BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURE

I. Details of the Listed Entity:

1	Corporate Identity	L32200MH1940PLC003164					
' '	Corporate Identity Number (CIN) of the	L322001VIF	_32200IVIT 1940PLC003104				
	Listed Entity						
		Nieles I's	te . I				
2	Name of the Listed	Neico Lin	iitea				
	Entity	1010					
3	Year of incorporation	1940					
4	Registered office	EL-6, 1 IC I	ndustrial Area, Electronics Zone, MIDC	_ Mahape, Navi Mumbai 400/10			
<u> </u>	address	FI 4 TTC					
5	Corporate address		ndustrial Area, Electronics Zone, MIDC	_ Mahape, Navi Mumbai 400/10			
6	E-mail	services@					
7	Telephone	022 67399	· · · ·				
8	Website	www.nelc	<u>o.in</u>				
9	Financial year for which	2024-25					
	reporting is being done						
10		BSE Limite	ed (BSE), National Stock Exchange of Ir	ndia Limited (NSE)			
	Exchange(s) where						
	shares are listed						
11	Paid-up Capital	INR 22817					
			Contact Person				
	Name of the Person	Ms. Leena	Thomas				
12	Telephone	022 67399	9100				
	Email address	leena.thor	mas@nelco.in				
			Reporting Boundary				
	Type of Reporting		Consolidated				
	If selected consolidated:	Sr No.	Name of the Subsidiaries/JVs/	CIN Numbers			
13			Associate Companies				
13		1	Nelco Network Products Limited	U32309MH2016PLC285693			
		(Subsidiary)					
		Piscis Networks Pvt. Ltd (Associate) U72900MH2021PTC363941					
14	Name of assurance	Not Applicable					
14	provider						
15	Type of assurance	Not Appli	cable				
15	obtained						

II. Product/Services:

16 Details of business	Sr. No.	Description of Main Activity	Description of Business Activity	% Turnover of the Entity
activities (accounting for 90% of the turnover):	1	Information and Communication	Wired, wireless or satellite Telecommunication services	100%



17	Products/ Services sold by	Sr. No.	Product/Service	NIC Code	% of Total Turnover contributed
	the entity	1	43212: Installation of telecommunications wiring, computer network and cable television wiring, including fiber optic, satellite dishes 61900: Other telecommunications activities		Sale of Bandwidth-67% Sale of Equipment-12% AMC services – 6% Rental of VSAT -4% Other -11%

Operations: III.

18	Number of locations where plants and/or operations/		Number of plants	No. of Offices	Total		
	offices of the entity are	National	0	17	17**		
	situated:	International	0	0	0		
19	Market served by the entity	Locations					
	a. No. of Locations	National (No. of States)	28 States & 8 Union Territories				
		International (No. of Countries)		0			
	b. What is the contribution of exports as a percentage of the total turnover of the entity?	25	.30%*				
	c. A brief on types of customers	S Nelco provides satellite communication services for various segment and use-cases in Enterprise and Government such as ATM, Bank Branche Offshore Oil exploration, renewable energy, maritime communication and inflight Wi-Fi services					

^{*}Revenue is generated by providing services to customers located outside India.

IV. **Employees:**

20.	0. Details as at the end of Financial Year:							
S.	Particulars	Total (A)	Ma	ale	Female			
No.			No. (B)	% (B/A)	No. (C)	% (C/A)		
a.	Employees and workers (including differential)	ently abled)						
		Employees	i					
1	Permanent Employees (A)	196	177	90%	19	10%		
2	Other than Permanent Employees (B)	109	106	97%	3	3%		
3	Total Employees (A+B)	305	283	93%	22	7%		
b.	Differently abled employees and workers	5						
		Employees						
1	Permanent Employees (E)	0	0	0	0	0		
2	Other than Permanent Employees (F)	0	0	0	0	0		
3	Total Employees (E+F)	0	0	0	0	0		

Note: Nelco does not employ any workers, hence there will be no disclosures applicable.

^{**} Includes 7 offices, 6 Warehouses & 4 Teleports

21.	21. Participation/Inclusion/Representation of women						
S.	Category	Total (A)	al (A) No. and % of females				
No.			No. (B)	% (B/A)			
1	Board of Directors	6	1	17%			
2	Key Management Personnel	2	0	0			

Note: Managing Director & Chief Executive Officer is considered in BOD and Chief Financial Officer & Company Secretary are considered as KMPs.

22. Turnover rate for p	Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)								
Category	FY 2024-2025			FY 2023-2024			FY 2022-23		
	(Turnover rate in current		(Turnover rate in previous			(Turnover rate in previous			
	FY)		FY)			FY)			
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	8%	5%	8%	10%	5%	10%	8%	0	8%
Permanent Workers	0	0	0	0	0	0	0	0	0

Note: Voluntary turnover rates are disclosed

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

23.(a)	a) Names of holding / subsidiary / associate companies / joint ventures									
S. No	Name of the holding / subsidiary / associate companies / joint ventures	Indicate whether it is a holding / Subsidiary / Associate / or 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.	The Tata Power Company Ltd.	Holding Company	50.04%	No						
2.	Nelco Network Products Limited (NNPL)	Subsidiary Company	100.00%	Yes						
3.	Piscis Networks Pvt. Ltd.	Associate Company	31.72%	Yes						

VI. CSR Details:

24	a. Whether CSR is applicable as per section 135 of Companies Act, 2013:	Yes
	Turnover (in ₹)	3,04,87,56,226
	Net worth (in ₹)	1,27,89,61,663



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

•		less conduct	FY 20	024-25 (Curren	t FY)	FY 20	23-24 (Previou	ıs FY)
Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No)	If Yes, then provide web-link for grievance redress policy	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	For Grievance	0	0	-	0	0	-
Investors (other than shareholders)	Investors and shareholders are the same	for employees,	0	0	-	0	0	-
Shareholders	for Nelco	Stakeholder	6	0	Resolved	4	0	Resolved
Employees and workers	Yes	relationship committee, Whistle blower	0	0	-	5	0	Minor field injuries
Customers	Yes	policy & Vigil	0	0	-	0	0	-
Value Chain Partners	Yes	Mechanism,	0	0	-	0	0	-
Other - an anonymous complaint was received		Additionally, all Vendors are aware about TCoC, SCOC and ESG policy. For Communities & vendors. Nelco grievances can be addressed at ethics@nelco.in For customers, Nelco provides helpline link helpdesk@nelco.in to address any grievances and queries	1	0	Resolved	0	0	-

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

Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Customer relationship management	Opportunity	Robust customer relationship management can help the Company to strengthen its market leadership position in key segments, build competitive advantages and enhance growth.	-	Positive, as successful customer relationship can drive revenue growth and profitability.

Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Supply chain management	Risk	Nelco relies on its supply chain partners for Satcom equipment and bandwidth capacity. Any disruptions in timely supply, price escalations, or regulatory compliance issues may impact the Company's operations and its ability to deliver satisfactory services to customers. Effective Supply Chain Management is also critical to build competitive advantages.	i. Diversification of Supply Chain Partners: Reduce dependency on a single source to mitigate the impact of disruptions. ii. Continual Stakeholder Engagement: Helps identify potential issues early. iii. Comprehensive Supply Chain Assessment: Periodic assessment of the supply chain identifies vulnerabilities and areas for improvement. This includes evaluating supplier performance, risk management practices, and compliance with regulatory standards.	Negative as due to supply chain disruptions might lead to price escalations, increased costs, slower customer satisfaction, and reduced competitiveness
Talent Management	Opportunity	The Company on boards and builds newer competencies to aid its multifold growth. The Company also plans to enhance skills of existing people and build future required competencies.	-	Positive, in terms of higher productivity of the people, fosters innovation, expertise, and competitiveness, ensuring a skilled workforce to drive business growth and success.
Corporate Governance and Ethics	Risk	Effective corporate governance and strong ethical standards are essential to maintain stakeholder trust, mitigate risks and ensure compliance. Prioritizing these areas supports sustainable business practices and long-term success.	Nelco has a powerful, competent, and diverse Board. The Company has instituted robust policies and Standard Operating Procedures (SoPs) to ensure good corporate governance, compliance, and ethical business practices, thereby maintaining stakeholder trust and regulatory adherence.	Negative due to legal issues, reputational damage, loss of investor confidence, and decreased stakeholder trust, harming long-term sustainability.



Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Business continuity and Risk Management	Risk	The company's infrastructure is vulnerable to interruptions from natural disasters, power outages, IT system failures, security breaches, and human errors. Such events can significantly impact service quality and customer satisfaction. A robust business continuity framework and integrated risk management is key to enhance Company's resilience and long-term business success.	The company has implemented a comprehensive risk management framework and policy to identify and assess existing and emerging risks across its business segments. The Risk Management Committee (RMC) is responsible for monitoring and reviewing the risk management plan to ensure its effectiveness. Key risks are discussed with the RMC three times a year, and major risks identified by the businesses and functions are systematically addressed	Negative due to higher expenditure in mitigation measures & asset cost, revenue loss, operational disruptions, increased recovery costs, and damage to brand reputation

Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Cybersecurity & Data Privacy	Risk	Operating in the satellite communication industry, Nelco prioritizes cybersecurity and data protection to prevent data breaches and cyber-attacks. Such incidents can expose the organization to significant vulnerabilities, leading to financial and reputational loss. Ensuring robust cybersecurity measures is vital for maintaining trust, avoiding financial loss and ensuring operational integrity.	Nelco has implemented a Cybersecurity and Data Privacy policy aligned with global standards, ensuring strict adherence to cybersecurity compliances and robust procedural guidelines. The Company is ISO/IEC 27001:2013 certified, reflecting its commitment to information security management. Regular audits are conducted to identify potential vulnerabilities and plug them in a timely manner. Additionally, Nelco provides continuous training to employees on cybersecurity best practices and incident response protocols, further mitigating risks and enhancing organizational resilience.	Negative implications encompass the possibility of incurring additional or increased costs associated with the management of timely, frequent, and customized updates in the following areas: i. Internal IT infrastructure and architecture ii. Software purchases iii. IT hardware iv. Adjustments necessitated by sector-specific or theme-specific regulatory requirements.
Digitalization	Opportunity	Embracing digitalization, analytics and AI is crucial for Nelco to enhance operational efficiency, service delivery, and customer experience. Through automated processes, real-time monitoring, and innovative solutions, Nelco can drive significant improvements. The Company is actively pursuing multiple digitalization initiatives across the organization and leveraging external expertise where necessary to stay at the forefront of technological advancements.	-	Positive as digitalization and use of AI/ML has the potential to enhance operational efficiency



Material	Indicate whether	Rationale for identifying	In case of risk, approach	_
lssue Identified	wnetner risk or	the risk/opportunity	to adapt or mitigate	of the risk or opportunity (Indicate positive or
identified	opportunity			negative implications)
People Well-	Opportunity	Diversity, Equity, and		Positive as it boosts the
being, Health	Оррогини	Inclusion (DE&I) are		morale, productivity, and
& Safety,		crucial for the company		retention, creating a safer,
1		to promote fair treatment		healthier work environment
Diversity		and full participation of		
equity & Inclusion				and positive company culture. Also, workforce
IIICIUSIOII		all employees, including individuals of different		diversity is vital for
		races, ethnicities,		business success, attracting
		religions, abilities,		talent, and enhancing its
		genders, and sexual		reputation as a premier
		orientations. A diverse,		service provider.
		equitable, and inclusive		service provider.
		ecosystem enables Nelco	_	
		to effectively respond		
		to challenges, retain top		
		talent, and better meet		
		the needs of various		
		stakeholders. Additionally,		
		prioritizing people's well-		
		being, health, and safety		
		fosters a productive and		
		hazard-free workplace,		
		contributing positively		
		to the Company's growth		
		and development.		
Emissions	Opportunity	Emission reduction and		Positive due to Improved
Reduction	, ,	energy management		operational efficiency,
and Energy		help Nelco to enhance		cost savings, and
Management		operational efficiency		enhanced reputation
		and optimize energy		as an environmentally
		use, thereby reducing		responsible company,
		operational costs. By		leading to increased
		focusing on these areas,		customer trust and loyalty
		Nelco can minimize its		
		environmental footprint,	_	
		comply with regulatory	_	
		requirements, and		
		contribute to global		
		sustainability efforts. This		
		strategic approach not		
		only supports cost savings		
		but also strengthens the		
		Company's reputation as a		
		responsible and forward-		
		thinking organization.		

Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Community Development	Opportunity	It is important as it enables the Company to contribute positively to the communities it operates in, thereby enhancing its social reputation. By investing in community initiatives, Nelco can foster goodwill, build strong local relationships, and support sustainable development. This commitment not only benefits the community but also aligns with Nelco's values and long-term business objectives, reinforcing its role as a responsible corporate citizen.	-	Positive as it can enhance brand reputation, foster goodwill, support talent attraction, and foster sustainable relationships with local stakeholders.
Waste and Water Management	Opportunity	Efficient waste and water management help the company lower operational costs, enhance its reputation and demonstrate its commitment to environmental sustainability. This strategic focus not only supports regulatory compliance but also strengthens the Company's image as a responsible and ecofriendly organization.	-	Positive due to Reduced environmental impact, cost savings, regulatory compliance, and enhanced reputation



SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Integrating the principles of the National Guidelines for Responsible Business Conduct into the structures, policies and processes ensure that stakeholder interests are integrated into the business fabric. Creating adequate governance enables businesses to contribute towards wider development goals.

NGRBC Principles

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 service 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 7

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

















PRINCIPLE 9

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











PRINCIPLE 6

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



















PRINCIPLE 8

Businesses should promote inclusive growth and equitable development.



























closure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
icy and Management Process			_		,					·
1	r's policy/policies cover ts core elements of the	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been (Yes/No)	approved by the Board?	appro polici	policies oved by ies are utive Off	the approv	Board/ ved by	Comm the M	ittees, Ianagir	and c	ther ir	nterna
c. Web Link of the Polic	ies, if available	All the Company policies are made available to respective stakeholders. Some of the policies are available on the Company's website at https://www.nelco.in/ for customers / suppliers etc. For employees they are available on the Company's internal portal. Nelco Limited has the following policies: P1: Tata Group Code of Conduct (TCoC), Whistle Blower,								
		Vigil Mechanism Policy P2: Occupational Health & Safety Policy P3: Prevention of Sexual Harassment Policy (POSH), Occupational Health & Safety Environment Policy, Drug & Alcohol policy, Tata Code of Conduct								
		P4: P5: P6:	Tata Co POSH P Occupa Social Respon	ode of Golicy, Tational	Conduc Tata Coo Healtl overnar	t, Supp de of Co n & Sa nce po	lier Coo onduct afety p	de of Co	Enviror	nment
		P7: P8:	Code of conduction	t for P	reventi	on of In	sider T	rading		ode o
		P9:	Data Pr	ivacy a	and cyb	ersecu	rity			
into procedures. (Yes / I			he appro	oved p	olicies	are tran	slated	into pr	ocedur	es.
Do the enlisted policie chain partners? (Yes/No	es extend to your value	Yes								
certifications/labels/s Stewardship Council, Alliance, Trustee) star OHSAS, ISO, BIS) adop mapped to each princip	tandards (e.g., Forest Fairtrade, Rainforest ndards (e.g., SA 8000, ted by your entity and le.	The company is audited and certified as per international standards like TL 9000, ISO 27001, ISO 20000. The policies and their implementation are evaluated as part of these audits. Additionally, the policies meet the regulatory requirements such as SEBI Listing Regulations etc. The policies reflect Tata groups commitment to improve the quality of life of the communities it serves and practice of giving back to the society.								
Specific commitments, the entity with defined	goals and targets set by timelines, if any.	environmental, social, and governance (ESG) practices. An								
	tity against the specific and targets along-with e are not met.									

Gover	overnance, Leadership and Oversight								
7	Statement by Director responsible for the b	usiness responsibility report, highlighting ESG related							
	challenges, targets and achievements.								
	At Nelco Limited, we recognize the critical importance of conserving energy, reducing waste, and addressing climate change. As part of our commitment to sustainability, we are dedicated to reducing our carbon footprint and adapting to the evolving environmental landscape. By implementing energy-efficient practices, optimizing logistics, minimizing waste, and embracing innovative solutions, we aim to contribute positively to global climate goals. Our efforts not only enhance operational efficiency but also reinforce our responsibility towards future generations. Together, we can build a resilient and sustainable future.								
8	Details of the highest authority responsible for	Name: PJ Nath							
	implementation and oversight of the Business	DIN: 05118177							
	Responsibility policy (ies).	Designation: Managing Director and CEO							
9	Does the entity have a specified Committee of	Yes							
	the Board/ Director responsible for decision Name: PJ Nath								
	making on sustainability related issues? (Yes / Designation: Managing Director and CEO								
	No). If yes, provide details.								

10. Details of Review of NGRBCs by the company:	P1	P2	P3	P4	P5	P6	P7	P8	P9
					FJ	FU	Γ/	го	ГЭ
Indicate whether review was undertaken by Director /	Comm	nittee o	f the Bo	oard					
Committee of the Board/ Any other Committee									
Performance against above policies and follow up	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
action									
Compliance with statutory requirements of relevance	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
to the principles, and rectification of any non-									
compliances									
Frequency (Annually/ Half yearly/ Quarterly/ Any other	Quarte	rly							
– please specify)									
Performance against above policies and follow up	The B	oard of	f Direct	tors an	d its C	ommit	tees m	eet qu	arterly
action	and as	and w	hen re	quired.	BRSR i	ssues (if any) i	are disc	cussed
	in respective meetings.								
Compliance with statutory requirements of relevance	ce Yes, on need basis								
to the principles, and rectification of any non-									
compliances									

11.	Has the entity carried out independent	P1	P2	P3	P4	P5	P6	P7	P8	P9
	assessment/ evaluation of the working of its	No								
	policies by an external agency? (Yes/No). If yes,									
	provide name of the agency.									



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	Р3	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 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) 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

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	1	POSH, Ethics, Governance	100%
Key Management Personnel	1	POSH, Ethics, Governance	100%
Employees other than BODs	18	POSH, Ethics, Governance,	97%
and KMPs		ESG & BRSR	

- 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:
 - a. Monetary

Туре	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the case	Has an appeal been preferred? (Yes/No)				
Penalty/ Fine	0								
Settlement	0	Not Applicable							
Compounding fee	0								

b. Non-Monetary

Туре	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the case	Has an appeal been preferred? (Yes/No)				
Imprisonment	0	Not Applicable						
Punishment	0	Not Applicable						

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:

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, Nelco is committed to preventing, deterring, and identifying any instances of bribery and other unethical business practices. As a part of the Tata Group, Nelco adheres to the Tata Code of Conduct (TCoC), a comprehensive guide outlining ethical standards for all Tata employees, companies, and third parties associated with Nelco, encompassing its entire operations. In addition to the TCoC, Nelco has its own independent policy, the Anti-bribery and Anti-corruption policy (ABAC), which is reviewed annually and provides additional guidelines to complement the TCoC and is available on Company website at https://www.nelco.in/pdf/Policies/ABAC%20Policy.pdf

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

Category	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0



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

Topic	FY 2024-25	(Current FY)	FY 2023-24 (Previous FY)		
	Number	Remarks	Number	Remarks	
Number of complaints received				Not Applicable	
in relation to issues of Conflict of	0		0		
Interest of the Directors		Not Amplicable			
Number of complaints received		Not Applicable			
in relation to issues of Conflict of	0		0		
Interest of KMPs					

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

Not Applicable

Number of days of accounts payables [(Accounts payable *365) / Cost of goods/services procured]: 8.

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Number of days of accounts payables	69	67

Note: Previous year figure re-grouped and re-classified.

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:

Parameter	Metrics	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)				
Concentration of Purchases	a. Purchases from trading houses as % of total purchases						
	b. Number of trading houses where						
	purchases are made from	Not Ap	plicable				
	c. Purchases from top 10 trading						
	houses as % of total purchases from trading houses	om					
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	f					
	b. Number of dealers /distributors to whom sales are made	Not Applicable					
	c. Sales to top 10 dealers / distributors	1101715	phedole				
	as % of total sales to dealers / distributors						
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	10.61%	7.38%				
	b. Sales (Sales to related parties / Total Sales)	5.75% 4.24%					
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)						
	d. Investments (Investments in related parties / Total Investments made)	0	0				

Note: Previous year figure re-grouped and re-classified.

LEADERSHIP INDICATORS

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

During the financial year, the company has actively engaged in various awareness programmes aimed at enhancing the skills and knowledge of our value chain partners. These initiatives include:

- i. **Collaboration with Local Service Providers:** We work closely with local service providers to acquire installation and maintenance services for remote VSAT terminals. To ensure high standards and efficiency, we conduct regular training sessions that focus on enhancing their technical skills and capabilities.
- ii. **Capacity Building on POSH Policies:** In addition to technical training, we prioritize the importance of creating a safe and respectful work environment. Capacity building sessions on the Prevention of Sexual Harassment (POSH) policies and principles are conducted for our franchisees and other value chain partners, excluding permanent employees. These sessions aim to foster a culture of respect and awareness regarding workplace conduct.

Through these programmes, we strive to empower our value chain partners with the necessary skills and knowledge to uphold our principles and contribute to the overall success and integrity of our operations

Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in value chain covered by the awareness
		programmes
16	POSH (Prevention of Sexual Harassment),	100%
	Ethics, Safety & Health, Training on TCoC	

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, Nelco has established robust processes to avoid and manage conflicts of interest involving members of the Board. Key measures include:

- i. **Distinct Roles:** The role of the Chairman of the Board is non-executive and distinct from that of the Managing Director and Chief Executive Officer (MD & CEO). This separation ensures a clear distinction between governance and management functions.
- ii. **Codes of Conduct:** The Codes of Conduct for Non-Executive Directors (NEDs) and Independent Directors (IDs) contain clauses addressing the prevention of conflicts of interest. These codes are designed to uphold a high standard of integrity and ethical behavior.
- iii. **Tata Code of Conduct (TCoC):** The TCoC includes clauses prohibiting any employee, including the Managing Director (MD), from accepting any position of responsibility, with or without compensation, in any other organization without prior written approval from the Company. For the MD, such approval must be obtained from the Board.

These processes are integral to maintaining transparency, accountability, and trust within the organization.



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

ESSENTIAL INDICATORS

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

Туре	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)	Details of improvement in social and environmental aspects
Research & Development (R&D)	0%	0%	Not Applicable
Capital Expenditure (CAPEX)	0%	0%	Not Applicable

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

Yes, Nelco has established comprehensive procedures for sustainable sourcing. Key aspects include:

- i. Emphasis on Reliability, Quality, and Affordability: The entity prioritizes these factors in the procurement of materials and services to ensure high standards and cost-effectiveness.
- Adherence to the Tata Code of Conduct: All vendors are required to adhere to the Tata Code of Conduct. This ii. ensures that they align with the entity's ethical standards and principles.
- iii. Compliance with Environmental, Safety, Human Rights, and Ethical Guidelines: The entity ensures that its sourcing processes comply with guidelines related to environmental protection, safety, human rights, and ethics. This commitment is integral to promoting sustainable practices throughout the supply chain.
- Mandatory Compliance with Labor Principles and Relevant Laws: Vendors must comply with labor iv. principles and relevant laws before finalizing any supply and service agreements. This requirement underscores the entity's dedication to legal and ethical sourcing practices.

Through these procedures, the entity strives to foster a sustainable and responsible supply chain.

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

Nelco is actively working on establishing a framework to monitor sustainable sourcing practices among its suppliers. Currently, there is no system in place to provide a precise percentage of sustainable sourcing, but it is a priority, and the organization is committed to developing this capability.

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:

The company has implemented comprehensive processes to ensure the safe reclamation, reuse, recycling, and disposal of products at the end of their life cycle:

- Plastics (including packaging): The company emphasizes the reduction of plastic waste through initiatives such as minimizing packaging materials and promoting the use of recyclable and biodegradable alternatives. Use of lashing belt in lieu of plastic wrap for material stored helps reduce use of plastic.
- E-waste: The company operates its own product repair center, aiming to prolong product lifespan, promote b. recycling, and reduce waste. In cases where a remote site is disconnected, the electronic hardware and antennas are frequently relocated to alternative sites, effectively recycling the products. Electronic scrap is responsibly disposed of through certified E-waste management service providers approved by the Central Pollution Control Board and/or corresponding State Pollution Boards.

- c. **Hazardous waste:** The company ensures that hazardous waste is managed in compliance with all relevant regulations. Specialized processes are in place for the safe handling, storage, and disposal of hazardous materials to prevent environmental contamination and ensure the safety of all stakeholders.
- d. **Other waste:** The company adopts a holistic approach to waste management, focusing on reducing, reusing, and recycling various types of waste. This includes implementing waste segregation practices, promoting the use of eco-friendly materials, and collaborating with certified waste management service providers for the responsible disposal of non-recyclable waste.

Through these processes, the company is committed to sustainable practices that minimize environmental impact and promote the responsible management of resources.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same:

Yes, the entity is subject to Extended Producer Responsibility (EPR). The EPR policy may be accessed on the company website at: https://www.nelco.in/pdf/Policies/Rpdf/epr-plan-2022.html Nelco is authorized to gather E-waste in accordance with the E-Waste (Management) Rules, 2016. Nelco intends to retrieve waste from collection centers through their E-waste collection partners. Their logistics partner transports the waste from primary collection centers and delivers it to the recycling partners, Enviocare Recycling Pvt Ltd., EchoTech Recycling Pvt. Ltd., Green India E-Waste & Recycling Opc Pvt. Ltd.

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:

NIC Code	Name of	% of total	Boundary	Whether	Results
	Product/ Service	Turnover	for which the	conducted by	communicated
		contributed	Life Cycle	independent	in public domain
			Perspective/	external agency	(Yes/ No) If yes
			Assessment was	(Yes/ No)	provide web-
			conducted		link
No services undergo Life Cycle Assessment (LCA)					

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:

S,No.	Name of the product	Description of the risk	Action Taken			
There are no significant environmental concerns from our services from a life cycle perspective.						

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):

Input material	Recycled or re-used input	Recycled or re-used input material to total material						
	FY 2024-25 (Current FY)	FY 2024-25 (Current FY) FY 2023-24 (Previous FY)						
E-waste	17%	12%						

Note: Previous year figure re-grouped and re-classified.



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:

	FY 202	FY 2024-25 (Current FY) FY 2023-24 (Previous FY)		FY 2023-24 (Previous F		ous FY)
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste (in Metric Tonnes)	9.477	-	2.345	5.961	-	0.44
Hazardous waste	-	-	-	-	-	-
Other waste - oil (litres)	-	-	-	-	-	200

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

Not applicable as there were no significant issues reported necessitating corrective actions. Nevertheless, as a standard procedure, we provide training to both new hires and existing staff on these requirements. No notable risks or concerns have been raised. However, Company's ongoing efforts include assessments by labor consultants, maintaining awareness of ethics, and reporting measures for all employees and stakeholders (EHS). Additionally, we consistently provide training on these requirements to both new and existing personnel as part of its operational process.

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

ESSENTIAL INDICATORS

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

Category		% of employees covered by									
	Total		alth		dent		rnity	Paternity		Day Care	
	(A)	Insu	rance	Insui	rance	Ben	efits	Ben	efits	Facilities	
		No. (B)	% (B/A)	No. (C)	%(C/A)	No.(D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)
	Permanent Employees										
Male	177	177	100%	177	100%	NA	NA	177	100%	177	100%
Female	19	19	100%	19	100%	19	100%	NA	NA	19	100%
Total	196	196	100%	196	100%	19	10%	177	90%	196	100%
			0	ther thar	n Perman	ent Emp	loyees				
Male	106	106	100%	106	100%	NA	NA	106	100%	0	0
Female	3	3	100%	3	100%	3	100%	NA	NA	0	0
Total	109	109	100%	109	100%	3	3%	106	97%	0	0

Note: One person availed paternity leave

Spending on measures towards well-being of employees and workers (including permanent and other b. than permanent):

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Cost incurred on wellbeing measures as a % of total	0.35%	0.37%
revenue of the company		

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

Sr. No.	Benefits	FY 202	4-25 (Current	-25 (Current FY) FY		FY 2023-24 (Previous FY)		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	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 worker	Deducted and deposited with the authority (Y/N/N.A.)	
1	PF	100%	Not	Υ	100%	Not	Υ	
2	Gratuity	100%	Applicable	Υ	100%	Applicable	Υ	
3	ESI	Not applicable		Υ	0%		Υ	
4	Others* - Medical insurance after	10%		Υ	9%		Υ	
	retirement							

^{*}Nelco allows its employees to continue their company-purchased medical coverage at their own cost.

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, the company offers accessibility to ground-floor facilities for differently abled employees, including access to healthcare amenities. Additionally, we are planning to incorporate more facilities catering to their specific needs in our upcoming projects. This is being addressed as part of the forthcoming Infrastructure Development Project.

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:

Nelco adheres to the Tata Code of Conduct (TCoC) which mentions the Equal Opportunity policy. Detailed policy is available on https://www.nelco.in/investor-relation/corporate-governance.php,

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

Gender	Total number of people returned after parental leave in FY	Total Number of people who took parental leave in FY	Return to work rate	Total Number of people retained for 12 months after returning from parental leave	of people returned from parental leave	Retention Rate
		F	Permanent Empl	oyees		
Male	1	1	100%	0	0	100%
Female	0	0	Not applicable	0	0	Not Applicable
Total	1	0	100%	0	0	100%

Note: One employee took paternity leave and returned to work



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

Category	Yes/No	Details of the mechanism in brief
Permanent Employees	Yes	The Company has adopted a Whistle Blower & Vigil Mechanism (WBVM)
Other than Permanent	Yes	Policy for establishing a mechanism for employees to report to the
Employees		management, concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct or ethics policy. The WBVM provides a mechanism for employees of the Company to approach the Chief Ethics Counsellor (CEC)/Chairman of the Audit Committee of the Company for redressal.
		The Company has adopted a POSH policy to establish a mechanism for employees to report their concerns on sexual harassment and discrimination, hostile behaviour & others. The company has formed Internal Compliant committee which evaluates the complaints in line with the rules & regulations.

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

Category	FY 2	FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)		
	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)	
	Permanent Employees						
Male	177	0		154	0		
Female	19	0	Not Applicable	20	0	Not Applicable	
Total	196	0		174	0		

8. Details of training given to employees and workers:

a. Details of	Category	FY 20	024-25 (Curren	t FY)	FY 20	FY 2023-24 (Previous FY)		
Skill training given to employees		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received Skill Training (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received Skill Training (D)	%(D/C)	
			Pe	rmanent Emp	loyees			
	Male	177	177	100%	154	154	100%	
	Female	19	19	100%	20	20	100%	
	Total	196	196	100%	174	174	100%	
					1			
b. Details	Category	FY 20	024-25 (Curren		FY 20	23-24 (Previou	ıs FY)	
of training	Category	FY 20	No. of	t FY) % (B/A)	Total	No. of	%(D/C)	
of training on Health	Category	Total employees	No. of employees		Total employees	No. of employees		
of training on Health and Safety	Category	Total employees / workers in	No. of employees / workers in		Total employees / workers in	No. of employees / workers in		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective		Total employees / workers in respective	No. of employees / workers in respective		
of training on Health and Safety	Category	Total employees / workers in	No. of employees / workers in respective category,		Total employees / workers in	No. of employees / workers in respective category,		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective category, who		Total employees / workers in respective	No. of employees / workers in respective category, who		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective category, who received		Total employees / workers in respective	No. of employees / workers in respective category, who received		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective category, who received training on		Total employees / workers in respective	No. of employees / workers in respective category, who received training on		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective category, who received training on Health and		Total employees / workers in respective	No. of employees / workers in respective category, who received training on Health and		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective category, who received training on Health and Safety (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received training on		
of training on Health and Safety given to	Category	Total employees / workers in respective	No. of employees / workers in respective category, who received training on Health and Safety (B)		Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received training on Health and		
of training on Health and Safety given to		Total employees / workers in respective category (A)	No. of employees / workers in respective category, who received training on Health and Safety (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who received training on Health and Safety (D)	%(D/C)	

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

Category	FY 2	FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who had a career review (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who had a career review (D)	%(D/C)	
	Permanent Employees						
Male	177	177	100%	154	154	100%	
Female	19	19	100%	20	20	100%	
Total	196	196	100%	174	174	100%	



10. Health and safety management system:

a Whathay an accumptional health and cafety	Vac Nolco has implemented an OHC (Ossupational Health and
a. Whether an occupational health and safety	, , , , , , , , , , , , , , , , , , , ,
management system has been implemented	safety) policy. The policy has been published in our website and
by the entity? (Yes/No)	circulated internally to all concerned.
What is the coverage of such system?	This OHS management system is applicable to all our
	stakeholders working in our premises and involved in our
	business operations.
b. What are the processes used to identify	Nelco has online portal for reporting safety related hazards,
work-related hazards and assess risks on a	incidents, observations. We have work permit system and SOPs
routine and non-routine basis by the entity?	which are strictly adhered to. This year, we introduced an online
	app to report the any safety related incidents.
c. Whether you have processes for workers	Yes, we don't have the workers category the process includes
to report the work-related hazards and to	all permanent and contractual employees and they can report
remove themselves from such risks. (Yes/No)	work-related hazards through an incident portal, QR code, or
	safety drop box.
d. Do the employees/ worker of the entity have	Yes, the employees of the entity have access to non-occupational
access to non-occupational medical and	medical healthcare services
healthcare services? (Yes/ No)	

11. Details of safety related incidents:

Safety Incident/Number	Category	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Lost Time Injury Frequency Rate (LTIFR) (per	Employees	0	0
one million-person hours worked)			
Total recordable work-related injuries	Employees	0	0
No. of fatalities	Employees	0	0
High consequence work-related injury or ill-	Employees	0	0
health (excluding fatalities)			

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

At Nelco, the safety and well-being of our employees are at the heart of everything we do. We've put in place a comprehensive set of measures to create a secure and healthy work environment, ensuring everyone feels safe and supported.

- i. **Leadership and Accountability:** Our safety structure includes a central Apex committee, regional safety SPOCs, and Emergency Response Team (ERT) members. Senior leaders, including our MD & CEO, actively participate in safety walks and regular evaluations. Safety metrics are integrated into performance tracking, making safety a key priority for everyone.
- ii. **Identifying and Managing Hazards:** We use Hazard Identification and Risk Assessment (HIRA) to identify potential risks. These hazards are categorized into High, Medium, and Low Risks, with control measures implemented through Standard Operating Procedures (SOPs) and training programs. Regular third-party assessments help us stay proactive in mitigating risks.
- iii. **Compliance and Assurance:** Our Lateral Praxis System, an IT-enabled online tracking system, ensures we stay compliant with statutory requirements. Regular internal and external audits help us adhere to health and safety regulations, keeping our workplace safe for everyone.

- **Design and Operational Control:** Safety is integrated into every aspect of our operations. We have detailed SOPs for each activity, which are regularly updated based on recommendations. Employees receive regular training to ensure they have the skills and knowledge to perform their jobs safely. Environmental monitoring, including air quality checks, helps maintain a safe working environment.
- Building Competency and Encouraging Safe Behaviors: We offer various training programs to enhance our ٧. employees' safety knowledge and skills. Exceptional safety behaviors are recognized through our Suraksha awards, fostering a culture of safety. Continuous reinforcement of safety norms through communication and training ensures that safety is always top of mind.
- Communication and Empowerment: We use multiple communication channels, including town halls, vi. emailers, posters, and safety induction programs, to keep everyone informed about safety measures. National Safety Week initiatives and third-party training sessions encourage active participation. Employees are empowered to report unsafe conditions and stop work if necessary.
- Regular Safety Audits: Electrical safety audits are conducted regularly by external experts at key offices in vii. Mumbai and Delhi to enhance workplace safety standards.
- Fire Safety Systems: Nelco invests in fire hydrant systems at its Mahape office, subjecting them to rigorous maintenance checks to guarantee operational readiness.
- On-Site Medical Provisions: On-site medical provisions, including access to a doctor and health check-ups for ix. employees aged 35 and above, underscore the company's commitment to employee well-being.
- Hygienic Facilities: The provision of hygienic canteen facilities and office spaces further reinforces a conducive Χ. work environment.
- Training Sessions: Regular training sessions on safety, ethics, and health are conducted to instil a culture of xi. awareness and responsibility among the workforce.

These measures collectively ensure that Nelco maintains a safe and healthy workplace, prioritizing the well-being of its employees.

Safety precautions during onboarding

As part of the onboarding process, each new employee undergoes a safety briefing. The office conducts regular fire drills and provides training on fire equipment usage. Before being fully integrated into the system, all employees must complete the safety induction procedure. The company maintains a structured safety training schedule to foster a safety-conscious culture among its employees.

Welfare Measures

Nelco takes a proactive and accountable stance in ensuring the well-being of its employees. This includes providing on- site doctor, medical check-up facilities, virtual seminars on health topics, fitness sessions, daily health emails, Hygienic canteen facility for employees to have food, Annual sports day and company vehicles for commuting. Regular workshops and health camps are organized to promote awareness of health and hygiene. During Safety Week, specific awareness sessions are conducted to educate everyone, including vendors.



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

Topic	FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)			
	Filed during the year	Pending resolution at the end of	Remarks	Filed during the year	Pending resolution at the end of	Remarks	
		year			year		
Working	83	0	-	11	0	No	
Conditions						complaints	
Health & Safety	10	0	Minor field	1	0	Minor field	
			injuries			injuries	

14. Assessments for the year:

Topic	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	One Audit by Cholamandalam done for Mahape Office
Working Conditions	100% (Internal audits conducted)

- 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:
 - Hazard Identification and Risk Assessment (HIRA): Developed and implemented HIRA to systematically identify workplace hazards and unsafe conditions, ensuring appropriate control measures are in place to mitigate risks.
 - Digitization of Permit-to-Work (PTW) System: Transitioned from a manual PTW system to a digital platform to enhance tracking, ensure compliance, and streamline approval processes through an online workflow.
 - Enhanced Lockout/Tagout (LOTO) Register: Established a comprehensive LOTO register to effectively monitor isolation activities, following a detailed assessment by a third party and TBEXG to address identified improvement areas.

LEADERSHIP INDICATORS

- 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):
 - Employees (Yes/No): Yes a.
 - **Workers (Yes/No):** Not Applicable since there is no one in the workers category
- 2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners:

During the invoicing process, the company verifies the compliance documents of its partners to confirm the payment of statutory dues. The vendor agreement stipulates the examination of vendors' statutory dues, granting Nelco the right to conduct audits. Nelco ensures vendors fulfill their statutory obligations, including ESIC, PF, and Professional tax payments, to the appropriate authorities punctually. Cross-checking with employees of the vendors is conducted to verify timely salary payments, and compliance documents are reviewed. The agreement incorporates statutory compliance requirements, with emphasis on timely filing.

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:

Category	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 2024-25 (Current FY)	FY 2023-24 (Previous FY)	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)	
Employees	0	0	0	0	

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

Yes, the company offers a procedure through which retired employees can opt to engage their services as consultants with the company, with the help of contract for service agreement

5. Details on assessment of value chain partners:

Topic	% of value chain partners (by value of business done with such partners)
· F	that were assessed*
Health and safety practices	*100% Service partners are assessed for health and safety practices and working
Working Conditions	conditions. The vendors agreement includes clauses to conduct periodical
	audits of the vendors. The vendors also need to adhere to Nelco's Occupational
	Health, safety and Environment policy.

Provide details of any corrective actions taken or underway to address significant risks / concerns arising 6. from assessments of health and safety practices and working conditions of value chain partners:

Hazard Identification and Risk Assessment (HIRA): Developed and implemented HIRA to systematically identify workplace hazards and unsafe conditions, ensuring appropriate control measures are in place to mitigate risks.

Digitization of Permit-to-Work (PTW) System: Transitioned from a manual PTW system to a digital platform to enhance tracking, ensure compliance, and streamline approval processes through an online workflow.

Enhanced Lockout/Tagout (LOTO) Register: Established a comprehensive LOTO register to effectively monitor isolation activities, following a detailed assessment by a third party and TBEXG to address identified improvement areas.



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

ESSENTIAL INDICATORS

Describe the processes for identifying key stakeholder groups of the entity:

Nelco Limited employs a systematic approach to identify and engage with its key stakeholder groups. This process is integral to ensuring that the company addresses the needs and expectations of all relevant parties. The key steps in this process include:

- Stakeholder Mapping: Nelco conducts comprehensive stakeholder mapping to identify all potential stakeholders, including employees, customers, suppliers, investors, regulatory bodies, and the community. This mapping is regularly updated to reflect any changes in the stakeholder landscape.
- Engagement Channels: Various engagement channels are established to facilitate two-way communication ii. with stakeholders. These channels include surveys, focus groups, meetings, and digital platforms, ensuring that stakeholders have multiple avenues to express their views and concerns.
- iii. **Needs Assessment:** Nelco performs regular needs assessments to understand the priorities and expectations of different stakeholder groups. This involves gathering feedback through structured interactions and analyzing the data to identify key themes and areas of interest. Materiality assessment conducted by external assessors help in better understanding of the priorities.
- **Prioritization:** Based on the needs assessment, stakeholders are prioritized according to their influence and impact on the company's operations. This helps Nelco allocate resources effectively and address the most critical stakeholder concerns.
- Continuous Monitoring: The company continuously monitors stakeholder interactions and feedback to V. ensure that its engagement strategies remain relevant and effective. This ongoing process allows Nelco to adapt to changing stakeholder needs and maintain strong relationships.
- vi. Reporting and Transparency: Nelco is committed to transparency and regularly reports on its stakeholder engagement activities. This includes sharing updates on how stakeholder feedback has been incorporated into business decisions and strategies.

By following these processes, Nelco Limited ensures that it remains responsive to the needs of its key stakeholders, fostering trust and collaboration.

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),	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders/ Investors	No	 E-mail, Meetings, Company website, Newspaper, Advertisements 	Annually	Share price, Dividends, Growth prospects
Employees	No	 Employee Portal, E-mail, Company website, MD open house, Notice Boards 	Ongoing	 Training and awareness, Health and safety, Engagement activities, Operational Efficiency
Suppliers	Yes	E-mails, Company website, One-on-one engagement	Ongoing	Timely delivery and payments, Safety concerns, Compliances, Collaborations
Customers	No	E-mails, Survey, Helpdesk, One-on-one engagement	Ongoing	Product Quality, Product guidelines
Local Communities	No	Volunteering	Ongoing	Community Development

LEADERSHIP INDICATORS

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board:

The company's management consistently engages with essential stakeholders, such as investors, customers, suppliers, and employees, through various channels and at different intervals. These interactions aim to grasp their requirements and gather suggestions to enhance both financial and non-financial performance.

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 Materiality assessment revised in the fiscal year 2023-24 involved in-depth discussions with specific stakeholder groups to identify and prioritize the material topics to align with the overall organizational goal of enhancing its sustainable growth. This aims to pinpoint environmental, social, and governance matters crucial to the company's corporate sustainability and enabled Nelco to highlight and rank the topics, thereby facilitating the development of an ESG strategy aligned with Nelco's business objectives and risks.

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

There are no vulnerable/marginalized stakeholder groups identified by Nelco.



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	FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
		Emį	oloyees			
Permanent	196	196	100%	174	174	100%
Other than permanent	109	109	100%	108	108	100%
Total Employees	305	305	100%	282	282	100%

2. Details of minimum wages paid to employees and workers:

Category		FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)					
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Mini	al to mum ige		than m Wage
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
				En	nployees					
				Pe	rmanent					
Male	177	0	0	177	100%	154	0	0	154	100%
Female	19	0	0	19	100%	20	0	0	20	100%
	Other than Permanent									
Male	106	0	0	106	100%	103	0	0	103	100%
Female	3	0	0	3	100%	5	0	0	5	100%

3. Details of remuneration/salary/wages

a. Median remuneration / wages:

	M	ale	Female		
	Number	Median remuneration/ salary/ wages of respective category (INR)	Number	Median remuneration/ salary/ wages of respective category (INR)	
Board of Directors (BoD)*	6	82,500	1	90,000	
Key Managerial Personnel	2	52,76,401	0	0	
Employees other than BoD and KMP	203	10,92,528	21	8,50,524	

^{*}For details of remuneration of the Board Members, kindly refer to the Corporate Governance Report which forms a part of this Annual Report

b. Gross wages paid to females as % of total wages paid by the entity:

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Gross wages paid to females as % of total wages	8.07%	8.45%

Note: Managing Directors & Chief Executive Officer is considered in BOD and Chief Financial Officer & Company Secretary are considered as KMPs.

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 has a POSH & Ethics Committees tasked with handling human rights concerns. Additionally, there is a chief Ethics counsellor and regional ethics counsellor's designated to address grievances related to human rights issues. These complaints are brought to the attention and discussed with the Managing Director (MD) and are required to be resolved within a 90-day timeframe.

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

Nelco is committed to upholding human rights and has established comprehensive policies to support, respect, and safeguard the human rights of both its direct and indirect employees, including those of its subsidiaries. The internal mechanisms in place to redress grievances related to human rights issues include:

- Whistle-blower & Vigil Mechanism Policy: Nelco has adopted and implemented a Whistle-blower & Vigil Mechanism Policy to provide a system for employees to report concerns about unethical behaviour, actual or suspected fraud, or violations of the Company's Code of Conduct or ethics policy. This mechanism ensures that employees can report their concerns to management without fear of retaliation.
- POSH Committee: Nelco has a dedicated POSH (Prevention of Sexual Harassment) Committee to handle complaints related to sexual harassment. This committee extends its coverage to associates, franchisee engineers, and vendors, ensuring a safe and respectful workplace for all.
- Tata Code of Conduct (TCoC) Review Mechanism: Concerns regarding violations of the Tata Code of Conduct (TCoC) are addressed internally through a review mechanism managed by the Ethics Counsellor and Senior Management. This process ensures that any violations of the TCoC are thoroughly investigated, and appropriate actions are taken.

These mechanisms collectively ensure that Nelco Limited maintains a workplace environment that respects and protects human rights, providing employees with the necessary channels to voice their concerns and seek redressal.

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

	FY 2024-25 (Current FY)			FY 20	23-24 (Previou	ıs FY)
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the y ear	Pending resolution at the end of year	Remarks
Sexual Harassment	0			0		
Discrimination at	0			0		
workplace						
Child Labor	0	Not	No cases	0	Not	No cases
Forced Labor/	0	Not Applicable	reported	0	Not Applicable	
Involuntary Labor		Applicable	reported		Аррисаые	reported
Wages	0			0		
Other human rights	0			0		
related issues						



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

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
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 alignment with the Whistleblower Policy and POSH Policy, the Company includes a section dedicated to safeguarding the anonymity of the complainant. All instances of discrimination and harassment are handled in strict accordance with Company' policy.

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

Yes. Human rights provision is integrated into all the supplier contracts. These provisions encompass concerns such as child labor, forced labor, discrimination, working conditions and compensation. Disciplinary measures against violations are also addressed. Suppliers are mandated to adhere to these clauses outlined in the agreement and establish procedures for addressing any violations of such policies. The Supplier Code of Conduct is an integral component of the contract with vendors and is obligatory for all the vendors to comply with applicable labor laws, workplace regulations, and human rights.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)				
Child labor	100%				
Forced/involuntary labor					
Sexual harassment	We ensure that there is no violation of child labor, forced labor, sexual harassment,				
Discrimination at workplace	discrimination, minimum wages in Company's operations by strict adherence to the				
Wages	statutory laws and its policies on the same.				
Others – please specify					

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

Not applicable, there were no issues reported to take any corrective actions.

LEADERSHIP INDICATORS

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

Although there were no grievances or complaints registered during the year, we have stepped up awareness campaigns regarding cybercrimes and crimes against women. We have also taken steps to ensure that our value chain partners are aware of our policies and specifically listed them in purchase orders released to vendors.

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

Nelco maintains 100% compliance of the statutory provisions at all their locations, While we may not yet have a formal process of human rights assessments, we do have multiple channels for stake holders to report any actual or perceived violation and we have a process of engaging with the stakeholder, understand the concern and take appropriate action to mitigate it while ensuring that our business processes align with human rights standards.

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

Yes, the provisions are made available for the differently abled people on the ground floor premises. Inclusive design and necessary accommodation for accessibility to the differently abled people will be considered under future infrastructure development projects.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that
	were assessed
Child labor	100%
Forced/involuntary labor	
Sexual harassment	Periodical vendor audits are conducted by Nelco for all its vendors. We ensure that
Discrimination at workplace	there is strict adherence to the statutory laws and the policies on the same. We also
Wages	ensure that the vendors pay the statutory dues such as ESIC, PF, PT etc. in timely manner. Vendors are required to accept our policies as part of the Purchase order
	process.

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 as no major issues were reported upon which the corrective actions might be required. However, as a process the Company ensures training of new joiners and existing employees on such requirements. No significant risk/concerns raised. However, external assessment by labor consultant, awareness on ethics and reporting measures are continued efforts to educate the employees and all stakeholders (EHS).

$PRINCIPLE\,6: Businesses\,should\,respect\,and\,make\,efforts\,to\,protect\,\,and\,restore\,the\,environment.$

ESSENTIAL INDICATORS

Details of total energy consumption (in Joules or multiples) and energy intensity:

Parameters	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
From renewable sources		
Total electricity consumption (A)	0	0
Total fuel consumption (B)	0	0
Energy consumption source (C)	0	0
Total energy consumed from renewable sources	0	0
(A+B+C)		
From non-renewable sources		
Total electricity consumption (D) (GJ)	8,133	8,170.07
Total fuel consumption (E) (GJ)	293.7	709.27
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources	8,427.7	8,879.34
(D+E+F) (GJ)		
Total energy consumed (A+B+C+D+E+F) (GJ)	8,427.7	8,879.34



Parameters	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Energy intensity per rupee of turnover	0.27	0.28
(Total energy consumed / Revenue from operations (₹in		
lacs)) (GJ/Lacs INR)		
Energy intensity per rupee of turnover adjusted for	-	-
Purchasing Power Parity (PPP)		
(Total energy consumed / Revenue from operations		
adjusted for PPP)		
Energy intensity in terms of physical output	-	-
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:

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 to Nelco.

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

Parameters	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	7,260	6,980
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i +	7,260	6,980
ii + iii + iv + v)		
Total volume of water consumptio (in kilolitres)	7,260	6,980
Water intensity per rupee of turnover	0.23	0.22
(Total water consumption / Revenue from operations		
(₹ In lacs)) (KL/Lacs INR)		
Water intensity per rupee of turnover adjusted for	-	-
Purchasing Power Parity (PPP)		
(Total water consumption / Revenue from operations		
adjusted for PPP (₹ In lacs)		
Water intensity in terms of physical output	-	-
Water intensity (optional) – the relevant metric may	-	-
be selected by the Entity		

Note: Previous year figure re-grouped and re-classified.

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.

There was no independent assessment carried out by an external agency.

4. Provide the following details related to water discharged:

Parameters	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Water discharge by destination and level of treatm	ent (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)	-	-

Note: As Nelco operates in leased and co-working offices, mechanism to track water discharge are to be establish enabling us to report the parameter in future.

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.

There has been no independent assessment carried out by an external agency.

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

Since Nelco is service based company, mechanism of Zero Liquid discharge is not applicable.

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

Parameter	Please specify unit	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
NOx	KG	45	72
Sox	KG	5	8
Particulate matter (PM)	KG	6	8
Persistent organic pollutants (POP)	NA	-	-
Volatile organic compounds (VOC)	NA	-	-
Hazardous air pollutants (HAP)	mg/m3	-	-
Others – please specify	PPM	-	-

Note: Previous year figures re-grouped and re-classified

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, Currently Nelco has not opted for assurance from any external agency.



7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:

Parameter	Please specify	FY2024-25	FY2023-24
	unit	(Current FY)	(Previous FY)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4,	Metric tonnes	24.12	50.05
N2O, HFCs, PFCs, SF6, NF3, if available)	of CO2		
	equivalent		
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4,	Metric tonnes	1617.64	1,624.93
N2O, HFCs, PFCs, SF6, NF3, if available)	of CO2		
	equivalent		
Total Scope 1 and Scope 2 emission intensity per rupee	tCO2/Lakh INR	0.05	0.05
of turnover (Total Scope 1 and Scope 2 GHG emissions/			
Revenue from operations (₹ In lacs))			
Total Scope 1 and Scope 2 emission intensity per rupee of	tCO2e/INR	-	-
turnover adjusted for Purchasing Power Parity (PPP)			
(Total Scope 1 and Scope 2 GHG emissions / Revenue from			
operations adjusted for PPP (₹ In Lacs))			
Total Scope 1 and Scope 2 emission intensity in terms of		-	-
physical output			
Total Scope 1 and Scope 2 emission intensity (optional)		-	-

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, Currently Nelco has not opted for assurance from any external agency.

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

As Nelco Limited embarks on its ESG journey, it is committed to reducing greenhouse gas emissions through forwardthinking initiatives. These initiatives include:

- **Upgrading Systems:** Replacing outdated systems with energy-efficient alternatives to reduce overall energy i. consumption and emissions.
- ii. Energy Audits: Conducting regular energy audits to identify areas for improvement and implement energysaving measures.
- iii. Emission Control Devices: Deploy emission control devices for generators to minimize emissions during operations.
- iv. Renewable Energy Integration: Explore the feasibility of integrating renewable energy sources into our operations to further minimize environmental impact.

Through these efforts, Nelco Limited aims to significantly reduce its greenhouse gas emissions and contribute to a more sustainable future.

9. Provide details related to waste management by the entity:

Parameters	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Total Waste gener	ated (in metric tonnes)	
Plastic waste (A)	-	-
E-waste (B)	11.82	6.65
Bio-medical waste (C)	-	
Construction and demolition waste (D)	-	
Battery waste (E)	-	
Radioactive waste (F)	-	
Other Hazardous waste. Please specify, if any. (oil) (G)	0	0.16
Other Non-hazardous waste generated (H).	-	
Please specify, if any. (Break-up by composition i.e. by		
materials relevant to the sector)		
Total (A+B + C + D + E + F + G+ H)	11.82	6.81
Waste intensity per rupee of turnover	0.0004	0.0002
(Total waste generated / Revenue from operations		
(₹ In lakh)		
Waste intensity per rupee of turnover adjusted	-	-
for Purchasing Power Parity (PPP)		
(Total waste generated / Revenue from operations		
adjusted for PPP (₹ In lakh.)		
Waste intensity in terms of physical output		-
Waste intensity (optional)		-
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	-	-
(ii) Re-used	9.47	5.96
(iii) Other recovery operations		-
Total	9.47	5.96
For each category of waste generated, total waste of	lisposed by nature of disposa	al method (in metric tonnes)
Category of waste		
(i) Incineration	-	
(ii) Landfilling	-	
(iii) Other disposal operations (e-waste scrap)	2.345	0.44
(iii) Other disposal operations (oil)	0	0.16
Total	2.345	0.6

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

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

All generated E-Waste, are disposed of by a certified e-waste vendor authorized by the Maharashtra Pollution Control Board (MPCB). The company emphasizes the use of Restriction of Hazardous Substances (RoHS) compliant products.

No, Currently Nelco has not opted for assurance from any external agency.



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:

S. no	Location of Operations/ Offices	Type of Operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
1	Dehradun Teleport	Monitoring and	
		management of	
		remote VSATs	

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

Nelco didn't engage in any projects that were subject to Environmental Impact Assessment requirements in accordance with the law.

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:

Nelco operates as a service-based company, and its operations do not emit any harmful substances. However, the organization prioritizes environmental compliance with all rules and regulations.

LEADERSHIP INDICATORS

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

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

- (i) Name of the area
- Nature of operations (ii)

(iii) Water withdrawal, consumption and discharge:

Parameter	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	7,260	6,980
(iv) Seawater / desalinated water	-	
(v) Others	-	
Total volume of water withdrawal (in kilolitres)	7,260	6,980
Total volume of water consumption (in kilolitres)	7,260	6,980
Water intensity per rupee of turnover (Water consumed / turnover)	0.23	0.22
Water intensity (optional)	-	-
Water discharge by destination and level of treatm	ent (in kilolitres)	
(i) Into Surface water	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(ii) Into Groundwater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) Into 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)	-	-

Note: Previous year figure re-grouped and re-classified.

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, Currently Nelco has not opted for assurance from any external agency.



2. Please provide details of total Scope 3 emissions & its intensity:

Parameter	Please specify unit	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4,	Metric tonnes of	-	-
N2O, HFCs, PFCs, SF6, NF3, if available)	CO2		
	Equivalent		
Total Scope 3 emissions per rupee of turnover	Metric tonnes of	-	-
	CO2		
	Equivalent		
Total Scope 3 emission intensity (optional) – the relevant		-	-
metric may be selected by the entity			

Nelco acknowledges the significance of emissions across its value chain and is in the process of formulating a system to monitor and disclose scope 3 emissions in the forthcoming years.

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, currently Nelco has not opted for assurance from any external agency.

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

There is no impact of the entity on biodiversity as it is only a satellite teleport is situated in this area.

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:

Nelco Limited is actively developing an ESG strategy that focuses on key areas such as emissions reduction, energy management, waste, and water management. Our initiatives include:

- i. Emissions Reduction and Energy Management:
 - Implement systems to reduce emissions and improve energy efficiency.
 - Conducting regular energy audits to identify and address inefficiencies.
- ii. Waste and Water Management:
 - Develop waste management plans to minimize waste generation and promote recycling.
 - Implement water conservation measures to reduce water usage and enhance water efficiency.
- iii. Resource Efficiency Plans:
 - Line up actions aimed at improving resource efficiency across our operations.
 - Establish Key Performance Indicators (KPIs) to monitor and achieve our ESG goals.

Outcomes:

- Significant reduction in emissions and energy consumption.
- Improved waste management practices and reduced environmental impact.
- Enhanced water conservation and resource efficiency.

Through these initiatives, Nelco Limited is committed to achieving its ultimate ESG goals and contributing to a sustainable future.

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

Yes, Nelco has established a Business Continuity Plan (BCP) policy and procedures aligned with the ISMS framework for IT applications and infrastructure. This policy ensures the continuity of critical business processes and eir recovery in the event of significant disruptions.

The BCP addresses all significant business processes and emphasize on:

- Identification of risks
- Identification of business requirements for continuity
- Quantification of impact of potential threat
- Establishing recovery priorities by defining Recovery Time

The plan is developed in accordance with operational requirements and identifies disaster types along with typical recovery and management methods.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?:

Nelco has not conducted any evaluations to assess the impact of its value chain.

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

No value chain partners were assessed for environmental impact.

- 8. How many Green Credits have been generated or procured:
 - a. By the listed entity
 - b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners.

Nelco plans to adopt a structured approach towards calculating Green Credits. The company has planted and maintained an additional 11 trees during 2023-24 and 7 trees during 2024-25.



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

> Currently, we are engaged as participating members in two associations, namely Broadband India Forum (BIF) and Indian Space Association (ISpA), as indicated in the table below. The MD & CEO of Nelco serves as the Chairperson of the Satcom Committee for BIF.

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:

S. no	Name of the trade and industry chambers/	Reach of trade and industry chambers/	
	associations	associations (State/National)	
1	Broadband India Forum	Member	
2	Indian Space Association	Founding Member	

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			
No such cases recorded					

LEADERSHIP INDICATORS

Details of public policy positions advocated by the entity:

S. No	Public policy advocated	Method resort for such advocacy	Whether the information is available in public domain? (Yes/No)	Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify	Web Link, if available
1.	Nelco participated in several industry groupings and associations including DOT, TRAI, BIF, ISPA etc.	Nelco has advocated for policies related to satellite communication services, data communication services, digital transformation like satcom spectrum management & pricing, licensing framework. Nelco's membership at these regulatory associations serves as a medium for such advocacy	No	-	-

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

ESSENTIAL INDICATORS

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

brief o	ne and letails of oject	SIA notification no.	Date of notification	Whether conducted by independent external agency (Yes / No)	Resulted communicated in public domain	Relevant Web Link
Asofno	As of now, no social impact assessments are conducted, since the business does not significantly affect communities.					

As of now, no social impact assessments are conducted, since the business does not significantly affect communities in a negative manner.

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

S.no	Name of project for which R&R is ongoing	State	District	No of Project Affected Families		Amount Paid to PAFs in the FY (in INR)		
Not applicable, Projects undertaken by Nelco do not involve any necessity for Rehabilitation and Resettlement (R&R)								

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

Nelco has developed a mechanism to receive and redress grievances of the community and local communities can voice their concerns by reaching out through the email addresses provided on the website: ethics@nelco.in

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

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Directly sourced from MSMEs/ Small producers	28%	24%
Directly from within India	71%	59%

Note: Previous year's figures re-grouped and re-classified.

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 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Rural	-	-
Semi-urban	-	-
Urban	-	-
Metropolitan	100%*	100%

Note:

- Places to be categorized as per RBI Classification System rural / semi-urban / urban / metropolitan
- Only permanent employees are covered.



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):

Not Applicable

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

S. No.	State	Aspirational District	Amount Spent in INR
1	Maharashtra	Turbhe- e-Vidya, Nelco sponsored Community Learning Centre	20,00,000
2	Maharashtra	Mumbai - CSA (Catalysts for Social Action)	10,00,000

Nelco is engaged in CSR initiatives in the partnership with TPDCT and CSA which majorly is covered within Mumbai area and we understand that these initiatives are not situated in the aspirational districts according to the guidelines of NITI Aayog. However, Nelco aims to explore the opportunities and expand the coverage to the needful areas in the forthcoming years.

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

No

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

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:

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:

Not Applicable

6. Details of beneficiaries of CSR Projects:

S.	CSR Project	No of persons benefited	% of beneficiaries
No.		from CSR Projects	from vulnerable and
			marginalized group
1	Desire Society	63	100%
2	Jeevan Jyoti Ashalay	33	100%
3	Vatsalya (Kanjur Marg)	50	100%
4	Vatsalya (Sanpada)	61	100%
5	Financial Inclusion camp	50	100%
6	Community Learning Centre	210	100%
7	Jan Vikas Society Mermier Bal Ashram	32	100%
8	Children of God Foundation	28	100%
9	Aarike Chritable Trust	70	100%
10	Prem Daan	191	100%

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

ESSENTIAL INDICATORS

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

Customer satisfaction is a key focus for Nelco Limited. We maintain a robust system for monitoring consumer complaints and feedback. Our complaint management process includes registering complaints, conducting root-cause analysis by the relevant department, engaging with customers through various stakeholders, and resolving issues with customer feedback.

Complaints can be received through:

- Service Desk portal
- Email (<u>helpdesk@nelco.in</u>)
- Help Desk phone number: 022-67918728

Additionally, customers can address any ethics-related complaints to our dedicated email id: ethics@nelco.in. A portal is also provided for customers to report any safety-related issues.

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

Туре	As a percentage to total turnover
Environment and Social parameters relevant to product	
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	

3. Number of consumer complaints:

	FY 20	FY 2024-25 (Current FY) FY 2023-			3-24 (Previous FY)	
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	0			0		
Advertising	0			0		
Cyber-security	0			0		
Delivery of essential	0	Not	No	0	Not	No
services		- Applicable	complaints		Applicable	complaints
Restrictive Trade	0	Applicable	received	0	Аррисавіе	received
Practices						
Unfair Trade Practices	0]		0		
Others	0			0		

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

	Number	Reason for recall
Voluntary recalls	Not Applicable, since Nelco is in the Service industry, there is no defect	
Forced recalls	of product for which these need to be recalled. However, products are	Not Applicable
	sold as enablers for service offering and if required these are repaired or	Not Applicable
	replaced during Warranty/ AMC (Annual Maintenance Contract) period.	



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, Nelco is dedicated to safeguarding sensitive information, which contributes to fostering trust and confidence in its products and services. The company implements and upholds efficient controls to oversee the confidentiality, integrity, and accessibility of its information assets.

Policy

Nelco has Board approved policies concerning information security, cybersecurity, and data privacy. While the Data Privacy policy is accessible to both internal and external parties, the Information Security and Cybersecurity policies are available exclusively on the company's intranet. Web-link: https://www.nelco.in/privacy-policy.php#

Certifications

Nelco holds ISO/IEC 27001:2013 certification, which is an internationally recognized standard for Information Security Management Systems (ISMS).

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:

There has been no reported issues regarding advertising, delivery of essential services, cyber security, and data privacy of customers, nor has there been instances of product recalls or regulatory penalties/actions taken on product/service safety.

- Provide the following information relating to data breaches: 7.
 - a. Number of instances of data breaches – There were no data breaches occurred during the year.
 - b. Percentage of data breaches involving personally identifiable information of customers- Not Applicable
 - Impact, if any, of the data breaches- Not Applicable c.

LEADERSHIP INDICATORS

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

Details about the Company's goods and services can be accessed on its website https://www.nelco.in/ https://www.nelco.in/key-services/vsat.php Given that Nelco operates in the B2B sector, much of its customer engagement occurs through individual interactions, where consultative selling is often employed, considering the unique requirements of each customer.

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

Nelco's solutions are tailored for Business to Business (B2B) use, focusing on delivering satellite-based communication services. The company has established guidelines for clients to adhere to while on-site, specifically addressing consumer safety. These guidelines are communicated to customers via email during the contracting phase, and Nelco also provides safety information and best practices through presentations.

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

In case there is a planned downtime of service, customers are informed in advance. All the approvals for the same are taken prior to the disruption.

82nd Annual Report 2024-25

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, consumers are provided with product information that exceeds the requirements mandated by local laws. Since Nelco offers services using technical products, displaying product information directly on the product is not feasible. However, these details are communicated to customers during the pre-sale process.

Yes, every year, a third-party agency conducts service-related surveys. Additionally, the company conducts a formal Customer Satisfaction (CSAT) survey annually through a reputable external market research agency. This survey encompasses a significant portion of the company's customer base. It aids in comprehending customer concerns and enables the company to be more responsive to their needs. The findings of the CSAT survey are deliberated upon with all relevant stakeholders to determine actionable points for enhancing customer satisfaction levels.