

Business Responsibility and Sustainability Report



SECTION A: GENERAL DISCLOSURES

I Details of the listed entity

	Remarks
1 Corporate Identity Number (CIN) of the Listed Entity	L65990MH1977PLC019986
2 Name of the Listed Entity	CENTRUM CAPITAL LIMITED
3 Year of incorporation	1977
4 Registered office address	Level-9, Centrum House, C.S.T. Road, Vidyanagari Marg, Kalina, Santacruz (E) Mumbai - 400098
5 Corporate address	Level-9, Centrum House, C.S.T. Road, Vidyanagari Marg, Kalina, Santacruz (E) Mumbai - 400098
6 E-mail	secretarial@centrum.co.in
7 Telephone	022 4215 9000
8 Website	www.centrum.co.in
9 Financial year for which reporting is being done	2023-24
10 Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited, BSE Limited
11 Paid-up Capital	₹ 41,60,32,740
12 Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Jaspal Singh Bindra 022 4215 9000 cs@centrum.co.in
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 standalone basis
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):

SI No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Financial and Insurance Services	Financial Advisory, Brokerage and Consultancy Services	51.10
2	Financial and Insurance Services	Other Financial Activities	48.90

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

SI No	Product/Service	NIC Code	% of total Turnover contributed
1	Activities auxiliary to financial service activities n.e.c.	66190	100

III Operations

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

Location	Number of plants	Number of offices	Total
National	0	3	3
International	0	0	0

19 Markets served by the entity

a. Number of locations

Location	Total
National (No. of States)	3
International (No. of Countries)	0

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

0.67%

c. A brief on types of customers

The Company is engaged in providing fee based financial services to its clients comprising bluechip corporates, state and centre level undertakings (PSU), banks and financial institutions. It is also associated with fund raising exercises through placement of debt.

IV. Employees

20 Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Particulars	Total (A)	Male		Female	
		No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES					
Permanent (D)	45	35	78	10	22
Other than Permanent (E)	0	0	0	0	0
Total employees (D + E)	45	35	78	10	22
WORKERS					
Permanent (F)	0	0	0	0	0
Other than Permanent (G)	0	0	0	0	0
Total workers (F + G)	0	0	0	0	0

b. Differently abled Employees and workers

Particulars	Total (A)	Male		Female	
		No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES					
Permanent (D)	0	0	0	0	0
Other than Permanent (E)	0	0	0	0	0
Total differently abled employees (D + E)	0	0	0	0	0
DIFFERENTLY ABLED WORKERS					
Permanent (F)	0	0	0	0	0
Other than Permanent (G)	0	0	0	0	0
Total differently abled workers (F + G)	0	0	0	0	0

21 Participation/Inclusion/Representation of women

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	11	2	18.18
Key Management Personnel	3	0	0

Note : Key Managerial Personnel are Executive Chairman, Chief Financial Officer and Company Secretary. Further, Board of Directors include the Executive Chairman.

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

Particulars	FY 2024			FY 2023			FY 2022		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12.31%	34.78%	18.18%	12.20%	2.40%	14.60%	31.70%	31.20%	44.90%
Permanent Workers	Not Applicable								

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

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

SI 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	Centrum Retail Services Limited	Subsidiary	100%	No
2	Centrum Financial Services Limited	Subsidiary	99.99%	No
3	Centrum Broking Limited	Subsidiary	100%	No
4	Centrum Wealth Limited	Subsidiary	84.10%	No
5	Centrum Capital Advisors Limited	Subsidiary	100%	No
6	Centrum Housing Finance Limited	Subsidiary	56.39%	No
7	Centrum Insurance Brokers Limited	Subsidiary	100%	No
8	Centrum Investment Advisors Limited	Subsidiary	84.10%	No
9	Centrum Finverse Limited	Subsidiary	99.99%	No
10	Modulus Alternatives Investment Managers Limited	Subsidiary	82.35%	No
11	Ignis Capital Advisors Limited	Subsidiary	99.99%	No
12	Unity Small Finance Bank Limited	Subsidiary	50.99%	No
13	Acorn Fund Consultants Private Limited	Associate	49%	No

*Note: the % specified is the % of shares ultimately held by the Company either by its own and/or through its subsidiaries.

VI. CSR Details

24	(i) Whether CSR is applicable as per section 135 of Companies Act, 2013 (Yes/No):	No
	(ii) Turnover (in ₹ lakhs)	5,722.00
	(iii) Net worth (in ₹ lakhs)	39,346.60

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	-	-	-	-	-	-	-
Investors (other than shareholders)	Yes, Debenture Holders can register their complaints/grievances by writing an email to the Company ID cs@centrum.co.in	0	0	-	0	0	-
Shareholders	Yes, Shareholders can register their complaints/ grievances by writing an email to the Company ID cs@centrum.co.in	0	0	-	2	0	Complaints were suitably resolved in a timely manner.
Employees	Yes, Employees can raise their grievances through email to Group Head - HR. The Company has a Vigil Mechanism in place and employees can report as per the Whistle Blower Policy of the Company. Whistle Blower Policy is published on the website and intranet of the Company.	0	0	-	1	0	Complaints were suitably resolved in a timely manner.
Customers	Yes, Customers can raise their grievances by writing an email to the Company ID igmbd@centrum.co.in or cs@centrum.co.in	0	0	-	0	0	-
Value Chain Partners	-	-	-	-	-	-	-

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

SI No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Human Capital	Opportunity and Risk	<p>Opportunity: Due to the nature of our business, we require highly skilled and talented human capital to navigate the ever-changing regulatory environment and effectively guide our clients, customers, and stakeholders.</p> <p>Risk: There is significant competition for experienced senior management and qualified personnel, particularly office managers and executives. If we are unable to hire additional or retain existing management personnel and employees, our business expansion may be hindered, and our revenue could suffer. Inadequate training and motivation of our employees could lead to higher attrition rates, necessitate additional hiring, divert management resources, negatively impact our origination and collection rates, increase our exposure to high-risk credit, and incur significant costs.</p>	The demand for skilled human capital is high. Consequently, the Company has invested in employee learning and development, in line with market standards not only in terms of remuneration and employment benefits but also in promoting mental and physical well-being.	<p>Positive: Retaining key employees enhances customer acquisition and retention.</p> <p>Negative: High attrition rates increase employee benefit expenses and create legacy issues.</p>
2	Technology and Data Security	Opportunity and Risk	<p>Opportunity: Technology has enabled the Company to deliver services remotely, allowing us to serve clients robustly and efficiently. It acts as a catalyst for innovation, driving economic growth and creating new business opportunities. Technology facilitates the development of new products, services, and business models, enhancing productivity and competitiveness.</p> <p>Risk: Computer break-ins, power outages, and communication disruptions could compromise the security of information stored in and transmitted through our computer systems and network infrastructure.</p>	We strive to safeguard our computer systems and network infrastructure against physical intrusions, fraud, and system failures. To minimize the risk of security breaches, we utilize security measures such as firewalls and password encryption.	<p>Positive: A strong IT infrastructure provides several benefits, including enhanced efficiency, improved communication and collaboration, scalability, effective data management and security, business continuity, long-term cost savings, and a competitive edge.</p> <p>Negative: A significant failure in security measures or operational procedures could have a impact on our business. Despite our efforts to prevent system-related and other types of fraud, there is no guarantee of complete prevention.</p>

SI No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Investments in Subsidiaries	Opportunity	The Company, as a holding company, holds substantial investments in various subsidiaries engaged in diversified fee-based businesses, an expanding lending platform, and a Small Finance Bank. The Banking, Financial Services, and Insurance (BFSI) sector are poised for significant growth in the foreseeable future, propelled by government initiatives like Digital India, the Unified Payments Interface (UPI), globalization, and a shift towards a cashless economy.	-	<p>Positive: The digital lending market is anticipated to emerge as a significant catalyst for growth, with a projected book size reaching \$ 515 billion by 2030. The increasing adoption of digital payment methods and mobile applications in rural regions is paving the way for digital banking and opening up new business prospects. Furthermore, the streamlining of banking processes through digitization is expanding the accessibility of the banking sector.</p> <p>As India's high-net-worth and ultra-high-net-worth population expands, the potential for growth in the wealth management sector remains exceptionally high.</p>



SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

National Voluntary Guidelines (NVGs) on social, environmental and economic responsibilities of business prescribed by the Ministry of Corporate Affairs advocates the nine principles as detailed below:

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

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

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

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

PRINCIPLE 5: Businesses should respect and promote human rights

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

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

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

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

11	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
		No, however all policies and processes are subject to audits / reviews done internally in the Company from time to time.								

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)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	-	-	-	-	-	-	-	-	-



SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1:

BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE.

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors		Refer Note 1	
Key Managerial Personnel		Refer Note 2	
Employees other than BOD and KMPs		Refer Note 2	
Workers	The Company does not have any workers as provided in the guidance note on BRSR, issued by SEBI		

Note 1

The Company provides various updates to the members of the Board and Committee during the course of board/committee meeting and offline sessions of matters pertaining to updates on the business, risk management framework, fraud prevention, cyber security, key compliance, risk and audit observations, impact arising out of the issues along with management action plans. The Board was also apprised on the latest development in laws including changes in the laws pertaining to Insider Trading, Taxation, Anti-money Laundering and Know Your Customer Guidelines, etc. Considering all of the above, approximately 2 hours would have been spent by each Board Member during the financial year on various familiarisation programmes during Board/Committee meetings and offline sessions.

Note 2

The Company has a Code of Conduct which defines the professional and ethical standards that employees, KMPs and Directors need to adhere to in compliance with all applicable statutory laws, regulations and internal policies. The Code is published on the Company's website/Intranet. Employees including KMPs are required to annually confirm that they have read and understood the Code. All new employees are also required to confirm that they have read and understood the Code at the time of their induction. In addition, the Company has instituted several policies to ensure adherence to existing statutory laws and regulations such as The Whistle Blower policy, The Prevention of Sexual Harassment (POSH) at the Workplace policy, etc.

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine					
Settlement			Nil		
Compounding fee					

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		

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

	FY 2024	FY 2023
Directors		
KMPS		
Employees		Nil
Workers		

6 Details of complaints with regard to conflict of interest

	FY 2024		FY 2023	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Not Applicable	0	Not Applicable
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Not Applicable	0	Not Applicable

7 Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest: Not Applicable

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	NA	NA

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:

	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	Not Applicable	Not Applicable
	b. Number of trading houses where purchases are made from	Not Applicable	Not Applicable
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable	Not Applicable
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	Not Applicable	Not Applicable
	b. Number of dealers / distributors to whom sales are made	Not Applicable	Not Applicable
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	Not Applicable	Not Applicable
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	17.29	53.06
	b. Sales (Sales to related parties / Total Sales)	16.86	27.40
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	100	100
	d. Investments (Investments in related parties / Total Investments made)	98.26	97.60

Leadership Indicators

1 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 obtains quarterly declaration from the directors affirming compliance with the Code of Conduct for the Board of Directors and Senior Management Personnel of the Company. The Company also conducts regular internal checks to ensure the same.

PRINCIPLE 2:**BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE****Essential Indicators**

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

	FY 2023-24	FY 2023-22	Details of improvements in environmental and social impacts
R&D	Nil	Nil	NA
Capex	Nil	Nil	NA

- 2 a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)
No
- b. If yes, what percentage of inputs were sourced sustainably?
The consumption of resources is limited to running of operations and sourcing of inputs is not material.
- 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.
Not applicable. The Company is engaged in Financial services industry. The Company doesn't supply any products and hence this is not applicable.
- 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
No

PRINCIPLE 3:**BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS****Essential Indicators**

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care facilities*	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	35	35	100%	0	0	0	0	35	100%	0	0
Female	10	10	100%	0	0	10	100%	0	0	0	0
Total	45	45	100%	0	0	10#	22.22%	35#	77.78%	0	0
Other than Permanent employees											
Male	Not Applicable										
Female	Not Applicable										
Total	Not Applicable										

*To enable women employees to stay invested in their careers, the Company offers supportive policies that cater to their needs at various life stages. Some of these policies include maternity leave including sabbatical, adoption leave of 84 days and medical leave in case of miscarriage / medical termination of pregnancy, any illness arising out of pregnancy and trust based sick leave and paternity leave.

The Company extends Maternity Benefit and Paternity Benefit to all female and male employees respectively.

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (D/A)	Number (D)	% (D / A)	Number	% (E / A)	Number (F)	% (F / A)
Permanent Workers											
Male	Not Applicable										
Female	Not Applicable										
Total	Not Applicable										
Other than Permanent workers											
Male	Not Applicable										
Female	Not Applicable										
Total	Not Applicable										

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI

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

	FY 2024	FY 2023
Cost incurred on well-being measures as a % of total revenue of the company	0.38	0.95

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

Benefits	FY 2024			FY 2023		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	98	0	Yes	98	0	Yes
Gratuity	100	0	Yes	100	0	Yes
ESI	0	0	NA	0	0	NA
Others – please specify	0	0	NA	0	0	NA

3. Accessibility of workplaces

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

Yes, our offices are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

Yes, Equal Opportunity Policy of the Company is available at <https://centrum.co.in/sites/default/files/Policies/Equal%20Opportunity%20Policy.pdf>

5. Return to work and Retention rates of permanent employees and workers that took parental leave

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	Not Applicable, as none of the employees availed Maternity or Paternity			
Female	Leave during the year under review.			
Total				

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

Yes/No (If Yes, then give details of the mechanism in brief)	
Permanent Workers	The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI
Other than Permanent Workers	-
Permanent Employees	<p>Yes, The Company has a culture where employees can freely raise and discuss issues concerning themselves with their Superiors, Business Leaders or Human Resource Head.</p> <p>The Company has formulated a Policy on Prevention of Sexual Harassment at Workplace for prevention, prohibition and redressal of sexual harassment at workplace. The Policy can be viewed at https://centrum.co.in/sites/default/files/Policies/Policy%20for%20Prevention%20Prohibition%20and%20Redressal%20of%20Sexual%20Harassment%20at%20the%20workplace_0.pdf. Further the Company has set-up an Internal Complaints Committee has to redress any such complaints received.</p> <p>The Company has a Whistle Blower Policy to report genuine concerns or grievances and to provide adequate safeguards against victimization of persons who may use the mechanism. The Whistle Blower Policy encourages the employees and other parties to report unethical behaviors, malpractices, wrongful conduct, fraud, violation of the Company's policies & values, violation of law by any employee of the Company without any fear of retaliation. The mechanism provides for adequate safeguards against victimization of employees to avail of the mechanism and also provides for direct access to the Chairperson of the Audit Committee in exceptional cases. The policy can be viewed at https://centrum.co.in/sites/default/files/Policies/Whistle%20Blower%20Policy_1.pdf"</p>
Other than Permanent Employees	NA

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

Benefits	FY 2024			FY 2023		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Category						
Total Permanent Employees						
- Male						Nil
- Female						
Total Permanent Workers						
- Male						Not Applicable
- Female						

8 Details of training given to employees and workers

Category	FY 2024					FY 2023				
	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	35	35	100	1	3	30	30	100.00	3	10
Female	10	10	100	2	20	13	13	100.00	2	15
Total	45	45	100	3	7	43	43	100.00	5	12
Workers										
Male										
Female	Not Applicable									
Total										

9 Details of performance and career development reviews of employees and worker: Rewards and Recognition programme conducted

Category	FY 2024			FY 2023		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	35	26	74.29	30	22	73.33
Female	10	9	90.00	13	8	61.54
Total	45	35	77.78	43	30	69.77
Workers						
Male						
Female	Not Applicable					
Total						

10 Health and safety management system:

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

The Company doesn't have occupational health or safety hazard considering its business operations. However health risks related to long hours at desk, exposure to electronic devices like laptop, mobile, etc. is expected. Employee well-being continues to be a priority of the Company. Considering the well-being of our employees we conduct yoga sessions, health awareness campaigns on various topics affecting our employees. Periodic trainings on fire safety and fire-fighting equipment are provided along with evacuation drills.

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

This is not directly applicable given the nature of business. However, the company regularly conducts seminars by leading health practitioners on areas of health affecting our employees.

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

This is not applicable to the Company since we do not have workers as provided in the guidance note on BRSR, issued by SEBI.

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

Yes. All of the Company's employees are covered under its health insurance policy.

- 11 Details of safety related incidents, in the following format

Safety Incident/Number	Category	FY 2024	FY 2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	NA	NA
Total recordable work-related injuries	Employees	0	0
	Workers	NA	NA
No. of fatalities	Employees	0	0
	Workers	NA	NA
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	NA	NA

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

To create a safe and healthy work environment, the Company has implemented several measures:

Fire alarm systems, smoke detectors, and fire extinguishers are installed at all premises to ensure prompt detection and effective response in case of fire incidents.

The Company organizes various programs and events to promote good health and well-being among employees. Examples include Wow Wednesdays, Independence Day Quiz, Women's Day celebration, Diwali, Christmas and other such events which encourage employee engagement and foster a healthy work culture.

Interactive webinars on various health, awareness and well being related topics are conducted to provide employees with valuable knowledge and skills. These webinars cover subjects such as Stress Management, Yoga At Your Desk, Work-life Balance, Interactive session on Diet & Nutrition, Workplace Productivity, etc.

The Company ensures that proper ventilation systems are in place to maintain good indoor air quality. This helps to reduce the concentration of pollutants, allergens, and pathogens, contributing to a healthier work environment.

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

Category	FY 2024			FY 2023		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	NA	Nil	Nil	NA
Health & Safety	Nil	Nil	NA	Nil	Nil	NA

- 14 **Assessments for the year:** **FY 2024**

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

Health and safety practices No assessment has been done by statutory authorities or third parties.

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

No corrective actions required this year due to zero accidents. However, the policy and practice is reviewed for adequacies annually by the HR Team.

Leadership Indicators

- 1 Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Yes, the Company extends support to families in the event of an employee's death. This includes Term life Policy, Future Service Gratuity Policy and Retrial benefits (PF, gratuity and Employees Deposit Linked Insurance Scheme).

- 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 is compliant with deduction of statutory dues of employees towards income tax, provident fund, professional tax, ESIC etc. as applicable from time to time. Value chain partners (vendors) are equally responsible to comply as per the contract with the Company. The Company has requisite statutory and internal audit procedures to ensure the above.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024	FY 2023	FY 2024	FY 2023
Employees	Nil	Nil	Not Applicable	Not Applicable
Workers	Nil	Nil	Not Applicable	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 key stakeholders are identified in consultation with the Company's management. Considering the business activities of the Company, stakeholders are Investors (includes Shareholders), Communities, Government & Regulatory Bodies, Vendors/Clients and Employees.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors (includes Shareholders)	No	Email, SMS, Newspaper, Notice, Website, Stock Exchange Intimations	Atleast Quarterly and need based	To update about material developments of the Company, performance of the Company, information mandated to be provided as per regulations
Communities	No	Through Centrum Foundation, Newspapers	Need based	To reach out to the under privileged and needy.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government & Regulatory Bodies,	No	Email	Need based	Seeking clarifications and relaxation, communicating challenges and providing recommendations, knowledge sharing, regulatory inspections and queries.
Vendors/ Clients	No	Email	Ongoing	Superior customer service throughout the engagement life cycle
Employees	No	Email, Meetings, Internal communication platforms	Ongoing	Career development salary and other perquisites, work ethics, policy communication, team building

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

We prioritize stakeholder consultation on economic, environmental, and social topics to ensure a comprehensive approach to our Environmental, Social, and Governance (ESG) framework. We engage in careful deliberations with the management to identify our key internal and external stakeholders, which include Investors (includes Shareholders), Communities, Government & Regulatory Bodies, Vendors/Clients and Employees. Through this inclusive approach, we gather valuable insights and feedback from our stakeholders. These inputs are integrated into our decision-making processes, allowing us to align our business imperatives with the critical needs of our stakeholders and the broader society. This information serves as a crucial input for informed decision-making, enabling us to navigate economic, environmental and social considerations responsibly and sustainably.

- 2 Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity

Yes. The engagement with stakeholders on a continuous basis helps in meeting the expectations for enabling the Company to serve its stakeholders better. As a result of engaging with our employees, the Company in the recent years has installed a EV charging point to encourage employees to use electric vehicles, made amendments to the leave policy to allow for bereavement leave and sabbaticals and allocated resources for planting plants in and around the office premises.

PRINCIPLE 5:**BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS****Essential Indicators**

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

Category	FY 2024			FY 2023		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	45	45	100	43	43	100
Other than permanent	0	0	0	0	0	0
Total Employees	45	45	100	43	43	100
Workers						
Permanent						
Other permanent						
Total Workers						

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

Category	FY 2024					FY 2023				
	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	45	0	0	45	100	43	0	0	43	100
Male	35	0	0	35	100	30	0	0	30	100
Female	10	0	0	10	100	13	0	0	13	100
Other than permanent	-	-	-	-	-	-	-	-	-	-
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Workers										
Permanent										
Male										
Female										
Other than permanent										
Male										
Female										

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

- a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (In ₹)	Number	Median remuneration/ salary/ wages of respective category (In ₹)
Board of Directors (BOD)	11	4,00,000	2	250000
Key Managerial Personnel	3	3,24,80,850	0	0
Employees other than BOD and KMP	37	15,41,143	14	12,57,999
Workers	NA	NA	NA	NA

Key Managerial Personnel are Executive Chairman, Chief Financial Officer and Company Secretary. Further, Board of Directors include the Executive Chairman.

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

	FY 2024	FY 2023
Gross wages paid to females as % of total wages	8.60%	11.19%

*Reference to wages is considered as remuneration for the purpose of details provided in Point 3(b) above

- 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

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

The Company has Internal Complaints Committee, under Section 4(1) of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. Each ICC has one presiding member, three other members and an external member. Any complaint can be emailed to the presiding officer and the grievance will be redressed by the committee in the appropriate manner.

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

Category	FY 2024			FY 2023		
	Filed during the year	Pending resolution at the end of year	remarks	Filed during the year	Pending resolution at the end of year	remarks
Sexual Harassment	0	0	0	0	0	0
Discrimination at workplace	0	0	0	0	0	0
Child Labour	0	0	0	0	0	0
Forced Labour/Involuntary Labour	0	0	0	0	0	0
Wages	0	0	0	0	0	0
Other human rights related issues	0	0	0	0	0	0

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

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

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

In cases of complaints of Sexual Harassment made in good faith, the Aggrieved Person lodging the Complaint and any person providing information or any witness, are protected from any form of retaliation. While dealing with Complaints, the Internal Complaints Committee ensures that the Aggrieved Person or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the Aggrieved Person while the investigation is in progress can be reported by the Aggrieved Person to the Internal Complaints Committee. Disciplinary action can be recommended by the Internal Complaints Committee to the Management Team against any such Complaints.

Further, in case of complaints made with malicious intent, the internal complaints committee may recommend appropriate disciplinary against the complainant. The persons who are victims of such frivolous or false complaints may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

In cases of Whistle Blower Complaints, no unfair treatment is meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under the Whistle Blower Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Complete protection is given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his/her duties/ functions including making further Protected Disclosure.

As per the Whistle Blower Policy, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure etc.

The identity of the Whistle Blower is kept confidential. Any other Employee assisting in the said investigation is also protected to the same extent as the Whistle Blower.

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

No

- 10 Assessments for the year:

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

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

No corrective actions were required given that no inspection were undertaken.

Leadership Indicators

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

No corrective actions on the current procedure were initiated as the current system in place was found adequate and also since no incidence of violation took place, indicating a greater possibility of an effective system in place.

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

Not Applicable

- 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?

We are committed to ensuring full compliance with the Persons with Disabilities Act 2016, as we actively enhance our premises to provide optimal accessibility for all visitors, including differently abled.

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	FY 2024	FY 2023
Total electricity consumption (A)	339.01 Gigajoule	374.37 Gigajoule
Total fuel consumption (B)	0	14.83 Gigajoule
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C)	339.01 Gigajoule	389.2 Gigajoule
From non-renewable sources	-	-
Total electricity consumption (D)	339.01 Gigajoule	389.2 Gigajoule
Total fuel consumption (E)	-	-
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	-	-
Total energy consumed (A+B+C+D+E+F)	339.01 Gigajoule	389.2 Gigajoule
Energy intensity per rupee (in lakhs) of turnover (Total energy consumed / turnover in lakhs)	0.06	0.14
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	-	-
Energy intensity per rupee of turnover (Total energy consumption / turnover in Lac)	0.06	0.14
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

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

No site / facilities in identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India

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

Parameter	FY 2024	FY 2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	Not Applicable	Not Applicable
(ii) Groundwater	Not Applicable	Not Applicable
(iii) Third party water	322.91 kl	642.86 kl
(iv) Seawater / desalinated water	Not Applicable	Not Applicable
(v) Others	Not Applicable	Not Applicable
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	322.91 kl	642.86 kl
Total volume of water consumption (in kilolitres)	322.91 kl	642.86 kl
Water intensity per rupee of turnover (Water consumed / turnover in lakhs)	0.06	0.25
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	-	-
Water intensity in terms of physical output	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, name of the external agency. NO.

4 Provide the following details related to water discharged:

Parameter	FY 2024	FY 2023
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
No treatment		
With treatment – please specify level of treatment		
(ii) To Groundwater		
No treatment		
With treatment – please specify level of treatment		
(iii) To Seawater		
No treatment		
With treatment – please specify level of treatment		
(iv) Sent to third-parties		
No treatment		
With treatment – please specify level of treatment		
(v) Others		
No treatment		
With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

The Company is engaged in the financial services industry and provides services in relation to Investment Bank, Debt Syndication and Infrastructure Debt Advisory. In the financial services sector, our water discharge is minimal and limited to the usage within our offices, primarily for everyday operations. Given this limited scope, detailed data on water discharge by destination and level of treatment is not as relevant to our business.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, name of the external agency. NO

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

No

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

Parameter	Please specify unit	FY 2024	FY 2023
NOx	NA	Not measured separately	Not measured separately
SOx	NA	Not measured separately	Not measured separately
Particulate matter (PM)	NA	Not measured separately	Not measured separately
Persistent organic pollutants (POP)	NA	Not Applicable	Not Applicable
Volatile organic compounds (VOC)	NA	Not Applicable	Not Applicable
Hazardous air pollutants (HAP)	NA	Not Applicable	Not Applicable
Others – please specify	NA	Not Applicable	Not Applicable

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, name of the external agency. NO.

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

Parameter	Please specify unit	FY 2024	FY 2023
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	Refer Note 1 Below	
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)		Refer Note 1 Below	
Total Scope 1 and Scope 2 emissions per rupee of turnover			
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		Refer Note 1 Below	
Total Scope 1 and Scope 2 emission intensity in terms of physical output			
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. NO.

Note: 1. Being an Investment Banking Company, we typically do not have significant Scope 1 emissions since our core operations typically involve financial services rather than activities that directly generate greenhouse gas emissions. However, there may be some limited instances where the company may have minor Scope 1 emissions. The Company is actively working to collect more data on Scope 1 and 2 emissions. Due to the nature of our business and our limited direct emissions sources, we have determined that the impact of Scope 1 emissions is negligible. Similarly, our Scope 2 emissions, which are associated with the consumption of purchased electricity, are not reported as we are unable to obtain reliable and verifiable data on the emission factors specific to our electricity sources. We acknowledge the importance of transparent reporting and taking responsibility for our environmental impact. We are committed to continuously improving our sustainability practices and exploring opportunities for comprehensive emissions reporting in the future.

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

No

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

Parameter	FY 2024	FY 2023
Total Waste generated (in metric tonnes)		
Plastic waste (A)	Not measured separately	Not measured separately
E-waste (B)	E-waste is disposed through recognised vendors.	
Bio-medical waste (C)	Not Applicable	Not Applicable
Construction and demolition waste (D)	Not Applicable	Not Applicable
Battery waste (E)	Battery is disposed through recognised vendors.	
Radioactive waste (F)	Not Applicable	Not Applicable
Other Hazardous waste. Please specify, if any. (G)	Not Applicable	Not Applicable
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	Not Applicable	Not Applicable
Total (A+B + C + D + E + F + G + H)	-	-

Parameter	FY 2024	FY 2023
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	Nil	Nil
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	Nil	Nil
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	Not measured separately	Not measured separately
(ii) Landfilling	Not measured separately	Not measured separately
(iii) Other disposal operations	Not measured separately	Not measured separately
Total	Not measured separately	Not measured separately

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, name of the external agency. - NO

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

Company's business activities provides limited opportunities to incorporate recycled materials as processed inputs. The Company disposes of waste (like paper, plastic, etc.) through the state's municipal authorities, while e-waste is discarded via authorised vendors. In an effort to minimise the usage of plastics in offices and branches, Company has actively encourages use of alternative materials. Due to the nature of the Company's business it is not required to directly use hazardous and toxic materials for its products / processes.

- 11 If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
The office does not have operations/offices in/around ecologically sensitive areas		

- 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
The office does not have operations/offices in/around ecologically sensitive areas					

- 13 Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

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
Yes, Company is compliant with all the applicable laws.			

Leadership Indicators

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

Yes. All critical IT services required for business operations like email and collaboration and file storage are hosted with reputed SaaS providers on redundant private / public cloud. Users are provided computers to access cloud services to perform business processes using multi-factor authentication. Data for SaaS service is archived and can be restored from archive even in case user deletes the data. Financial accounting solution is hosted on-premises and its data is backed up on the cloud on daily basis. In case of primary site goes down, data can be restored on the cloud and normal operations can be resumed from there.

PRINCIPLE 7:

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

Essential Indicators

- 1 a. Number of affiliations with trade and industry chambers/ associations - 4
- 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.

Sr.No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Association of Investment Bankers of India	National
2	All India Association of Industries	National
3	Federation of Indian Chamber of Commerce and Industry	National
4	Bombay Chamber of Commerce and Industry	National

- 2 Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities - Nil

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 - Not Applicable
- 2 Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity - Not Applicable
- 3 Describe the mechanisms to receive and redress grievances of the community.

Centrum Foundation actively collaborates with communities to make a positive impact in several key areas, including education, health care, and disaster relief etc. from time to time. Company employees also volunteer in the activities of Centrum Foundation, contributing their time and skills to support our community engagement efforts. This collective involvement not only enhances the impact of our initiatives but also promotes a culture of empathy and community service within our organization.

- 4 Percentage of input material (inputs to total inputs by value) sourced from suppliers - Not applicable, as we are not in manufacturing of goods and sourcing of goods is not a part of our core activities.
- 5 Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Location	FY 2024	FY 2023
Rural	0	0
Semi-urban	0	0
Urban	0	0
Metropolitan	100	100

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

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.

We have a robust mechanism in place to receive and respond to consumer complaints and feedback. As a company committed to delivering exceptional services, we recognize the importance of actively engaging with our valued customers and addressing their concerns promptly and effectively. Our customers can reach out to the respective business heads and alternatively write to igmbd@centrum.co.in for redressal of their complaint or to share their feedback.

The consumer complaints are duly responded to by respective Business Heads.

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

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

- 3 Number of consumer complaints in respect of Data Privacy, Advertising, Cyber-security, Delivery of Essential Services, Restrictive Trade Practices, Unfair Trade Practices

There are no consumer complaints in respect of Data Privacy, Advertising, Cyber-security, Delivery of Essential Services, Restrictive Trade Practices, Unfair Trade Practices for FY 2022-23 and FY 2023-24.

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

Company has a cyber security framework that covers important aspects like IT governance, end user training, cyber incident and crisis management plan, identification and securing of critical information and assets, secure transfer of information and anti-malware solutions. Access to information and systems are restricted by "need-to-know" and "need-to-have" basis to mitigate risk. Multi-factor authentication is required to access critical IT resources. Safe disposal of storage medium is followed.

- 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.

No corrective actions required for the period as there were no instances of breach and routine procedures were found effective in review.

- 7 Provide the following information relating to data breaches

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

The Company did not witness any instances of data breaches during the year.

Leadership Indicators

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

Information on products and services of the Company can be accessed on www.centrum.co.in