

**& SUSTAINABILITY REPORT 2022-23** 



Annexure-V to the Directors' Report

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT-2022-23 OVERVIEW

At THDC India Limited (THDCIL), we are committed to embodying the principles of responsible corporate governance, extending our focus to Environmental, Social, and Governance (ESG) considerations. As a part of our unwavering dedication to good corporate governance practices, we adhere to the reporting requirements mandated for the top 1,000 listed companies in India by the Securities and Exchange Board of India (SEBI). We furnish a comprehensive account of our initiatives in the realm of ESG through the Business Responsibility Report (BRR), complying with SEBI's specified reporting format.

THDCIL embraces the new reporting template as recommended by SEBI, which aligns with our ethos of transparency and sustainability. We have meticulously established processes and systems across our functions, aligning them with the key metrics outlined in the Business Responsibility and Sustainability Reporting (BRSR) framework. Our approach prioritizes pertinent indicators that effectively measure our sustainability score, enabling us to gather, consolidate, and report on meaningful ESG indicators.

Central to THDCIL's operations is our solution-centric approach, powered by knowledge and driven by empathy. Our actions are guided by a fusion of intellect, compassion, and diligence. We firmly believe that modern challenges demand innovative thinking and diligent effort, underpinned by a profound understanding of the needs of all stakeholders. This philosophy resonates through every facet of our operations.

Recognizing our carbon footprint's multifaceted impact on the environment, we acknowledge its role as a catalyst for human-induced climate change, urban air pollution, acid rain, coastal and ocean acidification, and the degradation of polar ice. With an unwavering commitment to environmental sustainability, we are systematically working towards reducing the carbon intensity of our energy production. Our dedication to sustainability is not only an ethical imperative but also recognized by capital markets, which reward companies like ours for investing in climate change mitigation and sustainability, reflecting positively in our stock prices.

In a rapidly evolving landscape where investors factor in non-financial disclosures for their investment decisions, THDCIL embraces this trend with open arms. Our approach extends to integrated financial reporting, showcasing our holistic commitment to ESG considerations.

Our Business Responsibility & Sustainability Report for the year 2022-23 serves as a testament to the interplay between our business activities, the environment, and the community. It highlights our steadfast dedication to ensuring that our operations create a positive impact while embracing our responsibilities towards the environment, society, and governance.

## **SECTION - A: GENERAL DISCLOSURES**

Detai	Details of the listed entity						
1.	Corporate Identity Number(CIN) of the Entity	U45203UR1988G0I009822					
2.	Name of the Listed Entity	THDC INDIA LIMITED (not Listed till date)					
3.	Year of incorporation	1988					
4.	Registered office address	THDC India Limited, Bhagirathi Bhawan, Bhagirathipuram, Top Terrace, Tehri Garhwal-249 001 (Uttarakhand)					
5.	Corporate address	THDC India Limited, Ganga Bhawan, Bypass Road, Pragatipuram, Rishikesh-249201 (Uttarakhand)					
6.	E-mail	cmd@thdc.co.in					
7.	Telephone	0120-2473311					
8.	Website	www.thdc.co.in					
9.	Financial year for which reporting is being done	2022-23					
10.	Name of the Stock Exchange(s) where shares are listed	NA					
11.	Paid-up Capital	₹ 3665.88 Cr. (as on 31.03.2023)					
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Shri. B.K. Garg, AGM (Plg.), THDC India Limited, NCR Office, Plot No. 20, Sector 14, Kaushambi, Ghaziabad-201010 (U.P) (email- bkgarg@thdc.co.in					



13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together): Consolidated

#### II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Power Generation	Generation and Sale of Electricity from Hydro, Wind and Solar Power Plants	100

2. 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.	Electric Power, Consultancy and Coal Mining	3510	100

## III. Operations

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

Location	Number of plants / Under Construction / Development Projects	Remarks			
National	11	THDCIL have 06 operational plants, 02 no. under construction hydro projects, 01 no. under construction Thermal Project, 01 no. Coal Mining and 01 no. under development hydro project.			
International	NIL				

## 2. Markets served by the entity:

THDCIL is engaged in generation of electricity. Electricity is supplied to States Distribution Companies (DISCOMs).

a. Number of locations:

Locations	Number
National (No. of States)	11
International (No. of Countries)	NIL

- b. What is the contribution of exports as a percentage of the total turnover of the entity?
  - NIL
- c. A brief on types of customers— Electricity is supplied to Nine States of Northern Region, Gujarat and Kerala.

## IV. Employees

- 1. Details as at the end of Financial Year:
- a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female					
			No. (B)	% (B/A)	No. (C)	% (C/A)				
	EMPLOYEES									
1	Permanent (D)	780	729	93.46	51	6.54				
2	Other than Permanent (E)	162	145	89.50	17	10.50				
3	Total employees (D + E)	942	874	92.78	68	7.22				
		WO	RKERS							
4	Permanent (F)	783	729	93.10	54	6.90				
5	Other than Permanent (G)	8935	8762	98.06	173	1.94				
6	Total workers (F + G)	9718	9545	98.21	227	2.33				

#### b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	IV	lale	Female				
			No. (B)	% (B / A)	No. (C)	% (C / A)			
	DIFFERENTLY ABLED EMPLOYEES								
1	Permanent (D)	9	8	88.89	1	11.11			
2	Other than Permanent (E)		Not Available						
3	Total differently abled employees (D + E)	9	8	88.89	1	11.11			
	DIF	FERENTLY	ABLED W	ORKERS					
4.	Permanent (F)	18	15	83.33	3	16.67			
5.	Other than permanent (G)	Not Available							
6.	Total differently abled workers (F + G)	18	15	83.33	3	16.67			

## 2. Participation/Inclusion/Representation of women :

	Total	No. and percentage of Females			
	(A)	No. (B)	% (B / A)		
Board of Directors	11	1	11.11		
Key Management Personnel	3	1	33.33%		



## 3. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

		F.Y. 2022-23 (Turnover rate in current F.Y.)		F.Y. 2021-22 (Turnover rate in previous F.Y.)			F.Y. 2020-21 (Turnover rate in the year prior to the previous F.Y.)			
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	Retired	47	2	49	42	1	43	22	0	22
	Resigned	7	1	8	5	0	5	5	1	6
Permanent Workers	Retired	36	2	38	40	1	41	59	7	66
	Resigned	1	0	1	2	0	2	0	0	0

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

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	NTPC Limited	Holding Company	74.49	Yes
2.	TUSCO Limited	Joint Venture	74	No
3.	TREDCO Rajasthan Limited	Joint Venture	74	No

## VI. CSR Details

- (i) Whether CSR is applicable as per Section 135 of the Companies Act, 2013: (Yes)
- (ii) Turnover (in ₹): (Total revenue) ₹ 1974.30 Cr.
- (iii) Net worth (in ₹): ₹ 10428.78 Cr.

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from	Grievance Redressal Mechanism in Place	F.Y. 2022-23 Current Financial Year			F.Y. 2021-22 Previous Financial Year			
whom complaint is received	(Yes/No) (If Yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	
Communities	(Yes) (R&R) (Offline Register Entry.)	1	1	Re- Appointment of GRC head (Gazetted Officer) is in progress.	NIL	NIL	Re- Appointment of GRC head (Gazetted Officer) is in progress.	
	Corporate S&E(CSR)  (https://www.thdc. co.in/content/ feedback-form)	NIL	NIL		NIL	NIL		



Investors (other than shareholders)	Yes https://scores.gov.in/admin/Chk_login.html	NIL	NIL	-	NIL	NIL	
Shareholders	Yes https://scores.gov.in/ admin/Chk_login.html	NIL	NIL	No complaints were received	NIL	NIL	No complaints were received
Employees and workers	Yes www.thdc.co.in	02	01	-	01	NIL	NIL
Customers	Through Annual Feedback and one to one meeting with DISCOMS	NIL	NIL	NIL	NIL	NIL	NIL

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Disposal of Ash	Opportunity	Opportunity Now, fly ash is being used in cement industries and other construction material manufacturing industries as a main raw material.	Fly ash is a by-product of Thermal Power Plant. Therefore, opportunity to its 100% utilization in manufacturing industries can be realized as a revenue potential. During the operation of Khurja Plant about 56.8 million cum ash is expected to be produced in 25 years. Since the project is in construction phase and with regard to the present status of market demand in the F.Y. 2024-25 an EOI was invited by THDCIL. According to the preliminary assessment, around 24 Lac MT plus per annum requirement has been envisaged from the two industries.	As per the market current trend considering the fly ash rate as ₹ 500 per MT (which may vary at the time of actual sale), the tentative financial implication comes to the tune of ₹ 120 Cr. per annum.
2.	Legitimate expectation of PAF's/ Local	Risk	Based on working experience	<ul> <li>Constant communication and consultation/ interaction to built trust by interfacing with PAF's for resolution of issues.</li> <li>High pursuance or motivation to PAFs to shifting.</li> <li>Payment of special package on one installment.</li> </ul>	Delay in construction of project resulting increase in completion cost of project.
				Seeking intervention of Distt.     Admin to maintain Law & order.	



## **SECTION- B: MANAGEMENT AND PROCESS DISCLOSURES**

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

	Disclosure Questions	P1	Р	2	Р3		P4		P5		P6	P7		P8		P9
	Policy and management processes		'										'			
1a	Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	1	Y	Υ		Υ		Υ		Υ	Υ		Υ		N
1b	Has the policy been approved by the Board? (Yes/No)	Y	,	Y	Y		Υ		Y		Υ	Υ		N		N
1c	Web Link of the Policies, if available	*	ŕ	*	Not on Web		*		*		*	Not o Web		*		-
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Υ	\	Y	Υ		Υ		Υ		Υ	Υ		Υ		N
3	Do the enlisted policies extend to your value chain partners? (Yes/No)															
4	Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.						Ple	ease r	efer T	able-1	below					
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.															
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	All the statutory guidelines are complied with Responsibility are fixed as per Table 1.														
	Governance, leadership and oversight															
7	Statement by Director responsible for the (listed entity has flexibility regarding the	e busi placer	ness ro	espon f this (	sibility r	eport, re)	highli	ghtin	g ESG	relate	d challe	enges, ta	arget	s and	achiev	ements
8	Details of the highest authority responsit of the Business Responsibility policy (ie	ole for s).	implei	menta	tion and	overs	sight			NA						
9	Does the entity have a specified Commit for decision making on sustainability relaprovide details.	tee of ated is	the Bo sues?	oard/ E ' (Yes /	irector No). If	respo yes,	nsible				ewed th	year, CS ie Susta			te	
10	Details of Review of NGRBCs by the Cor	Details of Review of NGRBCs by the Company:														
	Subject for Review	unde	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee					Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
		P1	P2	P3 F	P4 P5	P6	P7	P8	P9	P1	P2 P	3 P4	P5	P6	P7	P8 P9
	Performance against above policies and follow up action	Satisfactory performance is measured by way of submission of compliance report.  As and when required						,								
	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Y Y Y Y Y Y Y N As and when required														
11	Has the entity carried out independent as evaluation of the working of its policies I agency? (Yes/No). If yes, provide name	by an (	externa	al i	lo											



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

Questions	
The entity does not consider the Principles material to its business (Yes/No)	THDCIL does not have any policy for principle-9 the policy
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	seems not be required.  Detailed description placed at Table -1 below
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	
It is planned to be done in the next financial year (Yes/No)	
Any other reason (please specify)	

## \* Environment Policy is available on:

https://thdc.co.in/content/environment-policy

\* R&R Policy is available on:

https://thdc.co.in/content/rr-policy

\* CSR & Sustainability Policy is available on:

https://thdc.co.in/sites/default/files/CSR-CD-policy28.05.13.pdf

\* CSR Communication strategy of THDCIL is available on:

https://thdc.co.in/sites/default/files/CSR\_CommuStrategy.pdf

\* Vision, Mission and values of THDCIL are available on:

https://thdc.co.in/content/visionmissionvalues

\* Corporate Ethics Policy is available on:

https://thdc.co.in/sites/default/files/Corporate\_Ethics\_Policy.pdf

\* Whistle Blower Policy is available on:

https://thdc.co.in/sites/default/files/WhistleBlowerPolicy.pdf

\* Code of Business Conduct and Ethics is available on:

 $\underline{https://thdc.co.in/sites/default/files/CodeBusinessConduct\&Ethics.pdf}$ 

Table -1

Principle No.	Description	Policy / Policies	Director(s) Responsible
Principle 1 (P1)	Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and Accountable.	<ul> <li>Vision, Mission and Values</li> <li>Conduct Discipline and Appeal Rules</li> <li>Standing orders for workmen</li> <li>Corporate Ethics Policy</li> <li>Code of Business Conduct and Ethics</li> <li>CDA Rules</li> <li>Whistle Blower Policy</li> <li>Integrity Pact</li> <li>Record Management Manual of THDCIL</li> <li>Training Policy for Directors of THDCIL</li> </ul>	Director (Finance) Director (Technical) Director (Personnel
Principle 2 (P2)	Businesses should provide goods and services in a manner that is sustainable and safe.	Safety Policy CSR & Sustainability Policy ISO 45001:2018	Director (Technical)
Principle 3 (P3)	Businesses should respect and promote the well- being of all employees, including those in their value chains.	HR Policies Placement and transfer Policy	Director (Personnel)



Principle No.	Description	Policy / Policies	Director(s) Responsible
Principle 4 (P4)	Businesses should respect the interests of and be responsive towards all its stakeholders.	R & R Policy Vision & Mission	Director (Technical)
Principle 5 (P5)	Businesses should respect and promote human rights.	Vision, Mission & Values HR Policies	Director (Personnel)
Principle 6 (P6)	Business should respect and make efforts to protect and restore the environment.	Environment Policy ISO 14001:2015 (EMS)	Director (Technical)
Principle 7 (P7)	Businesses, when engaged in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.	Code of Conduct     Core Value	Director (Technical) Director (Personnel) Director (Finance)
Principle 8 (P8)	Businesses should promote inclusive growth and equitable development.	CSR & Sustainability Policy CSR Communication Strategy	Director (Technical)
Principle 9 (P9)	Businesses should engage with and provide value to their consumers in a responsible manner.	All the core elements identified under Principle-9 are of through its commercial procedures. However, THDC policy on Principle 9 is not required because:	
		THDCIL supplies electricity to the beneficia majority of which are owned by respective Sta	, ,
		Allocation of Power is made by Ministry of Pow on certain policies and guidelines.	ver, Govt. of India based
		Power Tariff for Hydro Power Projects of TH Central Electricity Regulatory Commission stakeholders.	
		Tariff for Renewable Energy Projects is deci agreement between THDCIL and individual ben	
		Issues, if any, are discussed and resolved a Northern Regional Power Committee (NRPC), and generators are members.	
		Separate feedback is obtained from custor understand their needs and expectations.	mers (beneficiaries) to

## **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.

## 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 and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	01	<ul> <li>Capacity Building Session Sector Specific Ministry of Power</li> <li>Capacity Building of Non Official Directors (DPE)</li> <li>Familiarization programme for Independent Directors</li> </ul>	33.33%



Key Managerial Personnel	03	<ul><li>Familiarization Program for Independent Directors</li><li>Training Program for Company Secretary</li></ul>	40%
Employees other than BoD and KMPs	02	<ul> <li>Talk on Corruption Free India for a Developed Nation covering 350 No. Executives.</li> <li>Training Program on Conduct Rules &amp; preventive Vigilance covering 114 No. Executives         Total employees covered = 464 No.     </li> </ul>	59.48%
Workers	01	Training Program on Ethics & Values covering 38 No. Workers     Total employees covered = 38 No.	4.85%

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 INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)				
Penalty/ Fine	// Fine								
Settlement			Nil						
Compounding fee									
		Non-Mo	onetary						
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case		Has an appeal been preferred? (Yes/No)				
Imprisonment									
Punishment	Nil								



- No. 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.
- NA
- Does the entity have an anti-corruption or anti-bribery policy?
   If yes, provide details in brief and if available, provide a weblink to the policy.

The Corporation does not have any specific and notified anticorruption or anti-bribery Policy. However, all the employees are governed by Prevention of Corruption Act, 1988 and Central Vigilance Commission Act, 2003.

The employees of the Organization are bound by the enforceable policies with the Code of Conduct of the organization. Codes of conduct are the set of specific rules designed to outline specific practices and behaviors that are to be encouraged or prohibited. Code of Conduct also lays down guidelines and procedures to be used to determine whether violations of the code occurred and what penalties would be imposed for specific infractions.

The brief of attributes of the laid down code of conduct in form of various rules/polices/codes/regulations are as under:

## (A) Vision, Mission and Values

Every employee should strive to accomplish Company's Vision & Mission in a professional manner. It is the duty of employees to serve with respect, concern, courtesy, and responsiveness in carrying out the Organization's mission. Employee should strive for personal and professional excellence and encourage the professional development of others. The Vision and Mission of the Corporation are being diligently pursued and endeavor is being made to realize the same through utmost devotion to duty.

## (B) Conduct, Discipline and Appeal Rules

These rules are called the THDCIL's Conduct, Discipline, and Appeal Rules, 1990. These rules are applied to all employees of the Company including those on deputation/contract service except in casual employment or paid from contingencies and governed by the Standing Orders of the Company under Industrial Employment (Standing Orders) Act, 1946.

The purpose of this rule is to enhance ethical and transparent process in managing the affairs of the Company, and thus to sustain the trust and confidence reposed in the Officers by the stakeholders of the Company. Officers are expected to understand, adhere to, comply with, and uphold the laid down provisions of this code & standards in their day to day functioning. The principles prescribed in this Code are general in nature and lay down broad standards of compliance and ethics.

## (C) Standing Orders for Workmen

This act is to require employers in industrial establishments to formally define conditions of employment under them in the form of Standing Orders after certifying authority. It applies to every industrial establishment wherein 100 (reduced to 50 by the Central Government in respect of the establishments for which it is the Appropriate Government) or more workmen are employed. The purpose of having Standing Orders is to regulate industrial relations. These Orders regulate the conditions of employment, grievances, misconduct etc. of the workers employed in industrial undertakings.

#### (D) Corporate Ethics Policy:

THDCIL upholds the importance of a fair and transparent approach. It is done by adopting the highest standards of professionalism, honesty, integrity, and ethical behavior in all its business processes and transactions. THDCIL is committed to follow the principles of fair practice and business ethics and adopted the Corporate Ethics Policy, which lays down the principles and standards that govern the actions of the Company and the employees.

This Ethics Policy statement shall apply to members of the Board of Directors, employees including those on deputation/ lien except those in casual employment, contracting agencies, consultants, suppliers associated in business relationship and other stakeholders. All concerned are expected to observe the highest standards of ethical conduct, consistent with the values of integrity, impartiality and discretion. In the performance of duties, employees are expected to act with exclusive loyalty to THDCIL, and to its objectives, purposes and principles.

#### (E) Code of Business Conduct and Ethics

The Codes of Business Conduct & Ethics are for Board Members and Senior Management of THDC India Limited. The purpose of this Code is to enhance ethical and transparent process in managing the affairs of the Company. This Code for Board Members and Senior Management has been framed specially in compliance of the provisions of Clause 49 of the Listing Agreement with Stock Exchanges, whenever applicable, and as per the Guidelines of DPE.

This Code is intended to serve as a basis for ethical decision-making in the conduct of professional work. It may also serve as a basis for judging the merit of a formal complaint pertaining to violation of professional ethical standards.

#### (F) Whistle Blower Policy

For ensuring higher level of transparency by CPSEs, the Government decided to make "Guidelines on Corporate Governance for CPSEs" mandatory and applicable to all CPSEs.

As per the Guidelines, Whistle Blower Policy states that "The Company may establish a mechanism for employees to report to the management, concerns about unethical behavior, actual or suspected fraud, or violation of the Company's General Guidelines on conduct or ethics policy. This mechanism could also provide for adequate safeguards against victimization of employees who avail of the mechanism and also provide for direct access to the Chairman of the Audit Committee in exceptional cases. Once established, the existence of the mechanism may be appropriately communicated within the organization."

This policy is formulated to facilitate highest possible standards of ethical, moral, and legal business conduct in the Company.

#### The objective of the Policy is to

- provide opportunity to employees to access in good faith, to the Management or in exceptional cases, to the Chairman of the Audit Committee, in case they observe unethical and improper practices or any other wrongful conduct in the Company.
- provide necessary safeguards for protection of employees from victimization, for whistle blowing in good faith
- prohibit managerial personnel from taking any adverse personnel action against those employees.



## (G) Integrity pact

THDCIL in its endeavor to eradicate/ mitigate corruption has adhered to utilizing or leveraging various packages as effective tools in THDCIL administration. In order to achieve these goals, THDCIL has implemented Integrity Pact in line with the requirement of Central Vigilance Commission. It has established mutual contractual rights and obligations to reduce the high cost and effects of corruption. The Pact essentially envisages an agreement between the prospective vendors/bidders and the buyer committing the persons/officials of both the parties, not to exercise any corrupt influence on any aspect of the contract.

Only those vendors/bidders who have entered into such an Integrity Pact with the buyer would be competent to participate in the bidding. In other words, entering into this Pact would be a preliminary qualification. The Integrity Pact in respect of a particular contract would be effective from the stage of invitation of bids till the complete execution of the contract.

The Integrity Pact envisages a panel of Independent External Monitors (IEMs) approved for the organization. The IEM is to review independently and objectively, whether and to what extent parties have complied with their obligations under the Pact.

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

	F.Y. 2022-23 (Current Financial Year)	F.Y. 2021-22 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	F.Y. 2022-23 (Current Financial Year)		F.Y. 20 (Previous Fin	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	Nil	-

- 12. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.
  - Not Applicable

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

 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 investments made by the entity, respectively.

R&D Expenditures against approved R&D Plan & Budget (F.Y. 2022-23)

SI. No.	Particulars of the Project	Expenditure incurred during F.Y. 2022-23 (₹ in Lakh)	Impact of the study	Outcome of the study
1.	Condition Monitoring of EM equipment of Tehri HPP& KHEP	317	Periodic condition monitoring and health assessment of critical electro- mechanical equipment to detect early signs of deterioration, malfunctioning and inception faults and thus ensure reliability and stability of the projects.	The study is useful in fault analysis of EM equipment.
2.	Pilot project on "Indoor Air Pollution Abatement using indoor plants		Air quality Index at location where the indoor plants were placed had been improved	The results of the study have established that the Air quality Index at locations where the indoor plants were placed has been improved



3.	Analysis and mitigation of oscillations in Hydro Generator fed high voltage Transmission lines.	The study has identified the oscillations with reasons incurred in generating units of Tehri HPP and Koteshwar HPP and develops solutions for damping out the oscillations.	The study has identified the oscillations with reasons incurred in generating units of Tehri HPP and Koteshwar HPP and develops solutions for damping out the oscillations.
4.	Comprehensive solution for slope stability of road between Zero bridge to Koteshwar.	Assessment of Global/ large movement if any, of the slope along Tehri-Koteshwar road and mitigation measures.	The sub - surface movement of soil particles is being monitored at all vulnerable slopes at site through the Inclinometers installed in inclinometer holes at site.
5.	Seismological study through Micro-seismological network around Tehri Dam region and Strong motion Accelerographs network	Collection of long term data on micro earthquake activity of the region around Tehri dam before, during and after impounding of water in Tehri reservoir.	The results of the study are being used to assess the health of the Dam body and other important engineering structures.

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?

Almost all the procurements are made through sustainable sourcing methods viz GeM Portal, e-Tendering etc.

- 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
  - (a) Plastics (including packaging)

A solid waste management plant has been established in Rishikesh. The segregated inorganic waste collected from all houses, Guest Houses and offices in THDCIL premises is being utilized by making the Plastic Bales. There are two sheds constructed for this purpose, one for plastic baling machine and other for segregation of plastic material from other type of inorganic waste like broken glasses, lather material and metallic material. Similar practices are followed at other locations.

(b) E-waste

THDCIL have very minimal E-Waste. The E-Waste is disposed as per Govt. Norms.

(c) Hazardous waste

The Hazardous waste is being dealt as per Hazardous Waste Management rules, 2016 at Projects by the contractor. All the hazardous waste are collected in leak proof closed vessels (Drum) and handed over to authorize agencies/recycler.

(d) Other waste.

**Biomedical Waste Management:-**

The safe and sustainable management of biomedical waste (BMW) is social and legal responsibility of all people related to health-care activities. Bio-medical Waste Management Rules, 2016 is being implemented for healthy humans and cleaner environment. The basic principle of Bio-medical Waste Management is segregation at source and waste reduction is being followed for a greener and cleaner environment. For this purpose, Biomedical Waste is being placed in color coded bins. The waste is then handed over to expert agency for final disposal.

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

Not Applicable.



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

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

Category				% of	employee	s covered by	ı				
	Total (A)	Health ins	urance	Accident in	Accident insurance		Maternity benefits		Benefits	Day Care	facilities
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F/A)
Permanent employees											
Male	729	N/A	N/A	729	100	N/A	N/A	729	100	N/A	N/A
Female	51	N/A	N/A	51	100	51	100	N/A	N/A	N/A	N/A
Total	780	N/A	N/A	780	100	51	6.54	729	92.30	N/A	N/A
				Other tha	n Permane	ent employed	es				
Male	145	N/A	N/A	145	100	N/A	N/A	N/A	N/A	N/A	N/A
Female	17	N/A	N/A	17	100	17	100	N/A	N/A	N/A	N/A
Total	162	N/A	N/A	162	100	17	10.49	N/A	N/A	N/A	N/A

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

Category					% of v	workers cov	ered by				
	Total (A)	Health insurance		Accident insurance Maternity benefits		/ benefits	Paternity Benefits		Day Care facilities		
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	729	N/A	N/A	729	100	N/A	N/A	729	100	N/A	N/A
Female	54	N/A	N/A	54	100	54	100	N/A	N/A	N/A	N/A
Total	783	N/A	N/A	783	100	54	6.89	729	92.10	N/A	N/A
				Oth	er than Peri	nanent worl	ers				
Male	8762	N/A	N/A	8762	100	N/A	N/A	N/A	N/A	N/A	N/A
Female	173	N/A	N/A	173	100	173	100	N/A	N/A	N/A	N/A
Total	8935	N/A	N/A	8935	100	173	1.93	N/A	N/A	N/A	N/A

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

Benefits	Cu	F.Y. 2022-23 rrent Financial Year		F.Y. 2021-22 Previous Financial Year			
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	
PF	100%	100%	100%	100%	100%	100%	
Gratuity	100%	100%	100%	100%	100%	100%	
ESI	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	
Others – please specify	Retirement benefit for employees who have joined before 2014 under GSLI Scheme	100%	100%	100%	100%	100%	



#### 3. Accessibility of workplaces

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

In compliance of implementation of United Nations Convention on the Rights of Persons with Disabilities, the Corporation has provided easy accessibility by way of erecting ramps in most buildings of the Corporation. The Company has been making all efforts towards creation of barrier free environment for differently abled by following the guidelines laid down under Sugamya Bharat Abhiyan. The Company has been nominating employees belonging to Physically Handicapped category to attend special training programmes. The Company has nominated Liaison Officers to identify the issues pertaining to differently abled employees and implementation of various welfare activities for them. The Company has Equal Opportunity Policy and is implemented in letter and spirit.

3. 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://thdc.co.in/sites/default/files/EQUAL OPPORTUNITY POLICY 0.pdf

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

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

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes
Other than Permanent Workers	-
Permanent Employees	Yes
Other than Permanent Employees	-

#### 7. A brief write up on mechanism available to receive and redress grievances

#### PROCEDURE FOR GRIEVANCE REDRESSAL:

- Stage I: Aggrieved employee may present his grievance in writing (Form No.1) to his Controlling Officer (not below the rank of Deputy Manager) within 15 days from the date the said grievance arose. The grievance shall be entered in the grievance register maintained for the purpose in the office of the Controlling Officer. An acknowledgment indicating the number of the grievance will be issued to the employee. The controlling officer will make necessary enquiries and give a reply (Form no. II) to the employee within 30 days from the date of receipt of the grievance. The grievance of routine nature should not normally take more than 15 days for making the reply to the employee.
- Stage II: If the aggrieved employee is not satisfied with the reply made to him by the Controlling Officer, he may present his grievance to his HOD/ General manager (in Form No.1) indicating the original grievance number given by the Controlling Officer, within 10 working days of the receipt of the reply at stage-1. At his stage, Form No.1 will be addressed to his General Manager/Head of Project in case of Unit/Project and HOD in case of Corporate Office (as notified by Corporate HR Deptt.). On receipt of the grievance, GM/HOP/HOD will process the case further, give a personnel hearing to the employee concerned and make reply (Form No. II) in the matter, within a reasonable time. Normally, grievance at stage-II should not take more than 30 days to give a reply to the employee.
- **Stage III**: If the employee is still not satisfied with the reply he got at stage-II, he may present his grievance to the Chairman-GRC (Form No.1) indicating the original grievance number within seven days of receipt of reply at stage-II, stating the reasons why he is not satisfied with the reply received at Stage-II.



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

Category	(Cı	F.Y. 2022-23 urrent Financial Ye	ar)	F.Y. 2021-22 (Previous Financial Year)			
	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	780	78	10.0%	813	256	31.48%	
Male	729	74	10.15%	762	246	32.2%	
Female	51	04	7.84%	51	10	19.6%	
Total Permanent Workers	783	601	76.75%	831	786	94.58%	
Male	729	588	80.65%	775	736	94.9%	
Female	54	13	24.07%	56	50	89.28%	

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

Category		F.Y. 2022-23 (Current Financial Year)					F.Y.2021-22 (Previous Financial Year)			ıl Year)
	Total (A)	On Health a measures	and safety	On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	729	48	6.58%	390	53.49%	762	166	21.78%	66	8.66%
Female	51	Nil	-	42	82.35%	51	51	100%	03	5.88%
Total	780	48	6.15%	432	55.38%	813	217	26.69%	69	8.48%
					Workers					
Male	729	66	9.05	28	3.84%	775	147	18.96	48	6.19%
Female	54	03	5.55%	02	5.55%	56	06	10.71%	0	0
Total	783	69	8.81%	30	3.83%	831	153	18.41%	48	5.77%

## 10. Details of performance and career development reviews of employees and worker:

Category	F.Y. 2022-23 (Current Financial Year)			F.Y.2021-22 (Previous Financial Year)				
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)		
Employees								
Male	729	729	100%	762	762	100%		
Female	51	51	100%	51	51	100%		
Total	780	780	100%	813	813	100%		
		1	Workers					
Male	729	729	100%	775	775	100%		
Female	54	54	100%	56	56	100%		
Total	783	783	100%	831	831	100%		



#### 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, there is an established occupational Health & Safety Management System in place in THDCIL. This system is providing coverage through Designated Officer(s) & Qualified Safety officers, Site Engineers and Management Information System by adopting following:

- I. Policy and Commitment: THDCIL establish a clear health and safety policy that outlines the organization's commitment to providing a safe and healthy work environment for its employees.
- II. Hazard Identification and Risk Assessment: The Company identify potential hazards within its work processes and conduct risk assessments to evaluate the likelihood and severity of these risks.
- III. Legal Compliance: THDCIL ensure compliance with relevant occupational health and safety laws, regulations, and standards set by the government or industry bodies.
- IV. Objectives and Targets: The Company set specific health and safety objectives and targets to drive continuous improvement in managing occupational risks.
- V. Resources and Competence: THDCIL allocate resources and provide training and awareness programs to ensure employees have the necessary skills and knowledge to work safely.
- VI. Emergency Preparedness and Response: THDCIL have plans and procedures in place to respond effectively to emergencies, including evacuation procedures, communication protocols, and first aid provisions.
- VII. Incident Reporting and Investigation: The Company have a system for reporting and investigating incidents, accidents, near misses, and occupational health issues to identify root causes and implement corrective actions.
- VIII. Performance Monitoring and Measurement: Regular monitoring and measurement of Key Performance Indicators (KPIs) is conducted to track progress, identify areas for improvement, and ensure compliance with health and safety goals.
- **IX. Management Review:** THDCIL's top management periodically review the effectiveness of the OHSMS and make necessary adjustments to improve its performance.
- b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

The work-related hazards and assessment of risks are being identified through Safety Inspections /Site Visits by Site Engineers/Qualified Safety Officers and also by higher Officials time—to—time as per the need of hour as per following:

#### I. Hazard Identification:

- Regular inspections: Conducting regular inspections of the workplace to identify potential hazards, such as unsafe conditions, equipment malfunctions, or environmental factors.
- Job hazard analysis: Analysing specific job tasks and processes to identify inherent hazards and potential risks associated with each task.
- Incident reporting: Encouraging employees to report incidents, near misses, and hazardous conditions to identify previously unrecognized hazards.

#### II. Routine and Non-Routine Basis:

- Routine hazard identification: Implementing regular processes to proactively identify hazards and assess risks on an ongoing basis. This can include scheduled inspections, safety committee meetings, employee feedback mechanisms, or regular risk assessments for specific tasks or work areas.
- Non-routine hazard identification: In addition to routine processes, THDC India Limited may have specific procedures to identify hazards and assess risks associated with non-routine activities, such as maintenance work, project activities, or changes in work processes.
- Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)

Yes.

**Reporting Mechanisms:** THDC India Limited has established various channels for workers to report work-related hazards, such as:

- Incident Reporting Systems: A formal system that allows workers to report incidents, accidents, near misses, or hazardous conditions they observe or experience.
- Safety Committees or Representatives: Workers can approach designated safety committee members or representatives to communicate hazards and concerns.
- Supervisors and Management: Directly informing supervisors or higher-level management about work-related hazards they encounter.

**Anonymous Reporting:** THDC India Limited offer anonymous reporting mechanisms, such as suggestion boxes, online reporting tools, or dedicated hotlines, to encourage workers to report hazards without fear of reprisal.

**Training and Awareness:** The Company provide training and awareness programs to educate workers about the importance of hazard reporting and their rights to remove themselves from unsafe situations. This can include information on how to identify hazards, report them effectively, and the procedures for removing themselves from risks.

**Investigation and Corrective Actions:** Once hazards are reported, THDC India Limited would typically investigate the reported hazards promptly and thoroughly. Appropriate corrective actions should then be taken to eliminate or mitigate the identified risks.



**Employee Empowerment:** THDC India Limited emphasize employee empowerment by actively encouraging workers to take responsibility for their safety and empowering them to remove themselves from hazardous situations, if necessary, without fear of negative consequences.

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

Yes.

**General Medical Services:** THDCIL offer access to primary healthcare services, such as general check-ups, consultations with physicians, and treatment for common illnesses or non-work-related injuries.

**Preventive Care:** Employers often promote preventive care initiatives, such as vaccinations, health screenings, and wellness programs to encourage employees to maintain their overall health.

**Employee Assistance Programs (EAP):** EAPs can provide confidential counselling and support services to employees for personal issues that may impact their well-being, including mental health, stress management, and work-life balance.

**Tie-ups with Healthcare Providers:** THDCIL tie-ups with specific healthcare providers or hospitals to offer employees discounted rates or access to a network of healthcare services.

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

Safety Incident/Number	Category	F.Y. 2022-23 (Current Financial Year)	F.Y. 2021-22 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-	Employees	Nil	Nil
person hours worked)	Workers	Nil	Nil
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	Nil	01
No. of fatalities	Employees	Nil	Nil
	Workers	1	Nil
High consequence work-related injury or ill-health	Employees	Nil	Nil
(excluding fatalities)	Workers	Nil	Nil

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

THDCIL is an OHSAS-45001:2018 Management System certified company and is committed to ensure Health and Safety of its Employees, Contractors, Sub contractors and community by strict adherence to the norms of Occupational Health and Safety in their projects at Tehri HPP, Tehri PSP, Koteshwar HPP, Pipalkoti HEP & Dhukwan SHEP.

THDCIL is committed to comply with applicable legal requirements, laws, regulations and best practices in safety. THDCIL is committed to comply with applicable legal requirement viz. laws, regulation and best practices in Safety. The Company does its utmost to provide a Healthy & Stimulating work environment for all its employees.

**Occupational Health and Safety Policy:** THDCIL have a well-defined occupational health and safety policy in place that emphasizes the Company's commitment to providing a safe work environment and outlines its responsibilities and expectations regarding health and safety.

**Risk Assessment and Hazard Control:** THDCIL conduct regular risk assessments to identify potential hazards and evaluate risks associated with its operations. Based on these assessments, appropriate control measures would be implemented to eliminate or mitigate the identified risks.

**Training and Awareness:** THDCIL provide comprehensive health and safety training to its employees, ensuring they are equipped with the knowledge and skills necessary to work safely. This include training on specific hazards, safe work practices, emergency procedures, and the proper use of personal protective equipment (PPE).

**Safety Procedures and Guidelines:** The Company establish clear safety procedures, guidelines, and protocols that employees are expected to follow. This includes procedures for equipment operation, handling hazardous substances, working at heights, and other specific activities.

**Safety Equipment and Facilities:** THDCIL provide appropriate safety equipment and facilities to protect employees from workplace hazards. This can include personal protective equipment (PPE), safety signage, fire suppression systems, first aid kits, and ergonomic workstations.

**Regular Inspections and Audits:** The Company conduct regular inspections and audits of the workplace to identify potential hazards, ensure compliance with safety standards, and address any safety deficiencies promptly.



**Incident Reporting and Investigation:** THDCIL have a system in place for employees to report incidents, accidents, near misses, and hazardous conditions. These reports would be thoroughly investigated, and appropriate corrective actions would be taken to prevent similar incidents from occurring in the future.

**Emergency Preparedness:** The Company have emergency response plans in place, including evacuation procedures, communication protocols, and drills to ensure employees are prepared to respond to emergencies effectively.

Compliance with Legal and Regulatory Requirements: THDCIL ensure compliance with applicable occupational health and safety laws, regulations, and industry standards, as well as any other requirements specific to its operations.

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

	F.Y. 2022-23	(Current Financial Ye	ar)	F.Y. 2021-22 (Previous Financial Year)			
	Filed during the year Pending resolution at the end of year Remarks			Filed during the year	Pending resolution at the end of year	Remarks	
<b>Working Conditions</b>	Nil	Nil	Nil	Nil	Nil	Nil	
Health & Safety	Nil	Nil Nil Nil			Nil	Nil	

#### 15. 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%) We prioritize safety through regular external audits conducted by M/s National Safety Council, Uttarakhand. Additionally, third-party accident investigations are carried out to ensure a comprehensive assessment. These measures demonstrate our commitment to maintaining Health and safety practices and continuously improving safety standards.
Working Conditions	100%) Regular audits, both external and internal, are conducted annually to assess working conditions. Our dedicated team of engineers, safety officers, and consultants conduct thorough site inspections and TBT to ensure compliance and maintain a safe environment. These proactive measures ensure ongoing operational efficiency and employee well-being.

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

OHS Awareness Programs to had been /are being organized time to time impart training to Employees & Officers of Plants and under Construction Projects in respect of Fire Safety, PPE`s, In plant Safety awareness etc. THDCIL Safety Officers are imparting training/awareness on different topics of Safety Awareness Program from time to time to all workers on construction sites & Power House Plant. Besides Safety awareness through Mock drill program had been /are being organized regularly.

- I. Conduct OHS Awareness Programs: We recognize the importance of regular training and awareness programs to promote occupational health and safety (OHS). Therefore, we conduct OHS awareness programs periodically to educate our workforce on best practices, safety protocols, and emergency procedures. These programs will enhance their understanding of potential hazards and foster a culture of safety across the organization.
- II. Conduct External Safety Audit: To ensure an objective evaluation of our safety practices, we arrange for an annual external safety audit conducted by a NSC Uttrakhand Chapter. This audit will provide an unbiased assessment of our safety measures, identify any areas of improvement, and validate our compliance with legal requirements and industry standards.
- III. Conduct Internal Safety Audit: In addition to external audits, we conduct internal safety audits every year. These audits will be carried out by a team of qualified safety officers within THDCIL. By reviewing our processes, identifying potential risks, and recommending corrective measures, the internal safety audit will help us maintain a high standard of safety performance.
- IV. Compliance with Statutory Requirements: In the unfortunate event of an accident or incident, THDCIL is committed to fulfilling all statutory and legal obligations. We ensure that necessary actions are taken promptly, such as reporting the incident to the appropriate authorities, providing required support to the affected individuals, conducting investigations, and implementing corrective actions to prevent recurrence.



- V. Daily Safety Inspections, Visits, and Tool Box Talks: Our employees and officers play a crucial role in maintaining a safe work environment. They conduct daily safety inspections, visits, and tool box talks to address any immediate hazards, identify potential risks, and reinforce safe work practices. These proactive measures will help in mitigating risks and enhancing the overall safety culture within THDCIL.
- VI. Address Unsafe Act and Unsafe Conditions: THDCIL officers proactively identify and capture instances of unsafe acts and unsafe conditions. They take prompt action by providing Corrective and Preventive Actions (CAPA) to address these concerns. By implementing CAPA measures, THDCIL aims to mitigate risks, promote a safe working environment, and prevent accidents or incidents.
- VII. Monthly and Quarterly OH&S Safety Committee Meetings: To ensure compliance with the provisions laid under acts and rules, we will conduct monthly and quarterly OH&S Safety Committee Meetings involving workers and management representatives. These meetings will provide a platform for open discussions, sharing of safety concerns, feedback, and collaborative decision-making. Together, we can strengthen our safety practices and work towards continuous improvement.

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

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

We define our stakeholders as individuals and groups who are impacted by our activities, or those who can have an impact on our future development. Due to the diverse interests of each stakeholder group, which varies in each of our area of operation, we adapt our approach, communication channels and engagement activities as appropriate. Through this tailored approach, we continuously seek to understand our stakeholders' expectations and demands and reflect these in our sustainability strategy, report and overall business activities. Stakeholder engagement takes into account the varying perspectives, priorities and limitations of different stakeholders.

To ensure proper identification, Stakeholders Identification is kept as an integral part of THDCIL's CSR Communication Strategy. Communication strengthens trust between the Organization and its Stakeholders. Communication is critical to keep all the Stakeholders well informed, especially the employees so as to ensure that not only all the business processes are in tune with the globally accepted ethical systems and Sustainable Management practices, but also their engagement with the external Stakeholders is based on these values.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government and Statutory bodies / NTPC LTD.	No	<ul> <li>Signing of MoU</li> <li>Correspondence</li> <li>Annual Report</li> <li>Meetings</li> <li>Presentations</li> <li>Site Visits</li> </ul>	<ul> <li>Annually</li> <li>Round the year</li> <li>Annually</li> <li>As and when required</li> <li>As and when required</li> <li>As and when required</li> </ul>	Being PSU, equity is held by NTPC LTD and Govt. of UP. All project approvals and clearances. Performance MoU and other statutory requirements for running the business.
Employees	No	<ul> <li>Publication of Magazines</li> <li>Grievance Redressal Mechanism</li> <li>Circulars and Office Orders</li> <li>Communal Programmes</li> <li>Feedbacks</li> <li>Suggestion Mela</li> </ul>	<ul> <li>Quarterly, Annually, Half-yearly</li> <li>Round the Year</li> <li>Round the Year</li> <li>Round the Year</li> <li>Round the Year</li> <li>Annually</li> </ul>	Employees are engaged in day to day activities and periodical dialogues are held to understand their needs and expectations.
Customers	No	<ul> <li>Signing of PPAs</li> <li>Feedback survey</li> <li>Meetings</li> <li>Correspondence</li> </ul>	<ul> <li>Well before commissioning of any Project</li> <li>Annually</li> <li>As and when required</li> <li>Round the Year</li> </ul>	THDCIL takes prompt measures and offers assistance to its valuable Customers by synchronising its activities with other concerned Organizations/ Agencies



	1		
Suppliers &	No	❖ Tenders	As and when required THDCIL believes that Contractors,
Contractors		<ul> <li>Open Bid Discussions</li> </ul>	With every award Suppliers, Consultants and their employees are key Stakeholders in
		<ul> <li>Policy and Procedures</li> </ul>	Round the year Project Implementation. Concerns of the
		❖ Meetings	Regular basis Contractors/Suppliers/Consultants are
		<ul> <li>Joint Discussions</li> </ul>	Regular basis regularly being addressed.
Project Affected	Yes	<ul> <li>CSR Programmes</li> </ul>	Round the Year THDCIL has a mission "To undertake
Persons/ Local		❖ Meetings	As and when required Rehabilitation and Resettlement of Project
and Indigenous communities		❖ Grievance Redresseal	Round the Year Affected Persons with human face".
Communities		<ul> <li>Magazines</li> </ul>	❖ Quarterly, Annually, THDCIL is committed towards social
		Pamphlets/Website	Half-yearly upliftment of Rehabilitees. THDCIL is spending approx. 90% of its CSR Fund in
		Disclosures	Round the Year Project Affected Region.
		❖ Public Information Centres	Opened at project     sites-Operational     Plants
Media	No	Press Briefings	Round the Year THDCIL has formulated structured
		<ul> <li>Invitations to events</li> </ul>	Round the Year communications tools and established a separate Communication Department at Corporate Level for interaction with media (both print and electronic media)
Society at a large	No	❖ Press News	Round the year Being a public limited Company, it is our
		❖ Notice	Round the year responsibility to engage society as our
		❖ Publicity	Round the year stakeholder.
		❖ CSR Programmes	Round the year
		Display on website	Round the year
		<ul> <li>Facebook and Twitter</li> <li>Page</li> </ul>	Round the year

## PRINCIPLE: 5 Businesses should respect and promote human rights

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

Category	Cı	F.Y. 2022-23 Current Financial Year			F.Y. 2021-22 Previous Financial Year		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)	
	·	Employee	es				
Permanent	780	58	7.43%	813	39	4.79%	
Other than permanent	-	-	-	-	-	-	
Total Employees	780	58	7.43%	813	39	4.79%	
	·	Workers					
Permanent	783	25	3.19%	831	15	1.8%	
Other than permanent	-	-	-	-	-	-	
Total Employees	783	25	3.19%	831	15	1.8%	



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

Category	F.Y. 2022-23 Current Financial Year				F.Y.2021-22 Previous Financial Year					
	Total (A)		al to m Wage		than m 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)
				Empl	oyees					
Permanent	780	-	-	780	100%	813	-	-	813	100%
Male	729	-	-	729	100%	762	-	-	762	100%
Female	51	-	-	51	100%	51	-	-	51	100%
Other than Permanent	162	-	-	162	100%	14	-	-	14	100%
Male	145	-	-	145	100%	9	-	-	9	100%
Female	17	-	-	17	100%	5	-	-	5	100%
				Wor	kers					
Permanent	783	-	-	783	100%	831	-	-	831	100%
Male	729	-	-	729	100%	775	-	-	775	100%
Female	54	-	-	54	100%	56	-	-	56	100%
Other than Permanent	8935	8935	100%	-	-	5990	5990	100%	-	-
Male	8762	8762	100%	-	-	5820	5820	100%	-	-
Female	173	173	100%	-	-	170	170	100%	-	-

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

		Male	Female		
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category	
Board of Directors (BoD)	2	59,82,244.00	0		
Key Managerial Personnel*	2		1	20,56,756.00	
Employees other than BoD and KMP	1011	26,56,121.00	69	19,13,598.00	
Workers	525	18,75,454.00	33	13,63,786.00	

The above data includes employee joined & separated during the F.Y. 2022-2023 from corporation

## 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)

No.

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

There is no specific mechanism to redress grievances related to human rights however, Company has a mechanism of redressal of public grievances which enumerates the steps that are required to be taken to ensure that the internal public grievance redressal machinery is in order for prompt redressal of grievances of citizens. Wide publicity of the grievance mechanism available in the Corporation is made and the name, designation and address of Director of Public Grievances are given on the official website under Grievances menu.

In addition the company has Policy Guidelines & Procedure for Grievance Redressal of Employees. Under the policy 'Grievance' for the purpose of this scheme would only mean a grievance of individual nature relating to any employee arising out of the implementation of the policies/rules or decisions of the Corporation, subject to admissibility conditions. It can include matters relating to leave, increment, non-extension of benefits under rules, interpretation of service rules etc. The policy inherently includes human right values in it.

<sup>\*</sup>Median Remuneration of 2 male KMP is included in Board of Directors.



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

	Cı	F.Y. 2022-23 Current Financial Year			F.Y. 2021-22 Previous Financial Year			
	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	0.00	0.00	0.00	1	0.00			
Discrimination at workplace	0.00	0.00	0.00	0.00	0.00			
Child Labour	0.00	0.00	0.00	0.00	0.00			
Forced Labour/Involuntary Labour	0.00	0.00	0.00	0.00	0.00			
Wages	0.00	0.00	0.00	0.00	0.00			
Other human rights related issues	0.00	0.00	0.00	0.00	0.00			

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

Internal Complaints Committee (ICC) is working to protect the interest of the complainant in case of harassment. Moreover THDCIL complies with Article 12 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

## 7. Do human rights requirements form part of your business agreements and contracts?

Yes.

#### 8. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	No, External/third party audit has been carried out. Although, there is a robust mechanism of internal
Forced/involuntary labour	audits which are conducted on regular basis.
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

## 9. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

Any issues related to wages identified in the internal inspection are flagged to higher authorities for speedy resolution.

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

## 1. Details of total energy consumption (in MU) and energy intensity, in the following format:

Parameter	F.Y. 2022-23 (Current Financial Year)	F.Y. 2021-22 (Previous Financial Year)	Remarks
Total electricity consumption (A)	28.04 MU	26.75 MU	Includes Corporate
Total fuel consumption (B)	124007 Ltr	68649.47 Ltr	Office and Plants / Projects above
Energy consumption through other sources (C) (Roof Top Solar Plant)	10.85 MU	6.79 MU	- Flojecis above
Total energy consumption (A+C)	38.89 MU	33.54 MU	100 MW
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.14 Kwh/₹	0.14 Kwh/₹	Corporate Office



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, However THDCIL has taken Energy efficiency measures like replacement of old ACs with 5 star rated ACs, installation of LED lights, installation of solar street lights, Solar Geysers, Roof top solar etc. at Corporate Office and all major project locations.

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

Parameter	F.Y. 2022-23 (Current Financial Year)	F.Y. 2021-22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	1472800	1425320
(ii) Groundwater	87200	94850
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others (WTP &STP Plant)	2860	2880
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1562860	1523050
Total volume of water consumption (in kilolitres)	1560000	1520170
Water intensity per rupee of turnover (Water consumed / turnover)	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.
No.

5. Provide details of air emissions (other than GHG emission) by the entity, in the following format:

Please provide details of air emissions (other than GHG emissions) by the entity, in the following format: Parameter	Please specify unit	F.Y. 2022-23 Current Financial Year)	F.Y. 2021-22 (PreviousFinancial Year)	
NOx	$\mu$ g/m $^3$	Presently, THDCIL is generating power th		
Sox	$\mu$ g/m $^3$	Wind and Solar. Therefore, emissions are negligible in THDCIL's busin		
Particulate Matter (PM)	$\mu$ g/m $^3$			
Persistent Organic Pollutants (POP)	$\mu$ g/m $^3$			
Volatile Organic Compounds(VOC)	$\mu$ g/m $^3$			
Hazardous Air Pollutants (HAP)	$\mu$ g/m $^3$			

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

Parameter	Unit	F.Y. 2022-23 (Current Financial Year)	F.Y. 2021-22 (Previous Financial Year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric ton of CO <sub>2</sub> equivalent	Presently, THDCIL is generating power through renew sources viz. Hydro, Wind and Solar. Therefore, emiss	
<b>Total Scope 2 emissions</b> (Break-up of the GHG into $CO_2$ , $CH_4$ , $N_2O$ , HFCs, PFCs, SF6, $NF_3$ , if available)	Metric ton of CO <sub>2</sub> equivalent	are negligible in THDCIL's b	ousiness.
Total Scope 1 and Scope 2 emissions per rupee of turnover			
Total Scope 1 and Scope 2 emission intensity (optional) -the relevant metric may be selected by the entity			



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

NΑ

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

Parameter	F.Y. 2022-23 (Current Financial Year)	F.Y. 2021-22 (Previous Financial Year)			
Total Waste generated (in metric ton)					
Plastic waste(A)	0.806	0.467			
E-waste (B)	0.440	0.722			
Bio-medical waste (C)	0.632	0.572			
Construction and demolition waste(D)	0.00	852000			
Battery waste(E)	0.70	4.7			
Radioactive waste(F)	NIL	NIL			
Other Hazardous waste. (Burnt Oil, used tyres, lubricants, transformer oils etc.)(G)	15.59	8.45 MT			
Other Non-hazardous waste generated (office / plant non-saleable scrap) (H).	543.38	0.73 MT			
Total(A+B+C+D+E+F+G+H)	561.548	852015.64			
	e generated, total waste recovered through re her recovery operations (in metric tons)	cycling, re-using or			
Category of waste					
(i) Recycled	NIL	NIL			
(ii) Re-used	2.88	0.59			
(iii) Other recovery operations	NIL	21.767			
Total	2.88	22.357			
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)					
Category of waste					
Incineration	0.366	0.257			
Landfilling	0.1846	0.256			
Other disposal operations	0.431	0.825			
Total	0.9816	1.338			

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

The waste management practices followed at Corporate Office/ Township, Rishikesh is as under:

#### 1. Door to Door collection of organic and dry garbage in colony

One tempo carrier runs on all colony and office roads from 07:30 AM to 11:30 AM in all week days for collection of organic and inorganic garbage. A separation / partition space exists for organic garbage, inorganic garbage and mix garbage space in the Tempo carrier.

## 2. Segregation of dry and organic garbage from mix garbage at Bio-gas plant

After collection of garbage from all houses and offices in THDCIL premises, tempo carrier gets unloaded on the platform of Bio-gas plant where two labours segregate the organic garbage and inorganic garbage from the garbage mix obtained from all sources. Organic garbage is processed in the Bio-gas plant to produce the Bio-cooking gas which is supplied to the local Aahar canteen.

#### 3. Plastic waste disposal at solid waste management plant

A solid waste management plant has been established on 07.07.2019 under the guidance of solid waste management consultant. The segregated inorganic waste collected from all houses, Guest Houses, and offices in THDCIL premises is being utilized by making the Plastic Bales. There are two sheds constructed for this purpose, one for plastic baling machine (compactor) and other for segregation of plastic material from other type of inorganic waste like broken glasses, lather material and Metallic material.



#### 4. Disposal of unused Inorganic waste

After segregation of organic waste and usable plastic waste from total garbage collected, the remaining waste material is disposed off in the ground behind old storage area. This waste is buried under the ground so that no bad smell is spread in the nearby area. The pits are covered with earth after complete filling with un-useful garbage.

Similar practices are followed at project locations.

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

S. No.	Location of operations / offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1.	Vishnugad Pipalkoti HEP, Pipalkoti with Dam site at Helong and Power House site at Hat village, Chamoli District	Under Construction HEP (444 MW)	Vishnugad Pipalkoti HEP does not fall inside the ecologically sensitive areas but is located within 10 KM radius of Kedarnath Wild Life Sanctuary, therefore necessary clearance has beent obtained and conditions complied.

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Weblink		
Yes, the entity compliant w	Yes, the entity compliant with the applicable environmental law/ regulations/ guidelines in India						

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

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

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

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

THDCIL is member of two associations.

 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	All India Management Association (AIMA)	National
2	Standing Conference of Public Enterprises (SCOPE)	National

2. Provide details of corrective action taken or under way on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

-NA



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

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 link
NIL					

## Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being under taken by your entity, in the following Format:

S. N.	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 F.Y. (In INR)
1	VPHEP Project	Uttarakhand	Chamoli	559	94 %	2.83 Cr.
2	Khurja Super Thermal Power Project	UP	Bulandshahar	1725	91.76 %	NIL
3	Amelia	MP	Singrauli	576	84.7	33.00 Cr.

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

Feedback form is available in public domain that can be easily accessible at <a href="https://www.thdc.co.in/content/feedback-form">https://www.thdc.co.in/content/feedback-form</a>. All the queries are being resolved in compliance to Communication strategies finalized by THDCIL and same can be referred at <a href="https://www.thdc.co.in/content/communication-strategy">https://www.thdc.co.in/content/communication-strategy</a>.

In addition, THDCIL has set up a Grievance Redress Cell (GRC) for Project affected Persons at the project level. All the grievances registered are being put for the resolution of GRC during its meeting organized from time to time as per the requirement.

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

	F.Y. 2022-23 Current Financial Year	F.Y. 2021-22 Previous Financial Year
Directly sourced from MSMEs/ small producers	48.90%	66.39%
Sourced directly from within the district and neighbouring districts	N	A

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

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

Complained and feedback are received annually from beneficiaries on standard feedback format through mail.

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	THDCIL is producing electricity and is suppling to distribution
Safe and responsible usage	companies of respective States. Therefore, not applicable.
Recycling and/or safe disposal	



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

	F.Y. 2022-23 (Current Financial Year)		Remarks		021-22 inancial Year)	Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy						
Advertising						
Cyber-security						
Delivery of essential services			N	IIL		
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

	Number	Reasons for recall
Voluntary recalls	N	Λ.
Forced recalls	N	A

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.

THDCIL has IT & Cyber security guidelines available in employee section of its website. THDCIL does not have framework / policy on Cybersecurity and Risk related to Data privacy.

However, all the directives/ guidelines of Government of India and its agencies like CERT-In/ NCIIPC/CSK related to cyber security are followed.

The software application having data of its employees and contractors are audited by CERT-in empaneled agencies and vulnerabilities reported by the auditors are closed.

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.

NA