

# Business Responsibility and Sustainability Report 2024- 25

## Section A: General Disclosures

### I. Details of the Listed Entity

Sr. No.	Determinants	Details
1.	Corporate Identity Number (CIN) of the Company	L74999MH2017PLC292281
2.	Name of the Listed Entity	Sterling and Wilson Renewable Energy Limited ("SWREL")
3.	Year of incorporation	2017
4.	Registered office address	Universal Majestic, 9 <sup>th</sup> Floor, P. L. Lokhande Marg, Chembur (W), Mumbai – 400 043
5.	Corporate address	Universal Majestic, 13 <sup>th</sup> Floor, P. L. Lokhande Marg, Chembur (W), Mumbai – 400 043
6.	E-mail	ir@sterlingwilson.com
7.	Telephone	022 25485330
8.	Website	<a href="http://www.sterlingandwilsonre.com">www.sterlingandwilsonre.com</a>
9.	Financial year for which reporting is being done	April 01, 2024 – March 31, 2025
10.	Name of the stock exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11.	Paid-up capital	INR 23,34,94,316 as on March 31, 2025
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Jagannadha Rao Ch. V. Tel no.: 022-25485300, Email Id: ir@sterlingwilson.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis [i.e., only for the entity] or on a consolidated basis [i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together].	Standalone basis – Sterling and Wilson Renewable Energy Limited (SWREL)
14.	Name of assurance provider	-
15.	Type of assurance obtained	Currently, Sterling & Wilson Renewable Energy Limited has not obtained any external assurance

### II. Products/services

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

S. No.	Description of main activity	Description of business activity	% of turnover
1	Engineering, procurement, and construction ("EPC") solutions provider, operations and maintenance ("O&M") services	EPC solutions and O&M services provider	100%

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

S. No.	Product/Service	NIC Code	% of total turnover contributed
1	Construction and maintenance of Renewable power plants	42201	100%

### III. Operations

18. Number of locations where operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	151 (O&M), 22 EPC	3	176
International	15 (O&M), 4 EPC	4	23

19. Markets served by the entity:

a. Number of locations:

Location	Number
National (No. of states)	10
International (No. of countries)	9

b. What is the contribution of exports as a percentage of the total turnover of the entity?  
% of export on standalone basis – 0.53% of standalone revenue.

c. A brief on types of customers

We engage with a wide array of clientele, including independent power producers (IPPs) who have expanded into renewable energy ventures from diverse sectors such as oil and gas, steel, metals, and Solar. Our services extend to Public Sector Undertakings (PSUs) within India, serving as a pivotal Engineering, Procurement, and Construction (EPC) provider for NTPC in its mission of building large renewable based capacities in India. In addition to above, we are also a preferred EPC partner for large Private Equity firms across the globe and have built large utility scale projects for them in both India and international markets.

### IV. Employees

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

a. Employees and workers (including differently abled):

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	992	929	93.65%	63	6.35%
2.	Other than permanent E	677	662	97.78%	15	2.21%
3.	Total employees (D + E)	1669	1591	95.33%	78	4.67%
Workers						
4.	Permanent (F)	4	4	100%	0	0
5.	Other than permanent (G)	811	808	99.63%	3	0.37%
6.	Total workers (F + G)	815	812	99.63%	3	0.37%

b. Differently abled employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled employees						
1.	Permanent (D)	3	3	100%	0	0
2.	Other than permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	3	3	100%	0	0
Differently abled workers						
4.	Permanent (F)	We don't have differently abled workers				
5.	Other than permanent (G)					
6.	Total workers (F + G)					

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

	Total (A)	No. and % of females	
		No. (B)	% (B/A)
Board of Directors	8	2	25%
Key Management Personnel*	3	0	0

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

	FY 2024-2025 (Turnover rate in current FY)			FY 2023-2024 (Turnover rate in previous FY)			FY 2022-2023 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	32%	1.7%	33.7%	36.00%	1.00%	37.00%	25.00%	1.00%	26.00%
Permanent Workers	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	3.00%

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

## 23. (a) Name of holding/ subsidiary/ associated companies/ joint ventures:

Sr. No.	Name of the holding/ subsidiary/associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Esterlina Solar Engineers Private Limited	Subsidiary	100%	No, the Subsidiaries operate in different geographies and conduct their own initiatives as applicable on them.
2.	Sterling and Wilson International Solar FZCO	Subsidiary	100%	
3.	Sterling and Wilson (Thailand) Ltd.	Subsidiary	100%	
4.	Sterling and Wilson Saudi Arabia Limited	Subsidiary	95%	
5.	Sterling and Wilson Solar LLC	Subsidiary	70%	
6.	Sterling and Wilson Middle East Solar Energy LLC	Subsidiary	100%	
7.	Sterling and Wilson Singapore Pte Ltd	Subsidiary	100%	
8.	Sterling and Wilson Engineering (Pty) Ltd	Subsidiary	60%	
9.	Sterling and Wilson Solar Solutions LLC	Subsidiary	100%	
10.	Sterling and Wilson Solar Spain, S.L.	Subsidiary	99%	
11.	Sterling and Wilson Solar Solutions Inc	Subsidiary	100%	
12.	GCO Solar Pty. Limited	Subsidiary	100%	
13.	Sterling and Wilson Solar Australia Pty Ltd.	Subsidiary	100%	
14.	Sterling and Wilson Renewable Energy Spain S.L.	Subsidiary	100%	
15.	Sterling and Wilson Renewable Energy Nigeria Limited	Subsidiary	100%	
16.	Esterlina Solar – Proyecto Uno, S.L.	Subsidiary	99%	
17.	Esterlina Solar-Proyecto Dos, S.L.	Subsidiary	99%	
18.	Esterlina Solar – Proyecto Tres, S.L.	Subsidiary	99%	
19.	Esterlina Solar – Proyecto Cuatro, S.L.	Subsidiary	99%	
20.	Esterlina Solar – Proyecto Cinco, S.L.	Subsidiary	99%	
21.	Esterlina Solar – Proyecto Seis, S.L.	Subsidiary	99%	
22.	Esterlina Solar – Proyecto Siete, S.L.	Subsidiary	99%	
23.	Esterlina Solar – Proyecto Ocho, S.L.	Subsidiary	99%	
24.	Esterlina Solar – Proyecto Nueve, S.L.	Subsidiary	99%	
25.	Sterling and Wilson International LLP	Subsidiary	100%	
26.	Sterling and Wilson Kazakhstan, LLP	Subsidiary	100%	
27.	Sterling Wilson - SPCPL - Chint Moroccan Venture	Joint Venture	92%	

## VI. CSR Details

### 24. CSR Details

(i)	Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii)	Turnover (₹ in Cr.) (standalone for FY 2023-24)	2706.16
(iii)	Net worth (₹ in Cr.) (standalone for FY 2023-24)	2680.54

## 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 (NGBCRC):

Stakeholder group from whom the complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	Current Financial Year (FY 2024-25)			Previous Financial Year (FY 2023-24)		
		Number of complaints filed during the year	Number of complaints pending resolution at the end of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at the end of the year	Remarks
Communities	Yes	0	-		0	-	
Investors (other than shareholders)	<u>Corporate Governance</u>	0	-		0	-	
Shareholders	<u>- Sterling and</u>	0	-		0	-	
Employees and workers	<u>Wilson Renewable</u>	0	-		0	-	
Customers	<u>Energy Limited</u>	0	-		0	-	
Value chain partners		0	-		0	-	
Others		0	-		0	-	

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

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

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	The rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Governance and Business Ethics	Risk	To ensure transparency in our policies and disclosures on corporate governance and business ethics.	We adhere to stringent corporate standards and a comprehensive code of business ethics to ensure transparency in all our business practices.	Negative
2	Occupational Health and Safety	Risk	Protecting our workforce is integral to our business strategy, essential for both employee well-being and company success.	Dedicated to our pledge of prioritizing safety and health, we firmly believe that fostering trust, enhancing productivity, and upholding our commitment to excellence are paramount. With established policies in place, we diligently monitor every operational site to ensure adherence to these principles.	Negative

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	The rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Climate change	Risk	Climate change events pose a risk to our operations and asset management, affecting both internal and external stakeholders. Climate risk is also significant for our customers, investors, and employees. Addressing these concerns has become crucial for stakeholders to comprehend the climate-related risks facing the company.	Our goal is to perform climate change risk assessments for all operational sites in accordance with the GHG protocol, fulfilling Eco-Vadis requirements.	Negative
4	Avenues in renewable energy	Opportunity	India will take its non-fossil energy capacity to 500 gigawatts by 2030.	In alignment with India's Pancha Mitra initiative, In FY 2024-25, we worked on constructing near to 8 GW of renewable energy and O&M Of another 8 GW. We are committed to supporting India's goal of reaching 500 GW of installed renewable energy capacity by 2030.	Positive
5	Water conservation	Opportunity	Water plays an indispensable and irreplaceable role as a fundamental natural resource. Many of our activities depend on it, and we are acutely aware of the risks posed by water shortages.	We are committed to performing water conservation activities for all operational sites in accordance with climate change.	Positive
6	Vendor management	Risk	Assessment of Environmental and Social Practices, encompassing vendor Procurement Methods	We are committed to include 100% of our vendors and suppliers in the ESG Supply Chain program, Additionally, we have conducted Eco Vadis evaluations in FY 24-25 and scored well.	Negative
7	Social and environmental compliance	Risk	Compliance with applicable laws and regulations	We prioritize compliance with social and environmental regulations, and We are fully aligned with our social and environmental accountability goals.	Negative
8	Community Engagement	Opportunity	Generate opportunities for local employment and foster community development.	We are committed to actively engaging with our communities through continuous collaboration, training initiatives, and awareness programs. By creating local employment opportunities, we strive to improve the overall quality of life.	Positive

## Section B: Management and Process Disclosures

This section is aimed at helping businesses demonstrate the structures, policies, and processes put in place towards adopting the NGRBC principles and core elements.

Sr. No.	Principle description									
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable									
P2	Businesses should provide goods and services in a manner that is sustainable and safe									
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains									
P4	Businesses should respect the interests of and be responsive to all their stakeholders									
P5	Businesses should respect and promote human rights									
P6	Businesses should respect and make efforts to protect and restore the environment									
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent									
P8	Businesses should promote inclusive growth and equitable development									
P9	Businesses should engage with and provide value to their consumers in a responsible manner									

  

Disclosure question	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
1. a. Whether your entity's policy /policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web-link of the policies, if available.	<a href="https://www.sterlingandwilsonre.com/investor-relations/corporate-governance">https://www.sterlingandwilsonre.com/investor-relations/corporate-governance</a> There are more policies are available internally on company portal								
2. Whether the entity has translated the policy into procedures. (Yes/No)	Yes								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/ certifications / labels /standards (e.g., Forest stewardship council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) mapped to each principle.	<ul style="list-style-type: none"> <li>ISO 14001:2015 (Environment Management System)</li> <li>ISO 45001:2018 (Occupational Health and Safety Management System)</li> <li>ISO 9001:2015 (Quality Management System)</li> <li>ISO 27000:2019 (Information and Communication Technology)</li> <li>IFC Performance Standards</li> <li>Equator Principles</li> <li>EBRD Principles</li> <li>Sustainable Development Goals &amp; GRI reporting</li> </ul>								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p><b>Sterling Wilson Renewable Energy Limited (SWREL)</b>, a prominent global EPC solar and O&amp;M service provider, is dedicated to fostering sustainable progress through the adoption of a comprehensive ESG (Environmental, Social, and Governance) framework.</p> <p><b>Environmental Objectives</b></p> <ul style="list-style-type: none"> <li>We have adopted eco-friendly operational practices and regulatory compliance measures to avoid any environmental degradation, maintaining a flawless record of zero environmental incidents</li> <li>By 2045, we are committed to reaching carbon neutrality through measurable reductions in the following key areas:-</li> </ul>								

Disclosure question	P1	P2	P3	P4	P5	P6	P7	P8	P9
	<ul style="list-style-type: none"><li>Reduction in Greenhouse gas (GHG) emissions intensity</li><li>Reduction in Energy consumption intensity</li><li>Reduction in Water usage intensity</li><li>Reduction in Waste generation intensity.</li></ul>								

Governance, leadership, and oversight

7. Statement by the director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements

I would like to reaffirm our steadfast dedication to Environmental, Social, and Governance (ESG) principles. We recognize that while the renewable energy sector plays a pivotal role in addressing climate change, it also encounters its own unique ESG-related challenges. These include environmental issues such as land-use efficiency and sustainable waste management; social responsibilities like upholding fair labour standards across the supply chain and fostering meaningful community engagement; and the need for robust corporate governance focused on transparency and anti-corruption practices. At SWREL, we have set ambitious ESG goals and are actively advancing towards them. Our target is to enhance land-use efficiency by 15% by 2027 through innovative project designs and collaboration with environmental conservation organizations.

On the social front, we have implemented a comprehensive supplier code of conduct, backed by regular audits, to ensure ethical labour practices. Our community development initiatives have significantly improved the quality of life around our project areas, surpassing our initial stakeholder engagement benchmarks.

We hold a strong sense of accountability toward all our stakeholders. We actively engage with our workforce and have effectively delivered training sessions on diverse topics such as sustainability and inclusivity, mental health and well-being, ethics, and more. Building on these efforts, we have reinforced our commitment to the health and safety of our employees and contract workers, with continuous efforts to improve our Lost Time Injury Frequency Rate (LTIFR).

In addition, we have launched various development initiatives aimed at the upliftment and empowerment of communities located near our operational sites. In the financial year 2024-25, our community outreach programs have positively impacted 2,37,162.51 Man hrs trainings.

In terms of governance, we have strengthened our anti-corruption policies through mandatory employee training and the implementation of a secure whistleblower policy. We fully understand that the path to ESG excellence is a continuous journey. We remain committed to setting bold targets, engaging transparently with stakeholders, and constantly enhancing our ESG practices. By working in close partnership with all stakeholders, we believe we can create a sustainable, clean energy future.

This report offers a comprehensive overview of our ESG initiatives.

Disclosure question	P1	P2	P3	P4	P5	P6	P7	P8	P9
8. Details of the highest authority responsible for implementation and oversight of the business responsibility policy/policies.	The Company’s Board has tasked with overseeing the company’s strategies, initiatives, and policies related to environmental stewardship, social responsibility, corporate governance, occupational health and safety, talent development, retention and other material issues and indicators, aligned with global best practices and the evolving regulatory landscape.								
	Name of Member		Position in Committee-						
	Mr. Khurshed Yazdi Daruvala		Chairperson (Independent, Non-Executive Director)						
	Mr. Umesh Khanna		Non-Executive, Non-Independent Director						
	Mr. Balanadu Narayan		Non-Executive, Non-Independent Director						
	Mr. Saurabh Agarwal		Non-Executive, Non-Independent Director						
	Ms. Rukhshana Mistry		Non-Executive, Independent Director						
	Mr. Cherag Balsara		Non-Executive, Independent Director						
	Ms. Naina Krishna Murthy		Non-Executive, Independent Director						
	Mr. Rahul Dutt		Non-Executive, Independent Director						
9. Does the entity have a specified committee of the Board/ Director responsible for decision-making on sustainability-related issues? (Yes/No). If yes, provide details.	To suffice this purpose, we have a committee for ESG decision making consisting of HODs Key members and led by GCEO.								
	The purpose of the Committee is to support the Board of Directors in performing its duties by monitoring and guiding the Company’s key strategies, policies, and initiatives related to social responsibility, public welfare, and sustainability in alignment with the Company’s long-term objectives.								

#### 10. Details of review of NGRBCs by the Company:

Subject for review	Indicate whether the review was undertaken by the Director/committee of the board/ any other committee									Frequency (Annually/half-yearly/quarterly any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against the above policies and follow-up action	The performance review against policies and follow-up action are undertaken by "ESG Committee" as mentioned above and the Frequency is Annual.																	
Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances	The performance review against policies and follow-up action are undertaken by "ESG Committee" as mentioned above and the Frequency is Annual.																	
11. Has the entity carried out an independent assessment/ evaluation of the working of its policies by an external agency? If (Yes/No). If yes, provide the name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Yes, Independent assessment of working of some of the policies																	



**12. If the answer to question [1] above is “No” i.e., not all Principles are covered by a policy, reasons to be stated**

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity is not at a stage where it is able to formulate and implement the policies on specified principles (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity does not have the financial or/ human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

**Section C: Principle-wise Performance Disclosure**

**Principle 1: Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable**

**Essential Indicators****1. Percentage coverage by training and awareness programs on any of the principles during the financial year:**

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	% of persons in the respective category covered by the awareness programs
Board of directors	1	1. Company policies 2. Risk management policy & mitigation plan. 3. Human Rights 4. Code of conduct 5. Environmental sustainability	100%
Key managerial personnel	2	1. Organizational Performance 2. Customer Centricity 3. Human Rights 4. Code of Conduct 5. Whistle-blower Policy 6. POSH 7. Anti-corruption & anti-bribery 8. ESG & sustainability awareness	100%
Employees other than BOD & KMPs	72	1. Team building 2. Safety training programs 3. Customer centricity 4. Human rights 5. Code of conduct 6. Whistle-blower policy& POSH 7. Anti-corruption & anti-bribery 8. Grievance redressal mechanism 9. Health & mental wellness 10. ESG & sustainability awareness	98%

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	% of persons in the respective category covered by the awareness programs
Workers	6095	1. Safety training programs 2. Waste management 3. Energy conservations 4. Human rights 5. Technical/functional programs 6. Whistleblower policy & POSH 7. Grievance redressal mechanism	100%

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

There have been no instances of fines, penalties, awards, compounding fees, or settlement amounts paid by the entity or its Directors/Key Managerial Personnel (KMPs) in any proceedings with regulators, law enforcement agencies, or judicial institutions during the Financial Year 2024–25.

Monetary					
	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	Nil	Nil	Nil	Nil	Nil
Settlement	Nil	Nil	Nil	Nil	Nil
Compounding Fees	Nil	Nil	Nil	Nil	Nil

Non-Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial Institutions	Brief of the Case	Has an appeal been preferred? (Yes / No)	
Imprisonment	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil

3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision are 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, the Company's Code of Ethics clearly outlines a strict prohibition against corruption and bribery. We maintain a zero-tolerance policy towards such practices and are committed to conducting all business activities with professionalism, fairness, and integrity across all our offices. The policy explicitly forbids any form of improper payment, whether related to tangible or intangible benefits. Individuals found to be involved in such misconduct are subject to serious consequences, including disciplinary action, financial penalties, imprisonment, and other stringent measures as deemed appropriate by the Company.

Code of Business Ethics: <https://www.sterlingandwilsonre.com/pdf/Code-of-Business-Ethics-Policy.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.

	FY 2024-25	FY 2023-24
Directors	NIL	NIL
KMPs		
Employee		
Workers		

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

	Current Financial Year (FY 2024-25)		Previous Financial Year (FY 2023-24)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to the issue of conflict of interest of the directors	0	No complaint received	0	No complaint received
Number of complaints received in relation to issue of conflict of interest of the KMPs	0	No complaint received	0	No complaint received

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

Not Applicable

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Number of days of accounts payables	177	234

9. Openness of business-

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

Parameter	Metrics	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	NA	NA
	b. Number of dealers / distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	NA	NA
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.001	0.000
	b. Sales (Sales to related parties / Total Sales)	0.008	0.007
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0.999	0.995
	d. Investments (Investments in related parties / Total Investments made)	1.000	NA

## Leadership Indicators

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

Total number of awareness programs	Topics/principles covered under the training	%age of vale chain partners covered (by value of business done with such partners) under the awareness programs
7209	<p><b>Awareness Programs Covered:</b></p> <p>Training and awareness sessions were conducted for subcontractors on a variety of workplace safety and health topics, including:</p> <ul style="list-style-type: none"> <li>Safe practices for working at heights.</li> <li>Proper use of personal protective equipment (PPE)</li> <li>First aid and medical emergency response</li> <li>Incident reporting protocols</li> <li>Workplace cleanliness and housekeeping</li> <li>Prevention of slips, trips, and falls</li> <li>Health and wellness awareness</li> <li>Electrical hazard safety</li> <li>Ergonomics and safe manual handling techniques</li> <li>Chemical handling and safety measures</li> <li>Noise level monitoring</li> <li>Compliance with HSE (Health, Safety &amp; Environment) legal requirements</li> <li>Lockout/tagout procedures</li> <li>Permit-to-work system.</li> <li>Road and traffic safety awareness</li> </ul> <p><b>Environmental Awareness Topics:</b></p> <p><b>Sessions also included environmental topics such as:</b></p> <ul style="list-style-type: none"> <li>Noise pollution control</li> <li>Energy efficiency and conservation</li> <li>Waste management and disposal.</li> <li>Air quality and pollution prevention</li> </ul>	100%

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, SWREL has the policy on code of conduct applicable for All the members of the Board of Directors & All the members of the Senior Management of the Company. The objective of the Code is to maintain standards of business conduct of the Company and ensure compliance with all the applicable laws and regulations. It outlines the principles and core values that enhance the Company's reputation, guide ethical business practices, and discourage any form of misconduct in all business-related activities.

All members of the Board of Directors and Senior Management are expected to act in the best interest of the Company, exercising sound judgment and making decisions free from external influence, with a commitment to promoting the Company's objectives.

A conflict of interest arises when a personal interest of a director or a member of Senior Management interferes, or appears to interfere, with the interests of the Company as a whole. Directors and Senior Management are expected to avoid any such conflicts. Any actual or potential conflict of interest must be promptly disclosed to the Company Secretary.

**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 product and processes' environmental and social impacts to total R&D and capex investments made by the entity, respectively.

	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D	3 Cr	3 Cr	We are spending approximately 3 Crore on technology software renewals for our projects which also contribute for R&D
Capex	NIL	NIL	-

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

Yes

- (b) If yes, what percentage of input was sourced sustainably?

The company upholds a Suppliers' Code of Conduct outlining clear expectations for supplier engagement. Through a sustainable sourcing procedure, both new and existing supply chain partners undergo mandatory evaluation based on environmental, health and safety (EHS), and sustainability criteria prior to integration. The Suppliers/vendors Code of Conduct fosters collaborative partnerships, promoting professional and equitable business practices that prioritize human rights, business ethics, and environmental considerations. Our primary goal is to minimize adverse impacts on people and the environment, while proactively managing business and reputation risks and leveraging opportunities for growth. We offer various capacity-building programs for our value chain partners. The sustainability assessment of critical suppliers encompasses evaluations across:

- Human Rights
- Environment
- Health and Safety
- Business Ethics and Governance
- Community engagement

Most of our suppliers are aligned with our sustainability goals, with most being certified under internationally recognized standards such as ISO 14001 (Environmental Management Systems) and ISO 45001 (Occupational Health and Safety Management Systems). Furthermore, approximately 80% of our input materials, by value, are sourced from sustainable sources, reflecting our strong commitment to responsible sourcing and environmental stewardship throughout our supply chain

- 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.

We are dedicated to responsible waste management as part of our broader commitment to environmental stewardship and regulatory compliance. At all project and operational sites, we ensure that waste is managed in strict accordance with applicable regulations and best environmental practices.

We have established comprehensive procedures and Standard Operating Protocols (SOPs) for waste management that meticulously address the classification, handling, and disposal of waste based on its type and nature.

Upon project completion, we take full responsibility for the proper handling, disposal, and documentation of all waste generated. Our waste management practices include:

- Plastics (including packaging):** We collaborate with authorized recyclers to ensure that all plastic waste, including packaging materials, is responsibly and effectively recycled.

- b) **E-waste and Batteries:** Electronic waste and used batteries are recycled through certified vendors or authorized recyclers. Wherever possible, we implement battery buy-back mechanisms. Damaged solar panels are routed to Original Equipment Manufacturers (OEMs) or specialized recyclers for material recovery.
- c) **Hazardous Waste:** All hazardous waste is managed with utmost care and directed to authorized recyclers to ensure safe and compliant disposal.
- d) **Other Waste:** We work with trusted vendors to recycle various other waste streams, ensuring minimal environmental impact.
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 EPR plan submitted to Pollution Control Boards? If not, take steps to address the same. Extended Producer Responsibility (EPR) is not applicable as the company does not manufacture any such products.

### Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product service	% of total Turnover	Boundary for which the life cycle Perspective / Assessments conducted	Whether conducted by independent external agency (Yes	Results communicated in public domain (Yes/No) If so, provide web -link
Not applicable, owing to the nature of the Company's product/service offerings [Generation of Electricity] We [SWREL] are contractors and not owners of any materials/ equipment /power plants installed.					

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of product	Description of the risk / concern	Action Taken
	NA	

However, the Company adopts proactive measures to mitigate any environmental or social impact arising from our activities as per EIA and HIRA

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

Indicate input material	Recycled or re-use input material to total material	
	FY 2024 – 25 (Current Financial Year)	FY 2023 – 24 (Previous Financial Year)
	NA	NA

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tons) reused, recycled, and safely disposed, as per the following format:

	FY 2024 – 25 (Current Financial Year)			FY 2023 – 24 (Previous Financial Year)		
	Re-Used	Re-Cycled	Safely Disposed	Re-Used	Re-Cycled	Safely Disposed
Plastics (including packaging)	Not applicable, owing to the nature of the Company's product/service offerings [Generation of Electricity] We (SWREL) are contractors and not owners of any materials/ equipment / power plants installed. So we just install/maintain project/power plant for the contract specific period.					
E-waste						
Hazardous waste						
Other waste						

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not applicable, owing to the nature of the Company's product/service offerings [Generation of Electricity] We (SWREL) are contractors and not owners of any materials/ equipment /power plants installed.	

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

#### Essential Indicators-

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Daycare facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	929	929	100%	929	100%	-	-	929	100%	0	0
Female	63	63	100%	63	100%	63	100%	-	-	0	0
Total	992	992	100%	992	100%		-	-	-	0	0
Other than permanent employees											
Male	662	662	100%	662	100%	-	-	662	100%	0	0
Female	15	15	100%	15	100%	15	100%	-	-	0	0
Total	677	677	100%	677	100%	-	-	-	-	0	0

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Daycare facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
		Permanent employees									
Male	4	4	100%	4	100%	-	-	4	100%	-	-
Female	-										
Total	4	4	100%	4	100%	-	-	4	100%	-	-

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Daycare facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Other than permanent employees											
Male	808	808	100%	808	100%	0	0	0	0	0	0
Female	3	3	100%	3	100%	0	0	0	0	0	0
Total	811	811	100%	811	100%	0	0	0	0	0	0

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

	FY24-25 (Current Financial Year)	FY23-24 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company.	0.04%	0.24%

2. Details of retirement benefits.

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	NA	80%	Yes	NA	45%	Yes
Others -please specify	NA					

3. Accessibility of workplaces- are the premises/ offices of the entity accessible to differently abled employees and workers as per the requirements of the rights of persons with disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

In compliance with the Rights of Persons with Disabilities Act, 2016, our company premises are equipped with ramps, elevators, and other accessible facilities to accommodate individuals of all abilities. We are committed to fostering an inclusive environment that supports the needs of everyone.

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

Yes, the company upholds an Equal Opportunity Policy, which is outlined in the HR Manual. In addition, our Code of Ethics reinforces this commitment by ensuring equal opportunity for all employees—regardless of race, color, religion, sex, national origin, ancestry, age, marital status, sexual orientation, or disability. We are dedicated to fostering a diverse, inclusive, and respectful workplace.

Code of ethics policy: <https://www.sterlingandwilsonre.com/pdf/Code-of-Business-Ethics-Policy.pdf>



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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	100%	100%
Female	100%	100%	-	-
Total	100%	100%	-	-

## 6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers [Permanent workers, Other than permanent workers, Permanent employees, Other than permanent employees]? If yes, give details of the mechanism in brief.

Permanent Workers	Yes, "Meri Awaaz Suno" functions as a platform that enables workers to articulate their concerns, obtain explanations regarding policies and HR affairs, voice grievances etc.
Other than Permanent Workers	
Permanent Employees	Employee Voice- " <b>Report Now</b> " is also a mechanism and channel available to report, anonymously if required, concerns related to topics covered under our company's whistle-blower policy and Code-of-Conduct. Reportable matters may include any actual or potential violation of our Code-of-Conduct, any of our policies or related incidents of workplace ethical misconduct.
Other than Permanent Employees	Employee promptly report any unethical issues / concerns that come to your attention by calling 1800-102-6969 or log on to <a href="https://secure.integritymatters.in">https://secure.integritymatters.in</a> with access code "SW00001" to post a query or report a concern.

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

There are no employee associations that are officially recognized by the Company.

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	On health and Safety measures		On skill upgradation		Total (D)	On health and Safety measures		On skill upgradation	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (F/D)
Employees										
Male	929	929	100%	423	46%	731	731	100%	257	35.16%
Female	63	63	100%	28	44%	55	55	100%	40	72.73%
Total	992	992	100%	451	45%	786	786	100%	297	37.79%
Workers										
Male	812	812	100%	286	35.4%	28	28	100%	10	35.71%
Female	3	3	100%	3	100%	0	0	0	0	0
Total	815	815	100%	286	35.40%	29	28	100%	10	34.48%

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	929	618	66.52%	731	632	86.45%
Female	63	51	80.95%	55	43	78.18%
<b>Total</b>	<b>992</b>	<b>669*</b>	<b>67.44%</b>	<b>786</b>	<b>675</b>	<b>85.8%</b>
<b>Workers</b>						
Male	812	584	72%	948	0	0
Female	3	3	100%	0	0	0
<b>Total</b>	<b>815</b>	<b>587*</b>	<b>72%</b>	<b>948</b>	<b>0</b>	<b>0</b>

\*Note – Performance and career development reviews of employees and workers are applicable as per the policy.

## 10. Health and safety management system:

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

We have established a comprehensive Occupational Health and Safety (OHS) Management System that spans all aspects of our operations, including construction project sites, O&M activities, and office environments. Aligned with the SWREL HSE Policy, our systems are developed in accordance with the International Standard ISO 45001:2018 for Occupational Health and Safety Management Systems. This framework defines the core requirements for the systematic management and implementation of health and safety practices across the organization.

Our Integrated HSE Management System is accredited by internationally recognized certification bodies, ensuring consistent compliance with rigorous safety standards across all operational areas.

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

The company follows a structured risk management process to proactively identify and mitigate hazards across both routine and non-routine activities at construction project sites, O&M operations, and office locations.

Leveraging the Process Map software platform, we utilize online tools for real-time monitoring, review, and approval of risk assessments. This digital approach ensures efficiency, accuracy, and transparency throughout the risk management lifecycle.

Key stakeholders, including construction engineers, design and planning teams, EHS professionals, and frontline workers are actively involved in the assessment and mitigation process. All risk assessment records are securely stored and easily accessible through the Process Map platform, promoting accountability and seamless access for all relevant parties.

- c. Whether you have processes for workers to report work-related hazards and to remove themselves from such risks.

Promoting the reporting of workplace hazards is essential to enhancing our Health & Safety performance. We actively encourage all personnel involved in project execution, including contractors and their workforce to identify and report hazards as they arise.

Real-time hazard reporting is enabled through the Process Map software platform, which streamlines the submission, tracking, and resolution of safety observations. The entire process from hazard identification to the implementation of corrective actions is closely monitored to ensure timely and effective response.

Our commitment to safety is reinforced by the active involvement of top management, who oversee and support the hazard reporting process to ensure that appropriate measures are planned and executed without delay.

We have provisions in place to report work-related hazards through various communication channels, including WhatsApp groups and email, to ensure timely and effective reporting.

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

Yes, Employees and workers are included in a Medclaim/ESIC policy that covers non-occupational medical services.

## 11. Details of safety-related incidents.

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (Per one million-person hours worked)	Employee	0	0
	Worker	0.15	0.18
Total recordable work-related injuries	Employee	0	0
	Worker	2	4
No. of fatalities	Employee	0	0
	Worker	2	0
High-consequence work-related injury or ill-health (Excluding fatalities)	Employee	0	0
	Worker	0	0

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

Our organization operates with a robust Integrated Health, Safety, and Environment (HSE) management system on a global scale. We proudly hold certification under the ISO 45001:2018 standard, affirming the effectiveness of our safety management protocols in addressing workplace health and safety concerns. Our dedication to safe work execution is further reinforced by comprehensive protocols for Contractors' HSE management, a rigorous risk assessment process, a Permit-to-Work system, and robust Audit and Inspection protocols. As an integral component of our HSE management framework, we develop project-specific EHS plans at the outset of each new project. These plans delineate the key parameters of EHS management, identifying hazardous operations and the associated risks. Additionally, ongoing training for workers at site underscores our commitment to maintaining a safe and secure work environment.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working conditions						
Health & safety						

## 14. Assessments for the year:

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

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

Periodic corporate audits and site-level assessments are conducted to evaluate compliance and identify opportunities for improvement. Based on audit findings, corrective and preventive actions are systematically implemented to address gaps and strengthen our safety practices.

All incidents and accidents are thoroughly investigated to determine root causes, with preventive measures developed and applied accordingly. Lessons learned from these investigations are regularly shared across the organization to promote awareness and ensure formal compliance.

Additionally, risk-based evaluations guide our focus on critical activities such as excavation, electrical work, working at height, permit-to-work systems, material handling, and road safety. These high-risk areas are continuously reviewed to drive targeted improvements and enhance overall workplace safety.

We have integrated the Cross-Functional Audit Management System (CFMS) into our operations and enhanced the Permit to Work procedures to ensure a more robust safety management framework. These measures are aimed at significantly reducing safety-related incidents, with the goal of achieving zero incidents across our operations.

Some of the corrective actions undertaken are as follows:

- Implemented a safety audit system for value chain partners to address critical safety issues and ensure effective follow-up through the Corrective and Preventive Action (CAPA) mechanism. Additionally, SWREL conducts monthly review meetings with all value chain partners to understand their evolving requirements and align the systems accordingly.
- Established digitized controls in the CMMS Permit System by introducing a specific category for "Electrical Works with Isolation". The system now ensures that only insulated tools are used by automatically selecting them during permit issuance, thereby enhancing operational safety.
- Conducted seven HSE awareness workshops for both senior and junior management teams, focusing on the dissemination of key safety messages and sharing of "Lessons Learnt" from past incidents to promote a culture of continual improvement.

### 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).

Yes, employees are covered under Death benevolent policy & Group personal accident policy.

Yes, on roll & off roll workers covered under Employ deposit link insurance & death compensatory package.

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

SWREL has adequate mechanisms to ensure that requisite statutory dues, as applicable to the transactions of the Company with its value chain partners, are deducted and deposited in accordance with applicable regulations and reviewed as per regular audit processes. The Company also collects necessary certificates and proofs from its contractors with respect to payment of statutory dues relating to contractual employees and workers. The Company expects its value chain partners to behave ethically and with integrity in all its business transactions and uphold standards of fair business practices. We write it in the T&C of PO and get acknowledgement.

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

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024 – 25 (Current Financial Year)	FY 2023 – 24 (Previous Financial Year)	FY 2024 – 25 (Current Financial Year)	FY 2023 – 24 (Previous Financial Year)
Employees	0	0	0	0
Workers	2	0	*	0

\*Note : In case of fatality, compensation was provided to the affected family.

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

No

5. Details on assessment of value chain partners.

% of value chain partners (by value of business done with such partners) that were assessed	
Health and safety practices	100%
Working Conditions	100%

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

As part of our strategy to prevent health and safety-related incidents, we have identified two key focus areas: Contractor Safety Management (CSM) and operational discipline. The CSM procedure facilitates effective oversight and coordination of workforce deployment, while operational discipline ensures that appropriate measures are implemented across all sites to identify and eliminate potential hazards.

Some of the corrective actions undertaken are as follows:

- a. Implemented a safety audit system for value chain partners to address critical safety issues and ensure effective follow-up through the Corrective and Preventive Action (CAPA) mechanism. Additionally, SWREL conducts monthly review meetings with all value chain partners to understand their evolving requirements and align the systems accordingly.
- b. Established digitized controls in the CMMS Permit System by introducing a specific category for “Electrical Works with Isolation”. The system now ensures that only insulated tools are used by automatically selecting them during permit issuance, thereby enhancing operational safety.
- c. Conducted seven HSE awareness workshops for both senior and junior management teams, focusing on the dissemination of key safety messages and sharing of “Lessons Learnt” from past incidents to promote a culture of continual improvement.

Principle 4: Businesses should respect the interests of and be responsive to all their stakeholders

Essential Indicators

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

At SWREL, we place strong emphasis on building and maintaining positive relationships with our stakeholders, recognizing that effective engagement is key to long-term value creation.

Our approach begins with a structured process to identify key stakeholders who significantly influence or are impacted by our operations. This includes both internal and external stakeholders such as employees, customers, suppliers, shareholders, investors, regulators, and the communities in which we operate.

The stakeholder identification and engagement process involve:

- 1. **Stakeholder Identification:** We systematically identify stakeholders who have direct or indirect interests in our operations.
- 2. **Assessing Significance:** We evaluate the significance of each stakeholder’s impact on our business goals and outcomes.
- 3. **Prioritization:** Stakeholders are prioritized based on their influence and potential to affect our operations positively or negatively.
- 4. **Engagement:** We engage with stakeholders proactively, tailoring our interactions to their needs and expectations.

This approach ensures that stakeholder perspectives are integrated into our decision-making processes, driving continuous improvement and maximizing mutual value creation.

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

Stakeholder group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community meetings, Notice board, Website), Other	Frequency of engagement (Annually/half-yearly quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	E-Mail, Onsite and Offsite Meetings, Website	As and when required	Project Progress Product quality Access and pricing
Employees	No	E-Mail, Meetings, Website, Notice Boards, Employee Engagement Activities	Monthly	Learning and development programs. Occupational Health & Safety. Rewards & recognition Work environment and policies. Career growth
Suppliers	No	E-Mail, Onsite and Offsite Meetings, Website, Supplier Agreements.	Monthly	Supply and Distribution Quality and Quantity
Shareholders	No	Meetings and E-Mails	As and when required	Risk Management Financial performance Corporate governance Entry into new markets
Community	Yes	Informal Meetings and Advertisements.	As and when required	Corporate social responsibility
Industrial bodies, Regulators, Government Authorities	No	Govt Forms Filling, E-Mails and Meetings	As and when required	Policy implementation review. Communicating with industry's challenges and issues. Compliance Management
Investors	No	Meetings and E-Mails	As and when required	Risk Management Financial performance Corporate governance Entry into new markets
NGOs	No	E-Mail, Onsite and Offsite Meetings, Website	As and when required	CSR initiatives review and Implementation

### 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 strives to integrate sustainability considerations into all its systems and operations. Relevant functional heads actively engage with stakeholders on a range of subjects, and insights gathered from these interactions are communicated to the Board for matters related to economic, environmental, and social issues.

Our dedicated mailing portal facilitates the resolution of queries and concerns raised by vendors and customers. Additionally, employees utilize the grievance management system to voice their concerns, which are addressed in a structured and timely manner.

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 input received from stakeholders on these topics was incorporated into policies and activities of the entity.

Yes, our material issues are determined through active engagement with our stakeholders. The input received plays a vital role in shaping our strategies. We have established ambitious targets to drive our sustainability journey and align our goals with stakeholder expectations.

As part of our commitment to transparency, collaboration, and inclusive decision-making, we have launched a dedicated initiative for stakeholder consultation titled: “You Said, We Heard – What Matters to You, Matters to Us.”

This initiative is designed to actively listen to the voices of our stakeholders—and other key groups—and integrate their feedback into our planning and implementation processes. Through open forums, surveys, interactive sessions, and one-on-one engagements, we seek to understand the real needs, concerns, and aspirations of stakeholders.

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

SWREL operates multiple projects across various regions in India and out of India, and we recognize our responsibility to support the communities residing near these facilities, particularly marginalized and vulnerable groups in those areas. We are committed to safeguarding their rights, interests, and both natural and cultural resources, while also empowering them to participate in and benefit from developmental initiatives. We recognize the vital importance of providing reliable and high-quality healthcare services, particularly to economically disadvantaged and vulnerable communities. In response to this pressing need, we have made significant strides in improving access to essential healthcare services. Key initiatives include our Occupational Health Centre (OHC) doctors and paramedical staff for health camps and organise the health check-up facilities and medical camps across various locations, both nationally and internationally. These efforts are aimed at promoting preventive healthcare and ensuring timely medical support for underserved populations.

In addition to healthcare, we are deeply invested in the empowerment of underserved individuals. We extend financial support and facilitate access to training for those in need, helping them develop practical skills that enable self-reliance and economic independence.

Our efforts align with the broader vision of ‘Viksit Bharat 2047’, with a strong emphasis on empowering India’s youth.

In addition, we place a strong emphasis on Inclusive Learning and Women’s Empowerment, with a core focus on equity and access for marginalized communities. Our programs are designed to break socio-economic barriers by providing educational resources, digital literacy, and livelihood opportunities, particularly for women and girls.

We provide local employment and are proud to allocate a substantial portion of our resources, 6.90% specifically dedicated to Women’s Economic Empowerment.

## 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 policies of the entity, in the following format:

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	992	992	100%	786	786	100%
Other than permanent	677	677	100%	592	592	100%
Total employees	1669	1669	100%	1378	1378	100%
<b>Workers</b>						
Permanent	4	4	100%	5	5	100%
Other than permanent	811	811	100%	943	679	66.11%
Total employees	815	815	100%	948	679	66.11%

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

Category	FY 2024-25 (Current Financial Year)				
	Total (A)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Employees</b>					
Permanent	992	0	0	992	100%
Male	929	0	0	929	100%
Female	63	0	0	63	100%
Other than permanent	677	0	0	677	100%
Male	662	0	0	662	100%
Female	15	0	0	15	100%
<b>Workers</b>					
Permanent	4	0	0	4	100%
Male	4	0	0	4	100%
Female	0	0	0	0	0
Other than permanent	811	0	0	811	100%
Male	808	0	0	808	100%
Female	3	0	0	3	100%

Category	FY 2023-2024 (Previous Financial Year)				
	Total (D)	Equal to minimum wage		More than minimum wage	
		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>					
Permanent	786	0	0	786	100%
Male	731	0	0	731	100%
Female	55	0	0	55	100%
Other than permanent					
Male			NA		
Female					
<b>Workers</b>					
Permanent	5	0	0	5	100%
Male	5	0	0	5	100%
Female	0	0	0	0	0
Other than permanent	943	0	0	943	100%
Male	943	0	0	943	100%
Female	0	0	0	0	0

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

## a. Median remuneration/ wages:

	Male		Female	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration / salary / wages of respective category
Board of Directors (BoD)	-	-	-	-
Key managerial personnel	-	-	-	-
Employees other than BoD and KMP	1588	INR 106437/-	78	INR 81966/-
Workers	812	INR 17434/-	3	INR 19950/-



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

	FY24-25 (Current Financial Year)	FY23-24 (Previous Financial Year)
Gross wages paid to females as % of total wages	6.32%	16.85%

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, concerned team members from human resources team take care of human rights related issues.

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

We have a human rights policy at place. In addition to, we have a human resources team and grievances redressal mechanism for employees at places which act as internal mechanism to address grievances related to human rights.

We have grievance redressal platform titled "Meri Awaaz Suno" dedicated to ensuring that every stakeholder has the opportunity to be heard.

This initiative is designed to empower individuals to raise concerns, share feedback, and report issues directly to the management in a safe, respectful, and transparent manner. Whether it's a suggestion for improvement, a workplace challenge, or a personal grievance, "Meri Awaaz Suno" serves as a formal and accessible channel for open communication. Crucially, this platform is open to all employees, regardless of their employment status—including both on-roll and off-roll staff—underscoring our commitment to equality, inclusivity, and fairness across the organization.

Through this initiative, we aim to foster a culture of trust, accountability, and continuous improvement.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual harassment						
Discrimination at workplace						
Child labor						
Forced labor/Involuntary labor						NIL
Wages						
Other human rights-related issues						

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

	FY24-25 (Current Financial Year)	FY23-24 (Previous Financial Year)
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)		
Complaints on POSH as a % of female employees / workers		NIL
Complaints on POSH upheld		

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

Our Whistle Blower Policy aims to assure Employees and stakeholders of confidentiality and protection to the Whistle Blower. The Policy protects Whistle Blowers against any unfair practice.

Policy link: <https://www.sterlingandwilsonre.com/pdf/whistle-blower-policy.pdf>

<https://www.sterlingandwilsonre.com/pdf/POSH-policy.pdf>

WSREL provides a secure and accessible platform for all employees to report concerns related to unethical practices, potential or actual violations of the Code of Conduct, whistle-blower policy, or workplace ethical misconduct

Employees can report by calling 1800-102-6969 or log on to <https://secure.integritymatters.in> with access code "SW00001" to post a query or report a concern.

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

Yes

10. Assessments of the year

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

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

No significant risks/concerns reported.

### Leadership Indicators

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

Nil, as during the reporting period no major concerns were reported

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

SWREL Code applies to all our dealings with the key stakeholders such as, employees, customers, business partners and suppliers. This code encompasses various human rights principles, including anti-bribery, anti-corruption, and ethical behaviour also addresses our relationship with the government, regulators, communities and the protection of the environment. The Management and employees are responsible for ensuring consistent compliance. In addition, we have implemented a dedicated Human Rights Policy that reflects our strong commitment to upholding human rights. This involves identifying and evaluating the potential impact of our activities on human rights particularly before initiating new projects or entering into business partnerships, and during significant operational changes. We also take appropriate measures to prevent and mitigate any identified risks to ensure the protection and promotion of human rights throughout our operations.

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

Yes, across all our office locations, we have established dedicated facilities for employees and workers with disabilities, in alignment with the Rights of Persons with Disabilities Act, 2016. We are passionately committed to promoting equal opportunity and embracing the value of a diverse and inclusive workplace.

Our office spaces are thoughtfully designed to provide the necessary support and accommodations that empower individuals with disabilities to perform their roles effectively. At our corporate offices, ramps have been installed at entry points and lobbies to facilitate wheelchair access, complemented by elevator connectivity.

In addition, our other operational sites comply with all relevant national and local accessibility standards to foster an inclusive environment for persons with disabilities. The Company's existing and upcoming infrastructure developments incorporate universal design principles, ensuring accessibility across workstations, restrooms, shared spaces, and circulation areas within and around our premises.

#### 4. Details on assessment of value chain partners

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	100%
Discrimination at workplace	100%
Child Labor	100%
Forced Labor/ Involuntary Labor	100%
Wages	100%
Others - Please specify	-

[SWREL direct suppliers & contractors working in SWREL premises]

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

No significant risks identified during assessment.

### Principle 6: Businesses should respect and make efforts to protect and restore the environment.

#### Essential Indicators

#### 1. Details of total energy consumption (in GJ) and energy intensity-

Parameter	FY 2024-25	FY 2023-24
From renewable source		
Total electricity consumption (A)	519917.1444	253708.0956
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	519917.1444	253708.0956
From non-renewable source		
Total electricity consumption (D)	4684.58	4031.00
Total fuel consumption (E)	66813.37	36502.55
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	71497.95	40533.55
Total energy consumed (A+B+C+D+E+F)	591415.10	294241.65
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.000009384 (9.384*10 <sup>-6</sup> )	0.000009695 (9.695 10 <sup>-6</sup> )
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) [Total energy consumed / Revenue from operations adjusted for PPP]	0.000078099 (7.809*10 <sup>-5</sup> )	0.000080683 (8.068*10 <sup>-5</sup> )
Energy intensity in terms of physical output	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

**Note:** All emission factors and NCV values of fuel were taken from Department for Energy Security and Net Zero (DRFRA), "Conversion factors 2024: Version 1.1 condensed set (for most users) – Next update date 10 June 2026.

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

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? 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.

Not Applicable

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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source in kiloliters</b>		
i. Surface water	-	-
ii. Groundwater	-	-
iii. Third party water	123834.92	4239195.00
iv. Seawater / desalinated water	0	0
v. Others	0	0
<b>Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)</b>	123834.92	4239195.00
<b>Total volume of water consumption (in kiloliters)</b>	123834.92	4239195.00
<b>Water intensity per rupee of turnover</b> (Water consumed / Revenue from operations)	0.0000019650 (1.965*10 <sup>-6</sup> )	0.0011871100 (11.871*10 <sup>-4</sup> )
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> [Total water consumption/ Revenue from operations adjusted for PPP]	0.0000163531 (1.635*10 <sup>-5</sup> )	0.00987928 (9.8*10 <sup>-3</sup> )
<b>Water intensity in terms of physical output</b>	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment /evaluation /assurance has been carried out by any external agency? (Y/N), If yes, name of the external agency. Yes, done by Enen Green Services Pvt Ltd

4. Provide the following details related to water discharged-

S. No.	Parameter	Unit	Current Financial Year (FY24-25)	Previous Financial Year (FY23-24)
<b>Water discharge by destination and level of treatment (in kiloliters)</b>				
(i)	To Surface water	Kiloliter	0	0
a.	No Treatment	Kiloliter	0	0
b.	With treatment – please specify level of treatment	Kiloliter	0	0
(ii)	Groundwater	Kiloliter	0	0
a.	No Treatment	Kiloliter	0	0
b.	With treatment – please specify level of treatment	Kiloliter	0	0
(iii)	To Sea water	Kiloliter	0	0
a.	No Treatment	Kiloliter	0	0
b.	With treatment – please specify level of treatment	Kiloliter	0	0
(iv)	Sent to third parties	Kiloliter	0	0
a.	No Treatment	Kiloliter	0	0
b.	With treatment – please specify level of treatment	Kiloliter	0	0
(v)	Others		0	0
a.	No Treatment	Kiloliter		
b.	With treatment – please specify level of treatment	Kiloliter		
<b>Total Water Discharged (in Kiloliters)</b>		Kiloliter	0	0

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

No

5. Has the entity implemented a mechanism for zero liquid discharge? If yes, provide details of its coverage and implementation.  
No

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

Parameter	Unit	FY 2024-25	FY 2023-24
NOx	g/m3	18.962	16.943
Sox	g/m3	11.677	11.169
Particulate matter (PM10)	g/m3	87.511	77.574
Persistent organic pollutants (POP)	g/m3	-	-
Volatile organic compounds (VOC)	g/m3	-	-
Hazardous air pollutants (HAP)	g/m3	-	-
Others – please specify (PM2.5)	g/m3	35.600	32.083

**Note:** We hereby confirm that all emissions data for NOx, Sox, and particulate matter have been calculated as the average value derived from all running sites on which SWREL has conducted tests through third party lab.

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Yes, done by Enen Green Services Pvt Ltd

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

Parameter	Unit	FY 2024-25	FY 2023-24
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Tons of CO <sub>2</sub> equivalent	4974.90	2371.00
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Tons of CO <sub>2</sub> equivalent	946.03	801.00
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Tons of CO <sub>2</sub> equivalent	0.00000009395 (9.395*10-8)	0.00000010451 (10.451*10-8)
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b>	Tons of CO <sub>2</sub> equivalent per Dollar	0.00000078189 (7.819*10-7)	0.00000086978 (8.698*10-7)
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	Tons of CO <sub>2</sub> equivalent per MW	-	-
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional)– the relevant metric may be selected by the entity	Tons of CO <sub>2</sub> equivalent	-	-

Note: All emission factors and NCV values of fuel were taken from Department for Energy Security and Net Zero (DRFRA), "Conversion factors 2024: Version 1.1 condensed set (for most users) – Next update date 10 June 2026.

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

8. Does the entity have any project related to reducing greenhouse gas emissions? If yes, then provide details.

We are actively engaged in projects to reduce greenhouse gas emissions. We conserve energy by utilizing prefabricated system components, which minimizes the need for power tools and eliminates the use of Diesel Generators (DG) at our sites. Our solar

plant lighting designs rely on LED technology, significantly reducing energy consumption. Additionally, we treat on-site sewage water for dust control purposes.

To utilize alternate energy sources, we electrify our site offices with solar-powered inverters, reducing our dependence on DGs. We employ semi/fully automatic robots for PV module cleaning, which substantially cuts water and electricity usage. Solar lighting is also used for auxiliary consumption during the night.

We have made significant capital investments in energy conservation equipment, including a mobile testing lab for PV modules. This facility allows us to test module performance on-site, improving testing efficiency and conserving energy that would otherwise be spent on logistics and transportation.

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

Parameter	FY 2024-25	FY 2023-24
<b>Total Waste generated (in metric tons)</b>		
Plastic waste (A)	0	0
E-waste (B)	4.91100	0
Bio-medical waste (C)	0.02330	0.00315
Construction and demolition waste (D)	291.107	60.087
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	0.0031	3.9200
Other Non-hazardous waste generated (H). (Carton Box, White Paper, Book Cover Paper, Iron, Steel)	2083.8	683.8
<b>Total (A+B + C + D + E + F + G+ H)</b>	<b>2379.84</b>	<b>747.81</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated/ Revenue from operations)	0.0000000378 (3.78*10-8)	0.0000002464 (24.64*10-8)
<b>Waste intensity per rupee of turnover</b> (Total waste generated/Revenue from operations adjusted for PPP)	0.002882 (2.882*10-3)	0.001880 (1.880*10-3)
Waste intensity in terms of physical output	-	-
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)

Parameter	FY 2024-25	FY 2023-24
<b>Category of waste</b>		
(i) Recycled	2083.784	683.800
(ii) Re-used	291.107	60.087
(iii) Other recovery operations	0	0
<b>Total</b>	<b>2374.891</b>	<b>743.887</b>
<b>For each category of waste generated, total waste disposed of by nature of disposal method (in metric tons)</b>		
<b>Category of waste</b>		
(i) Incineration	0.02330	0.00315
(ii) Landfilling	0	0
(iii) Other disposal operations	4.9141	3.9200
<b>Total</b>	<b>4.9374</b>	<b>3.9232</b>

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

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

We're certified with ISO 14001:2015. Before we start any work, we create a waste management plan for each project site. We hire approved vendors to recycle and treat our waste. Our 'Waste Stream Mapping' protocol gives clear instructions on how to handle waste at every step, from generating it to storing it temporarily and disposing of it. We mark and label places for separating and storing waste. We never mix different types of waste to avoid problems when recycling.

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

Not Applicable

12. Details of Environmental Impact Assessments of projects undertaken by the entity based on applicable laws, in the current financial year.

Environmental impact assessments of projects are carried out by the Clients and are not within the scope of work of the Company.

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 there under (Y/N). If not, provide details of all such non-compliances.

Sr. No.	Specify the law/regulation/ guidelines which were not complied with	Provide details of the non-compliance	Any fines/ penalties/ actions taken by regulatory agencies such as pollution control boards or by courts	Corrective actions taken, if any
	The Company remains fully compliant with all applicable environmental regulations in the country. There were no reported incidents of environmental non-compliance during the financial year 2024-25, reflecting our ongoing commitment to responsible and sustainable operations.			

### Leadership Indicator

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

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

- Name of the area: Bikaner, Jaisalmer, Kuchh
- Nature of operations: EPC & O & M
- Water withdrawal, consumption, and discharge in the following format.

Water withdrawal by source (in kiloliters)

Parameter	FY 2024-25	FY 2023-24
(i) Surface water	0	
(ii) Groundwater	0	
(iii) Third party water	114455.715	
(iv) Seawater / desalinated water	0	
(v) Others	0	
Total volume of water withdrawal (in kiloliters)	114455.715	
Total volume of water consumption (in kiloliters)	114455.715	
Water intensity per rupee of turnover (Water consumed, KL / turnover in Cr)	0.0000018162 (1.816*10 <sup>-6</sup> )	
Water intensity [KL] per rupee of turn over adjusted for Purchasing Power Parity (PPP) [Total water consumed [KL] / Revenue from operations adjusted for PPP]	0.0000151147 (15.115*10 <sup>-6</sup> )	-

		FY 2024-25	FY 2023-24
<b>Water discharge by destination and level of treatment (in kiloliters)</b>			
(i) To Surface water	Kiloliter	0	0
a. No Treatment	Kiloliter	0	0
b. With treatment – please specify level of treatment	Kiloliter	0	0
(ii) Groundwater	Kiloliter	0	0
a. No Treatment	Kiloliter	0	0
b. With treatment – please specify level of treatment	Kiloliter	0	0
(iii) To Sea water	Kiloliter	0	0
a. No Treatment	Kiloliter	0	0
b. With treatment – please specify level of treatment	Kiloliter	0	0
(iv) Sent to third parties	Kiloliter	0	0
a. No Treatment	Kiloliter	0	0
b. With treatment – please specify level of treatment	Kiloliter	0	0
(v) Others			
a. No Treatment	Kiloliter	0	0
b. With treatment – please specify level of treatment	Kiloliter		
<b>Total Water Discharged (in Kiloliters)</b>	Kiloliter	0	0
Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? {Y/N} If yes, name of the external agency		No	

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

We have initiated data monitoring for Scope 3 emissions and plan to disclose all relevant emissions in the upcoming year.

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.

At SWREL, we are committed to protecting and enhancing biodiversity in and around our project locations. We have a formal Biodiversity Policy in place that aligns with both Indian and international environmental regulations and standards. Our policy framework is designed to ensure full compliance with, and where possible, exceed local, regional, and national requirements for land use and biodiversity conservation. It is supported by a formal governance structure that enables systematic biodiversity management across the organization. To enhance biodiversity awareness among stakeholders through our Integrated Management System (IMS). These efforts ensure biodiversity considerations are embedded into our strategic planning, project development, and operational decision-making processes.

If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
1	Use of High-Rating Solar Modules	Implementation of high-efficiency solar modules.	Enhanced module efficiency and advanced technology resulted in reduced land requirement for solar project setup.
2	Use of Robotic Module Cleaning	Deployment of robotic systems for solar panel cleaning to replace conventional water-based methods.	Eliminated water usage in module cleaning, contributing to water conservation and operational efficiency.



4. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.
- As an ISO-certified organization, we have established comprehensive and structured risk management procedures. These processes enable us to proactively identify and assess significant risks that could potentially disrupt our operations. In alignment with our commitment to business continuity and operational resilience, we implement appropriate preventive and mitigation measures to address these risks effectively.
- In addition to risk management, the entity has developed a robust and systematic emergency management framework. This framework encompasses natural disasters, socio-political events, and business-related emergency scenarios. We have prepared detailed, project-specific, and office-specific emergency response plans to ensure a prompt and effective response to any type of crisis or disruption.
- Reinforce our preparedness, we regularly conduct emergency response training and awareness programs for all stakeholders, including employees, contractors, and partners. These initiatives are designed to enhance response capabilities, promote a culture of safety, and ensure seamless coordination during emergency situations.
- SWREL has established a robust Disaster Recovery Procedure as a critical component of its commitment to information security under the ISO/IEC 27001 framework.
- Aligned with the international standards of ISO 27001, SWREL's disaster recovery plan is regularly tested, reviewed, and updated to adapt to evolving threats and business requirements.
5. Disclose any significant adverse impact to the environment, arising from the value chain of entity. What mitigation or adaptation measures have been taken by the entity in this regard.
- No impact is anticipated.
6. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.
- Not Done

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

**Essential Indicators**

1. a. Number of affiliations with trade and industry chambers/associations
- 3
- b. List of the top 10 trade and industry chambers/associations (determined based on the total members of such a body) the entity is a member of/affiliated with.
- | Sr. No. | Name of the trade and industry chambers/associations         | Reach of trade and industry chambers/ associations (State/National) |
|---------|--|---|
| 1       | Bombay Chamber of Commerce and Industry                      | National  |
| 2       | Federation of Indian Chambers of Commerce & Industry (FICCI) | National  |
| 3       | Confederation of Indian Industry                             | National  |
2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity based on adverse orders from regulatory authorities.
- In the financial year 2024–25, no concerns were raised by regulatory authorities regarding anti-competitive behavior, conflicts of interest, or monopolistic practices.

## Leadership Indicator

- Details of public policy positions advocated by the entity:

Sr. No.	Public Policy advocated	Method resorted for such advocacy	Whether information is available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others—please specify)	Web link if available
Nil during FY 2024-25					

## 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.

The company's scope of work does not extend to conducting Social Impact Assessments (SIAs) for projects that are done by our clients.

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

The company's scope of work does not extend to conducting Rehabilitation and Resettlement (R&R) for projects, this task if required is done by our clients.

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

We have established multiple channels for reporting grievances to ensure accessibility and timely redressal. Few mechanisms are:

- Personal Meetings:** Individuals can directly approach the SWREL project team or the on-site team to communicate their concerns in person.
- Digital Communication:** Grievances can also be reported through messages or WhatsApp, providing an easy and informal method for individuals to reach out.
- Grievance Register:** A physical grievance register is maintained at the security gate, allowing individuals to submit their complaints in written form.

All reported grievances, regardless of the mode of submission, are systematically documented and reviewed. Our team takes appropriate actions to investigate and resolve each issue in a timely and effective manner, ensuring accountability and continuous improvement.

This integrated approach ensures grievances are handled efficiently and transparently, reinforcing trust and transparency across all our operations. Insights gathered from grievance resolutions are used to drive continuous improvement in our operations and stakeholder relationships. This structured approach not only facilitates effective grievance resolution but also strengthens our relationships with stakeholders by demonstrating our commitment to addressing their concerns promptly and transparently.

Aligned with SDGs Goal 8: Decent Work and Economic Growth & Goal 16: Peace, Justice and Strong Institutions, SWREL Promotes safe working environments.

Employee Voice" is a mechanism and channel available to report, anonymously if required, concerns related to topics covered under our company's whistle-blower policy and Code-of-Conduct. Reportable matters may include any actual or potential violation of our Code-of-Conduct, any of our policies or related incidents of workplace ethical misconduct.

Employee promptly report any unethical issues / concerns that come to your attention by calling 1800-102-6969 or log on to <https://secure.integritymatters.in> with access code "SW00001" to post a query or report a concern.

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

	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Directly sourced from MSMEs/small producers	4.48%	29.20%
Sourced directly from within India	94.23%	70.18%

5. Job creation in smaller towns- Disclose wages paid to people 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 Financial Year	FY 2023-24 Previous Financial Year
Rural	Detailed wage break-ups by location or employment type are not available, while all employees—whether permanent, non-permanent, or contract-based—are compensated above the minimum wage. Our hiring efforts encompass a diverse workforce, including individuals from rural, semi-rural, and smaller town communities.	
Semi-urban		
Urban		
Metropolitan		

## Leadership Indicator

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

Details of negative social impact identified	Corrective action taken
NA	NA

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

Sr. No.	State	Aspirational District	Amount spent (In Cr.)
1	NIL		

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

No, we do not have a policy on this yet.

b. From which marginalized /vulnerable groups do you procure?

NA

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

NA

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Sr. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
		NIL		

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

Name of authority	Brief of the Case	Corrective action taken
NA		

6. Details of beneficiaries of CSR Projects:

Sr. No.	CSR Project (Focused Area)	No. of people benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups
1	SSHM-Medical Aid (Ayuraksha) and Sustenance (Upajivan)	14163	The Company shall start reporting this data in future
2	SSHM-Skill Development		
Total		14163	

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

### Essential Indicators

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

As a service-oriented organization, SWREL has successfully delivered projects in both EPC (Engineering, Procurement, and Construction) and O&M (Operations and Maintenance) for our valued customers. Recognizing the importance of client satisfaction and continuous improvement, SWREL has implemented a comprehensive framework that includes systematic processes and well-defined procedures to efficiently manage customer complaints and proactively gather feedback.

This structured approach ensures timely resolution of issues, enhances service quality, and strengthens long-term relationships with our clients. By actively listening to customer concerns and incorporating their insights, SWREL remains committed to delivering excellence and driving continuous improvement across all operations. Our adherence to the ISO 9001:2015 Quality Management System certification ensures consistent delivery of products and services that align with both customer expectations and regulatory standards. At the project level, we have established a formalized grievance handling process to methodically address consumer issues.

Each project and operational site maintain grievance registers to meticulously document and monitor all customer concerns. Customers evaluate our performance based on critical parameters-

- Engineering Design and Specifications
- Project Planning
- Construction Proficiency
- Project Quality Assurance
- Operational Management

Customer complaints related to our services and executions are received through various channels, including email, feedback, and direct verbal communications with project management teams.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/ or safe disposal	100%

Note- SWREL is responsible for the safe disposal and recycling of all materials generated at our site that fall within the scope of SWREL's operations.

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

	FY 2024-25		Remark	FY 2023-24		Remark
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy						
Advertising						
Cyber-security						
Delivery of essential services		Nil			Nil	
Restrictive trade practices						
Unfair trade practices						
Other						

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

	Number	Reasons to recall
Voluntary recall	NA	NA
Forced recall	NA	NA

## 5. Does the entity have a framework/policy on cyber security and risks related to data privacy? If available, provide a web link to the policy. [Yes/No] If available, provide a web-link of the policy.

We understand that cybersecurity, and data privacy are our digital shield and protect critical information from cyberattacks, leaks, and unauthorized access. Breaches can cripple operations, damage reputations, and incur hefty fines. By safeguarding data, related practices ensure smooth operations, build trust with customers and partners, and give you a competitive edge. We have a comprehensive IT Policy which suffices the purpose for us and sounds well rounded. This Policy covers various aspects like Awareness and Training, Exceptions and Deviations, Information Security Policy Domains, Related Risk Management, Physical and Environmental Risks along with other major risks.

IT policy link: <https://www.sterlingandwilsonre.com/pdf/IT-Policy.pdf>

## 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 the safety of products/ services.

We have not received any such issue till date due to strong Data Privacy and Cyber Security System inside the organization.

## Leadership Indicators

- Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available)  
NA - <https://www.sterlingandwilsonre.com>
- Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.  
We provide training and awareness to our customers regarding the required project equipment
- Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.  
We connect with our customers regularly, following structured external communication procedures.
- 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 a survey regarding 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]  
SWREL conducts this survey for its customers during the EPC (Engineering, Procurement, and Construction) and O&M (Operations and Maintenance) phases.
- Provide the following information relating to data breaches:
  - Number of instances of data breaches
  - Percentage of data breaches involving personally identifiable information of customers
  - Impact, if any, of the data breaches

No Cases for Data Breaches were recorded.