



July 28, 2025

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor,
Plot No. C-1, G Block,
Bandra Kurla Complex, Bandra (East)
Mumbai - 400 051.

BSE Limited

Phirozee Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Scrip ID - STLTECH

Scrip Code - 532374

Sub.: Submission of Business Responsibility and Sustainability Report for FY2024-25

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for the financial year ended March 31, 2025, which forms part of Annual Report for FY 2024-25.

The same is also being uploaded on the website of the Company at <https://www.stl.tech/>

Kindly take the same on record.

Thanking you.

Yours faithfully,

For **Sterlite Technologies Limited**

Mrunal Asawadekar

Company Secretary (ACS 24346)

Encl.: As above.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Company	L31300PN2000PLC202408
2	Name of the Company	STERLITE TECHNOLOGIES LIMITED
3	Date of Incorporation	March 24, 2000
4	Registered office address	4 th Floor, Godrej Millennium, Koregaon Road 9, STS 12/1, Pune-411001, Maharashtra, India
5	Corporate office address	4 th Floor, Godrej Millennium, Koregaon Road 9, STS 12/1, Pune-411001, Maharashtra, India
6	E-mail id	stl.communications@stl.tech
7	Telephone	+91 20 30514000
8	Website	https://www.stl.tech
9	Financial year for which reporting is being done	April 01, 2024 to March 31, 2025 (FY 2024-25)
10	Name of the Stock Exchange(s) where shares are listed	
S. No.	Name of stock exchange	Description of other stock exchange
a.	National Stock Exchange of India Limited (NSE)	-
b.	BSE Limited (BSE)	-
11	Paid-up capital	97.58 Cr
12	Name and contact details of the person who may be contacted in case of any queries on the BRSR report	Anjali Byce, Chief Human Resources Officer +91-20-30514000; anjali.byce@stl.tech
13	Reporting Boundary	Standalone basis
14	Whether the company has undertaken reasonable assurance of the BRSR Core?	No
15	Name of assurance provider	-
16	Type of assurance obtained	-

II. products/services

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

S. No	Description of main activity	Description of business activity	% Of turnover
1	STL is a leading global optical company. Telecom operators, cloud companies, citizen networks, and large enterprises recognize and rely on STL for advanced capabilities in optical connectivity.	Optical Networking Business	54.31%
2	Global services offer system integration services in ICT space by integrating different technological products, networks, data centre and applications.	Global Service Business	32.65%
3	STL Neox is a leading provider of cutting-edge Next Generation Voice Services with a strong global market presence and unmatched expertise in IP technology. Neox is a Unified Communication platform, featuring a comprehensive suite of UCaaS, CCaaS, and CPaaS offerings.	STL Digital	0.66%
4	The Optical Connectivity Solution has been created to help telecom operators, ISPs, citizen networks, and major corporations build out networks more quickly, more effectively, and more affordably. We are offering end-to-end functionality, including optical fibre components, pre-connectorized kits, and post-sales support.	Optical Interconnect	12.38%

18. 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	Optical fibre cable	2731	22.02%
2	Optical fibre	2310	14.23%
3	Copper telecom cables	2732	18.06%
4	Fibre optical cable laying services	4321	32.65%
5	Software Business	4651	0.66%
6	Optical Interconnect	2620	12.38%

III. Operations**19. Number of locations where plants and/or operations/offices of the entity are situated**

Location	Number of plants	Number of offices	Total
National	5	3	8
International	0	0	0

20. Markets served by the entity**a. Number of locations**

Location	Number
National (No. of states)	28
International (No. of countries)	52

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

30%

c. A brief on types of customers

STL manufacturing facilities serve diverse customers across the entire value chain-

- Telecom companies
- Cloud companies
- Large enterprises

IV. Employees**21. Details as on March 31, 2025****a. Employees and workers (including differently abled)**

S. No	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
EMPLOYEES								
1	Permanent (D)	1050	937	89.24%	113	10.76%	0	0.00%
2	Other than Permanent (E)	781	706	90.40%	75	9.60%	0	0.00%
3	Total employees (D+E)	1831	1643	89.73%	188	10.27%	0	0.00%
WORKERS								
1	Permanent (F)	0	0	0.00%	0	0.00%	0	0.00%
2	Other than Permanent (G)	2047	1711	83.59%	336	16.41%	0	0.00%
3	Total workers (F+G)	2047	1711	83.59%	336	16.41%	0	0.00%

b. Differently abled employees and workers

S. No	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
DIFFERENTLY ABLED EMPLOYEES								
1	Permanent (D)	2	2	100.00%	0	0.00%	0	0.00%
2	Other than Permanent (E)	0	0	0.00%	0	0.00%	0	0.00%
3	Total employees (D+E)	2	2	100.00%	0	0.00%	0	0.00%
DIFFERENTLY ABLED WORKERS								
1	Permanent (F)	0	0	0.00%	0	0.00%	0	0.00%
2	Other than Permanent (G)	0	0	0.00%	0	0.00%	0	0.00%
3	Total workers (F+G)	0	0	0.00%	0	0.00%	0	0.00%

22. Participation/Inclusion/Representation of women

Particulars	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors	8	2	25.00%
Key Management Personnel	3	1	33.33%

23. (Disclose trends for the past 3 years)

Particulars		Permanent Employees	Permanent Workers
Turnover rate in current FY25	Male	25.51%	0.00%
	Female	38.94%	0.00%
	Other	0.00%	0.00%
	Total	26.95%	0.00%
Turnover rate in previous FY24	Male	22.40%	0.00%
	Female	34.23%	0.00%
	Other	0.00%	0.00%
	Total	23.78%	0.00%
Turnover rate in the year prior to the previous FY23	Male	20.03%	19.23%
	Female	31.69%	16.67%
	Other	0.00%	0.00%
	Total	21.37%	18.75%

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

24.

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

S No.	Name of Holding/Subsidiary/Associate Companies/Joint Venture (A)	Indicate whether Holding/Subsidiary/Associate/Joint Venture	% Of shares held by listed entity	Does the entity indicated in column A, participate in the Business Responsibility initiatives of listed entity? (Yes/No)
1	Twin Star Overseas Limited, Mauritius (Immediate holding company)	Holding	42.92%	No
2	Jiangsu Sterlite Fiber Technology Co. Ltd	Subsidiary	100%	Yes
3	Sterlite Global Ventures (Mauritius) Limited	Subsidiary	100%	No
4	Sterlite Technologies UK Ventures Limited	Subsidiary	100%	No
5	Speedon Network Limited	Subsidiary	100%	No
6	Elitecore Technologies (Mauritius) Limited	Subsidiary	100%	No
7	Elitecore Technologies SDN BHD. (Malaysia)	Subsidiary	100%	No
8	Sterlite (Shanghai) Trading Company Limited	Subsidiary	100%	No
9	Sterlite Tech Holding Inc.	Subsidiary	100%	No
10	Sterlite Technologies Inc.	Subsidiary	100%	Yes
11	Metallurgica Bresciana S.p.A	Subsidiary	100%	Yes
12	Sterlite Innovative Solutions Limited	Subsidiary	100%	No
13	STL Digital Limited (earlier "Sterlite Tech Connectivity Solutions Limited")	Subsidiary	100%	Yes
14	Sterlite Tech Cables Solutions Limited	Subsidiary	100%	Yes
15	STL Digital UK Limited	Subsidiary	100%	No
16	PT Sterlite Technologies Indonesia	Subsidiary	100%	No
17	Sterlite Technologies Pty. Ltd	Subsidiary	100%	No
18	Sterlite Technologies DMCC	Subsidiary	100%	No
19	STL Optical Interconnect S.p.A.	Subsidiary	100%	Yes
20	Optotec S.p.A.	Subsidiary	100%	Yes
21	Optotec International S.A.	Subsidiary	100%	No
22	STL Networks Limited	Subsidiary	100%	No
23	STL Tech Solutions Limited, UK	Subsidiary	100%	Yes
24	STL UK Holdco Limited, UK	Subsidiary	100%	No
25	STL Digital Inc. (USA)	Subsidiary	100%	No
26	Clearcomm Group Limited, UK	Subsidiary	100%	Yes
27	STL Optical Tech Limited	Subsidiary	100%	No
28	STL Solutions Germany GmbH	Subsidiary	100%	No
29	Sterlite Condu spar Industrial Ltd	Subsidiary	50%	No

Vi. CSR Details

25.

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

a. Turnover (in ₹) - 3243.65 Crores

b. Net worth (in ₹) - 2635.56 Crores

VII. Transparency and Disclosures Compliances

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

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)	FY25			FY24		
			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	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Investors (other than shareholders)	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
shareholders	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	931	0	-	909	0	-
Customers	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Value Chain Partners	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Employees and Workers	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	0	0	-	0	0	-
Other	Yes	https://www.stl.tech/pdf/coc/Whistle%20Blower%20Policy.pdf	77	13	-	115	9	-

27. 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, 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	Carbon pricing	R	Carbon pricing mechanisms are being implemented to encourage companies to reduce their carbon footprint	STL has taken a goal to be Net zero and is working towards reducing its carbon footprint	Negative Implications
2	Sustainable supply chain	O	Customers and investors are increasingly demanding that companies adopt sustainable practices throughout their supply chains	STL is identifying and assessing the sustainability of its suppliers and taking steps to ensure that they meet our sustainability standards	Positive Implications
3	Climate-related regulations	R	Worldwide regulations are being implemented to promote energy efficiency and reduce greenhouse gas emissions	STL is investing in energy efficiency measures and exploring possibilities of renewable energy	Positive Implications
4	Raw material availability	R	Disruptions in supply chain are being observed leading to uncertain raw material availability and volatility in prices	STL is working towards increasing its local procurement to minimise these disruptions	Negative Implications
5	Health and safety risks	R	Companies must ensure the health and safety of their employees, particularly those working in hazardous or high-risk environments	STL is consistently assessing the health and safety risks associated with its operations and implement appropriate measures to protect its employees	Negative Implications
6	Innovation	O	Companies that fail to innovate and adopt new technologies and business models risk falling behind and losing market share	STL is investing in research and development to develop new sustainable technologies and business models	Positive Implications
7	Resource efficiency	O	With global increase in prices of raw materials, there is an increased focus on achieving the resource efficiency	STL is taking active measures to achieve the resource efficiency for raw materials, energy, water and materials management	Positive Implications
8	Cyber security	R	As companies become more reliant on technology, they face increasing cybersecurity risks	STL strives to implement robust cybersecurity measures to protect its data, systems, and operations from cyber-attacks and data breaches	Negative Implications
9	Data privacy	R	Companies must also comply with data privacy regulations to protect the personal data of their customers and employees	STL ensures that it complies with data privacy regulations in India and take steps to protect personal data from unauthorised access.	Negative Implications
10	Labour and human rights	R	Companies face risks associated with labour and human rights violations in their supply chains, such as forced labour, child labour, and unsafe working conditions.	STL assesses its suppliers' labour and human rights practices and works with them to improve conditions and eliminate any violations	Negative Implications
11	Diversity and inclusion	R	Companies that lack diversity and inclusivity risk reputational damage and loss of talent	STL continually assesses its diversity and inclusion policies and practices and work to promote diversity and inclusivity within our workforce	Positive Implications

SECTION B: MANAGEMENT AND PROCESS DISCLOSURE

Disclosure Question	POLICY AND MANAGEMENT PROCESSES		
	1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	b. Has the policy been approved by the Board? (Yes/No)	c. Web link of the policies, if available
P 1	Yes	Yes	Code of Conduct https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf
P 2	Yes	Yes	Sustainable sourcing policy https://www.stl.tech/pdf/coc/Sustainable%20Sourcing%20policy.pdf Conflict free sourcing policy https://www.stl.tech/pdf/coc/Conflict%20Free%20Sourcing%20Policy.pdf
P 3	Yes	No	Employee well-being policy https://www.stl.tech/pdf/Employee-well-being-policy.pdf
P 4	Yes	Yes	Sterlite Business partner code of conduct https://www.stl.tech/pdf/coc/Sterlite%20Business%20Partner%20Code%20of%20Conduct.pdf
P 5	Yes	No	Human Rights Policy https://www.stl.tech/pdf/coc/Human-Rights-Policy-V_2_0_.pdf
P 6	Yes	Yes	Waste Management Policy https://www.stl.tech/pdf/coc/Waste-Management-Policy.pdf Water Management Policy https://www.stl.tech/pdf/coc/Water-Management-Policy.pdf
P 7	Yes	Yes	Code of Conduct https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf
P 8	Yes	Yes	CSR Policy https://www.stl.tech/pdf/corporate-social-responsibility-policy-2021.pdf
P 9	Yes	Yes	Privacy Policy https://stl.tech/privacy-policy/

Disclosure Question	POLICY AND MANAGEMENT PROCESSES		
	2. Whether the entity has translated the policy into procedures. (Yes / No)	3. Do the enlisted policies extend to your value chain partners? (Yes/ No)	4. Name the national and international codes/ certifications/ labels/ standards
P 1	Yes	Yes	-
P 2	Yes	Yes	ISO 14001 certified all Indian plants. ISO 45001 certified all Indian plants
P 3	Yes	Yes	-
P 4	Yes	Yes	-
P 5	Yes	Yes	SA8000 certified all Indian plants
P 6	Yes	Yes	ISO 14001 Certified all Indian plants. ISO 14021 (Zero Liquid Discharge) Certified all Indian plants
P 7	Yes	Yes	-
P 8	Yes	Yes	-
P 9	Yes	Yes	ISO 27001 Certified all Indian plants

Disclosure Question	POLICY AND MANAGEMENT PROCESSES	
	5. Specific commitments, goals and targets set by the entity with defined timelines, if any	
P 1	Principle 6 1. Net-zero emissions by 2030 2. Ensuring water positivity across STL locations globally by 2030 3. Zero waste to landfill at manufacturing plants by 2030 4. 100% of Lifecycle assessment of products by 2030	Principle 8 1. Transforming 5 million lives by 2025 2. Replenishing 5 million cubic meters of water in communities by 2025 3. Undertaking 5 million plantations by 2025
P 2		
P 3		
P 4		
P 5		
P 6		
P 7		
P 8		
P 9		

Disclosure Question	POLICY AND MANAGEMENT PROCESSES	
	6. Performance of the entity against specific commitments, goals and targets	
P 1	Principle 6 1. Goal: Net-zero emissions by 2030. Performance: we have committed to Science Based Target Initiatives in FY23 2. Goal: Ensuring water positivity across STL locations globally by 2030. Performance: All Indian plants are Zero liquid discharge certified 3. Goal: Zero waste to landfill at manufacturing plants by 2030. Performance: All Indian plants are Zero waste to landfill certified 4. Goal: 100% of Lifecycle assessment of products by 2030. Performance: LCA model and reports have been prepared for 17 products	Principle 8 1. Goal: Transforming 5 million lives by 2025. Performance: Transforming 4.63 million lives 2. Goal: Replenishing 5 million cubic meters of water in communities by 2025. Performance: 2.69 million cubic meters 3. Goal: Undertaking 5 million plantations by 2025. Performance: 3.47 L plantation done and being maintained
P 2		
P 3		
P 4		
P 5		
P 6		
P 7		
P 8		
P 9		

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)

In view of the major transformations caused by recent global difficulties and resulting economic fluctuations, there has been a fundamental rethinking of society and business strategy around the world. During these changing socioeconomic landscapes, the importance of Environmental, Social, and Governance (ESG) concepts has expanded significantly. Talks at the political and business levels now inevitably include concerns about climate change, sustainable development, and other sustainability-related concerns.

Our ESG objectives include a wide range of programs targeted at promoting sustainable practices. These include commitments to sustainable sourcing and manufacturing,

achieving net-zero emissions, promoting water positivity across our worldwide locations, and reducing waste to landfills. Furthermore, we focus product lifecycle assessments to reduce environmental footprints.

To achieve meaningful and long-term change, we recognise the necessity of taking action across our value chain and in the communities we serve. As a result, we collaborate with both upstream and downstream partners to reduce packaging and waste while also addressing global issues such as gender inequity, healthcare disparities, and digital education gaps. Furthermore, our focus is on developing the world's digital backbone, which demonstrates how we are allowing nations to become digital economies in the areas where we operate, demonstrating our dedication to inclusivity and empowerment.

Finally, our dedication to ESG principles reflects our confidence in their critical role in navigating today's complex landscape. With our experience

and relentless passion, we are committed to creating a greener, safer, and more inclusive world for future generations.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility & Sustainability (BRSR) Policy

Name-Ankit Agarwal
Designation-Managing Director

9. Does the entity have a specified committee of the Board/ director responsible for decision making on sustainability related issues? (Yes/ No). If yes, provide details

Yes, within our organisational structure, we have established a dedicated Sustainability and Corporate Social Responsibility (CSR) committee, operating under the oversight of

the Board of Directors. This committee serves as a pivotal body responsible for facilitating the company's adherence to environmental, social, and governance (ESG) standards, while also overseeing the execution of our CSR and ESG policies.

The committee's core mandate entails providing guidance and support to ensure that the company effectively fulfils its obligations across environmental, social, and governance dimensions.

Through the diligent oversight and strategic direction provided by this committee, we reinforce our commitment to responsible business practices and sustainable development, thereby advancing our mission to create value for all stakeholders while safeguarding the interests of future generations.

10.Details of Review of the National Guidelines on Responsible Business Conduct (NGRBC) by the company:

Subject for Review		Performance against above policies & follow up action	Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances
Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	P 1	Director	Committee of the Board
	P 2		
	P 3		
	P 4		
	P 5		
	P 6		
	P 7		
	P 8		
	P 9		
Frequency: Annually (A) / Half yearly (H) / Quarterly (Q) / Any other – please specify	P 1	Annually	Quarterly
	P 2		
	P 3		
	P 4		
	P 5		
	P 6		
	P 7		
	P 8		
	P 9		

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.

P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes

Yes, the working of the above policies except CSR policy was verified by Intertek during SA 8000 audits.

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:

Segment	Total number of training and awareness programmes held	Topics/ principles covered under the training audits impact	% of persons in respective category covered by the awareness programmes
Board of Directors	4	1. Skill Upgradation 2. Compliance (POSH+CoC+BCP+IP+Infosec)	100%
Key Managerial Personnel (KMP)	4	1. Women Leadership Program 2. Compliance (POSH+CoC+BCP+IP+Infosec)	100%
Employees other than BoD and KMPs	222	1. Skill Upgradation 2. Technical upskilling 3. Induction 4. Compliance (POSH+CoC+BCP+IP+Infosec)	100%
Workers	0	-	0%

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	0	0	0	0	-
Settlement	0	0	0	0	-
Compounding fee	0	0	0	0	-

Non-Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	0	0	0	-
Punishment	0	0	0	-

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
NA	NA
NA	NA
NA	NA

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

Yes, STL's Code of Conduct and Ethics comprehensively addresses its anti-corruption and anti-bribery policy. The company strictly prohibits engagement in any form of illicit practices, including offering, making, or promising payments, gifts, or other valuables to government officials, customers, vendors, consultants, and other stakeholders. Such actions, whether perceived as intended or occurring directly or indirectly, are expressly forbidden if they are aimed at improperly influencing business decisions, actions or inactions, the perpetration of fraud, or the creation of opportunities for fraudulent activities.

https://www.stl.tech/pdf/coc/Sterlite_Code_of_Conduct_Final.pdf

<https://www.stl.tech/pdf/coc/Sterlite%20Business%20Partner%20Code%20of%20Conduct.pdf>

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

Particulars	FY25	FY24
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

6. Details of complaints about conflict of interest

Particulars	FY25		FY24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	-	0	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	-	0	-

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.

None.

8. Number of days of accounts payables

Particulars	FY25	FY24
(i) Accounts payable x 365 days	732211	831010
(ii) Cost of goods/services procured	2826	3426
(iii) Number of days of account payables	259	243

9. Open-ness of business – provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances & investments, with related parties, in the following format

Parameters	Metrics	FY25	FY24
Concentration of Purchases	a. i) Purchases from trading houses	-	-
	ii) Total purchases	-	-
	iii) Purchases from trading houses as % of total purchases	-	-
	b. Number of trading houses where purchases are made from	-	-
	c. i) purchases from top 10 trading houses	-	-
	ii) Total purchases from trading houses	-	-
	iii) Purchases from top 10 trading houses as % of total purchases from trading houses	-	-
Concentration of Sales	a. i) Sales to dealer/ distributors	-	-
	ii) Total Sales	-	-
	iii) Sales to dealers / distributors as % of total sales	-	-
	b. Number of dealers / distributors to whom sales are made	-	-
	c. i) Sales to top 10 dealers/ distributors	-	-
	ii) Total sales to dealer/distributors	-	-
	iii) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	-	-
Share of RPTs in	a.i) Purchases (Purchases with related parties)	-	-
	ii) Total Purchases	-	-
	iii) Purchases (Purchases with related parties / Total Purchases)	-	-
	b.i) Sales (Sales to related parties)	-	-
	ii) Total Sales	-	-
	iii) Sales (Sales to related parties / Total Sales)	-	-
	c. i) Loans & advances given to related parties	-	-
	ii) Total loans & advances	-	-
	iii) Loans & advances (Loans & advances given to related parties / Total loans & advances)	-	-
	d. i) Investments in related parties	-	-
	ii) Total investments made	-	-
	iii) Investments (Investments in related parties / Total Investments made)	-	-

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
3	Child Labour, Forced Labour, Health & Safety, Freedom of association & right to collective Bargaining, Discrimination, Disciplinary Practices, Working Hours, Remuneration & Management Systems	0.32 %

- 2. Does the entity have processes in place to avoid / manage conflicts of interest involving members of the Board? (Yes / No) If yes, provide details of the same.**

Yes, at the onset of each year, members of the Board diligently disclose any interests they hold in other entities, including directorships or ownership positions. Additionally, throughout the year, any changes to these interests are promptly communicated to the company. Should any proposal arise in which a Board member has a vested interest, they conscientiously abstain from participating in the voting process concerning that particular matter, ensuring transparency and upholding the highest standards of corporate governance.

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.**

	FY25	FY24	Details of improvements in environmental and social impact
R&D	22.77%	21.05%	MCF - Development of multi-core fibre technology that is novel and 4x less material intensive than traditional fibre IBR and Microcable cable - Reduce dia cable. Less RM Human safety & used in fire prevention requirements / avoid fire accident and other Cable Process improvement projects
Capex	0.00%	0.00%	No capex investment in FY25

- 2.

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

Yes.

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

0.32%.

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.**

Type of Waste	Name of Policy/ Process	Policy/ Process Description
Plastics (including packaging)	Waste Management Policy	Fibre spools containing fresh fibre manufactured at the Optical Fibre plants are dispatched to captive plants for consumption. These new spools are received at the Optical Fibre Cable plants. Post consumption of fibre, the spools are cleaned and sent back to of plants for re-use
E-waste	Waste Management Policy	-
Hazardous waste	Waste Management Policy	-
Other waste	Waste Management Policy	-

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

Yes.

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?

Yes.

NIC Code	Name of Product/Service	% of total Turnover contributed (FY 23-24)	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
27310	288F G652D Microduct cable MLT_ PE_250 (Qm) 10.6mm	0.00%	Cradle to gate	Yes	No
27310	288F G652D ADSS MLT 70m spann_ PE_250 (Qm) 16.8mm	0.00%	Cradle to gate	Yes	No
27310	288F G652D ADSS MLT 150m spann_ PE_250 (Qm) 22mm	0.00%	Cradle to gate	Yes	No
27310	96F G657A1 Microduct cable MLT_ PE_250 (Qm) 6.6mm	0.11%	Cradle to gate	Yes	No
27310	96F ADSS cable MLT 150m spann_ PE_250 (Qm) 16mm	0.09%	Cradle to gate	Yes	No
27310	288F G657A1 Microduct OFC cable PA_200 (Qm)_8.0mm	0.03%	Cradle to gate	Yes	No
27310	288F G652D Duct lite cable MLT_ PE_250 (Qm)_16.0mm	0.01%	Cradle to gate	Yes	No
27310	576F G657A1 micro duct cable PE_200 (Qm)_10.3mm	0.00%	Cradle to gate	Yes	No

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

Name of Product / Service	Description of the risk / concern	Action Taken
None	-	-

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

Type of Waste	FY25			FY24		
	Re-Used	Recycled	Safely Disposed (Metric Tonnes)	Re-Used	Recycled	Safely Disposed (Metric Tonnes)
Plastics (including packaging)	352	454	-	711	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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:

% of employees covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent Employees											
Male	937	937	100.00%	937	100.00%	-	-	937	100.00%	937	100.00%
Female	113	113	100.00%	113	100.00%	113	100.00%	-	-	113	100.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	1050	1050	100.00%	1050	100.00%	113	10.76%	937	89.24%	1050	100.00%
Other than Permanent Employees											
Male	706	706	100.00%	706	100.00%	-	-	692	98.02%	692	98.02%
Female	75	75	100.00%	75	100.00%	75	100.00%	-	-	66	88.00%
Other	0	0	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	781	781	100.00%	100.00%	100.00%	75	9.60%	692	88.60%	758	97.06%

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

% of workers covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent Employees											
Male	0	0	0.00%	0	0.00%	-	-	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	-	-	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other than Permanent Employees											
Male	1711	1711	100.00%	1711	100.00%	-	-	879	51.37%	1206	70.49%
Female	336	336	100.00%	336	100.00%	336	100.00%	-	-	336	100.00%
Other	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	2047	2047	100.00%	2047	100.00%	336	16.41%	879	42.94%	1542	75.33%

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

	FY25	FY24
(i) Cost incurred on wellbeing measures (well-being measures means well-being of employees and workers (including male, female, permanent and other than permanent employees and workers))	5,52,63,306	9,53,20,322
(ii) Total revenue of the company	32,43,65,00,000	39,51,53,00,000
(iii) Cost incurred on wellbeing measures as a % of total revenue of the company	0.17%	0.24%

2. Details of retirement benefits for the current and previous financial year

Benefits	FY25			FY24		
	No. of employees covered (as a % of total employee)	No. of workers covered (as a % of total workers)	Deducted & deposited with the authority (Yes/No/NA)	No. of employees covered (as a % of total employees)	No. of workers covered (as a % of total workers)	Deducted and deposited with the authority (Yes/No/NA)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	1.22%	100%	Yes	1.94%	100%	Yes
Others- Please Specify	-	-	-	-	-	-

3. Accessibility of workplaces

Are the premises/offices accessible to differently abled employees 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.

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

Yes, https://www.stl.tech/pdf/coc/Human-Rights-Policy-V_2_0.pdf

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	98.77%	63.16%	0.00%	0.00%
Female	55.56%	33.33%	0.00%	0.00%
Other	0.00%	0.00%	0.00%	0.00%
Total	94.44%	60.32%	0.00%	0.00%

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.

Yes.

Yes/No (If yes, then give details of the mechanism in brief)	
Permanent employees	Yes, our commitment to upholding the highest ethical and business standards across our global operations is a cornerstone of our corporate ethos. This commitment, however, relies heavily on the collaboration and dedication of our stakeholders and employees.
Other than Permanent Employees	Every member of our workforce is expected to adhere unwaveringly to our code of business conduct and ethics, ensuring that our principles are upheld at every level of our organisation.
Permanent Workers	To foster a culture of transparency and accountability, we have implemented a robust whistle-blower policy. This policy empowers not only our employees but also off-roll employees, workers, and business partners to voice concerns regarding any malpractice, impropriety, abuse, or misconduct at an early stage, without fear of reprisal or discrimination. Importantly, this policy has been extended to encompass external stakeholders, including vendors and customers, ensuring that all voices are heard and valued. Additionally, the toll-free number and email ID that can be used for making a complaint are displayed in all offices.
Other than Permanent Workers	Moreover, we have established a Prevention of Sexual Harassment Committee (PSHC) to oversee and address complaints effectively. Our commitment to creating a safe and respectful workplace is further underscored by annual training sessions provided to employees, equipping them with the knowledge and resources to identify and report instances of harassment through appropriate channels. Recognizing the importance of holistic well-being, both mental and emotional, we launched STL Care in FY22. This initiative is dedicated to promoting the wellness of our employees, underscoring our commitment to fostering a supportive and nurturing work environment. Through STL Care, we provide resources and support mechanisms to prioritise the mental and emotional well-being of our workforce, ensuring that they feel valued and supported in their professional journeys.

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

Category	FY25			FY24		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	0	0	0.00%	0	0	0.00%
Male	0	0	0.00%	0	0	0.00%
Male	0	0	0.00%	0	0	0.00%
Total Permanent workers	0	0	0.00%	0	0	0.00%
Male	0	0	0.00%	0	0	0.00%
Female	0	0	0.00%	0	0	0.00%

8. Details of training given to employees and workers

Category	FY25					FY24				
	Total (A)	On health & safety/ wellness measures		On skill upgradation		Total (D)	On health and safety measures/ wellness		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	1643	706	42.97%	1518	92.39%	1892	767	40.54%	1714	90.59%
Female	188	75	39.89%	175	93.09%	207	58	28.02%	182	87.92%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Total	1831	781	42.65%	1693	92.46%	2099	825	39.30%	1896	90.33%
Workers										
Male	1711	1711	100.00%	1711	100.00%	1633	1615	98.90%	1629	99.76%
Female	336	336	100.00%	336	100.00%	214	210	98.13%	213	99.53%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Total	2047	2047	100.00%	2047	100.00%	1847	1825	98.81%	1842	99.73%

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

Category	FY25			FY24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1643	1499	91.24%	1892	1875	99.10%
Female	188	151	80.32%	207	203	98.07%
Other	0	0	0.00%	0	0	0.00%
Total	1831	1650	90.11%	2099	2078	99.00%
Workers						
Male	1711	58	3.39%	1633	175	10.72%
Female	336	6	1.79%	214	18	8.41%
Other	0	0	0.00%	0	0	0.00%
Total	2047	64	3.13%	1847	193	10.45%

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, our company boasts a meticulously structured Quality, Environment, Health & Safety (QEHS) management system, meticulously implemented and upheld in accordance with our established procedures and legal mandates. Clear delineation of roles and responsibilities within the EHS team ensures effective oversight, with regular monitoring facilitated through comprehensive management reviews.

Furthermore, our unwavering commitment to excellence is underscored by the ISO 45001 and 14001 certifications obtained by all our manufacturing facilities. These internationally recognized certifications serve as a testament to our dedication to ensuring the highest standards of occupational health, safety, and environmental management across our operations.

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

As an ISO 45001 certified organisation, we prioritise the safety and well-being of our workforce through comprehensive risk assessment and management practices. Utilising our internal tool, we systematically evaluate risks associated with our processes on both routine and non-routine bases, ensuring proactive identification and mitigation of potential hazards.

Our commitment to maintaining high environmental and safety standards is further demonstrated through the governance of all manufacturing processes by our Quality, Environment, Health, and Safety (QEHS) policy. Each operational area is meticulously monitored through ISO 14001 certified Environment Management Systems and ISO 45001 Occupational Health and Safety management systems, facilitating the continuous improvement of our practices and the identification of any gaps.

To ensure that our workforce remains aware of potential hazards and risks, we provide access to policies such as the Quality, Environment, Health, and Safety policy, as well as Hazard Identification and Risk Assessment (HIRA) procedures. Standard Operating Procedures (SOPs) are readily

available to guide workers in navigating potential risks and preventing injury or ill health while on duty.

In the event of work-related incidents, our robust accident investigation procedures are promptly activated, allowing for thorough examination and analysis to prevent recurrence. Additionally, our plant implementation committees play a crucial role in spearheading initiatives such as Project Abhay, aimed at fostering cultural transformation in our EHS practices and continually optimising our safety protocols.

Key processes and SOPs are in place to systematically identify work-related hazards and assess risks, including:

- Identification of occupational safety hazards and risks for all activities, with mandatory adherence to control measures as per procedure. Non-routine or hazardous tasks require a Permit to Work (PTW) for initiation.
- Regular implementation of hazard identification and risk assessment for both routine and non-routine activities.
- Rigorous investigation of work-related incidents through established accident and investigation procedures, facilitating continuous improvement and preventative action implementation.

Through these structured approaches, we remain steadfast in our commitment to ensuring the safety and well-being of our employees while fostering a culture of continuous improvement in our environmental and safety practices.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)

Yes.

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

Yes.

11. Details of safety related incidents

Safety Incident/Number	Category	FY25	FY24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.11	0
Total recordable work-related injuries	Employees	0	0
	Workers	1	0
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

We have introduced Project Abhay, a comprehensive safety cultural transformation program of specifically designed systems and processes to ensure a safe work environment for all employees, minimising the risk of injury or adverse health effects. This program is helping to build safety culture in all manufacturing plants. It also shown continuous improvement in leading indicators & resulted into significant reduction in incidents. This program has a its own governance structure & monthly reviews mechanisms to ensure continuous improvements.

In addition to our well-being initiatives, we have implemented a comprehensive framework of systems and processes designed to ensure a safe work environment for all employees, minimising the risk of injury or adverse health effects. To enhance preparedness for potential emergencies, we operate on three key fronts:

1. Technological Foundation and Compliance:

Our systems are underpinned by a robust technological infrastructure, enforced through stringent compliance standards that govern every aspect of our operations.

2. Leadership and Management Oversight:

Leadership and management systems are actively involved in supervising the

implementation of our safety policies, ensuring their effective execution across all levels of the organisation.

3. Continuous Awareness:

We prioritise the transmission of information and behaviours that promote a safety-conscious culture throughout our workforce, fostering a collective commitment to workplace safety.

Furthermore, our employees have access to policies such as the Quality, Environment, Health, and Safety (QEHS) policy, as well as Hazard Identification and Risk Assessment (HIRA) procedures. These resources provide valuable awareness regarding workplace hazards, risks, and measures for preventing injury or illness. In the event of work-related incidents, thorough investigations are conducted through established accident and investigation procedures, allowing us to learn from each incident and further enhance our safety protocols.

Through these concerted efforts, we remain steadfast in our commitment to safeguarding the well-being of our employees and cultivating a culture of safety and resilience across our organisation.

13. Number of complaints on working conditions and health and safety made by employees and workers.

Category	FY25			FY24		
	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	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

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 and safety practices and working conditions.

At STL, we prioritise the safety and well-being of our workforce and the environment through a comprehensive approach to governance and monitoring. All manufacturing processes are governed by our Quality, Environment, Health, and Safety (QEHS) policy, ensuring adherence to high standards of environmental sustainability and occupational health and safety. Additionally, each process is rigorously monitored through ISO 14001 certified Environment Management Systems and ISO 45001 Occupational Health and Safety management systems.

Under Project Abhay, we have a special vertical of Incidence Management (IM), which helps to investigate each & every potential incidence, identify its root cause, identify its Corrective & preventive actions (CAPA) & verification of CAPA. Its primary objective is to avoid recurrence of an incidence. Incidence management subcommittee is responsible for quality & unbiased, cross functional investigations & horizontal deployment of findings across all relevant location.

We also use different tools like, Hazard Identification and Risk Assessment (HIRA), Hazard and Operability Study (HAZOP), Pre-Startup Safety Review (PSSR), Management of Change (MOC) to identify risks proactively & implement corrective actions to control Risks. We also adopt hierarchy of controls by adopting Elimination, substitution, Engineering Controls, Administrative Controls and Personal Protective Equipment's, respectively.

To further enhance awareness among our employees, we provide access to tools such as Hazard Identification and Risk Assessment (HIRA), Hazard and Operability Study (HAZOP), and standard operating processes. These resources equip our workforce with the knowledge needed to identify hazards, assess risks, and prevent injury or illness while carrying out their duties. In the event of work-related incidents, thorough investigations are conducted using established accident and investigation procedures, enabling us to learn from each incident and continually improve our safety protocols.

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)?

Employees	Yes
Workers	Yes

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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY25	FY24	FY25	FY24
Employees	0	0	0	0
Workers	0	0	0	0

3. 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)

Yes

4. 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	0.32%
Working Conditions	0.32%

5. 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.

Periodic audits are conducted to uphold environmental, health, and safety (EHS) standards. Corrective and preventive actions are tracked until closure, ensuring continuous improvement. Additionally, audits at vendors' premises ensure compliance with our EHS expectations, promoting responsible supply chain management. After conducting assessments on health and safety practices, we received SA-8000 certification, demonstrating our commitment to social accountability and ethical business practices, ensuring fair and safe working conditions for our employees, and promoting responsible and sustainable business operations.

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 STL Sustainability program meticulously documents and implements the stakeholder identification and engagement process. Recognizing the invaluable perspectives of stakeholders, we regularly interact with them to comprehend and proactively address their concerns. This ongoing and effective communication fosters transparency and collaboration with our stakeholders, who encompass entities and individuals impacted by or capable of influencing our operations.

Our stakeholders encompass a diverse range, including employees, customers, suppliers, vendors, investors, leadership, and non-governmental organisations (NGOs). This thorough identification enables us to categorise material issues aligned with our Environmental, Social, and Governance (ESG) priorities.

To facilitate continuous and unbiased feedback from stakeholders, we employ both direct and indirect mechanisms. These established channels ensure that we remain responsive to the evolving needs and expectations of our stakeholders, thereby enhancing our sustainability efforts and overall performance.

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

Key Stakeholders	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employee	No	Email	Quarterly	Feedback, grievances, talent management
Customers	No	Email	Quarterly	Feedback, grievances, new product development
Suppliers and Vendors	No	Email	Quarterly	Supplier satisfaction, material compliance, joint development, mutual value creation
NGOs	No	Email	Quarterly	Development projects according to the identified needs, support to social causes
Leadership	No	Email	Quarterly	Economic value creation, ESG disclosures, sector and program related
Investors	No	Email	Quarterly	Economic value creation, ESG disclosures, sector and program related, Quarterly earning calls, Annual general meeting.

Leadership Indicators

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

We are committed to addressing material issues identified through our policies, objectives, indicators, and performance targets. These actions are transparently articulated in our reporting, providing our organisation and stakeholders with a reliable basis for informed decision-making.

Our company has undertaken various initiatives to prioritise environmentally friendly practices, ensure occupational health and safety, and implement effective measures for emergency handling, control, and risk management across our operations. These responses to material aspects are clearly outlined in our reports, including disclosures on STL's policies and management systems and also shared feedback taken in the ESG committee meetings including governance.

We believe that our reporting effectively adheres to this principle, providing a comprehensive overview of our efforts to address material issues and demonstrating our commitment to transparency and accountability.

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, Stakeholder consultation plays a crucial role in informing our identification and management of environmental and social topics. We incorporate inputs from stakeholders to ensure a comprehensive understanding of relevant issues. This collaborative approach allows us to prioritise areas of concern and effectively address them in our sustainability strategies and initiatives.

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

At STL, we are committed to fostering inclusive development by leveraging technology and innovation to address the needs of vulnerable and marginalized communities. Our CSR programs are thoughtfully designed to ensure access to quality education for underprivileged children, equitable healthcare for all, and financial empowerment of women through vocational training. These inclusive, tech-driven, and sustainable initiatives contribute to building safer, healthier, more inclusive, and greener communities.

A. Women Empowerment:

Program: *Jeewan Jyoti Women Empowerment Programme*

- **Engagement:** The program empowers rural women in Maharashtra by providing vocational training in tailoring, fashion designing, nursing, beauty culture, and computer skills, along with leadership development and childcare support.
- **Actions Taken:** Since its inception in 2014, the program has positively impacted over 28,035 women across Velhe, Bhor, and Haveli blocks. It has facilitated the generation of ₹ 1.9 crore in revenue through micro-finance linkages. The program has also expanded to urban youth in Akola, KA, offering industry-relevant skill development with assured job placement upon course completion.

B. Equitable Education:

Program: *RoboEdge – Future Skills for All*

- **Engagement:** RoboEdge addresses educational inequality by equipping students from government schools with emerging skills in robotics, coding, and artificial intelligence.
- **Actions Taken:** The program currently reaches over 5,000 students across 11 government schools in Maharashtra and Dadra & Nagar Haveli. Notably, in 2024, 12 students from these schools represented India at the Robotex International Championship in Estonia—demonstrating the global potential of local talent.

C. Quality Healthcare:

Program: *Liver Transplant Support Initiative*

- **Engagement:** This initiative provides life-saving medical support to children from marginalized families in need of liver transplants.
- **Actions Taken:** In FY 2024-25, 31 children from economically disadvantaged backgrounds received full support for liver transplants under this program, improving health outcomes and offering a new lease on life to the families involved.

PRINCIPLE 5 - BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

Essential Indicator

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

Category	FY25			FY24		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
Employees						
Permanent	1050	1031	98.19%	1274	1180	92.62%
Other than Permanent	781	781	100.00%	825	789	95.64%
Total employees	1831	1812	98.96%	2099	1969	93.81%
Workers						
Permanent	0	0	0.00%	22	20	90.91%
Other than Permanent	2047	2047	100.00%	1825	1563	85.64%
Total workers	2047	2047	100.00%	1847	1583	85.71%

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

Category	FY25					FY24				
	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	1050	0	0.00%	1050	100.00%	1274	0	0.00%	1274	100.00%
Male	937	0	0.00%	937	100.00%	1125	0	0.00%	1125	100.00%
Female	113	0	0.00%	113	100.00%	148	0	0.00%	148	100.00%
Other	0	0	0.00%	0	100.00%	0	0	0.00%	0	100.00%
Other than Permanent	781	0	0.00%	781	100.00%	825	0	0.00%	825	100.00%
Male	706	0	0.00%	706	100.00%	767	0	0.00%	767	100.00%
Female	75	0	0.00%	75	100.00%	58	0	0.00%	58	100.00%
Other	0	0	0.00%	0	100.00%	0	0	0.00%	0	0.00%
Workers										
Permanent	0	0	0.00%	0	0.00%	22	0	0.00%	22	100.00%
Male	0	0	0.00%	0	0.00%	18	0	0.00%	18	100.00%
Female	0	0	0.00%	0	0.00%	4	0	0.00%	4	100.00%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	100.00%
Other than Permanent	2047	0	0.00%	2047	100.00%	1825	0	0.00%	1825	100.00%
Male	1711	0	0.00%	1711	100.00%	1615	0	0.00%	1615	100.00%
Female	336	0	0.00%	336	100.00%	210	0	0.00%	210	100.00%
Other	0	0	0.00%	0	100.00%	0	0	0.00%	0	100.00%

3. Details of remuneration/salary/wage

a. Median remuneration/wages:

Type of Waste	Male		Female		Other	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)	6	0.93 Cr	2	0.18 Cr	0	0
KMP (other than BoD)	1	3.23 Cr	1	0.30 Cr	0	0
Employees other than BOD & KMP*	937*	0.11 Cr	112*	0.15 Cr	0	0
Workers	0	0	0	0	0	0

Disclaimer: *This number only include salary of permanent employees

b. Gross wages paid to females:

	FY25	FY24
Gross wages paid to females	25,48,19,394	25,66,31,851
Total wages	2,24,36,19,751	2,29,90,38,131
Gross wages paid to female (Gross wages paid to female as % of total wages)	11.36%	11.16%

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes.

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

Adherence to the code of business conduct and ethics is a fundamental expectation for all our employees. Our whistle-blower policy, inclusive of employees, off-roll employees, workers, and business partners, enables the reporting of concerns regarding malpractice, impropriety, abuse, or misconduct without fear of reprisal. Extending beyond internal stakeholders, this policy also encompasses external stakeholders such as vendors and customers.

In FY 22, we introduced STL Care, a program dedicated to promoting the mental and emotional well-being of our employees. This initiative underscores our commitment to fostering a healthy work environment where employees feel supported and valued.

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

Category	FY25			FY24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	1	0	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labour	0	0	-	0	0	-
Forced /Involuntary Labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other issues	0	0	-	0	0	-

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

	FY25	FY24
(i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (POSH)	1	0
(ii) Female employees/workers	113	149
(iii) Complaints on POSH as a % of female employees/workers	0.88%	0.00%
(iv) Complaints on POSH upheld	1	0

Disclaimer: * Permanent female employees

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

Our company upholds a commitment to fostering a fair and inclusive workplace environment, where all employees are treated with dignity and respect, free from sexual harassment and discrimination based on gender. Our Prevention of Sexual Harassment policy aligns with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (POSH Act). To ensure compliance with the POSH Act, we have established a Prevention of Sexual Harassment Committee, tasked with addressing complaints related to sexual harassment. This committee follows a formalised process for conducting fair and timely inquiries into complaints, maintaining transparency and accountability throughout the process.

During this financial year, the company received no complaints under the POSH Act.

We assure employees who raise genuine concerns under this policy that they will not face any adverse consequences, including job loss or retribution. Additionally, we prioritise the protection of confidentiality and anonymity for complainants to the fullest extent possible, facilitating a conducive environment for conducting thorough and unbiased reviews.

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

Yes

10. Assessments for the year:

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

Disclaimer: *All Indian plants are covered under SA8000:2014 certification.

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

Not applicable

Leadership Indicators

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

Our company remains steadfast in its commitment to fostering a safe and conducive work environment for all employees. Embracing an open-door policy, we provide various avenues for employees to raise concerns or issues they encounter in the workplace. This includes accessible forums and a robust grievance resolution mechanism, facilitated by our Stakeholders' Relationship Committee and resolution hubs.

In our collaborations with partners, we prioritize the protection of human rights. Regular supplier assessments and audits are conducted to ensure alignment with our values and policies, particularly concerning environmental practices, fair labour, and anti-corruption measures. Upholding stringent standards, we conduct thorough due diligence when sourcing raw materials, ensuring ethical practices throughout our supply chain.

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

Human rights and fair labour practices are not only among our top material topics, but also integral considerations driven by partners across our value chain. To uphold these standards, we have implemented robust policies and ensure strict adherence to them. Periodic audits of both our facilities and partners are conducted to assess compliance with these parameters.

In addition to our commitment to ethical practices, we prioritise providing a secure working environment at all our plants. All our Indian plants have attained SA8000:2014 certification, demonstrating our dedication to upholding international labour standards.

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

Yes.

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	0.32%
Discrimination at workplace	0.32%
Child Labour	0.32%
Forces Labour/ Involuntary Labour	0.32%
Wages	0.32%
Others – please specify	. -

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

One of the suppliers was assessed having incomplete documentation and was not adhering to the standard supply chain practices as per company's internal audit checklist. It was suggested to the supplier to maintain proper documentation and improve its ESG practices in line with STL's ESG practices.

PRINCIPLE 6- BUSINESS SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT**Essential Indicator****1. Details of total energy consumption (in joules or multiples) and energy intensity, in the following format:**

Whether total energy consumption and energy intensity is applicable to the company?

Yes

	FY25	FY24
Revenue from Operations (in ₹)	32,43,65,00,000	39,51,53,00,000

Parameter	FY25	FY24
	(in GJ)	(in GJ)
From renewable sources		
Total electricity consumption (A)	6,202.31	3,273.71
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total Energy consumed from renewable sources (A+B+C)	6,202.31	3,273.71
From Non-renewable sources		
Total electricity consumption (D)	4,74,030.65	6,21,348.01
Total fuel consumption (E)	1,21,072.61	1,29,061.03
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	5,95,103.26	7,50,409.04
Total energy consumed (A+B+C+D+E+F)	6,01,305.57	7,53,682.75
Energy intensity per rupee of turnover (total energy consumption/ turnover in rupees)	0.000019 GJ/Rs	0.000019 GJ/Rs
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.00042 GJ/Rs	0.00044 GJ/Rs
Energy intensity in terms of physical Output	235.26 GJ/CKM*#	287.44 GJ/CKM*#
Energy intensity (Optional) the relevant metric may be selected by the entity	-	-

Disclaimer: *Energy intensity is for Optical fibre cable manufacturing facilities, the unit for energy intensity is GJ per kilometre of cable manufactured. #Furthermore, the energy intensity for optical fibre manufacturing facilities for FY2024-25 is 22.85 GJ per fibre kilometre and FY 2023-24 is 29.19 GJ per fibre kilometre.

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

No.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

No.

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

Parameter	FY25	FY24
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Ground Water	70,138.00	91,015.00
(iii) Third Party Water	2,32,588.42	3,54,381.34
(iv) Seawater/Desalinated Water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	3,02,726.42	4,45,396.34
Total volume of water consumption (in kilolitres)	3,02,726.42	4,45,396.34
Water intensity per rupee of turnover (total water consumption / Revenue from operations)	0.000009 KL/Rs	0.000011 KL/Rs
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	0.00021 KL/Rs	0.00026 KL/Rs
Water intensity in terms of physical output	0.175 KL/CKM*#	0.279 KL/CKM*#
Water intensity (Optional) the relevant metric may be selected by the entity	-	-

Disclaimer: *Water intensity is for Optical fibre cable manufacturing facilities, the unit for water intensity is kilolitre per kilometre of cable manufactured. #Furthermore, the water intensity for optical fibre manufacturing facilities for FY2024-25 is 0.0106 kilolitre per fibre kilometre and FY 2023-24 is 0.0157 kilolitre per fibre kilometre.

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

No.

4. Provide the following details related to water discharged:

Parameter	FY25	FY24
Water discharge by destination and level of treatment (in kilolitres)		
(i) Surface water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Ground Water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third – parties	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

No.

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

Yes, all our Indian manufacturing units have achieved 100% Zero Liquid Discharge (ZLD) certification, demonstrating our commitment to environmental sustainability. Our efforts include the installation of Effluent Treatment Plants (ETP) and Multi-Effect Evaporator (MEE) plants, along with various in-plant modifications to our processes.

Before treatment in the ETP, a comprehensive study of wastewater parameters is conducted, enabling us to reduce the load on the plant effectively. This process includes treating wastewater from scrubber processes, silicon tetrachloride (SiCl₄), and softener plants. Through chemical treatments and a three-stage centrifuging process in the MEE plant, solid particles and chlorine are removed from the water, allowing for its reuse in boiler and scrubber processes.

The implementation of Effluent and Sewage Treatment Plants has facilitated zero liquid discharge at all our Indian facilities.

The ZLD certification, conducted by DQS in accordance with Circular Water Management, Compliances, and ISO 14021:2016 Environmental labels and declarations, attests to our adherence to globally accepted standards.

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

Whether air emissions (other than GHG emissions) by the entity is applicable to the company?

Yes

Parameter	Please specify unit	FY25	FY24
NOx	Tonne	0.47	1.58
SOx	Tonne	0.37	0.92
Particulate matter (PM)	Tonne	21.81	50.56
Persistent organic pollutants (POP)	NA	-	-
Volatile organic compounds (VOC)	NA	-	-
Hazardous air pollutants (HAP)	NA	-	-
Others- please specify	NA	-	-

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

No.

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

Whether greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity is applicable to the company?

Yes

Parameter	Unit	FY25	FY24
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	6,871.17	7,516.51
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	93,045.86	1,23,504.14
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	tCO ₂ e/₹	0.0000031	0.0000033

Parameter	Unit	FY25	FY24
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emission/Revenue from operations adjusted for PPP)	tCO2e/₹	0.00007	0.000076
Total Scope 1 and Scope 2 emission intensity in terms of physical output	tCO2e/CKM*#	0.043	0.056
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

Disclaimer: *Total Scope 1 and Scope 2 emission intensity is for Optical fibre cable manufacturing facilities, the unit for Scope 1 and Scope 2 emission intensity is tCO2e per kilometre of cable manufactured.

#Furthermore, the total Scope 1 and Scope 2 emission intensity for optical fibre manufacturing facilities for FY2024-25 is 0.0038 tCO2e per fibre kilometre and FY 2023-24 is 0.0050 tCO2e per fibre kilometre.

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.

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

Yes, our company is dedicated to optimising operations and enhancing efficiency through several strategic initiatives:

- A. Roof top green solar installation under Phase-2 of solar installation with new roof sheet along with the skylight at daytime to reduce the plant lighting load – 380 Nos lights of total 38kw, yearly saving 53600 units and 4.2 lakh ₹.
- B. Water flow meters installed in respective bore-wells to track and control the water usage and lower the motor power units consumed in a day.
- C. Cooling tower running optimization through centralized system and along with fan control through temp sensor to reduce the power consumption of running cooling tower with 43 lakh liters of water saving through evaporation losses.
- D. Ultrasonic Water level sensors installed on a few water tanks to eliminate wastage of water.
- E. Systematic and scheduled charging of UPS Batteries to lower the power consumption and latest IGBT technology with high efficiency of 95% UPS with N+1 paralleling system presently running to reduce the power losses.
- F. Common centralized chiller for buffering and sheathing machines to improve efficiency and reduce the working of chillers. Approximate calculated savings in FY 25 is 1.08 lakh units with cost savings of 8.6 lakh and projected savings in next FY is 4.8 lakh units with cost savings of ₹ 38 lakh.
- G. VFD installation in Sheathing Water Circulation pumps with yearly savings of 71020 units.
- H. Low cost automation to reduce air compressors load with annualized savings of 3.5 lakh units.
- I. Industry 4.0 rollover in utilities to eliminate the possibility of overshooting of the contract demand and penalty charges from the government and have automated the trigger alarm and through mail for immediate shutting down the non-critical load.
- J. Replacing old plant lights with more efficient LED light for power saving as well to get better visibility.

These initiatives underscore our commitment to sustainable practices and continuous improvement, contributing to both environmental stewardship and operational excellence.

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

Parameter	FY25	FY24
Total waste generated (in metric tonnes)		
Plastic waste (A)	2,341.29	1,736.57
E-Waste (B)	3.28	7.02
Bio-Medical Waste (C)	0.014	0.03
Construction and demolition waste (D)	0	0

Parameter	FY25	FY24
Battery For (E)	5.16	1.68
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	1,876.22	2,570.32
Other Non-hazardous waste generated (H). Please specify, if any.	12,191.50	19,790.48
Total (A+B+C+D+E+F+G+H)	16417.45	24,105.10
Waste intensity per rupee of turnover (Total waste generated/Revenue from operation)	0.00000051 MT/Rs	0.00000061 MT/Rs
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operation adjusted for PPP)	0.000012 MT/Rs	0.000014 MT/Rs
Waste intensity in terms of physical output	0.0079 MT/CKM*#	0.0109 MT/CKM*#
Waste intensity (Optional) the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	14,699.13	20,451.12
(ii) Re-used	711.84	1,817.60
(iii) Other recovery operations (safely disposed)	-	-
Total	15,410.97	22,268.72
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Recycled	100.04	88.30
(ii) Re-used	906.43	1,748.08
(iii) Other recovery operations (safely disposed)	-	-
Total	1,006.47	1,836.38

Disclaimer: *Waste intensity is for Optical fibre cable manufacturing facilities, the unit for waste intensity is metric tonne per kilometre of cable manufactured.

#Furthermore, the waste intensity for optical fibre manufacturing facilities for FY2024-25 is 0.0006 metric tonne per fibre kilometre and FY 2023-24 is 0.0009 metric tonne per fibre kilometre.

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, For the previous year (FY23-24) the data was evaluated by TUV SUD and Zero waste to landfill certificate was issued. This year (FY24-25) the evaluation process is under way.

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.

Waste management stands at the forefront of our sustainability initiatives, embodying our commitment to resource efficiency and environmental responsibility. Our strategy revolves around waste elimination and resource optimization, both within our operations and across our supply chain.

We meticulously select vendors who share our environmental values and are approved by the Pollution Control Board, ensuring alignment with stringent environmental standards. To instill a culture of waste reduction and recycling, we educate and empower our employees and workers on the importance of waste segregation and recycling at our corporate offices and manufacturing facilities.

We rigorously monitor both hazardous and non-hazardous waste on a monthly basis, ensuring compliance with waste management regulations in each country of operation.

Through diligent waste monitoring and analysis, we continuously enhance process efficiency and identify

preventive measures to minimize waste generation. This comprehensive approach has culminated in our company being recognized as the world's first integrated optic fibre and cables manufacturer to achieve 100% Zero Waste to Landfill certification for all Indian manufacturing units.

By treating waste as a valuable resource, we optimize resource utilization and operate in a more efficient and eco-friendly manner, underscoring our commitment to sustainability and environmental stewardship.

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

Not applicable.

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in FY 2025

Name and brief details of project	EIA Notification Number	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes/No)	Relevant Web Links
NA	NA	NA	NA	NA	NA

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.

Yes, consent obtained from Pollution Control Board & Committee. Consent conditions compliance done.

Leadership Indicators

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

Whether total Scope 3 emissions & its intensity is applicable to the company?

Yes

Parameter	Unit	FY25	FY24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e*	10,262.80	12,187.60
Total Scope 3 emissions per rupee of turnover	tCO ₂ e/₹	0.00000032	0.00000031
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

Disclaimer: *The boundary of Scope 3 calculations includes STL standalone boundary + Sterlite tech cable solutions limited (STCSL) + Metallurgica Bresciana S.P.A Italy.

2. 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.

3. 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:

S.No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Rooftop Solar Power	The installation of a rooftop green solar system, along with a new roof sheet and skylights, has yielded multiple benefits. During daylight hours, the skylights provide natural light, reducing the need for artificial plant lighting.	This has resulted in the yearly saving of 1 lakh units of electricity and cost savings of ₹ 6.5 Lakh
2	Cooling Tower Optimization	A centralised control system coupled with fan driven through temperature sensor for cooling towers has yielded impressive results.	This approach has led to a yearly saving of 2.36 lakh units of electricity and a reduction of water evaporation losses by a remarkable 86 lakh liters
3	PHE System Integration	The integration of a PHE system for buffering and sheathing machines has resulted in improved efficiency and reduced chiller operation.	This innovative approach has led to a combined annual saving of 7.8 lakh units across the FG and buffering sections
4	Ensuring zero liquid/ effluent discharge into communities	To ensure Zero liquid discharge, a detailed study of parameters has been done on the wastewater before its treatment in the ETP which has in turn helped reduce the load on the plant. https://www.stl.tech/esg/	Each of our manufacturing units in Aurangabad and Silvassa are all zero-liquid discharge certified. Effluent treatment (ETP) and multi-effective evaporator (MEE) plants installed, in addition to several in-plant modifications to our processes help us ensure this.
5	Ensuring 100% manufacturing facilities to be Zero Waste to Landfill certified	We ensure our processes comply with stringent waste management rules in the countries we operate, we also verify the approaches our recyclers adopt. This assures us that they are operating according to the prescribed laws and our by-products or waste are further reused, promoting a circular economy. https://www.stl.tech/esg/	All Indian manufacturing units are Zero waste to landfill certified.
6	Eco-label methodology	We have launched third-party verified ecolabel methodology. It is of utmost importance as it adds credibility and trust to the environmental claims made by the company.	This methodology places company's sustainability efforts in the top quadrant of environmental leadership, classifying its gold rated eco-labelled products as "Sustainable and Green"

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

Yes, assessing both acute and chronic climate-related risks to our company's assets is an integral component of our business continuity and disaster management plan. These risks encompass a range of potential scenarios, including local incidents such as water shortages, temperature fluctuations, building fires, and natural calamities, as well as broader national events like pandemic outbreaks, among others.

To address these risks effectively, we have implemented a robust business continuity program designed to monitor and mitigate potential disruptions. Through proactive measures and contingency plans, we aim to ensure the ongoing reliability of our operations even in the face of adverse climate-related events.

5. 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.

As we progress on our ESG journey, we are committed to forging strategic partnerships throughout our value chain, selecting vendors who share our commitment to environmental, social, and regulatory responsibility. Currently, we have identified and are actively monitoring potential risks within our value chain, ensuring that there is no significant adverse impact on the environment.

Looking ahead, we have set a goal to achieve 100% sustainable sourcing by 2030, underscoring our dedication to responsible procurement practices and sustainable supply chain management. Through collaborative efforts and ongoing diligence, we aim to further strengthen our ESG performance and contribute positively to the well-being of society and the planet.

PRINCIPLE 7- BUSINESS, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

Essential Indicator

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

Six

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	Confederation of Indian Industry (CII)	National
2	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
3	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
4	Telecom Export Promotion Council (TEPC)	National
5	Broadband India Forum (BIF)	National
6	Voice of Indian Communication Technology Enterprises (VoICE)	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.

None

Leadership Indicators

1. Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Name and brief details of project	Name and brief details of project
1	2 Years extension of End-use Benefits – zero duty on raw materials extended for two years (FY26 and FY27),	Direct / Joint representations to the Govt. and through industry associations. Media articles	Yes	NA (Monthly Policy Council)	-
2	Amendment in PPP-MII – Local content calculation changed from project-based to product-based thereby eliminating use of imported OF & OFC in Govt projects	Direct representations to the Govt. and through industry associations. Media articles.	Yes	NA (Monthly Policy Council)	-
3	Extension of RoDTEP benefits	Direct representations to the Govt. and through industry associations.	Yes	NA (Monthly Policy Council)	-
4	Revision in Average Export Performance (AEP) under EPCG scheme	Direct representations to the Govt. and through industry associations.	Yes	NA (Monthly Policy Council)	-

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Name and brief details of project	Name and brief details of project
5	Revision in BABA Act	Direct representations to the Govt. and through industry associations. Media articles.	Yes	NA (Monthly Policy Council)	-
6	ADD and Anti subsidy investigation on Indian OFC in EU	Direct representations to the Govt. and through industry associations.	Yes	NA (Monthly Policy Council)	-
7	NOC for ECCS Tape from Ministry of Steel	Direct / Joint representations to the Govt. and through industry associations.	Yes	NA (Monthly Policy Council)	-
8	Restricting data cable import from border sharing nations	Direct representations to the Govt. and through industry associations.	Yes	NA (Monthly Policy Council)	-
9	Removing export control for GeCL4	Direct representations to the Govt.	Yes	NA (Monthly Policy Council)	-

PRINCIPLE 8- BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT**Essential Indicator****1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web Links
NA	NA	NA	NA	NA	NA

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
NA	NA	NA	NA	NA	NA	NA

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

- We have a dedicated email address & toll-free number to receive community complaints and maintain a copy of the physical register at the program site where possible.
- Once the complaint is received from the community members, within 24 hours it is directed to the respective program manager. These complaints shall be resolved within 5 working days and the team should report back on the central team along with a detailed report on the complaint resolution.
- Central team shall prepare a monthly report on the complaints received during the month by 10th of following month.

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

	FY25	FY24
Directly sourced from MSMEs/ small producers	36.04%	43.64%
Sourced directly from within the district and neighbouring districts	NA	12.75%

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

	FY25	FY24
1. Rural		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis	6,05,00,000.00	6,05,00,000.00
ii) Total wage cost	2,95,31,84,573.00	3,63,89,15,208.62
iii) % of Job creation in Rural areas	2.05%	1.66%

	FY25	FY24
2. Semi-urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis	0	8,67,43,057.00
ii) Total wage cost	2,95,31,84,573.00	3,63,89,15,208.62
iii) % of Job creation in Semi - Urban areas	0.00%	2.38%
3. Urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis	99,94,65,807.00	79,21,04,766.00
ii) Total wage cost	2,95,31,84,573.00	3,63,89,15,208.62
iii) % of Job creation in Urban areas	33.84%	21.77%
3. Urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis	1,89,32,18,766.00	2,69,95,67,385.62
ii) Total wage cost	2,95,31,84,573.00	3,63,89,15,208.62
iii) % of Job creation in Metropolitan areas	64.11%	74.19%

Leadership Indicator

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

NA

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 ₹)
1	-	-	-

3. Details of beneficiaries of CSR projects

S.No	CSR Projects (in FY 2024-25)	No. of persons benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups
1	Jeewan Jyoti Women Empowerment Program	2395	100%
2	Liver Transplant Support	31	100%
3	RoboEdge - NextGen Education Program	5000	100%
4	Employee Volunteering	6404	100%

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

Essential Indicator

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

At Sterlite Technologies Limited, we are committed to ensuring customer satisfaction by maintaining a Robust customer feedback and complaint resolution system. Our mechanisms for receiving and addressing Customer concerns are as follow

1. Dedicated Customer Support Channels

- Customers can reach out through email support.
- A trained customer support team is available to assist with queries, complaints, and technical support related to our products.

2. Online Grievance Redressal System

- We have an integrated online system to lodge complaints, track their resolution status, and provide feedback.
- The system ensures transparency and timely resolution by assigning unique reference numbers to each case.

3. On-Site Support & Technical Assistance

- For critical issues related to product performance or installation, we offer on-site inspections and technical support to diagnose and resolve customer concerns effectively.

4. Feedback Collection and Analysis

- We actively collect feedback through customer satisfaction surveys and industry events to understand customer needs and improve our products and services.

5. Escalation Mechanism

- If a complaint is not resolved within the stipulated timeframe, it is escalated to higher management for swift action.
- A dedicated Quality & Customer Experience team ensures that all escalations are handled efficiently.

6. Compliance with Regulatory Standards

Our grievance redressal mechanism aligns with industry best practices and regulatory requirements to uphold transparency and Customer rights.

2. 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	0
Safe and responsible usage	0
Recycling and/or safe disposal	0

3. Number of consumer complaints:

	FY25			FY24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-

	FY25			FY24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Unfair Trade Practices	0	0	-	0	0	-
Other (Complaints)	77	13	-	155	9	-

4. Details of instances of product recalls on accounts of safety issues

	Number	Reasons for recall
Voluntary recalls	0	0
Forced recalls	0	0

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, STL has a documented Information Security and Cyber Security policy which has cyber security framework as well. Risk Assessment is carried out periodic basis - at least annually and with major changes. Privacy policy is available on corporate website [URL:https://www.stl.tech/privacy.php](https://www.stl.tech/privacy.php)

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.

All the complaints were satisfactorily addressed, and no corrective actions were undertaken.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches along-with impact **Zero**
- Percentage of data breaches involving personally identifiable information of customers **0%**
- Impact, if any, of the data breaches **Not Applicable**

Leadership Indicators

1. Channels / platforms where information on products and services of the Company can be accessed.

STL Corporate Website: www.stl.tech

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

Yes, this information is available on product packaging, and/or as per the specifications and requirements of our customer. We conduct customer satisfaction surveys across major products. These surveys assess product quality, service efficiency, and overall customer experience, helping us improve our offerings based on feedback.