process, specialised training sessions on Prevention of Sexual Harassment (POSH) are conducted, reaffirming its commitment to fostering a secure environment for all staff members.

**Vigil Mechanism & Whistle-Blower Policy:** In addition, the Company has implemented a robust Vigil Mechanism & Whistle-Blower Policy, empowering stakeholders—including contractors, suppliers, service providers, Directors, and employees—with the authority to voice genuine concerns or grievances. This mechanism encompasses the reporting of significant deviations from management policies, instances of unethical conduct, fraud, or legal violations. By ensuring transparent communication channels and a fair process for addressing grievances, the Company underscores its dedication to upholding integrity and accountability across all levels of operation.

**7. MEMBERSHIP OF EMPLOYEES AND WORKER IN ASSOCIATION(S) OR UNIONS RECOGNISED BY THE LISTED ENTITY:**

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	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 employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)
<b>Total permanent employees</b>	Nil	Nil	NA	Nil	Nil	NA
Male	Nil	Nil	NA	Nil	Nil	NA
Female	Nil	Nil	NA	Nil	Nil	NA
<b>Total permanent workers</b>	Nil	Nil	NA	Nil	Nil	NA
Male	Nil	Nil	NA	Nil	Nil	NA
Female	Nil	Nil	NA	Nil	Nil	NA

Although the Company does not have a labour union, it highly regards the employees' right to peaceful association and collective bargaining. Moreover, the Company actively encourages open dialogue and direct interaction between management and employees, nurturing a supportive and collaborative workplace atmosphere.





**8. DETAILS OF TRAINING GIVEN TO EMPLOYEES AND WORKERS:**

The Company training requirements are specifically designed to align skills with its goals. The organisation emphasises tailored programmes, fosters a culture of continuous learning, and harnesses technology to deliver training effectively.

The Company induction programmes offer new hires comprehensive insights into the organisation's history, culture, products, processes, and team dynamics. Training covers essential topics, including the Employee Code of Conduct and workplace harassment prevention. Additionally, employees receive continuous training in areas such as personality development, computer proficiency, interpersonal skills, corporate etiquette, emotional intelligence, negotiation skills, networking skills, problem solving and decision-making, time management, and domain-specific expertise.

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	661	Nil	NA	359	54%	545	Nil	NA	297	54%
Female	351	Nil	NA	254	72%	289	Nil	NA	193	67%
Total	1012	Nil	NA	613	61%	834	Nil	NA	490	59%
Workers										
Male										
Female	Not Applicable									
Total										

**9. DETAILS OF PERFORMANCE AND CAREER DEVELOPMENT REVIEWS OF EMPLOYEES AND WORKER:**

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	661	345	52%	545	291	53%
Female	351	236	67%	289	179	62%
<b>Total</b>	<b>1,012</b>	<b>581</b>	<b>57%</b>	<b>834</b>	<b>470</b>	<b>56%</b>
<b>Workers</b>						
Male						
Female	Not Applicable					
<b>Total</b>						

#### 10. HEALTH AND SAFETY MANAGEMENT SYSTEM:

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

The Company has carefully crafted a robust framework to oversee occupational health and safety. This reflects the Company's commitment to fostering a safe and healthy work environment conducive to fulfilling its responsibilities with the utmost effectiveness. This comprehensive framework encompasses all aspects under the organisation's sphere of influence that could potentially impact the performance of occupational health and safety. Key elements of this framework include adherence to legal and regulatory requirements, thorough risk assessment and mitigation strategies. Additionally, it involves the provision of comprehensive orientation and job-specific training for all staff, along with specialised training tailored for employees in pivotal roles. Moreover, the Company crafts an annual execution plan involving consultation, active employee participation, and stakeholder engagement to establish objectives and ensure continuous improvement in its health and safety practices.

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

Given the nature of the Company's operations, direct applicability is limited. Nonetheless, hazard identification remains a continuous process, diligently conducted by designated employees within the Company.

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

Not Applicable

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

Yes. Every employee at the Company is covered by health insurance a personal accident policy.

#### 11. DETAILS OF SAFETY-RELATED INCIDENTS:

Safety incident/number	Category	2023-24 (Current financial year)	2022-23 (Previous financial year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees Workers	Nil Not Applicable	Nil Not Applicable
Total recordable work-related injuries	Employees Workers	Nil Not Applicable	Nil Not Applicable
No. of fatalities	Employees Workers	Nil Not Applicable	Nil Not Applicable
High-consequence work-related injury or ill-health (excluding fatalities)	Employees Workers	Nil Not Applicable	Nil Not Applicable

**12. DESCRIBE THE MEASURES TAKEN BY THE ENTITY TO ENSURE A SAFE AND HEALTHY WORKPLACE.**

Recognising the significant impact of a healthy work environment on employee motivation, productivity, and overall well-being, the Company has implemented substantial measures to secure and promote good health within its offices. These measures encompass various aspects:

- o Maintenance of fire safety equipment through an annual contract, including regular testing for effectiveness.
- o Placement of first aid kits at multiple locations within the office premises, accompanied by comprehensive employee training in first aid protocols, to enhance workplace safety and reduce accidents.
- o Monthly pest audits and periodic pest control treatments to maintain optimal hygiene levels and ensure a safe and healthy workspace.
- o Provision of oxygen concentrators on each floor, coupled with staff training for efficient operation during emergencies.
- o Collaboration with authorised vendors for the annual maintenance of all fire equipment.
- o Monthly checks by a tech-secure vendor on fire-fighting equipment and alarm systems, along with bi-monthly testing of fire alarms and extinguishers.
- o Regular inspection of emergency evacuation passages to ensure they are free from obstructions.
- o Availability of wheelchairs and stretchers for emergency situations.
- o Prioritisation of emotional and mental health through partnerships with external agencies for Employee Assistance Programs (EAP) services, offering counselling via various mediums and discreet provision of self-help resources to ensure confidentiality and anonymity

**13. NUMBER OF COMPLAINTS ON THE FOLLOWING MADE BY EMPLOYEES AND WORKERS:**

	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Filed during the year	Pending resolutions at the end of year	Remarks	Filed during the year	Pending resolutions at the end of year	Remarks
Working conditions	Nil	NA	NA	Nil	NA	NA
Health & safety	Nil	NA	NA	Nil	NA	NA



#### 14. ASSESSMENTS FOR THE YEAR:

	% of your plants and offices that were assessed (by the entity or statutory authorities or third parties)
Health and safety practices	Not Applicable
Working conditions	

#### 15. PROVIDE DETAILS OF ANY CORRECTIVE ACTION TAKEN OR UNDERWAY TO ADDRESS SAFETY-RELATED INCIDENTS (IF ANY) AND ON SIGNIFICANT RISKS/CONCERNS ARISING FROM ASSESSMENTS OF HEALTH & SAFETY PRACTICES AND WORKING CONDITIONS.

The Company has addressed safety concerns within its office premises. By collaborating with its pest control vendor, the Company devised a strategic plan that effectively eradicated pest infestations, significantly enhancing the workplace environment. Furthermore, the Company is currently in the process of establishing an Emergency Response Team (ERT) to proficiently manage any office emergencies, with completion anticipated by June 2024. Moreover, these initiatives demonstrate the Company commitment to guaranteeing the safety and well-being of its employees.

### Leadership Indicators

#### 1. DOES THE ENTITY EXTEND ANY LIFE INSURANCE OR ANY COMPENSATORY PACKAGE IN THE EVENT OF THE DEATH OF (A) EMPLOYEES (Y/N) (B) WORKERS (Y/N).

The Company offers employment opportunities to the spouse or dependents of a deceased employee. Furthermore, priority is given to settling benefits, including term life insurance, accidental insurance, provident fund, gratuity, and superannuation. Additionally, comprehensive group medical insurance coverage is provided for all employees and their families, including spouses and up to two children.

#### 2. PROVIDE THE MEASURES UNDERTAKEN BY THE ENTITY TO ENSURE THAT STATUTORY DUES HAVE BEEN DEDUCTED AND DEPOSITED BY THE VALUE CHAIN PARTNERS.

The Company diligently deducts and remits taxes in accordance with regulatory framework governing transactions within its jurisdiction. This process is subjected to thorough review through both internal and statutory audits to uphold compliance and accuracy.



3. PROVIDE THE NUMBER OF EMPLOYEES/WORKERS HAVING SUFFERED HIGH CONSEQUENCE WORK- RELATED INJURY/ILL-HEALTH/FATALITIES (AS REPORTED IN Q11 OF ESSENTIAL INDICATORS ABOVE), WHO HAVE BEEN REHABILITATED AND PLACED IN SUITABLE EMPLOYMENT OR WHOSE FAMILY MEMBERS HAVE BEEN PLACED IN SUITABLE EMPLOYMENT:

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	2023-24 (Current financial year)	2022-23 (Previous financial year)	2023-24 (Current financial year)	2022-23 (Previous financial year)
Employees	Nil		Nil	
Workers	Not Applicable		Not Applicable	

4. DOES THE ENTITY PROVIDE TRANSITION ASSISTANCE PROGRAMS TO FACILITATE CONTINUED EMPLOYABILITY AND THE MANAGEMENT OF CAREER ENDINGS RESULTING FROM RETIREMENT OR TERMINATION OF EMPLOYMENT?
- No

5. DETAILS ON ASSESSMENT OF VALUE CHAIN PARTNERS:



6. PROVIDE DETAILS OF ANY CORRECTIVE ACTIONS TAKEN OR UNDERWAY TO ADDRESS SIGNIFICANT RISKS/ CONCERNS ARISING FROM ASSESSMENTS OF HEALTH AND SAFETY PRACTICES AND WORKING CONDITIONS OF VALUE CHAIN PARTNERS.

Not Applicable.

## PRINCIPLE 4

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

### Essential Indicators

#### 1. DESCRIBE THE PROCESSES FOR IDENTIFYING KEY STAKEHOLDER GROUPS OF THE ENTITY.

The Company is dedicated to delivering top-tier services in mutual fund distribution. The Company's stakeholders comprise a rich tapestry of groups, encompassing clients, employees, banking institutions, custodial partners, business associates, shareholders, regulatory bodies, and communities.

With a firm commitment to nurturing strong alliances across all stakeholder categories, the Company carefully identifies and prioritises these groups based on their potential to strengthen its business endeavours.

The key stakeholders recognised by the Company include:

- a. Employees
- b. Clients/customers
- c. Shareholders
- d. Beneficiaries of CSR projects
- e. Regulatory bodies



## 2. LIST STAKEHOLDER GROUPS IDENTIFIED AS KEY FOR YOUR ENTITY AND THE FREQUENCY OF ENGAGEMENT WITH EACH STAKEHOLDER GROUP.

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (e-mail, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website), other	Frequency of engagement (annually/half yearly/quarterly/others)	Purpose and scope of engagement, including key topics and concerns raised during such engagement
<b>Employees</b>	<b>No</b>	One-on-one interactions, e-mail, senior management meetings, internal communication platforms	Quarterly, annually, need-based	Facilitate career development, ensure fair compensation and benefits, reinforce work ethics and policies, and foster effective communication and team building among employees
<b>Clients/ customers</b>		Branch assistance, e-mails, website, advertisements, newspapers and other digital platforms, customer helplines and toll-free numbers, customer satisfaction surveys	Ongoing and need-based	Provide superior customer service throughout the life cycle, address client needs and concerns, and gather feedback to improve services.
<b>Shareholders</b>		Quarterly earnings calls, e-mails, SMS, newspapers, advertisement, notices, website, Annual General meeting, intimation to stock exchanges, quarter financials and investor meetings/ conferences, investor presentations, press releases, annual reports, audio recording of the earnings call, and transcripts	At least quarterly and need-based	Keep shareholders informed about Company developments, performance, and industry trends, address shareholder concerns and grievances, provide transparency and accountability in corporate operations
<b>Regulatory bodies</b>		E-mails, one-on-one meetings, conference calls, video conferencing, websites	Need-based	Engage in discussions regarding approvals, circulars, guidelines, suggestions, amendments, and other regulatory matters, and ensure compliance with applicable laws and regulations
<b>Beneficiaries of CSR projects</b>	<b>Yes</b>	Partnership with local charities, community visits	Quarterly and need-based	Monitor and implement CSR projects and activities, ensure alignment with community needs and expectations, and evaluate the impact of CSR initiatives





## Leadership Indicators

- 1. PROVIDE THE PROCESSES FOR CONSULTATION BETWEEN STAKEHOLDERS AND THE BOARD ON ECONOMIC, ENVIRONMENTAL AND SOCIAL TOPICS OR IF CONSULTATION IS DELEGATED, HOW IS FEEDBACK FROM SUCH CONSULTATIONS PROVIDED TO THE BOARD.**

In its effort to enhance communication about its performance and strategies, the Company places strong emphasis on continuous and proactive engagement with its stakeholders. The Board receives regular updates on various developments, with Directors encouraged to provide feedback on these updates.

- 2. WHETHER STAKEHOLDER CONSULTATION IS USED TO SUPPORT THE IDENTIFICATION AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL TOPICS (YES/NO). IF SO, PROVIDE DETAILS OF INSTANCES AS TO HOW THE INPUTS RECEIVED FROM STAKEHOLDERS ON THESE TOPICS WERE INCORPORATED INTO POLICIES AND ACTIVITIES OF THE ENTITY.**

Taking a proactive stance, the Company conducts root-cause analyses of customer complaints and grievances, leveraging them as valuable opportunities to elevate service delivery. Furthermore, the Company dedicated CSR team identifies needy and underserved areas, spearheading health and educational aid initiatives that actively engage stakeholders to foster a positive community impact.

- 3. PROVIDE DETAILS OF INSTANCES OF ENGAGEMENT WITH, AND ACTIONS TAKEN TO, ADDRESS THE CONCERNS OF VULNERABLE/MARGINALISED STAKEHOLDER GROUPS.**

The Company has made significant strides in fulfilling its commitment to uplifting communities through its core aspect of Corporate Social Responsibility (CSR). With a dedicated focus on empowerment, the Company proactively involves itself with marginalised and vulnerable segments of society, particularly in domains, such as education, healthcare, and rural development. This commitment transcends mere philanthropy, aiming for holistic change that addresses root causes and fosters sustainable development. Additionally, the Company flagship CSR initiatives epitomise this approach, utilising a blended finance approach to maximise impact and ensure enduring sustainability in its community initiatives.





## PRINCIPLE 5

Businesses should respect and promote human rights.

### Essential Indicators

#### 1. EMPLOYEES AND WORKERS WHO HAVE BEEN PROVIDED TRAINING ON HUMAN RIGHTS ISSUES AND POLICY(IES) OF THE ENTITY:

Category	2023-24 (Current financial year)			2022-23 (Previous financial year)		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	1,012	1,012	100%	834	525	63%
Other than permanent	NA	NA	NA	NA	NA	NA
<b>Total employees</b>	1,012	1,012	100%	NA	NA	NA
<b>Workers</b>						
Permanent						
Other than permanent						
<b>Total employees</b>						

#### 2. DETAILS OF MINIMUM WAGES PAID TO EMPLOYEES AND WORKERS:

Category	2023-24 (Current financial year)					2022-23 (Previous financial year)				
	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	661	44	6.65%	617	93.34%	545	46	8.44%	499	91.56%
Female	351	11	3.13%	340	96.86%	289	7	2.42%	282	97.57%
Other than Permanent										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent										
Male										
Female										
Other than Permanent										
Male										
Female										

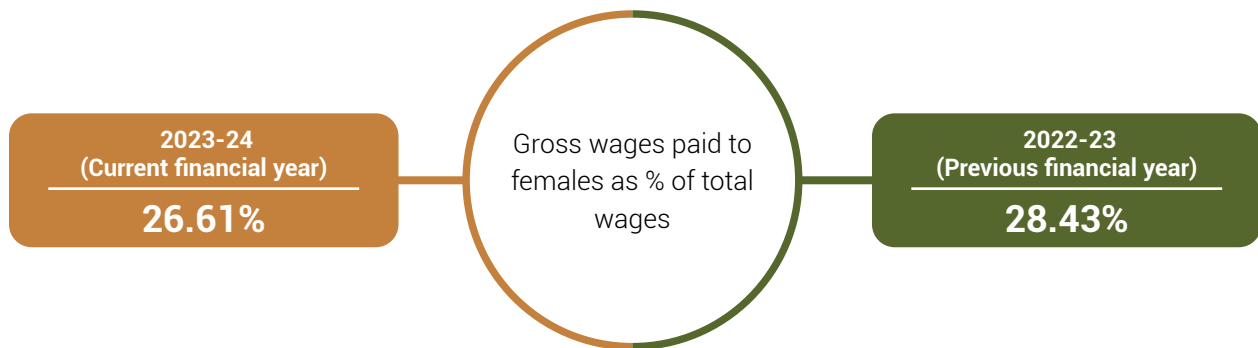
### 3. DETAILS OF REMUNERATION / SALARY / WAGES:

Category	Male		Female	
	Number	Median remuneration/ salary/wages of respective category	Number	Median remuneration/ salary/wages of respective category
Board of Directors (BoD) (in ₹)				
Executive Director*	1	77,620,000	-	NA
Non-Executive Director	2	NA	-	NA
Independent Director**	3	NA	1	NA
Key Managerial Personnel	3	12,420,000	-	NA
Employees other than BoD and KMP	661	992,000	351	792,000
Workers				N.A

\* Only one Executive Director receives remuneration.

\*\* The Independent Directors are compensated solely through sitting fees for their attendance at Board or Committee meetings, whether in person or via VC/OAVM.

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



#### 4. DO YOU HAVE A FOCAL POINT (INDIVIDUAL/COMMITTEE) RESPONSIBLE FOR ADDRESSING HUMAN RIGHTS IMPACTS OR ISSUES CAUSED OR CONTRIBUTED TO BY THE BUSINESS? (YES/NO)

Yes.

The Company is committed to fortifying its stance on human rights and has implemented crucial policies like the Anti-Sexual Harassment Policy and Whistle-blower Policy to uphold these values. The Human Resources team acts as the primary point of contact for human rights issues. They diligently ensure that all members of the organisation receive consistent briefings and education on these policies, fostering heightened awareness and compliance.

**5. DESCRIBE THE INTERNAL MECHANISMS IN PLACE TO REDRESS GRIEVANCES RELATED TO HUMAN RIGHTS ISSUES.**

The Company demonstrates a firm commitment to upholding human rights, fostering a culture of non-discrimination within its workforce, and providing avenues for addressing grievances from its key stakeholders. The Company's Code of Conduct is developed to uphold and promote human rights principles, ensuring full compliance with the Constitution of India, national laws, and policies governing human rights. Central to the Company ethos is the preservation of dignity and respect of all stakeholders and customers, a principle held in the highest regard.

With established policies on Whistle-blower protection and Prevention of Sexual Harassment of Women at the workplace, the Company addresses human rights issues comprehensively, striving to promote the fundamental rights and freedoms of individuals. Moreover, rigorous measures are in place to prevent common human rights violations, such as discrimination, violence, forced labour, and privacy infringements, ensuring a workplace environment aligned with ethical standards and legal requirements.

**6. NUMBER OF COMPLAINTS ON THE FOLLOWING MADE BY EMPLOYEES AND WORKERS:**

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

Sexual Harassment

Discrimination at Workplace

Child Labour

Forced Labour / Involuntary Labour

Wages

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:**

	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees/workers	Nil	Nil
Complaints on POSH upheld	NA	NA

**8. MECHANISMS TO PREVENT ADVERSE CONSEQUENCES TO THE COMPLAINANT IN DISCRIMINATION AND HARASSMENT CASES.**

The Company places a high priority on safeguarding confidentiality and ensuring the well-being of complainants throughout the investigation process. This includes regular follow-ups to mitigate any potential negative consequences and uphold their safety. Additionally, the Company is committed to providing equitable opportunities to all employees, contractors, and visitors, and strictly prohibits any form of discriminatory behaviour. Under the organisation's Policy on Prevention of Sexual Harassment of Women at Workplace, the Company has established an internal Complaints Committee to protect complainants from adverse repercussions, while maintaining their anonymity. As an equal-opportunity employer, the Company nurtures a welcoming and just atmosphere, where all employees are valued for their skills, experiences, and perspectives, irrespective of race, colour, ancestry, gender identity, sexual orientation, marital status, religion, age, or disability.

**9. DO HUMAN RIGHTS REQUIREMENTS FORM PART OF YOUR BUSINESS AGREEMENTS AND CONTRACTS? (YES/NO) :**

No

**10. ASSESSMENTS FOR THE YEAR:**





**11. PROVIDE DETAILS OF ANY CORRECTIVE ACTIONS TAKEN OR UNDERWAY TO ADDRESS SIGNIFICANT RISKS/ CONCERNS ARISING FROM THE ASSESSMENTS AT QUESTION 9 ABOVE.**

Not Applicable.

## Leadership Indicators

**1. DETAILS OF A BUSINESS PROCESS BEING MODIFIED/INTRODUCED AS A RESULT OF ADDRESSING HUMAN RIGHTS GRIEVANCES/COMPLAINTS.**

Not Applicable.

**2. DETAILS OF THE SCOPE AND COVERAGE OF ANY HUMAN RIGHTS DUE-DILIGENCE CONDUCTED.**

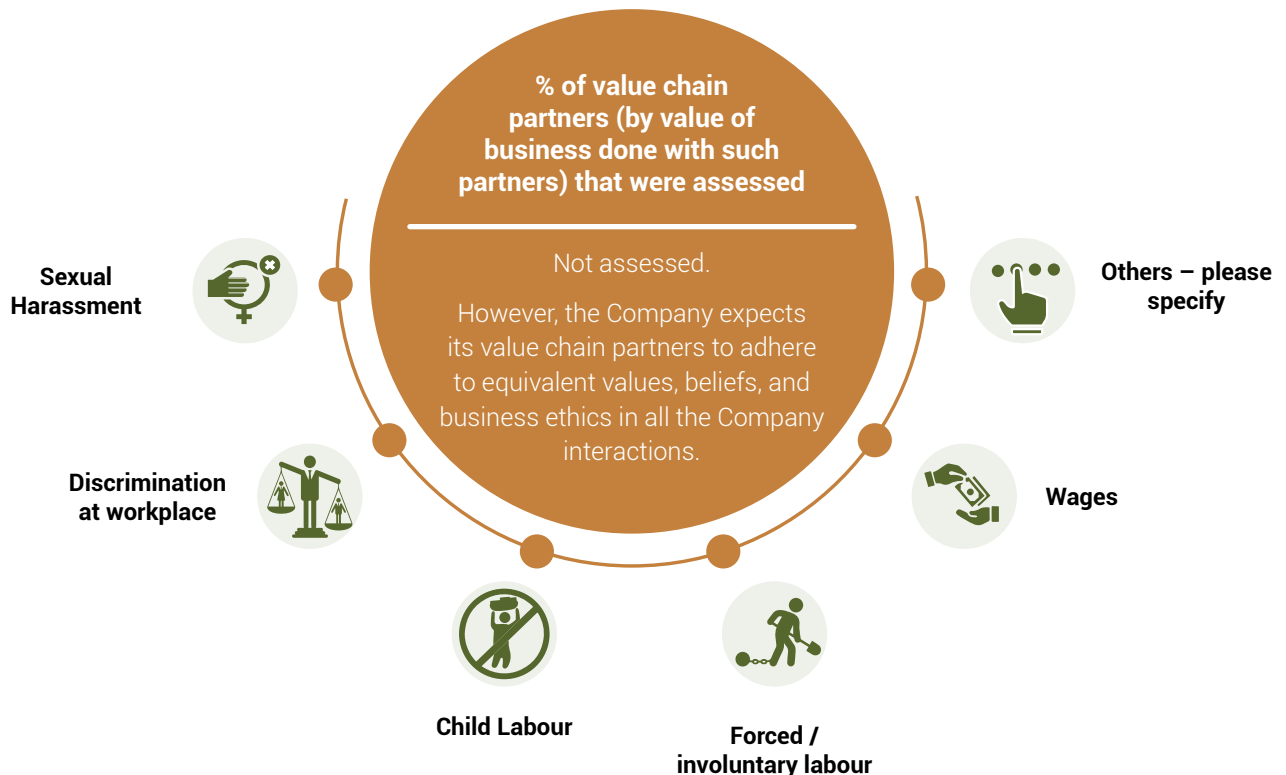
During the year, no human rights due-diligence was conducted by the Company.

**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. Please refer to question no. 3 under the essential indicators of Principle 3 of this report.

The Company places utmost importance on human rights, striving to establish a safe and inclusive environment for all individuals. Several initiatives like installing elevators and ramps for enhanced accessibility, have been introduced to assist individuals with disabilities. Furthermore, these endeavours reflect the Company commitment to ensuring that every employee feels appreciated and can navigate the workplace with convenience and confidence.

**4. DETAILS ON ASSESSMENT OF VALUE CHAIN PARTNERS:**



**5. PROVIDE DETAILS OF ANY CORRECTIVE ACTIONS TAKEN OR UNDERWAY TO ADDRESS SIGNIFICANT RISKS/ CONCERNS ARISING FROM THE ASSESSMENTS AT QUESTION 4 ABOVE.**

Not Applicable

## PRINCIPLE 6

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

### Essential Indicators

#### 1. DETAILS OF TOTAL ENERGY CONSUMPTION (IN JOULES OR MULTIPLES) AND ENERGY INTENSITY IN THE FOLLOWING FORMAT:

Parameter	2023-24 (Current financial year) (in GJ)	2022-23 (Previous financial year) (in GJ)
<b>From renewable sources</b>		
Total electricity consumption (A)	-	-
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	-	-
<b>From non-renewable sources</b>		
Total electricity consumption (D)	3,217.30	2,560.23
Total fuel consumption (E)	69.41	51.39
Energy consumption through other sources (F)	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	3,286.71	2,611.62
<b>Total energy consumed (A+B+C+D+E+F)</b>	3,286.71	2,611.62
<b>Energy intensity per rupee of turnover</b> (Total energy consumption in GJ/turnover in ₹ Crore)	4.57	4.85
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/revenue from operations adjusted for PPP)	1.24	3.13
Energy intensity in terms of physical output (Total energy consumed in GJ/employee)	3.25	3.13
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No) – No

#### 2. DOES THE ENTITY HAVE ANY SITES/FACILITIES IDENTIFIED AS DESIGNATED CONSUMERS (DCS) UNDER THE PERFORMANCE, ACHIEVE AND TRADE (PAT) SCHEME OF THE GOVERNMENT OF INDIA? (Y/N) IF YES, DISCLOSE WHETHER TARGETS SET UNDER THE PAT SCHEME HAVE BEEN ACHIEVED. IN CASE TARGETS HAVE NOT BEEN ACHIEVED, PROVIDE THE REMEDIAL ACTION TAKEN, IF ANY.

PAT scheme is not applicable for the Company.



### 3. DETAILS OF THE FOLLOWING DISCLOSURES RELATED TO WATER:

Parameter	2023-24 (Current financial year) (in GJ)	2022-23 (Previous financial year) (in GJ)
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	Not Applicable	Not Applicable
(ii) Groundwater	Not Applicable	Not Applicable
(iii) Third party water {Brihanmumbai Municipal Corporation (BMC) supply}	404.08	1,058.08
(iv) Seawater/desalinated water	NA	NA
(v) Others	NA	NA
<b>Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)</b>	404.08	1,058.08
<b>Total volume of water consumption (in kiloliters)</b>	404.08	1,058.08
<b>Water intensity per rupee of turnover</b> (Water consumed in KL/turnover in ₹ Crore)	0.56	1.97
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption/revenue from operations adjusted for PPP)	0.15	0.54
<b>Water intensity in terms of physical output</b> (Total water consumption in KL/employee)	0.40	1.27
<b>Water intensity</b> (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? (Yes/No) – No

**4. DETAILS RELATED TO WATER DISCHARGED:**

Not Applicable

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) To surface water		
- No treatment		
- With treatment – level of treatment		
(ii) To groundwater		
- No treatment		
- With treatment – level of treatment		
(iii) To seawater		
- No treatment	NA	NA
- With treatment – level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – level of treatment		
(v) Others		
- No treatment		
- With treatment – level of treatment		
<b>Total water discharged (in kilolitres)</b>		

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No) – No

**5. HAS THE ENTITY IMPLEMENTED A MECHANISM FOR ZERO LIQUID DISCHARGE? IF YES, PROVIDE DETAILS OF ITS COVERAGE AND IMPLEMENTATION.**

Not Applicable



**6. DETAILS OF AIR EMISSIONS (OTHER THAN GHG EMISSIONS) BY THE ENTITY:**

Parameter	Please specify unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
NOx			
Sox			
Particulate matter (PM)			
Persistent organic pollutants (POP)		Not Applicable	
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others			

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No) – No

**7. DETAILS OF GREENHOUSE GAS EMISSIONS (SCOPE 1 AND SCOPE 2 EMISSIONS) & ITS INTENSITY:**

Parameter	Unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Scope 1 emissions	tCO <sub>2</sub> e	4.79	3.23
Total Scope 2 emissions	tCO <sub>2</sub> e	723.89	576.05
<b>Total Scope 1 &amp; 2 emissions</b>	tCO <sub>2</sub> e	728.67	579.28
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Emissions in tCO <sub>2</sub> e/turnover in ₹ Crore)	tCO <sub>2</sub> e/₹ Crore	1.01	1.07
<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)		0.27	0.30
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b> (Total emissions in tCO <sub>2</sub> e/employee)		0.72	0.69
<b>Total Scope 1 and Scope 2 emission intensity</b> (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? (Yes/No) – No

**8. DOES THE ENTITY HAVE ANY PROJECT RELATED TO REDUCING GREEN HOUSE GAS EMISSION? IF YES, THEN PROVIDE DETAILS.**

The Company has undertaken several initiatives towards becoming environmentally sustainable and reducing their GHG emissions:

- i. **Reducing plastic usage:** The Company has transitioned from plastic pens to eco-friendly paper pens in its office stationery, thereby reducing plastic consumption and demand for plastic production. This shift contributes to a decrease in harmful carbon dioxide emissions, benefitting the environment.
- ii. **Usage of recycled paper:** Currently, the Company uses recycled paper notepads instead of fresh paper ones, conserving trees, reducing water usage, and minimising solid waste in landfills, and lowering carbon dioxide emissions.
- iii. **Provision of Company transport facility:** The Company offers bus transportation to employees, reducing private vehicle usage and carbon dioxide emissions, thus promoting cleaner air quality.
- iv. **Energy Efficiency:** Through the installation of motion sensors for office lighting and the utilisation of HVAC equipment with high energy ratings, the Company significantly saves power. This reduction in power consumption lessens the need for energy generation, subsequently lowering carbon dioxide emissions associated with fossil fuel combustion.

**9. DETAILS RELATED TO WASTE MANAGEMENT BY THE ENTITY:**

Not Applicable

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total waste generated (in metric tonnes)		
Plastic waste (A)		
E-waste (B)		
Bio-medical waste (C)		
Construction and demolition waste (D)		
Battery waste (E)		
Radioactive waste (F)		
Other hazardous waste (G)		
Other non-hazardous waste generated (H) (Break-up by composition i.e. by materials relevant to the sector)		Please refer the note below
<b>Waste intensity per rupee of turnover</b> (Total waste generated/Revenue from operations)		
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated/Revenue from operations adjusted for PPP)		
<b>Waste intensity in terms of physical output</b>		
<b>Waste intensity (optional) – the relevant metric may be selected by the entity</b>		
<b>Total (A + B + C + D + E + F + G + H)</b>		



Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled		
(ii) Re-used	NA	NA
(iii) Other recovery operations		
<b>Total</b>		
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration		
(ii) Landfilling	NA	NA
(iii) Other disposal operations		
<b>Total</b>		

\*Note: Battery and E-waste is dumped through recognised vendors

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No) – No

**10. BRIEFLY DESCRIBE THE WASTE MANAGEMENT PRACTICES ADOPTED IN YOUR ESTABLISHMENTS. DESCRIBE THE STRATEGY ADOPTED BY YOUR COMPANY TO REDUCE USAGE OF HAZARDOUS AND TOXIC CHEMICALS IN YOUR PRODUCTS AND PROCESSES AND THE PRACTICES ADOPTED TO MANAGE SUCH WASTES.**

Considering the nature of the Company business, it does not generate any hazardous or toxic chemical waste as a part of its operations. However, the Company exhibits proactive environmental stewardship by actively exploring sustainable alternatives to minimise plastic usage across its office and branch locations. Waste generated is handled in a systematic manner, as described below:

- Paper and dustbin bags are responsibly handled and sent to the state municipal authorities.
- E-waste disposal is meticulously managed through accredited vendors, ensuring adherence to environmental standards and regulations.

**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:**

Location of operations/offices	Type of operations	Whether the conditions of environmental approval/ clearance are being complied with? (Yes/No) If no, the reasons thereof and corrective action taken, if any.
Not Applicable		

**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
Not Applicable					

**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 (YES/NO). IF NOT, PROVIDE DETAILS OF ALL SUCH NON-COMPLIANCES:**

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

**Leadership Indicators**

**1. WATER WITHDRAWAL, CONSUMPTION AND DISCHARGE IN AREAS OF WATER STRESS (IN KILOLITRES):**

Not Applicable

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

- (i) Name of the area: Not Applicable
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge:

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water		
(ii) Groundwater		
(iii) Third-party water		
(iv) Seawater/desalinated water		
(v) Others		
<b>Total volume of water withdrawal (in kilolitres)</b>		
<b>Total volume of water consumption (in kilolitres)</b>		
<b>Water intensity per rupee of turnover</b> (Water consumed/turnover)		
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity		



Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into surface water		
- No treatment		
- With treatment – level of treatment		
(ii) Into groundwater		
- No treatment		
- With treatment – level of treatment		
(iii) Into seawater		
- No treatment		
- With treatment – level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – level of treatment		
(v) Others		
- No treatment		
- With treatment – level of treatment		
<b>Total water discharged (in kilolitres)</b>		

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No) – Not Applicable

## 2. DETAILS OF TOTAL SCOPE 3 EMISSIONS & ITS INTENSITY:

Parameter	Unit	2023-24 (Current financial year)	2022-23 (Previous financial year)
Total Scope 3 emissions	NA	NA	NA
<b>Total Scope 3 emissions per rupee of turnover*</b>	NA	NA	NA
<b>Total Scope 3 emission intensity</b> (optional) – the entity may select the relevant metric	NA	NA	NA

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Yes/No) – No

## 3. WITH RESPECT TO THE ECOLOGICALLY SENSITIVE AREAS REPORTED AT QUESTION 10 OF ESSENTIAL INDICATORS ABOVE, PROVIDE DETAILS OF SIGNIFICANT DIRECT & INDIRECT IMPACT OF THE ENTITY ON BIODIVERSITY IN SUCH AREAS ALONG-WITH PREVENTION AND REMEDIATION ACTIVITIES.

Not Applicable

**4. IF THE ENTITY HAS UNDERTAKEN ANY SPECIFIC INITIATIVES OR USED INNOVATIVE TECHNOLOGY OR SOLUTIONS TO IMPROVE RESOURCE EFFICIENCY, OR REDUCE IMPACT DUE TO EMISSIONS/EFFLUENT DISCHARGE/WASTE GENERATED, PLEASE PROVIDE DETAILS OF THE SAME AS WELL AS OUTCOME OF SUCH INITIATIVES:**

Sr. no.	Initiative undertaken	Details of the initiative (web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Installation of sensor taps	Sensor taps are installed in washrooms and pantry areas to reduce water consumption and prevent waste.	Reduction in water consumption, leading to conservation.
2	Regular plumbing checks	Authorised plumbers conduct periodic checks on all plumbing equipment to detect and repair any water leakages.	Prevention of water loss due to timely maintenance.
3	Employee bus transport facility	Providing bus transport for employees reduces reliance on private vehicles, resulting in cleaner air and reduced traffic congestion.	Mitigation of environmental impact through reduced vehicular emissions.
4	Paper consumption reduction	Implementation of strategies to minimise overall paper usage, advocating for printing only when necessary.	Reduction in paper waste and conservation of resources.
5	Energy consumption reduction	Measures include using radiant cooling, replacing CFLs with LED lights, and installing sensor lights to minimise energy usage.	Decreased energy consumption, contributing to sustainability efforts.

**5. DOES THE ENTITY HAVE A BUSINESS CONTINUITY AND DISASTER MANAGEMENT PLAN?**

Yes, the Company has an Emergency Preparedness and Response Plan.

The plan was crafted to establish a structured framework and procedures for effectively addressing a range of emergencies, including fire, earthquake, and bomb threats. Clear roles and responsibilities have been assigned to staff members to ensure a seamlessly coordinated response during crisis situations. This protocol prioritises human safety, minimises property damage, and swiftly restores normal Company operations, while facilitating responsive communication with all relevant parties.

Moreover, the procedure includes specific measures to familiarise employees with essential protocols. This include 'Action in the event of fire' and 'Action on hearing the alarm,' as well as identifying designated 'Assembly Points' for each work premises. This ensures that all staff are well-prepared and equipped to respond effectively to emergencies, fostering a culture of safety and awareness in the workplace.

Additionally, the Company is currently in the process of establishing an Emergency Response Team (ERT). This dedicated team will play a vital role in proactively managing emergency preparedness by conducting regular safety drills, maintaining emergency equipment, and staying informed about best practices. Furthermore, by maintaining a constant state of readiness, the Company aims to ensure that its workplace is well-prepared to handle a wide range of potential emergencies, safeguarding the well-being of its employees and the continuity of its operations.

**6. DISCLOSE ANY SIGNIFICANT ADVERSE IMPACT TO THE ENVIRONMENT, ARISING FROM THE VALUE CHAIN OF THE ENTITY. WHAT MITIGATION OR ADAPTATION MEASURES HAVE BEEN TAKEN BY THE ENTITY IN THIS REGARDS.**

Not Applicable

**7. PERCENTAGE OF VALUE CHAIN PARTNERS (BY VALUE OF BUSINESS DONE WITH SUCH PARTNERS) THAT WERE ASSESSED FOR ENVIRONMENTAL IMPACTS.**

Not Applicable



## PRINCIPLE 7

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

### Essential Indicators

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

1 (One)

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
Association of Mutual Funds in India (AMFI)

Reach of trade and industry chambers/associations (State/National)
India

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
Not Applicable		

### Leadership Indicators

1. DETAILS OF PUBLIC POLICY POSITIONS ADVOCATED BY THE ENTITY:

Sr. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (annually/half yearly/quarterly/others)	Web link, if available
The Company showcases its commitment to upholding AMFI guidelines by engaging in educational initiatives aimed at informing investors about mutual funds and financial products.					





## PRINCIPLE 8

Businesses should promote inclusive growth and equitable development.

### Essential Indicators

#### 1. DETAILS OF SOCIAL IMPACT ASSESSMENTS (SIA) OF PROJECTS UNDERTAKEN BY THE ENTITY BASED ON APPLICABLE LAWS, IN THE CURRENT FINANCIAL YEAR.

The Company is not required to conduct any social impact assessments of its CSR projects.

However, in the Company's CSR operations, it emphasises collaboration with implementing partners to maximise social impact. This collaborative effort aims at monitoring impact to ensure appropriate utilisation of funds. It spans the programs strategy, design, implementation, governance, and impact reporting. Additionally, programs analysis and evaluation against key performance indicators drive effective monitoring and reporting to the CSR Committee and Board.

#### 2. INFORMATION ON PROJECT(S) FOR WHICH ONGOING REHABILITATION AND RESETTLEMENT (R&R) IS BEING UNDERTAKEN BY THE COMPANY:

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 ₹)
Not Applicable						

#### 3. DESCRIBE THE MECHANISMS TO RECEIVE AND REDRESS GRIEVANCES OF THE COMMUNITY.

As the Company does not engage in operations directly impacting the community, this is not applicable to the Company. Additionally, the Company's CSR activities are conducted in collaboration with various NGOs and agencies.

#### 4. PERCENTAGE OF INPUT MATERIAL (INPUTS TO TOTAL INPUTS BY VALUE) SOURCED FROM SUPPLIERS:

Parameter	2023-24 (Current financial year)	2022-23 (Previous financial year)
Directly sourced from MSMEs/small producers	Not Applicable	
Sourced directly from within the district and neighboring districts		

\* Given the nature of the business, this does not apply to the Company. However, the Company prioritises sourcing office materials from sustainable and ethical sources.



**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**

2023-24 (Current financial year)	Location	2022-23 (Previous financial year)
NA	Rural	NA
NA	Semi-Urban	NA
35.88%	Urban	28.60%
64.12%	Metropolitan	71.40%

### Leadership Indicators

**1. PROVIDE DETAILS OF ACTIONS TAKEN TO MITIGATE ANY NEGATIVE SOCIAL IMPACTS IDENTIFIED IN THE SOCIAL IMPACT ASSESSMENTS (REFERENCE: QUESTION 1 OF ESSENTIAL INDICATORS ABOVE):**

Details of negative social impact identified	Corrective action taken
Not Applicable	



**2. PROVIDE THE FOLLOWING INFORMATION ON CSR PROJECTS UNDERTAKEN BY YOUR ENTITY IN DESIGNATED ASPIRATIONAL DISTRICTS AS IDENTIFIED BY GOVERNMENT BODIES:**

The Company has conducted CSR initiatives in various locations across the states of Maharashtra, Madhya Pradesh, Rajasthan, Karnataka, Tamil Nadu, West Bengal, and Odisha. However, none of these initiatives are undertaken in designated aspirational districts as identified by government bodies.

**3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised/vulnerable groups?**

The Company actively encourages procurement from small business units seeking social upliftment. However, owing to the nature of the business, the Company does not currently have a specific preferential procurement policy in place.

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

Not Applicable.

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

Not Applicable.

**4. DETAILS OF THE BENEFITS DERIVED AND SHARED FROM THE INTELLECTUAL PROPERTIES OWNED OR ACQUIRED BY YOUR ENTITY (IN THE CURRENT FINANCIAL YEAR), BASED ON TRADITIONAL KNOWLEDGE:**

Sr. No.	Intellectual property based on traditional knowledge	Owned/acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
Not Applicable				

**5. DETAILS OF CORRECTIVE ACTIONS TAKEN OR UNDERWAY, BASED ON ANY ADVERSE ORDER IN INTELLECTUAL PROPERTY RELATED DISPUTES WHEREIN USAGE OF TRADITIONAL KNOWLEDGE IS INVOLVED.**

Name of authority	Brief of the case	Corrective action taken
Not Applicable		

**6. 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	Maharshi Vedvyas Pratishthan	800	100.00%
2	Prabandh Samiti Adarsh Vidya Mandir	4,462	100.00%
3	Global Vikas Trust	88	100.00%
4	Parivaar Education Society	561	100.00%
5	Brahma Savitri Ved Vidhya Peeth Pushkar	105	100.00%
6	Shree Bhagwan Mahaveer Viklang Sahayata Samiti	115	100.00%

**PRINCIPLE 9**

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

**Essential Indicators****1. DESCRIBE THE MECHANISMS IN PLACE TO RECEIVE AND RESPOND TO CONSUMER COMPLAINTS AND FEEDBACK.**

The policy implements a centralised system to manage complaints, aiming for prompt resolution and equitable treatment for clients. Complaints undergo thorough analysis to identify root causes, enabling efficient handling and timely responses within designated timelines. Moreover, clients are informed of their rights and provided with alternative remedies as part of the Company commitment to transparency and client satisfaction. Furthermore, clients are encouraged to lodge their complaints or provide feedback via the Company designated email address: clientredressal@rathi.com.

**2. TURNOVER OF PRODUCTS AND/OR SERVICES AS A PERCENTAGE OF TURNOVER FROM ALL PRODUCTS/SERVICE THAT CARRY INFORMATION ABOUT:**

	As a percentage to total turnover
Environmental and social parameters relevant to the product	
Safe and responsible usage	Not Applicable*
Recycling and/or safe disposal	

\* The Company is engaged in the business of providing mutual fund distribution services and receives distribution commissions on a trial basis from asset management firms.

**3. NUMBER OF CONSUMER COMPLAINTS IN RESPECT OF THE FOLLOWING:**

	2023-24 (Current financial year)		Remarks	2022-23 (Previous financial year)		Remarks
	Received during the year	Pending resolutions at end of year		Received during the year	Pending resolutions at end of year	
Data privacy	Nil	NA	NA	Nil	NA	NA
Advertising	Nil	NA	NA	Nil	NA	NA
Cyber-security	Nil	NA	NA	Nil	NA	NA
Delivery of essential services	Nil	NA	NA	Nil	NA	NA
Restrictive trade practices	Nil	NA	NA	Nil	NA	NA
Unfair trade practices	Nil	NA	NA	Nil	NA	NA
Other	Nil	NA	NA	Nil	NA	NA

**4. DETAILS OF INSTANCES OF PRODUCT RECALLS ON ACCOUNT OF SAFETY ISSUES:**

	Number	Reasons for recall
Voluntary recalls		
Forced recalls		Not Applicable

**5. DOES THE ENTITY HAVE A FRAMEWORK/POLICY ON CYBER SECURITY AND RISKS RELATED TO DATA PRIVACY? (YES/NO) IF AVAILABLE, PROVIDE A WEB-LINK OF THE POLICY.**

Yes, the Company has implemented policies for Information Security (IS) as well as Cyber Security and Cyber Resilience (CSRP). These policies are readily accessible to all employees via the Company's intranet platform. However, as it is an internal resource, a web-link to the policy is unavailable.

**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:**

There were no reported instances of data breaches during 2023-24.

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

Not Applicable

## **Leadership Indicators**

**1. CHANNELS/PLATFORMS WHERE INFORMATION ON PRODUCTS AND SERVICES OF THE ENTITY CAN BE ACCESSED (PROVIDE WEB LINK, IF AVAILABLE).**

Information regarding products and other services is available on the Company website at: <https://anandrathiwealth.in/pwm.php>.

**2. STEPS TAKEN TO INFORM AND EDUCATE CONSUMERS ABOUT SAFE AND RESPONSIBLE USAGE OF PRODUCTS AND/OR SERVICES.**

The Company ensures compliance with all disclosure requirements pertaining to its products and services. This commitment involves strict adherence to the product labelling guidelines outlined by AMFI/SEBI within risk and disclosure categories.

**3. MECHANISMS IN PLACE TO INFORM CONSUMERS OF ANY RISK OF DISRUPTION/DISCONTINUATION OF ESSENTIAL SERVICES.**

In the event of any planned or unplanned disruption of services related to its digital platforms (e.g., website), the Company promptly informs its clients of the cause of the unavailability and provides an estimated time for resolution. Additionally, the Company proactively notifies customers of the availability of alternative channels for continued service.

**4. DOES THE ENTITY DISPLAY PRODUCT INFORMATION ON THE PRODUCT OVER AND ABOVE WHAT IS MANDATED AS PER LOCAL LAWS? (YES/NO/NOT APPLICABLE) IF YES, PROVIDE DETAILS IN BRIEF. DID YOUR ENTITY CARRY OUT ANY SURVEY WITH REGARD TO CONSUMER SATISFACTION RELATING TO THE MAJOR PRODUCTS/SERVICES OF THE ENTITY, SIGNIFICANT LOCATIONS OF OPERATION OF THE ENTITY OR THE ENTITY AS A WHOLE? (YES/NO)**

Yes, the Company upholds transparency and ensures customers can access all relevant information. Product communication is conducted through various channels like SMS, emails, and other platforms. Additionally, detailed product information is accessible on the Company website at: <https://anandrathiwealth.in/index.php>

As for conducting surveys regarding consumer satisfaction, the Company has not carried out any such survey during 2023-24.