

**ANNEXURE – F TO DIRECTORS' REPORT**
**BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT**
**SECTION A : GENERAL DISCLOSURES**
**I. Details of the listed entity**

1. Corporate Identity Number (CIN) of the Listed Entity : L50210PB1985PLC006473
2. Name of the Listed Entity : Swaraj Engines Limited
3. Year of incorporation : 24th September, 1985
4. Registered office address : Phase IV, Industrial Area, S.A.S.Nagar (Mohali), Punjab 160055
5. Corporate address : Phase IV, Industrial Area, S.A.S.Nagar (Mohali), Punjab 160055
6. E-mail : selinvestor@swarajenterprise.com
7. Telephone : 0172-2271620-27 (Registered Office), 0172-2234941-47 (Works)
8. Website : www.swarajenterprise.com
9. Financial year for which reporting is being done : 1st April, 2024 to 31st March, 2025
10. Name of the Stock Exchange(s) where shares are listed : BSE Limited (BSE), National Stock Exchange of India Limited (NSE)
11. Paid-up Capital : Rs. 1214.75 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: Mr. Mukesh Bansal, General Manager, Tel. No. 0172-2234941-47, email ID-bansal.mukesh@mahindrasel.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
14. Name of assurance provider: Not Applicable
15. Type of assurance obtained: Not Applicable

**II. Products/services**

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

S.No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Manufacturing of diesel engines and its components	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	Diesel engines and its components	29104	100%

**III. Operations**

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

Location	Number of plants	Number of offices	Total
National	1	1	2
International	-	-	-

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	2
International (No. of Countries)	–

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

c. A brief on types of customers : The Company is in the business of manufacturing diesel engines and its entire sale to Mahindra & Mahindra Ltd. ("M&M") for fitment into "Swaraj" tractors being manufactured by M&M.

**IV. Employees**

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled) :

S.No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	107	93	86.9%	14	13.1%
2.	Other than Permanent (E)	2	1	50.0%	1	50.0%
3.	Total employees (D + E)	109	94	86.2%	15	13.8%
WORKERS						
4.	Permanent (F)	182	181	99.5%	1	0.5%
5.	Other than Permanent (G)	1374	1138	82.8%	236	17.2%
6.	Total workers (F + G)	1556	1319	84.8%	237	15.2%

b. Differently abled Employees and workers:

S.No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1	1	100%	–	–
2.	Other than Permanent (E)	–	–	–	–	–
3.	Total differently abled employees (D + E)	1	1	100%	–	–
WORKERS						
4.	Permanent (F)	–	–	–	–	–
5.	Other than Permanent (G)	21	18	85.7%	3	14.3%
6.	Total differently abled workers (F+ G)	21	18	85.7%	3	14.3%

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### 21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	8	1	12.50%
Key Management Personnel	4*	1	25%

\*including Whole Time Director & CEO who is also covered in the Board of Directors.

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

(Disclose trends for the past 3 years)

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	2.15%	21.43%	4.67%	5.32%	18.18%	6.67%	3.00%	–	3.00%
Permanent Workers	3.87%	–	3.85%	8.33%	–	8.33%	3.37%	–	3.37%

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

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

S.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	Mahindra & Mahindra Limited	Holding Company	52.12%	No

### VI. CSR Details

#### 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013 : (Yes/No) Yes

(ii) Turnover (in Rs. Crores) : 1681.89

(iii) Net worth (in Rs. Crores) : 419.20

### 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:

The Company is committed to conduct its business in accordance with applicable laws, rules, regulations, highest standards of business ethics, honesty, integrity and ethical conduct. Towards this, the Company has formulated various policies which are also displayed at its website. For the redressal of any complaint, the Company has adopted vigil mechanism by implementing the Whistle-blower Policy covering all directors, employees, vendors, suppliers or any other stakeholders of the Company.

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (if Yes, then provide web-link for grievance redress policy)	FY 2024-25			FY 2023-24		
		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* <a href="https://swarajenterprise.com/policies">https://swarajenterprise.com/policies</a>	—	—	—	—	—	—
Investors (other than shareholder)	Yes <a href="https://swarajenterprise.com/contact">https://swarajenterprise.com/contact</a>	—	—	—	—	—	—
Shareholders	Yes <a href="https://swarajenterprise.com/contact">https://swarajenterprise.com/contact</a>	38	—	Primarily related to non-receipt of annual report, share certificate, dividend etc.	62	—	Primary related to non-receipt of annual report, share certificate, dividend etc.
Employees and workers	Yes <a href="https://swarajenterprise.com/policies">https://swarajenterprise.com/policies</a>	1	—	Complaint was received under POSH and duly resolved	1	—	Complaint was received under POSH and duly resolved
Customers	Yes <a href="https://swarajenterprise.com/policies">https://swarajenterprise.com/policies</a>	553	—	These complaints were received by M&M relating to engines fitted into various Swaraj brand of tractor models manufactured by M&M and the same were suitably resolved by the Company	357	—	These complaints were received by M&M relating to engines fitted into various Swaraj brand of tractor models manufactured by M&M and the same were suitably resolved by the Company
Value Chain Partners	Yes <a href="https://swarajenterprise.com/policies">https://swarajenterprise.com/policies</a>	—	—	—	—	—	—
Other (please specify)	—	—	—	—	—	—	—

\*The Company is having well defined whistle blower policy available at its website which offers a mechanism to raise any concern.

**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 adapt or mitigate the risk along with its financial implications, as per the following format :

S.No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
1	Environmental wellbeing	Opportunity	The Company gives high focus on all environment related aspects and targeting to reduce carbon footprint. The Company is working on alternate source of energy, water recycling and enhanced use of returnable packaging to minimize waste and maximise reuse.	–	Positive implications
2	Community well being	Opportunity	The Company is committed to its social responsibility by taking various initiatives which would benefit the society at large. Efforts are directed towards education including vocational skills training, public health, environment and community welfare.	–	Positive implications

S.No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
3	Ethical behaviour, Governance and Compliance	Risk	The Company believes in doing business by following ethical behaviour and practicing the principles of good corporate governance disclosure and transparency. Any non-compliance could lead to litigation and may also impact the brand reputation.	The Company adheres to strong ethical standard of integrity. Besides a well-defined code of conduct for its directors and employees, the Company is having whistle blower policy to ensure all the stakeholders are practicing the defined ethical standards. In addition, various measures are in place to meet all related compliances.	Positive implications
4	Diversity and equal opportunities	Opportunity	The Company's thrust is to promote diversity and offer equal opportunities at its workplace to all irrespective of their race, gender, colour, religion etc. Focused efforts are being made to increase the gender diversity in the organization.	–	Positive implications

## 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.

- 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 its 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 Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes (Note 1)	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes (Note 2)	Yes (Note 2)	Yes (Note 2)	Yes (Note 2)	Yes (Note 2)	Yes (Note 2)	Yes (Note 2)	Yes (Note 2)
c. Web Link of the Policies, if available	https://swarajenterprise.com/policies (Note 3)								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 9001 : 2015 (Quality Management System) ISO 14001 : 2015 (Environmental Management System) ISO 50001 : 2018 (Energy Management System) ISO 45001 : 2018 (Occupational Health and Safety Management System)								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	- Tree plantation FY25 - 5000 Nos. - Energy productivity to be improved in F25 by 2% over F24. - Water usage FY25 - 0.310 KL/Engine								
6. Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met.	- Tree plantation FY25 - 5200 Nos. - Energy productivity improved in FY25 by 9% over FY24. - Water usage FY25 - 0.284 KL/Engine								
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)									

Swaraj Engines Limited is continuously focusing on Environmental, Social & Governance (ESG) factors through sustained & focused programmes.

### Environment

The Company is putting its efforts towards conserving natural resources, reducing pollution and sustaining the environment. The Company is taking various initiatives for meeting emission norms requirements for diesel engines, reducing the carbon footprints, water conservation, usage of alternate source of energy etc. The Company continues to promote sustainable development through its business decisions and actions.

### Social

The Company is socially responsible towards its employees and the community at large. The Company encourages to create and maintain a diverse, inclusive and vibrant work environment that nurtures and motivates its employees. For the community, the Company's CSR policy intends to focus its efforts within the constituencies of girls, youth & farmers by innovatively supporting them through programmes designed in the domains of education, health and environment.

### Governance

The Company has been practicing the principles of good corporate governance, disclosure and transparency right from its incorporation. It has been a core belief and practice with the Company to consider itself as the custodian and trustee of all the constituencies of its businesses - customers, business associates, shareholders and society. The Company has sought and will continue to seek corporate excellence and profits through ethics, passion and perseverance.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Devjit Sarkar, Whole Time Director & Chief Executive Officer.
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.	While Mr. Devjit Sarkar, Whole Time Director & Chief Executive Officer is responsible for implementation and oversight of Business Responsibility initiatives, the CSR Committee of the Company also gives due focus on sustainability while finalizing annual CSR activities.

### 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)*								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	On-going	Q	Q	Q	On-going	Q	On-going	Q	Q
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	On-going	Q	Q	Q	On-going	Q	On-going	Q	Q

\* A – Annually, H – Half Yearly, Q – 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
	No	No	No	No	No	No	No	No	No

The Company on periodic basis internally reviews the policies.

Note 1: The Company complies with consumers' awareness through its customer by appropriate product labelling and operator manual & instructions supplied along with the final product (tractor) which ensure safe usage by the end consumer. However, Company's current control is limited till warranty period.

Note 2: While the Code of Conduct for Directors & Employees of the Company, Whistle Blower Policy, CSR policy, Prevention of Sexual Harassment Policy, Business Responsibility Policy are approved by the Board, the other relevant policies are issued by Director/CEO or being the group company of Mahindra & Mahindra Ltd., related policies for the group are referred.

Note 3: While the Code of Conduct for Directors & Employees of the Company, the Whistle Blower Policy and the Corporate Social Responsibility ("CSR") Policy are uploaded on the Company's website at <https://swarajenterprise.com/policies>, being a group company of Mahindra & Mahindra Ltd., other related policies for the group are available through its intranet site for information and implementation by respective internal stakeholders.

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

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

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

### Essential Indicators

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

The Company is guided by its principles of Code of Conduct ("CoC") which require its employees to be aware of the CoC and ensure to conduct themselves with the principles stated therein. Training sessions for new joiners are conducted as part of their induction program and annual certification through online learning platform is also required to be completed by the employees to confirm adherence to the CoC.

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	3	Adherence to the : <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Anti Bribery and Anti Corruption Policy</li> <li>• Prevention of Sexual Harassment Policy</li> </ul>	50%
Key Managerial Personnel	3		100%
Employees other than BoD and KMPs	3		100%
Workers	3		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):

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	—	—	—	—	—
Settlement	—	—	—	—	—
Compounding fee	—	—	—	—	—

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

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

Not applicable

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

The Company has zero-tolerance policy for bribery and corruption or facilitation payment in any form and encourages anti-bribery and anti-corruption practices amongst everyone working on behalf of the Company. Guidelines on anti-bribery and anti-corruption forms part of the Code of Conduct for every stakeholder. Further, being a part of Mahindra Group, the Company also follows its policy on Anti-Bribery and Anti-Corruption. Weblink for the Code of Conduct is <https://www.swarajenterprise.com/policies>.

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

There were no instances reported during FY 2024-25 and FY 2023-24 of any disciplinary action taken by any law enforcement agency for charges of bribery or corruption against any Directors, KMPs, employees or workers of the Company.

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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	—	—	—	—
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	—	—	—	—

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

Not Applicable as there was no fine, penalty or action taken by regulators, law enforcement agencies or judicial institutions on cases of corruption and conflict of interest.

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

	FY 2024-25	FY 2023-24
Number of days of accounts payables	61	52

9. Open-ness of business:

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

Parameter	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % of total purchases.	—	—
	b. Number of trading houses where purchases are made from	—	—
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	—	—

Concentration of sales	a. Sales to dealers / distributors as % of total sales b. Number of dealers / distributors to whom sales are made c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	— — —	— — —
Shares of RPTs in	a. Purchases (Purchases with related parties / Total Purchases) b. Sales (Sales to related parties / Total Sales) c. Loans & advances (Loans & advances given to related parties / total loan & advances) d. Investments (Investments in related parties / Total Investment made)	3.02% 99.65% — —	2.68% 99.73% — —

**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
1	Sustainability training, continuous improvement	30%

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 Code of Conduct for Directors and employees is in place.

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

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

	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D	100% Rs. 3.76 Crores	100% Rs. 4.65 Crores	This represents the total expenditure incurred by the Company including spent towards development of Engines for TREM V emission compliance.
Capex	0.28%	—	Towards energy conservation

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)  
Yes, the Company's sourcing practices are focussed towards optimizing logistics, returnable packaging to minimize waste and maximize re-use. The Company takes steps to ensure that its sourcing methods are sustainable. The Company's material procurement, majority of parts, is done within the country itself and majority of suppliers are

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located near the Company's manufacturing location (within a radius of around 250 KMs) apart from Proprietary Part Suppliers which are common across industry. Besides this, the Company ensures that its suppliers adhere to the environment, social and human rights regulations.

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

Around 80%.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

It is the Company's ongoing endeavour to have a mechanism to recycle products and limit the waste arising out of production of engines. To reduce usage of plastics (including packaging), majority of the Company's suppliers are supplying material in returnable packaging. Similarly, the waste generated during machining of components is being supplied to the Foundry of Mahindra & Mahindra Ltd.-Swaraj Division. Other scrap generated including e-waste and hazardous waste, is disposed-of through authorised scrap dealers.

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

Not applicable

### Leadership Indicators

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

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

The Company is engaged in the manufacturing of diesel engines for fitment in the tractors as one of its components. While no LCA has been conducted for engines, the necessary details about the related engine form part of the tractor catalogue shared by the tractor manufacturer.

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.

Not applicable

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

Due to specific product requirements, currently there is no use of any recycled or reused material in the Company's engine manufacturing process.

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed:

The engines manufactured by the Company are used as one of the components of the tractor by the tractor manufacturer. Therefore, details of end of life treatment of the product are not readily available.

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

Not applicable

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

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

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	93	93	100%	93	100%	—	—	93	100%	—	—
Female	14	14	100%	14	100%	14	100%	—	—	14	100%
Total	107	107	100%	107	100%	14	13.1%	93	86.9%	14	13.1%
Other than Permanent employees											
Male	1	1	100%	1	100%	—	—	1	100%	—	—
Female	1	1	100%	1	100%	1	100%	—	—	1	100%
Total	2	2	100%	2	100%	1	50%	1	50%	1	50%

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	181	181	100%	181	100%	—	—	—	—	—	—
Female	1	1	100%	1	100%	1	100%	—	—	1	100%
Total	182	182	100%	182	100%	1	0.55%	—	—	1	0.55%
Other than Permanent workers											
Male	1138	1138	100%	1138	100%	—	—	—	—	—	—
Female	236	236	100%	236	100%	236	100%	—	—	236	100%
Total	1374	1374	100%	1374	100%	236	17.17%	—	—	236	17.17%

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

	<b>FY 2024-25</b>	<b>FY 2023-24</b>
Cost incurred on well-being measures as a % of total revenue of the company	0.42%	0.39%

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

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%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	-	-	-	-	-	-
Others -Leave Encashment	100%	100%	N.A.	100%	100%	N.A.

3. Accessibility of workplaces

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

Yes, the Company has provided necessary assistance as per the Rights of Persons with Disabilities Act, 2016.

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

The Company provides equal opportunity and inclusion for all employees through its employment policies and practices by ensuring the provision of equal remuneration and offer equal opportunities to its employees to grow in the organisation irrespective of gender, caste and religion. Being part of Mahindra Group, the Company follows Equal Opportunity Policy of M&M, which is available on the intranet for the information and implementation by the internal stakeholders.

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

	Permanent employees		Permanent workers	
Gender	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	N.A.	N.A.
Female	100%	100%	-	-
<b>Total</b>	<b>100%</b>	<b>100%</b>	-	-

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

	<b>Yes/No (If Yes, then give details of the mechanism in brief)</b>
Permanent Workers	Yes, the Company has a grievance redressal mechanism for permanent and non-permanent employees & workers. The employees/workers can directly reach out to the Chief Executive Officer of the Company with their grievances at a designated email id for this purpose. Also, the employees/workers can use the third party platform to register their grievance through designated toll free number or web portal.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2024-25			FY 2023-24		
	Total employ- ees/workers in respective category (A)	No. of employ- ees/workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employ- ees/workers in respective category (C)	No. of employ- ees/workers in respective category, who are part of association(s) or Union (D)	% (D/C)
<b>Total Permanent Employees</b>	<b>107</b>	<b>–</b>	<b>–</b>	<b>105</b>	<b>–</b>	<b>–</b>
- Male	93	–	–	94	–	–
- Female	14	–	–	11	–	–
<b>Total Permanent Workers</b>	<b>182</b>	<b>82</b>	<b>45.1%</b>	<b>192</b>	<b>91</b>	<b>47.4%</b>
- Male	181	82	45.3%	191	91	47.6%
- Female	1	–	–	1	–	–

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	
		No.(B)	%(B/A)	No. (C)	%(C/A)		No.(E)	%(E/D)	No.(F)	%(F/D)
Employees										
Male	93	93	100%	93	100%	94	94	100%	94	100%
Female	14	14	100%	14	100%	11	11	100%	11	100%
Total	107	107	100%	107	100%	105	105	100%	105	100%
Workers										
Male	181	181	100%	181	100%	191	191	100%	191	100%
Female	1	1	100%	1	100%	1	1	100%	1	100%
Total	182	182	100%	182	100%	192	192	100%	192	100%



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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	93	93	100%	94	94	100%
Female	14	14	100%	11	11	100%
Total	107	107	100%	105	105	100%
<b>Workers</b>						
Male	181	181	100%	191	191	100%
Female	1	1	100%	1	1	100%
Total	182	182	100%	192	192	100%

The Company has well-defined Performance Management System (PMS) for its employees. The performance appraisals along with the career development discussion for all the employees are done annually. Besides this, progress review with respect to the set goals and Key Result Areas (KRAs) is also done on half yearly basis.

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?

Yes, the Company has an Occupational Health and Safety Management System, and driven through the Environment, Occupational Health & Safety (EOHS) Policy. Further the Company is also having ISO: 45001: 2018 certification and Central Safety Council (CSC) Standards. 100% of employees and workers are covered.

- 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 has structured OHS management system which enables to identify and mitigate risk at a preliminary stage to ensure a safe workplace. A well-defined Hazard Identification Risk Assessment (HIRA) and control standard operating procedure (SOP) for risk identification and mitigation are in place.

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

Yes, the Company has standard operating procedure (SOP) to report work-related hazards and remove themselves from these risks. The process of incident reporting is digitised through "Swaraj Safety Management Portal".

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

Yes, all the employees/workers have access to non-occupational medical and healthcare services through tie-ups with reputed medical entities in close proximity. In addition, the Company facilitates the accessibility of non-occupational health services through medical camps, vaccination drives and medical health check-ups.

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

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	–	–
	Workers	1.07	0.28
Total recordable work-related injuries	Employees	–	–
	Workers	4	1
No. of fatalities	Employees	–	–
	Workers	–	–
High consequence work-related injury or ill-health (excluding fatalities)	Employees	–	–
	Workers	–	–

\*Including the contract workforce

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

The Company is committed towards providing a safe workplace environment and encourages involvement of all its employees in activities related to safety, including promotion of safety standards. The Company has a well-established Safety, Occupational Health and Environmental Policy which inter alia ensures safety of public, employees, plant and equipment by ensuring compliance with all statutory rules and regulations on regular basis. The Company also imparts training to its employees as per the predefined training calendar, carries out statutory safety audits of its facilities as per legal requirement and promotes eco-friendly activities. Besides this, the Company also has safety committees in place to review the adequacy of resources for safety and to provide support for safety management system.

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 & safety practices and working conditions.

Safety related incidents, if any, are being investigated and any learnings from the investigation reports are shared with all concerned for deployment of corrective action to avoid recurrence of such incidents. In addition, safety councils meet at regular intervals to discuss safety related aspects and initiate action, if any, required to further strengthen the safety practices at workplace.

#### Leadership Indicators

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

Yes, the Company has taken life insurance policy for its employees & workers.

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

Supplier Code of Conduct for the Group mandated the suppliers to comply with all applicable regulatory compliances. Further, while processing the invoices of contractors providing manpower, the Company also verifies statutory dues like PF and ESI deposited by them.

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

	Total No. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	–	–	–	–
Workers	–	–	–	–

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 does not have policy on transition assistance. However, the Company provides various skill upgradation trainings on regular basis on diverse areas for the employees/workers which facilitate them in smooth transition to the new roles/organisations.

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%*

\*All suppliers have signed common Mahindra supplier Code of Conduct

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

There were no adverse observations from the suppliers reviewed during the reporting period.

**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 embraces a people-centric and stakeholder inclusive approach. For identification of the stakeholders, the Company follows the philosophy of role being played in the business value chain by individuals or groups of individuals or institutions. Accordingly, the Company identifies employees/workers, suppliers, customers, shareholders, society and local communities around the Company's manufacturing site as the key stakeholders.

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
Employees/ workers	No	Townhall meetings, coffee with CEO, performance review, employee engagement survey, periodic interaction with workers union	Ongoing	Employee engagement including sharing of the Company's performance, feedback to/from employees, training & development, career growth, rewards & recognition
Suppliers	No	Need-based one-to-one interactions, Suppliers meet for selective vendors, Schedule Adherence Report, Process enhancement Report, IVR Report	On going / Annually/ Monthly/ Monthly Quarterly	To share and understand mutual needs and expectations including for quality, cost & delivery, growth in business avenues
Customers	No	One-to-one interactions and emails	Ongoing	To share and understand mutual needs and expectations including for quality, cost & delivery, growth in business avenues
Shareholders	No	Annual General Meeting, email, newspaper publication	Annually / quarterly	To share the quarterly & annual financial results and to update on the Company's performance
Society / local communities	Yes	CSR activities/ initiatives at various locations nearby to the Company's Plant	Ongoing	To assess local community needs, strengthening livelihood opportunity, offering healthcare services and promoting clean environment

**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 broad process of engagement with the stakeholders is indicated above. The regular and proactive consultations/ feedback helps the Company to align the expectations, trust and confidence of the stakeholders. As a part of Risk Management being presented to the Risk Management Committee and the Board, due coverage is given to governance and employees' health & safety. Besides this, the Corporate Social Responsibility ("CSR") initiatives of the Company for the community at large towards health, education and environment are also discussed by the Corporate Social Responsibility Committee.

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

Yes, consultation / feedback with stakeholders is being used to identify areas related to environment and social aspects. These feedbacks are used as reference while formulating the Company's annual CSR activity plan. Besides regular CSR activities, based on inputs received, the Company also started a new batch for short-term courses in Diesel Mechanic, Child & Elderly care, beautician/make-up artist course for women, livelihood earning support to differently abled children through setting up workshops for eco-friendly paper bags & plates. The Company also assesses the impact of its major CSR projects, if any.

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

The Company has identified avenues to be meaningfully engaged with the communities through structured projects for improving their livelihood through education, skill based trainings as well as health awareness programs. Under its CSR, the Company has been driving various projects to uplift the marginalized and vulnerable community. Details of CSR initiatives are available at the Company's website [www.swarajenterprise.com](http://www.swarajenterprise.com).

**PRINCIPLE 5 : Businesses should respect and promote human rights**
**Essential Indicators**

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	107	107	100%	105	105	100%
Other than permanent	2	2	100%	2	2	100%
<b>Total Employees</b>	<b>109</b>	<b>109</b>	<b>100%</b>	<b>107</b>	<b>107</b>	<b>100%</b>
<b>Workers</b>						
Permanent	182	182	100%	192	192	100%
Other than permanent	1374	1374	100%	1253	1253	100%
<b>Total Workers</b>	<b>1556</b>	<b>1556</b>	<b>100%</b>	<b>1445</b>	<b>1445</b>	<b>100%</b>

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	%(B/A)	No. (C)	%(C/A)		No.(E)	%(E/D)	No.(F)	%(F/D)
Employees										
Permanent	107	-	-	107	100%	105	-	-	105	100%
Male	93	-	-	93	100%	94	-	-	94	100%
Female	14	-	-	14	100%	11	-	-	11	100%
Other than Permanent	2	-	-	2	100%	2	-	-	2	100%
Male	1	-	-	1	100%	1	-	-	1	100%
Female	1	-	-	1	100%	1	-	-	1	100%
Workers										
Permanent	182	-	-	182	100%	192	-	-	192	100%
Male	181	-	-	181	100%	191	-	-	191	100%
Female	1	-	-	1	100%	1	-	-	1	100%
Other than Permanent	1374	-	-	1374	100%	1253	-	-	1253	100%
Male	1138	-	-	1138	100%	1053	-	-	1053	100%
Female	236	-	-	236	100%	200	-	-	200	100%

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

- a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/salary/wages of respective category (Rs. in lakhs)	Number	Median remuneration/salary/wages of respective category (Rs. in lakhs)
Board of Directors (BoD)*	1	169.90	—	—
Key Managerial Personnel	2	41.21	1	10.70
Employees other than BoD and KMP	91	18.30	14	11.33
Workers	181	8.08	1	3.17

\*BoD represents data for Whole Time Director & Chief Executive Officer only, since rest of the BoD consists of Non-Executive Directors.

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

	<b>FY 2024-25</b>	<b>FY 2023-24</b>
Gross wages paid to females as % of total wages	5.64%	4.37%

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 an Internal Complaints Committee ("ICC") to address human rights related issues such as prevention of sexual harassment (POSH). The Board of Directors are responsible for the formation of the ICC. The Committee ensures that complaints, if any, are addressed and recommends the disciplinary action against any employee found guilty of any kind of harassment. For any other incidents of human right violations, one can inform to the Chief Ethics Officer.

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

Apart from the Internal Complaints Committee to address sexual harassment cases and the Chief Ethics Officer to resolve Code of Conduct violations, the Company has introduced a third-party Ethics Helpline to register grievances, if any, related to all types of issues or violations.

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

	<b>FY 2024-25</b>			<b>FY 2023-24</b>		
	<b>Filed during the year</b>	<b>Pending resolution at the end of year</b>	<b>Remarks</b>	<b>Filed during the year</b>	<b>Pending resolution at the end of year</b>	<b>Remarks</b>
Sexual Harassment	1	–	NA	1	–	N.A.
Discrimination at workplace	–	–		–	–	
Child Labour	–	–		–	–	
Forced Labour/ Involuntary Labour	–	–		–	–	
Wages	–	–		–	–	
Other human rights related issues	–	–		–	–	

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

	<b>FY 2024-25</b>	<b>FY 2023-24</b>
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	1	1
Complaints on POSH as a % of female employees / workers	0.43%	0.59%
Complaints on POSH upheld	1	1

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.
- The Company believes in providing a safe, non-hostile and harassment free work environment at its workplaces. Incidents of discrimination and harassment are handled by an Internal Complaints Committee ("ICC"). Any complaints or incidents reported under the POSH policy is treated with all possible care, sensitivity and discretion in protecting the sensibilities of the affected person and no information is divulged publicly or to any third party which can enable identification of the identity of the affected person. The Company provides protection to the complainant, if the situation requires and if the victim/complainant feels threatened in any manner. Further, the Company is also having a Corporate Governance Council to deal with other matters related to Code of Conduct.
9. Do human rights requirements form part of your business agreements and contracts? **(Yes/No)**
- Yes, the Code of Conduct for Suppliers specifically contain clauses to adhere to human rights requirements such as no use of child labour, provide safe & healthy environment etc.
10. Assessments for the year:

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others-please specify	—

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.
- Not applicable as there were no significant concerns that were observed.

#### **Leadership Indicators**

1. Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.
- Apart from the Internal Complaints Committee to address sexual harassment cases and the Chief Ethics Officer to resolve Code of Conduct violations, the Company has introduced a third-party Ethics Helpline to register grievances, if any, related to all types of issues or violations.
2. Details of the scope and coverage of any Human Rights due-diligence conducted.
- As a part of its Code of Conduct, the Company recognises the importance of maintaining and promoting fundamental human rights in all its operations. It provides fair and equitable wages, benefits, and other conditions of employment. The Company also respects the employees' right to freedom of speech and provide safe and humane working conditions. The Company evaluates the adherence to the Code of Conduct annually to ensure its strict compliance.



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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?

Currently, the visitor area is situated at the ground floor of the Company's premises and further steps will be taken as and when needed to meet the requirements.

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	The Code of Conduct for Suppliers provides an opportunity to suppliers to improve on the areas on environment, labour and business ethics with support and assistance from the Company through training sessions. The Company takes declaration on the above aspects from its suppliers before partnering with them.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others - please specify	

All suppliers have signed common Mahindra supplier Code of Conduct including signing by new suppliers at the time of their induction.

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 concerns were observed.

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

#### Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format :

Parameter	FY 2024-25	FY 2023-24
<b>From renewable sources</b>		
Total electricity consumption (A)	–	–
Total fuel consumption (B)	–	–
Energy consumption through other sources (C)	–	–
<b>Total energy consumption from renewable sources (A+B+C)</b>	–	–
<b>From non-renewable sources</b>		
Total electricity consumption (D)	37878	34135
Total fuel consumption (E)	12401	11068
Energy consumption through other sources (F)	1637	1522
<b>Total energy consumption from non-renewable sources (D+E+F)</b>	51916	46725
<b>Total energy consumed (A+B+C+D+E+F)</b>	51916	46725
<b>Energy intensity per rupee of turnover</b> (Total energy consumption/ revenue from operations)	0.00000309	0.00000329
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)	–	–
<b>Energy intensity in terms of physical output</b> (GJ/Engine)	0.309	0.337
Energy intensity (optional) - the relevant metric may be selected by the entity	–	–

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

Yes- ISO 50001 Energy Management System (EMS) audit conducted by BSI

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 as the Company is not covered under the category of Designated Consumers

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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	–	–
(ii) Groundwater	–	473
(iii) Third party water	–	–
(iv) Seawater / desalinated water	–	–
(v) Others - Supply from MC	47787	44927
<b>Total volume of water withdrawal (in kilolitres)(i+ii+iii+iv+v)</b>	47787	45400
<b>Total volume of water consumption (in kilolitres)</b>	47787	45400
<b>Water intensity per rupee of turnover</b> (Total Water consumption / revenue from operations)	0.00000284	0.00000320
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / revenue from operations adjusted for PPP)	–	–
<b>Water intensity in terms of physical output</b> (KL/Engine)	0.284	0.327
<b>Water intensity (optional)</b> - the relevant metric may be selected by the entity	–	–

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)  
If yes, name of the external agency. Yes- Environment Management System audit for ISO 14001 conducted by BSI

4. Provide the following details related to water discharged:

Parameter	FY 2024-25	FY 2023-24
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(ii) To Groundwater		
- No treatment	-	-
- With treatment - please specify level of treatment	-	-

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(iii) To Seawater		
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(iv) Sent to third-parties		
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(v) Others - Supply from MC		
- No treatment	-	-
- With treatment - please specify level of treatment	7013	7425.30
<b>Total water discharged (in kilolitres)</b>	<b>7013</b>	<b>7425.30</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. No assessment done by external agency.

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

Yes, the Company's Plant is Zero Liquid Discharge compliant, and the water treated in STP / ETP is used for gardening and flushing toilets etc.

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

Parameter	Please specify Unit	FY 2024-25	FY 2023-24
NOx	µg/m3	22	27
SOx	µg/m3	12	10
Particulate matter (PM)	µg/m3	46	37
Persistent organic pollutants (POP)	ppm	—	—
Volatile organic compounds (VOC)	ppm	—	—
Hazardous air pollutants(HAP)	µg/m3	—	—
Others-please specify		—	—

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- Ambient air audit was carried out by Eco Paryavaran

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

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)	Metric tonnes of CO <sub>2</sub> equivalent	1039	915
<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)	Metric tonnes of CO <sub>2</sub> equivalent	7649	7775
<b>Total Scope 1 and Scope 2 emissions intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO <sub>2</sub> equivalent per rupee of revenue from operations	0.00000052	0.00000061
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		–	–
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b> (Metric tonnes of CO <sub>2</sub> equivalent/Engine)		0.052	0.063
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) - the relevant metric may be selected by the entity		–	–

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

No assessment from outside agency

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

Although the activities of the Company are not energy intensive, necessary measures are taken to contain and bring about savings in energy consumption through improved operational methods. While the Company is in process of introducing solar energy based power generation to reduce use of conventional energy sources, following initiatives towards energy conservation are also taken during the year:

- Installation of intelligent flow control in compressed air distribution to reduce the power consumption.
- Introduction of power saving mode in machine shop for optimization and reduction in the power consumption.
- Implementation of cold washing process for machined components.
- Day light harvesting installed to utilise natural light.
- Installation of energy efficient air conditioners.
- Installation of auto power on & off timers in air conditioners and chip conveyors.

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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 tonnes)</b>		
Plastic waste (A)	56.77	66.04
E-waste (B)	1.16	0.455
Bio-medical waste (C)	0.00620	0.00774
Construction and demolition waste (D)	–	–
Battery waste (E)	–	–
Radioactive waste (F)	–	–
Other Hazardous waste – excluding e-waste, bio-medical waste (G)	37.75	45.97
Other Non-hazardous waste generated (H) – excluding plastic waste	2172.87	1697.66
<b>Total (A+B+C+D+E+F+G +H)</b>	2268.56	1810.13
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations)	0.00000013	0.00000013
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	–	–
<b>Waste intensity in terms of physical output</b> (MT/Engine)	0.013	0.013
<b>Waste intensity</b> (optional) - the relevant metric may be selected by the entity	–	–
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	2162.16	1725.23
(ii) Re-used	–	–
(iii) Other recovery operations	–	–
<b>Total</b>	2162.16	1725.23
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	–	–
(ii) Landfilling	–	–
(iii) Other disposal operations	–	–
<b>Total</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- Assessment for zero waste to landfill (ZWL) was done by M/s Euro Fins

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

The Company's Plant is certified under ISO 14001 : 2015 (Environmental Management System). The Company follows efficient waste management mechanism to monitor hazardous and non-hazardous waste generation. The waste generated in operations is duly segregated and stored separately at the designated sites in the Plant. The waste generated during machining of components is being supplied to the Foundry of Mahindra & Mahindra Ltd.-Swaraj Division. Other scrap generated is disposed-of through authorised scrap dealers as per the respective Government norms.

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:

Not applicable, as the Company does not have operations in any ecologically sensitive areas.

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

Not applicable, as the Company has not undertaken any new project.

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

S.No.	Specify the law / regulation/guidelines which was not complied with	Provide details of the non-compliance	Any fines/penalties/ action taken by regulatory agencies such as pollution control board or by courts	Corrective action taken, if any
—	—	—	—	—

Yes, the Company is compliant with applicable environment regulations / guidelines.

### Leadership Indicators

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

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

- (i) Name of the area  
(ii) Nature of operations  
(iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	N.A.	N.A.
(ii) Groundwater	N.A.	N.A.
(iii) Third party water	N.A.	N.A.
(iv) Seawater / desalinated water	N.A.	N.A.
(v) Others	N.A.	N.A.

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<b>Total volume of water withdrawal (in kilolitres)</b>	N.A.	N.A.
<b>Total volume of water consumption (in kilolitres)</b>	N.A.	N.A.
<b>Water intensity per rupee of turnover</b> (Water consumed/turnover)	N.A.	N.A.
<b>Water intensity</b> (optional) - the relevant metric may be selected by the entity	N.A.	N.A.
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water		
- No treatment	N.A.	N.A.
- With treatment - please specify level of treatment	N.A.	N.A.
(ii) Into Groundwater		
- No treatment	N.A.	N.A.
- With treatment - please specify level of treatment	N.A.	N.A.
(iii) Into Seawater		
- No treatment	N.A.	N.A.
- With treatment - please specify level of treatment	N.A.	N.A.
(iv) Sent to third-parties		
- No treatment	N.A.	N.A.
- With treatment - please specify level of treatment	N.A.	N.A.
(v) Others		
- No treatment	N.A.	N.A.
- With treatment - please specify level of treatment	N.A.	N.A.
<b>Total water discharged (in kilolitres)</b>	N.A.	N.A.

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.

Not applicable as the Company's operational boundaries do not fall under water-stress zone

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

Parameter	Unit	FY 2024-25	FY 2023-24
<b>Total Scope 3 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)	Metric tonnes of CO <sub>2</sub> equivalent	24310479	21954371
<b>Total Scope 3 emissions per rupee of the turnover</b>	Metric tonnes of CO <sub>2</sub> equivalent per rupee of turnover	0.001445	0.001547
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity	–	–	–

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

No assessment done by external agency

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

Not applicable as the Company is not operating in ecologically sensitive area.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, 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	Energy saving projects in Machine Shop & utility	Details as given in Point No. 8 of Essential Indicators resulted into optimization of energy consumption.	349K unit saving annually

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

The Company is focussed to run its operations in efficient way and to support the same, the Company is having ISO 9001 : 2015 (Quality Management System), ISO 14001 : 2015 (Environmental Management System), ISO 50001 : 2018 (Energy Management System) and ISO 45001 : 2018 (Occupational Health and Safety Management System) certifications. To meet any operational exigencies and ensuring business continuity, the Company has taken various initiatives such as installation of in-house 66 KV power sub-station with direct feeder line from the Government power distribution source backed up by gensets for uninterrupted power supply, data back up at remote server for data retrieval/recovery, storing e-mail data backup on Microsoft cloud, training to employees to handle potential emergency situations like fire, first-aid & medical support etc. in a prompt manner.

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

The Code of Conduct for Suppliers mandates them to comply with environmental / pollution control laws and regulations wherever they are based or operate.

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

The Company before partnering with any new suppliers, as a part of Code of Conduct for Suppliers, takes declaration from them to meet all regulatory compliances.



**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.  
Four (4). While the Company is not having any direct membership of any trade/chamber/ association, as a group company of Mahindra & Mahindra Limited (M&M), its interests are represented through M&M who is holding membership in various trade associations.
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/associations (State/National)
1	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
2	Confederation of Indian Industry (CII)	National
3	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
4	Tractor Manufacturer's Association (TMA)	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.

There were zero incidents of anti-competitive conduct during the year.

**Leadership Indicators**

1. Details of public policy positions advocated by the entity:  
The Company contributes through M&M when views are solicited on related matters.

**PRINCIPLE 8: Businesses should promote inclusive growth and equitable development**
**Essential Indicators**

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.  
Not applicable. Social impact assessment was not required as per law(s) for the CSR projects undertaken by the Company during the reporting period.
2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity:  
Not applicable
3. Describe the mechanisms to receive and redress grievances of the community.  
The CSR projects of the Company are primarily to serve the needs of surrounding communities. CSR team directly interact with the community members to understand their needs and to address their grievances, if any.
4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

Parameter	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/small producers	57%	45%
Sourced directly from within the district and neighbouring districts.	60%	62%

5. Job creations in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost:

Locations	FY 2024-25	FY 2023-24
Rural	–	–
Semi-urban	–	–
Urban	100%	100%
Metropolitan	–	–

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

#### Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
N.A.	N.A.

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)
N.A.	N.A.	N.A.	N.A.

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) - No  
 (b) From which marginalized/vulnerable groups do you procure ? - No  
 (c) What percentage of total procurement (by value) does it constitute?- No

The Company gives preference to the procurement of material based on price, quality and compliance competitiveness.

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:

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

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
N.A.	N.A.	N.A.

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### 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	Skill Centre & Learning	1892	100%
2	Mammography & HB Improvement /Health	6253	100%
3	Swachh Bharat/Environment	28000	100%
4	Prerna (women farmers)	740	100%
5	Nanhi Kali	2125	100%
6	Naandi Foundation	2443	100%

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

#### Essential Indicators

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

The Company manufactures engines with highest standards of inbuilt quality for fitment into various Swaraj brand of tractor models manufactured by Mahindra & Mahindra Ltd. (M&M). In case any customer complaint related to engines fitted in these tractors is received by M&M, details of the same are shared with the Company for its suitable redressal.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	No specific level provided
Safe and responsible usage	100%
Recycling and/or safe disposal	No specific level provided

- Number of consumer complaints in respect of the following:

	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	—	—		—	—	
Advertising	—	—		—	—	
Cyber-security	—	—		—	—	
Delivery of essential services	—	—		—	—	
Restrictive Trade Practices	—	—		—	—	
Unfair Trade Practices	—	—		—	—	
Other	553	—	Product related complaints during warranty period	357	—	Product related complaints during warranty period

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

	Number	Reasons for recall
Voluntary recalls	–	–
Forced recalls	–	–

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

Yes, the Company follows the Mahindra Group cyber security policy.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

Not applicable as no issues were received during the reporting period.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches along-with impact

Nil

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

Nil

c. Impact, if any, of the data breaches

**Leadership Indicators**

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

The Company manufactures engines for fitment into various Swaraj brand tractor models manufactured by Mahindra & Mahindra Ltd. (M&M) and the product related information is publicly available at the website <https://www.swarajtractors.com/hi>

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

As the engines manufactured by the Company form part of the Swaraj brand of tractors manufactured by M&M, the necessary education for the safe usage of product is being provided by the tractor dealers servicing teams.

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

Not applicable as the Company does not provide essential services.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/ Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Appropriate product labelling and operator manual & instructions supplied along with the final product (tractor) contains the requisite information of the product.