Annexure VI

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity:

1.	Corporate Identity Number (CIN) of the Listed Entity	L45202PB2006PLC029968
2.	Name of the Listed Entity	Nahar Capital and Financial Services Limited
3.	Year of incorporation	2006
4.	Registered Office Address	375, Industrial Area-"A", Ludhiana, Punjab-141003
5.	Corporate Office Address	375, Industrial Area-"A", Ludhiana, Punjab-141003
6.	E-mail id	secncfs@owmnahar.com
7.	Telephone	91-161-2600701 to 705, 91-161-2606977 to 980
8.	Website	www.owmnahar.com
9.	Financial Year for which Reporting is being done	2022-23
10.	Name of the Stock Exchange(s) where shares are listed	BSE Ltd & National Stock Exchange of India Limited
11.	Paid-up Capital	Rs. 837.31 Lakhs
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mrs. Anjali Modgil Company Secretary and Compliance officer Telephone No. +91-161-2600701 E-mail Address: secncfs@owmnahar.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 of the entity and all the entities which form a part its consolidated financial statements, taken together).	Disclosures under this report are made on a standalone basis

II. Products/Services:

14. Details of business activities

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Financial and Insurance Service	Other Financial Activities	88.56%
2.	Real Estate	Real Estate Activities	11.44%

15. Products/Services sold by the entity:

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Financial/Investment Activities	6430	88.56%
2.	Real Estate Activities	6810	11.44%

The Company is primarily engaged in financial/investment activities comprising of Long Term Investment, Strategic Investments and Short Term Investment Activities/Trading Investment. Other business activities of the Company are real estate business and lending activities. The Company does not manufacture any product or provide any service.

III. Operations:

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

Location	Number of plants	Number of offices	Total
National	Not Applicable	1	1
International		-	-

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States) International (No. of Countries)	Not applicable as the Company is mainly in the business of making investment.

b. What is the contribution of exports as a percentage of the total turnover of the entity?
Not Applicable

c. A brief on types of customers: Not Applicable

IV. Employees:

Note: The Company does not have any workers and differently abled employees as defined in the guidance note on BRSR.

18. Details as at the end of 31st March, 2023:

a. Employees

S.No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
1.	Permanent (D)	17	16	94.12	1	5.88
2.	Other than Permanent (E)	2	1	50.00	1	50.00
3.	Total employees (D + E)	19	17	89.47	2	10.53

19. Participation/Inclusion/Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)%	(B/A)
Board of Directors (including MD)	10	1	10
Key Management Personnel (excluding MD)	2	1	50.00

20. Turnover rate for permanent employees:

	FY 2023			FY 2022			FY 2021		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	5.88	0.00	5.56	5.56	0.00	5.26	NIL		

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

21. (a) Names of holding / subsidiary / associate companies / joint ventures:

S. No.	Name of the holding / subsidiary/ associate companies/ joint ventures (A)	Indicate whe ther 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.	Nahar Spinning Mills Limited	Associate Company	45.49	No
2.	Nahar Poly Films Limited	Associate Company	49.16	No

VI. CSR Details:

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
(ii) Turnover: Rs. 4011.30 Lakhs
(iii) Net worth: Rs. 85140.48 Lakhs

VII. Transparency and Disclosures Compliances:

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023			FY 2022		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes http://www.owmnahar.com/nahar_cf/pdf/vigil_mechanism.pdf	NIL	NIL	-	NIL	NIL	-
Investors (other than shareholders)	Not Applicable						
Shareholders	Yes As per SEBI Regulations	2	NIL	-	NIL	NIL	-
Employees	Yes http://www.owmnahar.com/nahar_cf/pdf/vigil_mechanism.pdf	NIL	NIL	-	NIL	NIL	-
Customers	Not Applicable						
Value Chain Partners	Yes http://www.owmnahar.com/nahar_cf/pdf/vigil_mechanism.pdf	NIL	NIL	-	NIL	NIL	-

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

Not applicable as the Company is mainly an Investment Company. Hence, there is no material business conduct and sustainability issue pertaining to environmental and social matters that may present a risk or an opportunity to the Company's business.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	NA	Y	Y	Y	Y	Y	Y	NA
b. Has the policy been approved by the Board? (Yes/No)	Y	NA	Y	Y	Y	Y	Y	Y	NA
c. Web Link of the Policies, if available	The polices are available on the company's website i.e. www.owmnahar.com under the head "Policies"								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	NA	Y	Y	Y	Y	Y	Y	NA

3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	NA	Y	Y	Y	Y	Y	Y	NA
4. Name of the national and international codes/ certifications/labels/standards (e.g. Forest Stewardship Council, Fair trade, Rainforest Alliance, Trustee) (standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	NA	NA	NA	NA	NA	NA	NA	NA	NA
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	N	NA	N	N	N	N	N	N	NA
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	NA	NA	NA	NA	NA	NA	NA	NA	NA

Governance, leadership and oversight

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

The Company is committed towards making its business truly sustainable and socially responsible. The company supports and promotes community development and environmental protection. The Company conducts its business efficiently through commitment to transparency and business ethics in discharging its corporate responsibilities.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name: Mr. Dinesh Oswal Designation: Managing Director DIN: 00607290
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.	The Board of Directors of the company is responsible for managing the sustainability issues of the company. The Board is supported by Corporate Social Responsibility Committee and Risk Management Committee in this regard.

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)
Performance against above policies and follow up action	All the applicable principles are reviewed by the Board of Directors. Additionally, Audit Committee reviews the code of business principles supported by CSR Committee on social and environmental projects.	Whenever there will be change in the laws.
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Board of Directors reviews the Statutory Compliances on applicable laws .	Quarterly

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

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

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

Governance: The Company continues to practice the principle of good Corporate Governance. It is Company's firm belief that good CORPORATE GOVERNANCE is a key to success of business. The Company believes in the conduct of the affair in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior in the organization. The Company has a Code of Conduct for its Directors, Senior Management Personnel. Their affirmation to the Code of Conduct is communicated to all stakeholders by Managing Director, through a declaration in the Annual Report. The Company's Employees also abide by the Code of Conduct, which prohibits abusive, corrupt and unfair practices. The company has Vigil mechanism / Whistle blower policy for directors and employees.

The Company communicate about the access of information about any decision that may impact any of the relevant stakeholders and fairly discloses all necessary legal and financial disclosures and disseminates it to the stakeholders through the Stock Exchanges, Company's website, Annual Report, Newspapers, etc. To ensure accountability and monitoring, the Board has constituted various committees such as the Audit Committee, Nomination and Remuneration Committee, Stakeholders' Relationship Committee, Corporate Social Responsibility Committee, Risk Management Committee etc. These committees meet periodically to supervise, review performance and advice for corrective direction.

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

The Company has established a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and is cognizant of its responsibility towards protecting and maintaining the confidentially and disclosure of price-sensitive information in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information not only conforms to the regulatory requirements but also instils a sense of responsibility among the designated persons for protecting and maintaining confidentiality.

Grievance redressal mechanism:

The Company has effective grievance redressal mechanism for receiving and dealing with the concerns, complaints of its stakeholders. The buyer / consumers can raise their concerns through emails, call or personal meetings. The Committee on Prevention of Sexual Harassment (POSH) addresses all sexual harassment complaints. The Company has received no complaints on sexual harassment during the reporting year. The company has designated email id gredressalncfsl@owmnahar.com for receiving and addressing investor grievances.

Essential Indicators

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

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and its impact	% age of persons in respective category by the awareness programs
Board of Directors	2	Financial controls, financial management compliance, Corporate Social Responsibility, Board effectiveness, strategic direction, Meetings and performance assessment; • Roles, functions, Duties, Responsibilities and liabilities of Independent Directors; • Directors Responsibility statement forming part of Boards' Report;	100
Key Managerial Personnel	2		100

		• Vigil Mechanism/ Whistle Blower policy including poliey formulation, disclosures, Code of Conduct for Directors etc. • Risk Management systems &framework; • Board Evaluation process and procedures.	
Employees other than BoD and KMPs	3	Fire Fighting, Fire Drills and First Aid Training	90

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, 2015 and as disclosed on the entity's website:

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	NA	NA	NA	NA
Settlement	NIL	NA	NA	NA	NA
Compounding fee	NIL	NA	NA	NA	NA

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	NA	NA	NA
Punishment	NIL	NA	NA	NA

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the re-enforcement agencies/ judicial institutions
NOT APPLICABLE	

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

The entity does not have any specific anti-corruption or anti-bribery policy, however the company has code of conduct for its Directors, Key Managerial Personnel and Senior Management Personnel. Their affirmation to the code of code of conduct is communicated to all stakeholders by Manging Director, through a declaration in the Annual Report. The company's employees also abide by the code of conduct, which prohibits abusive, corrupt and unfair practices.

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

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

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

Leadership Indicators		
1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:		
Total number of awareness programmes held	**Topics / principles covered under the training**	**%age of value chain partners covered (by value of business done with such partners) under the awareness programmes**
NIL		
2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No)-If Yes, provide details of the same. Yes, the Company has code of conduct for its Directors, Senior Management Personnel which helps in avoiding the conflict of interest. Their affirmation to the code of code of conduct is communicated to all stakeholders by Managing Director, through a declaration in the Annual Report. Moreover, Directors of the Company are required to disclose to the Board, on an annual basis, whether they, directly or indirectly or on behalf of third parties, have any material interest in any transaction or matter directly affecting the Company.		

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

Not Applicable

The Company is a Non-Banking Financial Company {Non- Deposit taking Systemically Important (ND-SI)} registered with Reserve Bank of India. The Company is primarily engaged in financial/investment activities comprising of Long Term Investment, Strategic Investments and Short Term Investment Activities/Trading Investment. Other business activities of the Company are real estate business and lending activities. The Company does not produce any good or provide any service.

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

Essential Indicators

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

Category	% of employees covered by									
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	16	Covered through ESI and employees who are exempted from ESI are getting medical allowances		16	100	Covered through ESI		NIL		NIL	
Female	1			1	100	Maternity Leave (with Full Salary for 6 months)					
Total	17			17	100						
Other than Permanent Employees											
Male	1	NIL		NIL		NIL		NIL		NIL	
Female	1										
Total	2										

b. Details of measures for the well-being of workers: Not Applicable

2. Details of retirement benefits:

Benefits	FY 2023			FY 2022		
	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	90	NA	Y	90	NA	Y
Gratuity	95	NA	Y	95	NA	Y
ESI	15	NA	Y	15	NA	Y
Others- Exgratia Bonus	90	NA	Y	90	NA	Y

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:
Not applicable as the Company is not having any differently abled employee and worker.

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:
Not Applicable

5. Return to work and Retention rates of permanent employees that took parental leave:
Not applicable as no employee of the Company has taken parental leave.

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Employees	Yes The Company endeavors to provide equal opportunity to each individual by evaluating him/her on its performance and ensure that there is no discrimination amongst its employees based on caste, creed, religion, disability, gender, age, sexual orientation, race, colour, ancestry, marital status and medical background. • The Company has established a Whistle Blower Policy / Vigil Mechanism to address the issues relating to ethics, bribery, corruption, sexual harassment or any discrimination of permanent employees and other than permanent employees. For this purpose the Company has a dedicated e-mail id i.e. whistleblowerncfs@owmnahar.com. • The company's Vigil mechanism empowers the employees and other stakeholders who have concerns about suspected misconduct, unethical behaviour, actual or suspected fraud or violation of the Code of Conduct or ethics policy, to come forward and express their concerns without fear of punishment or unfair treatment. • The company has placed complaint box in the company's office and employees can also use complaint box in case of any kind of complaint. • The company has set up open door policy under which any employees can approach Vice President (Personnel) and can raise their concerns or complaint.
Other than Permanent Employee	

7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:
Not applicable as the Company does not have any management recognized employee association.

8. Details of training given to employees:
During the year under review, the Company has conducted various training programs, designed to meet the changing skill requirements of our employees. These programs include Fire Fighting Drills, First Aid Training, orientation sessions for new employees, programs conducted by various skill-enhancing, role-specific functional academies, leadership programs and other management development programs for mid-level and senior executives. Majority of the permanent Employees were part of these training programs.

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

Category	**FY 2023**			**FY 2022**		
	Total (A)	**No. (B)**	**% (B/A)**	**Total (A)**	**No. (B)**	**% (B/A)**
			Employees			
Male	17	17	100	18	18	100
Female	2	2	100	2	2	100
Total	19	19	100	20	20	100

All the employees of the Company undergo an annual performance appraisal process.

10. Health and safety management system:

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

Keeping in view the nature of the business, as such there are no occupational health and safety risks due to the nature of the work.

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

Not Applicable

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

Not Applicable

D. Does all the employees of the entity have access to non-occupational medical and healthcare services? (Yes/ No) : Yes

Yes, the company recognizes the overall physical and mental well-being of its employees. The company undertakes several well-being programs for the mental health, physical health, safety at home, hospital services, occupational health services and organizes medical camps for their employees.

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

Safety Incident/ Number	Category	FY 2023	FY 2022
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	NIL	NIL
Total recordable work-related injuries			
No. of fatalities			
High consequence work-related injury or ill-health (excluding fatalities)			

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

The Company's continuous endeavor is to provide a safe, productive and positive environment for our employees. There is proper provision and maintenance of fire detection, alarm and suppression systems at the office premises. Regular mock drills for fire as well as medical emergencies are also conducted in the office premises to ensure maintenance of safety standards. Employee engagement campaigns are held on health & safety topics such as fire safety, road safety, emergency evacuation etc. Regular meetings and training educating employees regarding safety and healthy workplace are conducted.

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

	FY 2023			FY 2022		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	NIL	NIL	-	NIL	NIL	-
Health & Safety	NIL	NIL	-	NIL	NIL	-

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 & safety practices and working conditions.

Not applicable

Leadership Indicators

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

Yes

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

All the statutory dues are deducted and deposited by the Company itself.

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

	Total no. of affected employees		No. of employees that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023	FY 2022	FY 2023	FY 2022
Employees	NIL			

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No):
The company has no transition assistance program. However the company's continued skill development and up gradation during their working career helps the employees/workers in their employment after

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	Nil
Working Conditions	Nil

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.
Not applicable

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.
The Company has mapped its internal as well as external stakeholders to deepen its insights into their needs and expectations, and to develop sustainable strategies for the short, medium and long term. Key stakeholders identified by the Company are Shareholders /Investors, Government and Regulators and Employees.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board) Other	Frequency of engagement (Annually, Half yearly, Quarterly, others-please specify)	Purpose and scope of engagement including key topic and concerns raised during such engagement
Shareholders/Investors	No	Email, Newspaper, Advertisement, Website, Meetings, Notice Board	As per the requirement and in compliance of laws and regulations applicable to Company	To apprise regarding development in the Company and address/resolve their queries and to understand their expectations.
Government and Regulators	No	Email, E-filling Newspaper, Advertisement, Website		To maintains statutory records and ensure 100% compliances of the applicable Laws, Rules and Regulations.
Employees	No	Inter Office Memos, one- on-one counseling, Email, Website, Meetings, Notice Board	The Company engages with its employees on regular basis.	To provide them regular learning and skill development facility to boost their morale, develop their creativity and building a safety culture and inculcating safe work practices.

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 continuous engagement with a broad spectrum of stakeholders, helps to deepen insights into their needs and expectations, and to develop sustainable strategies for the short, medium and long term thereby enabling the Company to better serve its stakeholders. Accordingly, the feedback is shared with Board. However, the Company being an Investment Company, does not had any such consultation with stakeholders on economic, environmental, and social topics.

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

   Not applicable as the Company being an Investment Company, does not had any such consultation with stakeholders on economic, environmental, and social topics.

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

   Not Applicable

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

Essential Indicators

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

Category	FY 2023			FY 2022		
	Total (A)	No. of employees covered (B)	% (B/A)	Total (C)	No. of employees covered (D)	% (C/D)
Permanent	17	17	100	18	18	100
Other than Permanent	2	2	100	2	2	100
Total Employees	19	19	100	20	20	100

2. Details of minimum wages paid to employees in the following format :

Category	FY 2023					FY 2022				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent	17	NA		17	100	18	NA		18	100
Male	16			16	100	17			17	100
Female	1			1	100	1			1	100
Other than Permanent	2			NA	NA	2			NA	NA
Male	1			NA	NA	1			NA	NA
Female	1			NA	NA	1			NA	NA

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

	Male		Female	
	Number	Median remuneration/ salary of respective category (in Rs.)	Number	Median remuneration/ salary of respective category (in Rs.)
Board of Directors (BoD) (excluding MD)	8	40,000	1	40,000
Managing Director	1	4,46,00,000	-	-
Key Managerial Personnel (KMP)	1	27,13,590	1	7,79,719
Employees other than BoD and KMPs	15	3,86,131	1	24,00,000

- *All the Directors except MD are paid Sitting Fees only*

4. **Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)** Yes, the company has appointed Vice President (personnel) who is responsible for addressing the human rights impacts or issues caused or contributed to by the business.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.
The company has formulated and adopted Vigil Mechanism/Whistle Blower Policy for its directors and employees and value chain partners. The aim of the policy is to provide a channel to the directors and employees to report their genuine concerns about unethical behavior, actual or suspected fraud or violation of the code of conduct. Reporting avenues have been provided for stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of the Company Code, policies or law. Representations made in the reporting avenues are reviewed and appropriate action is taken on substantiated violations.

6. Number of Complaints on the following made by employees:
No complaint was received regarding human rights violation during the financial year 2023 and 2022.

7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.
Concerns on discrimination and harassment are dealt with confidentially. Complaints can be made without fear of reprisal and with the assurance that the Company will stands by you. The Company does not tolerate any form of retaliation against anyone reporting good faith concerns. Anyone involved in targeting such a person raising such complaint will be subject to disciplinary action. The Company has formulated and adopted Vigil Mechanism/Whistle Blower Policy for its directors and employees to prevent adverse consequences to the complainant in discrimination and harassment cases. In Exceptional circumstances, the complainant can also approach to the Chairman of Audit Committee.

8. Do human rights requirements form part of your business agreements and contracts? (Yes/No)
The Company advocates the supremacy of Human Rights. However, no agreement and contracts have been entered against the human rights requirements.

9. Assessments for the year:

	% of your offices that were assessed (by entity or statutory authorities or third parties)
Child labour	The Company internally monitors compliances with relevant laws and policies pertaining to these issues. No such assessment has been carried out by local statutory / third party in the year under review. No adverse observation was observed during the financial year 2022-23.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	

10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.
Not Applicable

Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.
Not applicable as no such grievances/complaints has been lodged.

2. Details of the scope and coverage of any Human rights due diligence conducted.
Not applicable as no such due diligence has been conducted .

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

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	The Company expects its value chain partners to adhere to the values, principles and business ethics. No such assessment has been carried out during the year under review.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.
Not applicable

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

1. **Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**
   Not Applicable
2. **Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**
   Not applicable
3. **Provide details of the following disclosures related to water, in the following format:**
   The Company's usage of water is restricted to human consumption purposes only. Efforts have been made to ensure that water is consumed prudently in the office premises.
4. **Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.**
   Not applicable
5. **Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**
   Not applicable
6. **Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**
   Not applicable
7. **Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.**
   Not applicable
8. **Provide details related to waste management by the entity, in the following format:**
   Not applicable.
9. **Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**
   Not applicable
10. **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 as the office of the Company is not situated in/around ecologically sensitive areas.
11. **Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:**
    Not applicable
12. **Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment Protection Act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:**
    Yes, based on the nature of business, the Company is in compliance with applicable environmental norms.

Leadership Indicators

1. **Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:**
   Not applicable
2. **Provide the following details related to water discharged:**
   The Company's usage of water is restricted to human consumption purposes only. Efforts have been made to ensure that water is consumed prudently in the office premises.
3. **Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):**
   The Company's usage of water is restricted to human consumption purposes only. Efforts have been made to ensure that water is consumed prudently in the office premises.

4. **Please provide details of total Scope 3 emissions & its intensity, in the following format:**
   Not applicable
5. **With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**
   Not applicable as the office of the Company is not situated in/around ecologically sensitive areas.
6. **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:**
   Not applicable
7. **Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.**
   The company has a standardized procedure to maintain business continuity and ensure effective management of incidents. A risk-based approach is followed to identify credible business risks and is reviewed regularly. In addition, to safeguard our data and IT systems, the company has a business continuity planning (BCP) and disaster recovery plan as part of Company's IT Policy. The purpose of this plan is to specify controls to ensure that our data, applications and systems can be recovered to meet business operational requirements following a disruptive cyber incident.
8. **Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**
   No any adverse impact to the environment arouse from the value chain of the entity
9. **Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**
   No such assessment has been carried out during the year under review.

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.**
      The Company is not a member of any trade and chamber or association.
   b. **List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.**
      Not applicable
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.**
   Not applicable

Leadership Indicators

1. **Details of public policy positions advocated by the entity:**
   Not applicable

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Essential Indicators

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**
   As a responsible organization focused on inclusive growth, the Company has followed a proactive approach towards Corporate Social Responsibility (CSR). The Company has a detailed CSR policy in place, and the CSR activities are monitored by the Board constituted CSR committee. The Company has been undertaking CSR projects through Oswal Foundation, which is a Registered Society formed in 2006, having its charitable objects in various fields. The key focus areas of Company's CSR programs are the promotion of education, preventive healthcare, rural development, skill enhancement, environment protection and other areas as defined in Schedule VII of the Companies Act, 2013.
   The Company internally performs an impact assessment of its initiatives at the end of each year to understand the efficacy of the program in terms of delivery of desired benefits to the community and to gain insights for improving the design and delivery of future initiatives.

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

   Not applicable

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

   The company has dedicated email address i.e. gredressalncfsl@owmnahar.com for the purpose redressing grievances and any complaint received from any investors and community which is looked in to by the Company's Compliance Officer so that the complaint/grievances is resolved at the earliest.

4. **Percentage of input material (inputs to total inputs by value) sourced from suppliers:** Not applicable

Leadership Indicators

1. **Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):** Not applicable

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

S. No.	State	Aspirational District	Amount spent (In INR)
1.	Punjab	Ludhiana	100.00 Lakhs*

**Out of Rs. 100 Lakhs paid to Oswal Foundation, an amount of Rs. 23.52 Lakhs has been adjusted against current year CSR obligation (i.e. 2022-23) and Rs. 76.48 Lakhs has been treated as an advance to Oswal Foundation and the same will be adjusted against the Company's CSR Obligation for the coming years.*

3. **(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)** Not applicable

   (b) From which marginalized /vulnerable groups do you procure? Not applicable

   (c) What percentage of total procurement (by value) does it constitute? Not applicable

4. **Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:** Not applicable

5. **Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved:** Not applicable

6. **Details of beneficiaries of CSR Projects:**

S. No.	CSR Project	No. of Persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1.	**Health Care Project:** At Mohan Dai Oswal Cancer Treatment & Research Foundation, Ludhiana (Refer Annexure-I to the Board's Report for Annual Report on CSR activities *Pursuant to Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014)*	The whole community living in the state of Punjab, Himachal Pradesh and union territory of Chandigarh have benefitted from the company's CSR Project. The most beneficial are the resident of Ludhiana district who are getting medical treatment at lower rate.	

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

Not Applicable

The Company is a Non-Banking Financial Company {Non- Deposit taking Systemically Important (ND-SI)} registered with Reserve Bank of India. The Company is primarily engaged in financial/investment activities comprising of Long Term Investment, Strategic Investments and Short Term Investment Activities/Trading Investment. Other business activities of the Company are real estate business and lending activities. The Company does not produce any good or provide any service. Hence the Company does not have any direct customer/consumer.

For and on behalf of the Board of Directors

Place: Ludhiana
Date: 9th August, 2023

Jawahar Lal Oswal
(Chairman)
DIN: 00463866