

Business Responsibility and Sustainability Report (BRSR)



SECTION A General disclosures

SECTION B Management and process disclosures

SECTION C Principle-wise performance disclosure

Principle 1

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



Principle 2

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



Principle 3

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



Principle 4

Businesses should respect the interests of and be responsive to all its stakeholders



Principle 5

Businesses should respect and promote human rights



Principle 6

Businesses should respect and make efforts to protect and restore the environment



Principle 7

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



Principle 8

Businesses should promote inclusive growth and equitable development



Principle 9

Businesses should engage with and provide value to their consumers in a responsible manner



SECTION

A

General disclosures

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Company	L40100GJ1981PLC004281
2.	Name of the Company	Kalpataru Projects International Limited
3.	Year of Incorporation	1981
4.	Registered office address	Plot No. 101, Part III, GIDC Estate, Sector 28, Gandhinagar – 382028, Gujarat, India
5.	Corporate office address	7 th Floor, Kalpataru Synergy, Opp. Grand Hyatt, Vakola, Santacruz (E), Mumbai – 400055. India
6.	E-mail	cs@kalpataruprojects.com investorrelations@kalpataruprojects.com
7.	Telephone	+91-79232 14000 +91 22 3064 2100/+91 22 6885 1500
8.	Website	https://kalpataruprojects.com/
9.	Financial year for which reporting is being done	01 st April 2024 to 31 st March 2025
10.	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited BSE Limited
11.	Paid-up Capital	Rs. 34.16 Crore
12.	Name and contact details (telephone, email address) of the person for BRSR Reporting	Lalitkumar Tiwari (Chief Sustainability Officer) +91-2230641550 lalitkumar.tiwari@kalpataru.com
13.	Reporting boundary	Standalone
14.	Whether the company has undertaken assessment or assurance of the BRSR Core?	Yes, assurance
15.	Name of assurance provider	TÜV SÜD South Asia Pvt. Ltd.
16.	Type of assurance obtained	Limited Assurance

II. Product/Services

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

Sr. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Transmission and Distribution	KPIL offers comprehensive services that include in-house design, testing, procurement, fabrication, construction, installation, and commissioning of power transmission lines and substations.	37.16
2.	Building and Factories	KPIL offers comprehensive services for executing civil works, designing and building composite projects, structural construction, finishing tasks, utility installations, and area development. Additionally, it collaborates with top industry partners to complete factory projects across various sectors, including automotive, FMCG, textile, power, government infrastructure, industrial, and building projects. These building projects encompass residential, commercial, and institutional structures, such as hospitals and educational facilities.	30.99
3.	Water	KPIL specializes in the design and construction of water intake systems, pipeline installation, water treatment, storage, supply, and distribution, as well as the operation and maintenance of these projects.	12.09

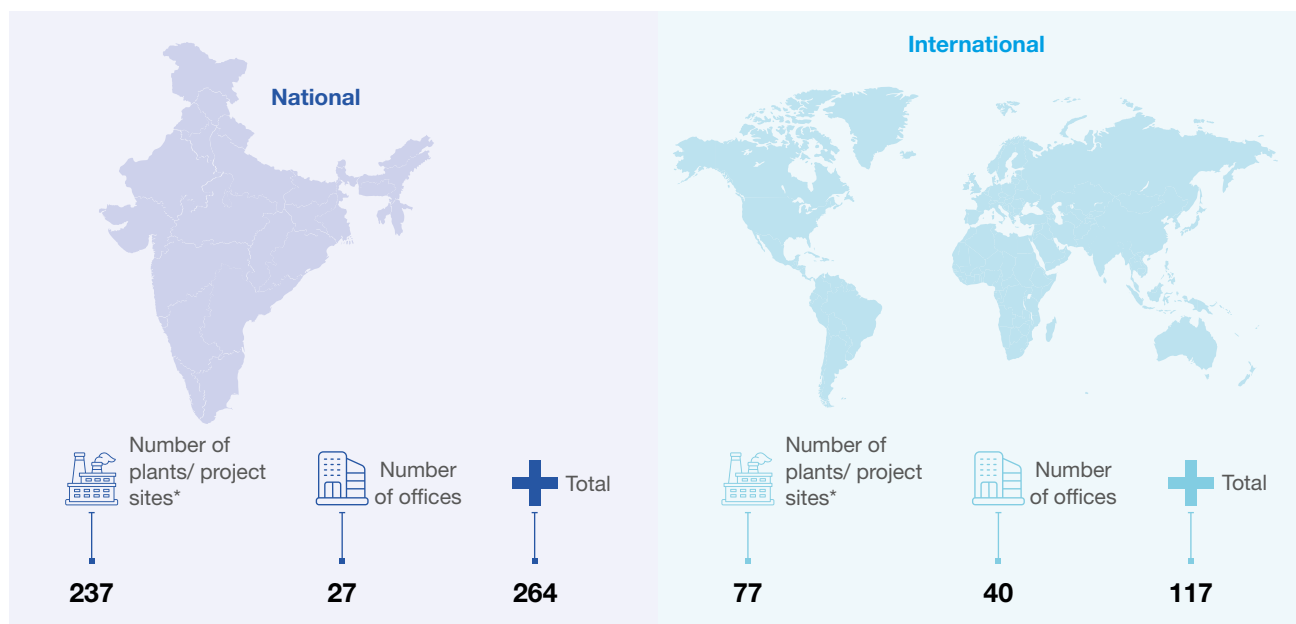
Sr. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
4.	Railways	KPIL provides a wide range of services through its railway division, including overhead electrification, traction substations, station construction, track laying, earthmoving, workshop development, signaling and telecommunication systems, power systems, and the civil works necessary for railway networks and integrated railway projects. Additionally, the Company is expanding its skills and service offerings in new areas such as dedicated rail corridors and rapid rail systems, among others.	5.39
5.	Oil and Gas	KPIL engages in EPC contracting for cross-country pipelines, terminals, and gas gathering stations serving the oil and gas industry across various regions.	9.31
6.	Urban Infrastructure	KPIL provides Engineering, Procurement, and Construction (EPC) services for the design and building of highways, bridges and flyovers, airports, metro rail corridor stations, and transit terminals and hubs.	4.12

18. Products/Services sold by the entity (accounting for 90% of the turnover):

Sr. No	Product/Services	NIC Code	% of total Turnover contributed
1.	EPC for Transmission and Distribution, Water and Oil & Gas businesses.	4,220 (Construction of utility projects)	50.06
2.	EPC for Building and Factories businesses.	4,100 (Construction of buildings)	30.99
3.	EPC for Urban Infrastructure and Railways businesses.	4,210 (Construction of roads and railways)	9.51
4.	Manufacturing of Transmission lines, Towers and Tower parts.	2,511 (Manufacture of structural metal products)	8.95

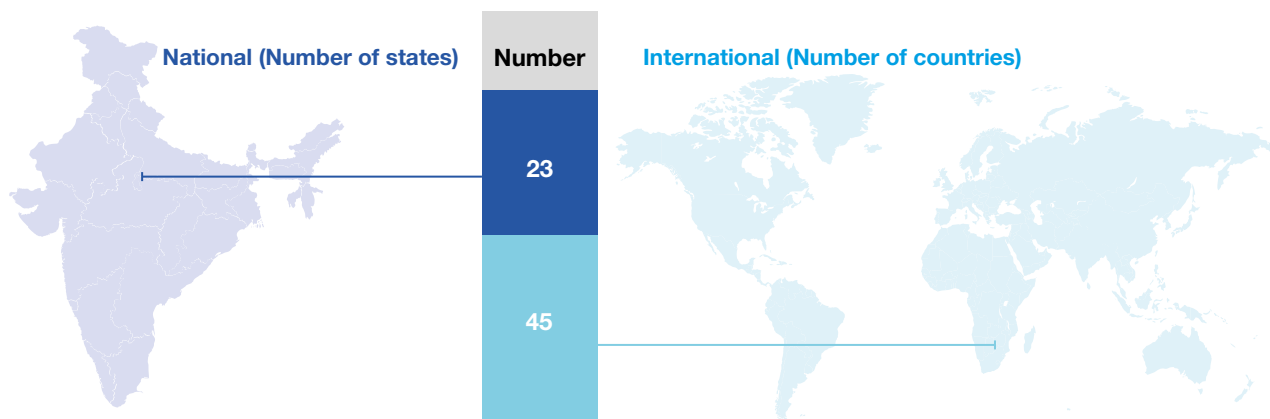
III. Operations

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



20. Markets served by the entity.

a. Number of locations served



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

30.47%

c. Briefly explain the types of customers

KPIL operates across six varied sectors, catering to a broad range of clients:

- **Transmission and Distribution (T&D):** KPIL is one of the preferred EPC contractor in the power transmission and distribution industry both domestically and internationally, serving primarily government owned/controlled and private power utility companies.
- **Buildings and Factories (B&F):** The clientele includes top-tier real estate developers for residential and commercial projects, as well as government and private institutions and industrial clients.
- **Water:** The Company works with state and central government sector enterprises along with local municipal authorities/bodies.
- **Urban Infrastructure:** This sector encompasses projects for both government and private entities.
- **Railways:** Most projects in this area are commissioned by government or government-owned companies.
- **Oil & Gas:** This business provides EPC services for cross-country pipelines, terminals, and gas gathering stations, working with government and private enterprises.

IV. Employees

21. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sr. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
	Employees					
1.	Permanent (D)	9,870	9,520	96.45	350	3.55
2.	Other than permanent (E)	3,001	2,947	98.20	54	1.80
3.	Total employees (D+E)	12,871	12,467	96.86	404	3.14
	Workers					
4.	Permanent (F)	11	11	100	-	-
5.	Other than permanent (G)	7,509	7,350	97.88	159	2.12
6.	Total workers (F+G)	7,520	7,361	97.89	159	2.11

Note: The data for 'other than permanent workers' covers contract workers directly engaged by KPIL and excludes sub-contracted workers.

b. Differently abled Employees and workers:

Sr. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
	Differently abled Employees					
1.	Permanent (D)	9	9	100	-	-
2.	Other than permanent (E)	-	-	-	-	-
3.	Total Differently abled employees (D+E)	9	9	100	-	-
	Differently abled Workers					
4.	Permanent (F)	-	-	-	-	-
5.	Other than permanent (G)	-	-	-	-	-
6.	Total Differently abled workers (F+G)	-	-	-	-	-

22. Participation/Inclusion/Representation of women*

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	8	1	12.5
Key Management Personnel#	4	1	25

Note:

*As on date March 31, 2025

#Includes Managing Director & CEO and Deputy Managing Director

23. Turnover rate for permanent employees and workers

Category	FY 2025			FY 2024			FY 2023		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	20.78	16.77	20.65	22.15	24.53	22.22	26.38	31.97	26.57
Permanent workers	16.67	0	16.67	55.60	0	55.60	14.00	0	14.00

V. Holding, Subsidiary and Associate Companies (including Joint ventures)**24. Names of holding/subsidiary/associate companies/joint ventures**

Sr. No	Name of the holding/subsidiary/associate companies/joint ventures	Is it a holding/Subsidiary/Associate/Joint Venture	% of shares held by listed entity	Does the entity participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Shree Shubham Logistics Limited	Subsidiary	100	No
2.	Energylink (India) Limited*	Subsidiary	100	Yes
3.	Punarvasu Financial Services Pvt. Ltd.	Step-down Subsidiary	100	No
4.	Amber Real Estate Limited*	Subsidiary	100	Yes
5.	Saicharan Properties Limited*	Step-down Subsidiary	100	Yes
6.	Kalpataru Power DMCC*	Subsidiary	100	Yes
7.	Kalpataru Power Transmission USA Inc*	Subsidiary	100	Yes
8.	Kalpataru Power Transmission (Mauritius) Ltd.*	Subsidiary	100	Yes
9.	LLC Kalpataru Power Transmission Ukraine*	Subsidiary	100	Yes
10.	Kalpataru Metfab Pvt. Ltd.*	Subsidiary	100	Yes
11.	Kalpataru Power Transmission Sweden AB	Subsidiary	100	No
12.	JMC Mining and Quarries Limited	Subsidiary	100	No
13.	Brij Bhoomi Expressway Pvt. Ltd.	Subsidiary	100	No

Sr. No	Name of the holding/subsidiary/ associate companies/joint ventures	Is it a holding/ Subsidiary/Associate/ Joint Venture	% of shares held by listed entity	Does the entity participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
14.	Wainganga Expressway Pvt. Ltd.	Subsidiary	100	No
15.	Vindhyachal Expressway Pvt. Ltd.	Subsidiary	100	No
16.	Linjemontage I Grastorp Aktiebolag*	Step-down Subsidiary	100	Yes
17.	Linjemontage AS*	Step-down Subsidiary	100	Yes
18.	Kalpataru Power Chile SpA	Subsidiary	100	No
19.	Kalpataru Power Do Brasil Participacoes S.A.*	Subsidiary	100	Yes
20.	Kalpataru IBN Omairah Company Ltd.*	Subsidiary	65	Yes
21.	Kalpataru Power Senegal – SARL*	Subsidiary	100	Yes
22.	Fasttel Engenharia S.A.*	Step-down Subsidiary	100	Yes
23.	Kurukshetra Expressway Pvt. Ltd.	Joint-Venture	49.57	No

Note: The above list is as on March 31, 2025.

*The above subsidiaries partially participate in the business responsibility initiatives of the Company viz. Anti-Bribery Management System

VI. CSR Details

25. i. Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- ii. Turnover (Rs.) – ~18,888 Crore
- iii. Net worth (Rs.) – ~7,185 Crore

VII. Transparency and disclosure compliances

26. Complaints/grievances on any of the principles (principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGBRC) –

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)* (If yes, then provide web-link for grievance redress policy)	FY 2025			FY 2024		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Investors (other than Shareholders)	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Shareholders	Yes	5	NIL	NIL	2	NIL	NIL
Employees and workers	Yes	4	NIL	NIL	2	NIL	NIL
Customers	Yes	6	NIL	NIL	NIL	NIL	NIL
Value Chain Partners	Yes	3	NIL	NIL	1	NIL	NIL
Others	Yes	8	2	NIL	1	NIL	NIL

*While the Company does not have dedicated grievance redressal policy/ies for individual stakeholder group, robust procedures are in place to address stakeholder grievances across functions. Complaints related to operational matters are managed at the functional / departmental level, with timely corrective actions undertaken as necessary.

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

Sr. No	Material issue identified	Is it 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.	Climate Change and Energy	Opportunity and Risk	Opportunity: <ol style="list-style-type: none"> Adopting sustainable practices to lower the carbon footprint supports the Company's sustainability strategy and enhances brand reputation. Cutting down on energy usage and focusing on conservation helps reduce utility expenses and operational costs. Risk: <ol style="list-style-type: none"> The Company's operations contributing to high carbon emissions could lead to environmental pollution. Rising energy consumption results in increased operational expenses. Climate change presents major physical and transition risks for the Company. 	<ol style="list-style-type: none"> Conducted a Climate Risk Assessment to identify and evaluate climate-related risks and opportunities; updated risk management strategies, conducted high-level assessments and in-depth scenario analysis Undertook GHG inventORIZATION and developed a decarbonization strategy to reduce emission footprint and enhance long term value creation. Deployed electric vehicles at project sites to encourage eco-friendly transportation and lower the Company's carbon emissions. Transitioning to cleaner energy sources by minimizing reliance on fossil fuels. Utilize vehicle tracking systems to optimize fuel usage. Installed energy-efficient equipment and processes to enhance energy conservation. We are in the process of enhancing the systems and processes to obtain ISO 50001:2018 certification for Energy Management Systems, offering a structured approach to optimizing energy usage and conserving energy. Harnessing renewable energy through the installation of solar panels or sourcing renewable energy power. 	Positive: Lowers operational expenses and mitigates the physical and transitional risks associated with climate change. Negative: Leads to increased costs for implementing strategies to mitigate risks associated with climate change.
2.	Biodiversity and Land Use	Opportunity	Opportunity: Enhancing biodiversity through organised tree planting initiatives helps reduce air pollution and enhances the visual appeal of the surroundings.		Positive: Expanding green spaces beyond regulatory standards helps mitigate the risks associated with climate change.

Sr. No	Material issue identified	Is it risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Resource Efficiency and Circularity (Includes Water and Waste Management and Recycling)	Opportunity and Risk	<p>Waste:</p> <p>Opportunity:</p> <ol style="list-style-type: none"> The adoption of a sustainable waste management strategy that emphasizes the 3R hierarchy—Reduce, Reuse, and Recycle—facilitates the transition to a circular economy. It decreases reliance on natural resources. <p>Risk:</p> <p>The lack of effective systems and practices for managing waste and wastewater results in environmental contamination.</p> <p>Water:</p> <p>Opportunity:</p> <p>Implementing water conservation measures lowers water-related expenses and mitigates associated risks.</p> <p>Risk:</p> <p>The unavailability of water in the required quality and quantity presents multiple operational challenges.</p>	<p>Waste:</p> <ol style="list-style-type: none"> Encouraged the recycling and reuse of waste by creating value-added products. Undertook waste footprint assessment to evaluate and enhance sustainable waste management practices and promote circular economy principles within the operations. <p>Water:</p> <ol style="list-style-type: none"> Implement rainwater harvesting to conserve water across all operations. Achieved zero liquid discharge (ZLD) in the plant operations. Recycle treated wastewater to decrease freshwater usage in operations. Evaluate operational and basin-level water risks using water risk assessment tools and apply water conservation strategies to address identified risks. Undertook water risk assessment to identify and improve water management practices to mitigate risks and enhance sustainability across its operations. 	<p>Waste:</p> <p>Positive:</p> <p>Lowers expenses related to waste disposal and supports the circular economy.</p> <p>Negative:</p> <p>Inadequate waste disposal leads to environmental contamination and may result in legal penalties from regulatory authorities.</p> <p>Water:</p> <p>Positive:</p> <ol style="list-style-type: none"> Limits water costs. Prevent business interruptions by implementing strategies to mitigate the identified water risks. <p>Negative:</p> <p>Operational disruptions faced by the Company due to the untimely availability of water.</p>
4.	Pollution	Risk	<p>Risk:</p> <ol style="list-style-type: none"> Improper disposal of hazardous materials can result in environmental pollution. Airborne dust particles may cause regulatory compliance challenges or raise concerns among stakeholders. 	<ol style="list-style-type: none"> Establish effective systems that comply with pollution control board regulations. We are developing SOPs mitigating the negative effects due to pollutants and proper disposal. Keep and use Material Safety Data Sheets (MSDS) consistently. Organize frequent training sessions for employees and workers on optimal pollution prevention practices. Initiate and maintain a dust prevention and control program. 	<p>Risk:</p> <p>Failure to properly and responsibly dispose of pollutants can result in environmental contamination, potentially leading to fines and penalties.</p>
5.	Human Capital Development	Opportunity	<p>Developing employees' and workers' skills, knowledge, and expertise builds a robust workforce, enhances the Company's overall productivity.</p>		<p>Positive:</p> <p>Prevents interruptions in business operations, boosts the Company's productivity, and guarantees sustainable practices.</p>

Sr. No	Material issue identified	Is it 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)
6.	Human Rights and Labor Relations	Risk	Risk: <ol style="list-style-type: none"> Failing to adhere to human rights laws can result in severe repercussions from regulatory bodies, negatively impacting the Company's brand reputation. In our project execution processes, the involvement of contractors in various regions may pose risks related to human rights and labor relations. 	<ol style="list-style-type: none"> Identification and addressing of human rights related risks by conducting human rights related due diligence in our operations. Conduct training programs to employees, workers and contractors on human rights related laws and regulations. Continued adherence to International Labor Organization (ILO) guidelines- (as applicable) and conventions prohibiting any kind of discrimination based on factors like race, color, age, gender, sexual orientation, gender identity and expression, ethnicity, religion, disability, family status, social origin. 	Negative: Failing to comply with human rights and labor laws can harm the Company's reputation and diminish its brand value.
7.	Occupational Health and Safety	Opportunity and Risk	Opportunity: <ol style="list-style-type: none"> Preventing injuries and accidents in the workplace boosts the Company's productivity by ensuring uninterrupted facility operations and minimizing absenteeism. Reducing health and safety incidents lowers costs associated with occupational health, enhances working conditions, improves employee morale, and strengthens the Company's reputation. Risk: <ol style="list-style-type: none"> Workplace injuries, accidents and unsafe working conditions may hamper the operations of the Company and affects the brand value of the Company. Health & safety related incidents and non-compliance to applicable laws could result in litigation and negatively impacts the brand value of the Company. 	<ol style="list-style-type: none"> Developed and implemented thorough health and safety policies and Standard Operating Procedures (SOPs). We regularly perform Environment Health & Safety (EHS) risk assessments and apply strategies to mitigate the identified risks. Organize regular training sessions, emergency drills, and safety passport initiatives throughout all operations. Motivate employees to report unsafe and hazardous conditions at the workplace. Attained ISO 45001:2018 certification for Occupational Health and Safety Management Systems. Realized a cultural transformation towards safety based on behavior. 	Positive: Addressing health and safety risks fosters trust among employees and workers by providing a secure work environment. Negative: Non-compliance with health and safety regulations can result in strict measures from regulatory bodies, negatively impacting the Company's brand reputation.
8.	Community Engagement	Opportunity	CSR projects implementation supports marginalized and vulnerable groups, promoting positive relationships with local communities.	NA	Positive: Avoids conflict with the local communities through implementation of CSR projects for uplifting of marginalized/ vulnerable groups. This creates conducive environment for the operations of the Company.

Sr. No	Material issue identified	Is it 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)
9.	Customer Centricity	Opportunity and Risk	Opportunity: <ol style="list-style-type: none"> Focusing on customer needs enhances satisfaction, loyalty, and retention. Consistent engagement and addressing customer concerns help build trust and facilitate business growth. Risk: The lack of an effective system for obtaining regular customer feedback hinders the Company's business growth.	<ol style="list-style-type: none"> We regularly collect customer feedback. We are also working towards enhancing our existing mechanisms for collecting customer feedback to address their complaints and concerns. Clearly communicate the steps taken by the Company to fulfill customer expectations and build their trust and confidence. 	Positive: Fostering trust and confidence among customers drives business expansion, increases revenue, and enhances the Company's brand value. Negative: If customer complaints are not addressed in timely manner, it affects the reputation and brand value of the company through negative propaganda.
10.	Supply Chain Management	Opportunity and Risk	Opportunity: <ol style="list-style-type: none"> Incorporating ESG (Environmental, Social, and Governance) criteria into supplier evaluations helps prevent disruptions in the supply chain. Managing the supply chain sustainably ensures the sourcing of materials and transportation is maintained even in challenging situations and conditions. Risk: Inadequate methods and procedures for evaluating and selecting suppliers can result in interruptions to business operations.	<ol style="list-style-type: none"> Launched a comprehensive Supply Chain Sustainability Program as a key element of our ESG strategy Initiated a sustainable supply chain management framework for critical suppliers, which will be scaled in phased manner. Broaden the range of suppliers and logistics options to ensure sustainable procurement and transportation of materials. Perform regular evaluations and screen suppliers based on ESG criteria. Support suppliers who offer sustainable materials. 	Positive: Implementing sustainable supply chain management practices helps prevent business disruptions. Negative: The lack of suitable systems and practices for sustainable supply chain management can hinder the company's operations.
11.	Sustainable Product and Service Quality	Opportunity and Risk	Opportunity: Improving product quality and features builds customer trust and fosters business growth. Negative: Failure to comply with industry standards and legal requirements in product development can result in customer complaints.	<ol style="list-style-type: none"> Regularly enhance product quality and features to align with industry standards and fulfill customer expectations. Integrate sustainability into product and service development. Develop a service portfolio that prioritizes renewable energy over fossil fuels. Employ water conservation and harvesting techniques in construction projects. Strengthening Construction and Demolition Waste Management practices to support a circular economy. 	Positive: Enhancing the quality of products to contribute to business growth, increase revenue, and bolster the company's brand reputation. Negative: Failing to adhere to industry standards during product development can negatively impact the company's brand value and reputation.

Sr. No	Material issue identified	Is it 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)
12.	Corporate Governance	Opportunity	A strong corporate governance framework that safeguards stakeholders' interests' guarantees accountability, transparency, ethical conduct, and fairness for all parties involved.	NA	Positive: Adopting governance policies and best practices enhances transparency and fosters stakeholder confidence.
13.	Business Ethics	Risk and Opportunity	<p>Risk: Breaching the company's code of conduct undermines business relationships and diminishes customer trust and confidence.</p> <p>Opportunity: Running the business ethically and transparently cultivates confidence and trust among customers, investors, and other stakeholders.</p>	<p>a. Hold frequent training sessions on the code of conduct for all employees and staff members.</p> <p>b. Enforce strict measures in cases of code of conduct violations.</p> <p>c. Continue to maintain anti-bribery practices and implement the ISO 37001:2016 standard certification.</p>	<p>Negative: Failure to adhere to the code of conduct damages the company's trust and reputation.</p> <p>Positive: Maintaining transparency and accountability throughout all business operations fosters trust and confidence among all stakeholders.</p>
14.	Data Privacy and Security	Risk	<p>a. Cyberattacks and the exposure of sensitive information undermine customer trust and damage the company's reputation.</p> <p>b. Inadequate measures for preventing, detecting, and addressing data security threats can lead to significant losses for the company and result in business interruptions.</p>	<p>a. Implemented suitable controls to ensure the security and privacy of data.</p> <p>b. Conduct proactive monitoring and analysis of emerging vulnerabilities and threats.</p> <p>c. Establish protective measures, systems, and practices to safeguard privacy and data security.</p>	Negative: Loss of confidential information disrupts the operations and erodes the customer trust.
15.	R&D, Innovation and Digitalization	Opportunity	Innovating and digitalizing product development fosters resource conservation and improves product quality and features, which supports business growth and diversification of the product portfolio.	NA	Positive: Broadening the range of products aids in the growth and extension of the business.
16.	Business Continuity and Risk Management	Opportunity	Implementation of enterprise level risk management framework addresses the business risks and ensures business continuity even in adverse situations.	NA	Positive: Implementing an enterprise-level risk management framework effectively addresses business risks and ensures continuity of operations, even in challenging circumstances.

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 National Guidelines on Responsible Business Conduct (NGRBC) principles and core elements. These are briefly as under:

P1	Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
P2	Businesses should provide goods and services in a manner that is sustainable and safe
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
P4	Businesses should respect the interests of and be responsive to all its stakeholders
P5	Businesses should respect and promote human rights
P6	Businesses should respect and make efforts to protect and restore the environment
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
P8	Businesses should promote inclusive growth and equitable development
P9	Businesses should engage with and provide value to their consumers in a responsible manner

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. (a) Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
(b) Has the policy been approved by the Board? (Yes/No)	Yes	No*	Yes	Yes	Yes	No*	Yes	Yes	No*
(c) Web Link of the Policies, if available.	<ul style="list-style-type: none"> Human Rights Policy Equal Opportunity Policy Grievance Redressal Policy Kalpataru Code of Conduct Policy on Remuneration for the Directors, KMP and other Employees Dividend Distribution Policy Code of Conduct for Directors and Senior Management Environment, Health, Occupational Safety and Sustainability Policy Cyber Security Policy Whistle-blower Policy Related Party Transactions Policy Terms and Conditions for Appointment of Independent Directors of the Company Policy enabling Debenture Holders to claim Unclaimed Interest and/or redemption amount Policy on Determining Material Subsidiaries Corporate Social Responsibility (CSR) Policy Director's Familiarization Program Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information Policy for Preservation of Document and Archival Policy Policy On Determination of Materiality Of Events/Information & Disclosure Of Material Events/Information Code Of Internal Procedures And Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders Anti-Bribery Anti-Corruption Policy Third-party Due Diligence Policy Policy On Directors' Appointment Including Criteria For Determining Qualifications, Positive Attributes, Independence Of A Director Policies & Guidelines Kalpataru Projects International Limited 								

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
2.	Whether the entity has translated the policy into procedures? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4.	Name of the national and international codes/certifications /labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	All policies adhere to the principles outlined in the NGRBC guidelines and the Companies Act, 2013, while also meeting the international standards of ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 37001:2016, ISO 3834-2:2021, EN 1090-1, and ISO/IEC 17025:2017, as relevant to each policy.								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>We have been dedicated to enhancing our sustainability efforts for several years now. Our approach to Environmental, Social, and Governance (ESG) practices is rooted in our Vision and Values, emphasizing our commitment to responsible and sustainable business operations. We have adopted the below as a part of our ESG strategy:</p> <p>A comprehensive governance structure:</p> <ul style="list-style-type: none"> Apex Committee: Composed of senior leadership, this committee oversees overall governance and provides strategic guidance on ESG matters. Core/Steering Committee: This cross-functional team focuses on identifying initiatives and projects related to ESG. <p>Sustainability Objectives:</p> <ul style="list-style-type: none"> Achieve Carbon Neutrality by 2040: We aim to become carbon neutral for Scope 1 and 2 emissions across all business divisions and locations by 2040. Achieve Water Neutrality by 2032: Our goal is to reach water neutrality for all business divisions and locations by 2032. Implement Circular Economy by 2035: We plan to adopt circular economy principles for construction and demolition waste by 2035. 								
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<p>As part of our long-term environmental commitments, Kalpataru Projects International Limited has adopted clear sustainability goals: achieving Carbon Neutrality by 2040, Water Neutrality by 2032, and implementing a Circular Economy for C&D Waste by 2035. The performance for the year reflects both measurable progress and areas requiring continued focus, in line with the operational complexities of the EPC sector.</p> <p>Carbon Neutrality by 2040</p> <p>During FY 2025, the share of renewable electricity in our total energy consumption increased to 51,655 GJ, up from 47,095 GJ in the previous year, marking a step forward in our clean energy transition. However, overall GHG emissions increased, largely due to project expansions with limited access to grid-based green power or renewable energy sources.</p> <p>Water Neutrality by 2032</p> <p>We initiated water consumption benchmarking across major sites to improve monitoring and identify efficiency opportunities. While total withdrawal increased in line with the growth in project activities, the groundwork laid this year will support more targeted conservation efforts in the future.</p> <p>Circular Economy (C&D Waste) by 2035</p> <p>KPIL is advancing circular waste practices through site-level planning, recycler engagement, and capacity building. These ongoing efforts reflect our commitment to responsible waste management, with the Environment (Construction and Demolition) Waste Management Rules, 2025 expected to further enable a supportive ecosystem for sector-wide implementation. The organization is actively preparing for compliance with the said Rules, effective April 1, 2026. Key initiatives include planning for waste segregation systems, stakeholder engagement for authorized recycler tie-ups, and capability building.</p>								

9.

10. Details of Review of NGRBCs by the Company

Subject for Review	a. Indicate whether review was undertaken by Director/Committee of the Board/ Any other Committee									b. Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	KPIL's policies are formulated by the Board or the Managing Director & CEO and are subject to periodic evaluations as mandated by the Board or relevant committees. These evaluations examine the effectiveness of the policies, resulting in necessary adjustments to ensure they continue to be effective and in harmony with the Company's goals.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	KPIL diligently ensures compliance with all applicable statutory requirements. Adherence to governing rules and regulations is systematically tracked, and any deviations are promptly corrected, underscoring our commitment to operating within established legal, regulatory, and ethical frameworks.																	

Description of Main Activity	P1	P2	P3	P4	P5	P6	P7	P8	P9
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.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

The assessments are conducted by independent specialist agencies with domain expertise aligned to the respective policies. We have engaged firms such as TÜV SÜD South Asia Private Limited, Alcumus ISOQAR Limited, BSI and other accredited bodies to ensure credible and robust evaluations.

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
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)									

Not Applicable

SECTION

C

Principle-wise performance disclosure

Principle

1



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

ESSENTIAL INDICATORS >>

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

Sr. No	Segment	Total number of training and awareness programs held*	Topics/principles covered under the training	% age of persons in respective category covered by the awareness programs
1.	Board of Directors	9	Familiarization Programmes are conducted for Directors from time to time which cover topics like Governance and Regulatory Requirements, Risk Management, ESG Priorities, Regulatory updates, Industry Outlook, Code of Conduct, etc.	100%
2.	Key Managerial Personnel	4	Anti-Bribery and Anti-Corruption, Kalpataru Code of Conduct (KCoC), Occupational Health & Safety Management etc.	100%
3.	Employees other than BOD and KMPs	9,029	Ethical Conduct, Anti-Bribery & Anti-Corruption Practices, Functional trainings including operations, Management Systems, Leadership Development, Project Management, Finance for Non-Finance, Behavioral & Soft Skills, Environmental Management System, Occupational Health & Safety Management, Quality Management, Sustainability, Business and Strategy, Joining and Safety Inductions etc.	84%
4.	Workers	42,565	Procedures and Practices, Checks, Emergency Response, Good Construction Practices and Construction / Operational Workmanship, Human Rights, Social Conditions, various programmes like Inductions, Tool Box talks, Motivating for Safe Work etc.	100%

*Note: The parameter 'Total number of training and awareness programs held' has been disclosed in number of sessions conducted.

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

Monetary					
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine	NIL	NIL	NIL	NIL	NIL
Settlement	NIL	NIL	NIL	NIL	NIL
Compounding Fee	NIL	NIL	NIL	NIL	NIL

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

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

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

4. Does the entity have an Anti-Corruption Policy or Anti-Bribery Policy? If yes, provide details in brief and if available, provide a web-link to the policy.

The Company has an established Anti-Bribery and Anti-Corruption Policy that serves as a structured framework to prevent, detect, and address corrupt practices across its operations. Aligned with ISO:37001 standards, this policy applies not only to our employees but also extends to our subsidiaries, joint ventures, suppliers, contractors, NGOs, and all other entities with whom we engage in transactions, both domestically and internationally.

Our policy emphasizes critical areas of vulnerability within our operations, such as gifts, hospitality, and political or charitable donations, where corruption, particularly bribery, poses a risk. To reinforce our commitment to integrity, we have implemented the Anti-Bribery Anti-Corruption Policy (ABAC) and Third-Party Due Diligence (TPDD) policies. These frameworks serve as essential tools for identifying and managing the risks associated with bribery and corruption, particularly in our interactions with government and public officials.

[Anti-Corruption and Anti-Bribery Policy](#)

We remain steadfast in our dedication to upholding the highest standards of ethical conduct throughout our operations.

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

Segment	FY 2025	FY 2024
Directors	NIL	NIL
Key Managerial Personnel	NIL	NIL
Employee	NIL	NIL
Workers	NIL	NIL

6. Details of complaints with regard to conflict of interest

Segment	FY 2025		FY 2024	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NIL	NIL	NIL
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	NIL	NIL	NIL

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

There were no cases related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest.

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

	FY 2025	FY 2024
Number of days of accounts payables	132	130

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 and investments, with related parties, in the following format:

Parameter	Metrics	FY 2025	FY 2024
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	8.40%	7.50%
	b. Number of trading houses where purchases are made from	926	720
	c. Purchases from top 10 trading houses as % of total purchases from trading houses.	50%	52%
Concentration of Sales	a. Sales to dealers/ distributors as % of total sales	Given the nature of business, this parameter is not applicable to KPIL.	
	b. Number of dealers/distributors to whom sales are made		
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors		
Share of RPTs in	a. Purchases (Purchases with related parties/Total Purchases)	0.7%	0.7%
	b. Sales (Sales to related parties/Total Sales)	0.9%	1.2%
	c. Loans and advances (Loans and advances given to related parties/Total loans and advances)	99.4%	99.5%
	d. Investments (Investments in related parties/Total Investments made)	87.9%	100%

LEADERSHIP INDICATORS

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

Total number of awareness programs held	Topics/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programs
6	ESG, BRSR Principles, Sustainability, Human Rights, Gender Diversity, Corporate Governance, Health & Safety, Community & Employee Wellbeing, Biodiversity, Supply Chain Sustainability	33.51%
1	In-depth training session was carried out on Anti-Bribery Management System	25 Critical suppliers were covered in this training session

To strengthen ESG integration across our supply chain, KPIL conducted ESG awareness sessions with 28 out of 111 identified key vendors and engaged over 300 MSMEs through six tailored sensitization workshops in FY 2025. These covered emissions, resource use, social safeguards, and governance. Vendors received toolkits including GHG calculator and ESG checklists.

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

Yes, to address conflicts of interests involving members of the Board, the Company follows a practice of obtaining annual disclosures from each Director at the commencement of the financial year. Additionally, Directors are required to promptly disclose any changes in their interests throughout the year. As a part of this process, any Director with a conflict of interest in restricted from participating in discussions or voting on matters where their conflict of interests or personal interests are involved, and they are present.

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.

Segment	FY 2025	FY 2024	Details of improvements in environmental and social impacts
R&D	3.42%	2.61%	Improvements have led to energy conservation, enhanced efficiency in energy and water use, optimized resource utilization, and strengthened employee wellbeing—collectively enhancing the environmental and social performance of our projects.
CAPEX	4.38%	0.99%	

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

Yes. KPIL has instituted structured procedures for sustainable sourcing through a comprehensive Supplier Code of Conduct, which has been updated to include key sustainability parameters such as anti-bribery, health, safety and environment (HSE), emissions reduction, human rights, and ethical practices. All new suppliers are required to sign a declaration affirming their commitment to these standards, ensuring alignment with KPIL's responsible sourcing principles.

To promote ESG integration across the value chain, KPIL conducted six targeted ESG sensitization sessions during FY 2025, engaging a combined total of 28 key vendors and over 300 MSME suppliers. These sessions focused on critical aspects including emissions management, resource efficiency, social safeguards, and governance standards. Participants were also provided with ESG toolkits, including GHG calculators and ESG checklists, to facilitate practical application of the concepts shared.

In addition, KPIL has initiated a formal process to assess suppliers on ESG parameters, with the aim of benchmarking their sustainability maturity and identifying areas for improvement. These efforts are embedded into KPIL's broader supply chain processes, which encompass vendor development, value engineering, order execution, and regular performance evaluations, thereby driving sustainable and ethical procurement practices across all tiers.

[Kalpataru Supplier Code of Conduct \(KSCC\)](#)

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

KPIL is currently developing a structured framework to evaluate the sustainability performance of its suppliers and quantify sustainably sourced inputs. This includes defining ESG-linked criteria to assess supplier practices. The Company intends to report on this metric in the coming years as the evaluation process matures.

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.

Product	Process to safely reclaim the product*
Plastics (Including packaging)	NA
E- Waste	NA
Hazardous Waste	NA
Other Waste	NA

*(NA - Not Applicable): As KPIL is an EPC Company engaged in sectors such as Power Transmission and Distribution, Buildings & Factories, Water, Railways, Oil & Gas, and Urban Infrastructure, it does not deal with consumer goods that require reclamation at the end of their lifecycle. Nonetheless, KPIL implements suitable procedures to recycle, reuse, and dispose of waste generated during project execution, adhering to regulatory standards.

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.

Yes, Extended Producer Responsibility (EPR) will become applicable to our activities under the Environment (Construction and Demolition) Waste Management Rules, 2025, notified by the Ministry of Environment, Forest and Climate Change (MoEFCC), which will come into effect on April 1, 2026. In anticipation of these regulations, we are actively planning and preparing to align our waste management practices with the EPR framework.

Our planning stages include:

1. EPR Plan Development: We are in the process of designing a comprehensive EPR compliance plan that will outline systematic waste collection, segregation, and recycling strategies, ensuring alignment with the C&D Waste Management Rules.
2. Stakeholder Engagement Planning: We are exploring potential partnerships with authorized recyclers and waste management agencies to establish a robust collection and recycling network that complies with EPR obligations.
3. Training and Awareness Planning: Our sustainability team is developing training modules to ensure that our site teams are well-prepared to implement EPR protocols, focusing on best practices for waste segregation, handling, and documentation.
4. Monitoring and Compliance Mechanism Planning: We are formulating a structured monitoring plan that will include periodic audits, compliance checks, and continuous improvement strategies for EPR adherence.

By proactively planning and preparing for EPR compliance, we aim to ensure a smooth transition once the regulations are enforced, contributing to sustainable construction practices and environmental conservation.

LEADERSHIP INDICATORS

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

NIC Code	Name of Product/Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective /Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
LCA has not been conducted in FY2025					

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	Description of the risk/concern Action Taken

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2025	FY 2024
NA	NA	NA

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

	FY 2025			FY 2024		
	Re-used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	NA	NA	NA	NA	NA	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	NA

Principle

3



Businesses should respect and promote the well-being of all employees, including those in their value chains.

ESSENTIAL INDICATORS >>

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

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	%(B/A)	No. (C)	%(C/A)	No. (D)	%(D/A)	No. (E)	%(E/A)	No. (F)	%(F/A)
				Permanent Employees							
Male	9,520	9,520	100	9,520	100	-	-	9,520	100	9,520	100
Female	350	350	100	350	100	350	100	-	-	350	100
Total	9,870	9,870	100	9,870	100	350	100	9,520	100	9870	100
				Other than Permanent Employees							
Male	2,947	2,947	100	2,947	100	-	-	-	-	-	-
Female	54	54	100	54	100	54	100	-	-	-	-
Total	3,001	3,001	100	3,001	100	54	100	-	-	-	-

Note: The data for 'other than permanent workers' covers contract workers directly engaged by KPIL and excludes sub-contracted workers.

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

Category	% of Workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
				Permanent Workers							
Male	11	11	100	11	100	-	-	11	100	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	11	11	100	11	100	-	-	11	100	-	-
				Other than Permanent Workers							
Male	7,350	7,350	100	7,350	100	-	-	-	-	-	-
Female	159	159	100	159	100	159	100	-	-	-	-
Total	7,509	7,509	100	7,509	100	159	100	-	-	-	-

Note: The data for 'other than permanent workers' covers contract workers directly engaged by KPIL and excludes sub-contracted workers.

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

	FY 2025	FY 2024
Cost incurred on well-being measures as a % of total revenue of the Company	0.16%	0.18%

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

Benefits	FY 2025			FY 2024		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	NA	100	100	NA
ESI*	100	100	Yes	100	100	Yes
Others	-	-	-	-	-	-

*Data covers permanent employees and workers

*ESI: The ESI available areas are covered with ESIC facility. However, in case of non-availability of ESIC, workmen compensation policy is subscribed.

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

Yes. KPIL has implemented measures to make its facilities accessible to employees with disabilities. Wheelchairs and ramps are available to assist individuals with mobility impairments in navigating the premises independently. These efforts highlight the Company's dedication to inclusivity and ensuring equal opportunities for all employees, regardless of their physical abilities.

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. KPIL is committed to its Equal Opportunity Policy, which serves as a fundamental part of its dedication to promoting an inclusive and equitable environment. This Policy guarantees equal opportunities for everyone, including individuals with disabilities, ensuring there is no discrimination. By focusing on accessibility and removing barriers to participation, the Company aims to foster a workplace where every employee can excel and contribute their unique skills and viewpoints to our shared success. For more information on our policies, interested parties can visit the following link:

[Equal Opportunity Policy](#)

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

Gender	Permanent Employees		Permanent Workers	
	Return to work Rate (%)	Retention Rate (%)	Return to work Rate (%)	Retention Rate (%)
Male	100	100	100	100
Female	100	100	100	100
Total	100	100	100	100

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.

Permanent Workers	<p>KPIL has established several key policies to address employee concerns, including the Grievance Redressal Policy, Whistleblower Policy, and Anti-Sexual Harassment Policy, among others. Employees and workers can report issues under the relevant policy depending on the nature of the grievance. Additionally, the Company offers an internal HR Helpdesk portal for employees to submit complaints, which are managed by a dedicated team. Employees can monitor the status and resolution of their complaints via this portal. Whistleblower complaints can be reported by calling the helpline at +91-7923214100 emailing abms@kalpataruprojects.com, or sending a letter to the Company at Kalpataru Projects International Limited, 101, Part III, G.I.D.C Estate, Sector 28, Gandhinagar -382028, Gujarat, India. For complaints related to sexual harassment, employees can contact any member of the Internal Complaints Committee.</p> <p>More information on the Grievance Redressal Policy can be found here: Grievance Redressal Policy</p>
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2025			FY 2024		
	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						
Male	9,520	0	0	8,158	0	0
Female	350	0	0	270	0	0
Total Permanent Workers						
Male	11	0	0	13	0	0
Female	0	0	0	0	0	0

Note: None of our permanent employees or workers are a part of recognized association(s) or Unions.

8. Details of training given to employees and workers*

Category	FY 2025					FY 2024				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
	Employees									
Male	9,520	3,075	32.30	5,235	54.99	8,158	5,076	62.00	5,318	65.00
Female	350	77	22.00	259	74.00	270	104	38.50	180	67.00
Total	9,870	3,152	31.94	5,494	55.66	8,428	5,180	61.00	5,498	65.00
	Workers									
Male	11	11	100	11	100	13	13	100	13	100
Female	-	-	-	-	-	-	-	-	-	-
Total	11	11	100	11	100	13	13	100	13	100

*Data covers permanent employees and workers

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

Category	FY 2025			FY 2024		
	Total (A)	No (B)	% (B/A)	Total (C)	No (D)	% (D/C)
Employees						
Male	9,520	9,520	100	8,158	8,158	100
Female	350	350	100	270	270	100
Total	9,870	9,870	100	8,428	8,428	100
Workers						
Male	11	11	100	13	13	100
Female	0	0	0	0	0	0
Total	11	11	100	13	13	100

Note: All eligible employees have received performance and career development reviews.

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. KPIL has effectively established an Occupational Health and Safety Management System and is ISO 45001:2018 certified. This robust system is thoroughly incorporated throughout the organization, demonstrating our dedication to safeguarding the health, safety, and welfare of our employees. By following stringent standards and procedures, we aim to cultivate a work environment that prioritizes occupational health and safety, minimizes risks, and promotes a culture of attentiveness, responsibility, and ongoing enhancement.

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

Yes. Each business unit regularly undertakes systematic efforts to identify hazards associated with occupational activities. These hazards are then evaluated based on their frequency and severity. Hazards classified as high severity are deemed critical, necessitating prompt actions to reduce or eliminate them. Additionally, proactive steps are taken to mitigate the impact of risks considered critical, even if their likelihood is lower. This methodology is applied to all standard and non-standard operational and occupational activities.

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

Yes, at KPIL, we have a structured process in place. Workers receive comprehensive training at every stage, from identifying hazardous activities to understanding the associated risks and outcomes. We also ensure that workers have access to effective communication channels through various means, such as daily meetings and weekly safety committee sessions led by department heads and project leadership teams. Additionally, monthly safety committee meetings are held to evaluate performance and address any emerging issues that may affect Environment, Health, and Safety (EHS) performance. All our employees and workers are encouraged to report work-related hazards to the Project/Plant Manager or EHS Officer.

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

Yes, we offer medical and healthcare services to our employees that are not related to occupational activities.

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

Safety Incident/Number	Category	FY 2025	FY 2024
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.022	0
	Workers	0.067	0.084
Total recordable work-related injuries	Employees	1	0
	Workers	76	81
No. of fatalities	Employees	0	0
	Workers	4	2
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.

KPIL conducts thorough assessments of all workplace conditions to ensure a safe and supportive environment. If any area is found to be unsafe, it is immediately closed off until necessary repairs are made. Regular internal audits and safety inspections are carried out to maintain a high level of vigilance. The Company stays informed about occupational and contagious diseases, implementing preventive measures to maintain a healthy work environment. New workers receive safety inductions upon joining, and monthly motivational programs are held to recognize and reward employees and workers who demonstrate strong safety awareness. Senior management is highly committed to health and safety, frequently reviewing and providing guidance on these matters.

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

Category	FY 2025			FY 2024		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Health and Safety Practices	1	0	-	2	0	-
Working Conditions	0	0	-	2	0	-

14. Assessments for the year

	% of your plants and offices that assessed (by entity or statutory authorities or third parties)*
Health and Safety Practices	100
Working Conditions	100

*All our facilities and manufacturing plants undergo three layer internal assessments- location based assessment, regional office assessment and corporate assessment. Each facility is assessed at least once in a quarter internally. External assessment are carried out by Clients, Third Party Certification agencies, Government and regulatory authorities at regular intervals.

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.

A structured incident investigation process is firmly established within the organization to ensure thorough analysis of all incidents, dissemination of key learnings, and timely implementation of corrective actions across project sites. The Hazard Identification and Risk Assessment (HIRA) process is reviewed periodically and shared with relevant stakeholders. All planned corrective actions for FY 2025 have been executed. Disciplinary measures, in line with corporate policy, have been initiated for violations of EHS procedures.

To reinforce safety awareness, comprehensive counselling and refresher training sessions are conducted for the workforce at designated sites. Additionally, innovative initiatives such as a Virtual Reality training module and a Learning Management System (LMS) have been introduced to enhance engagement and training effectiveness across the organization.

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)?

(A) Employees: Yes

(B) Workers: Yes

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

KPIL regularly conducts statutory compliance reviews and due diligence assessments of its value chain partners to ensure strict compliance with regulations regarding the deduction of dues. It prioritizes the thorough inclusion of all pertinent clauses related to statutory dues within agreements with these partners.

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

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025	FY 2024	FY 2025	FY 2024
Employees	0	0	0	0
Workers	4	2	4	2

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

Yes. KPIL offers comprehensive transition programs to support employees as they approach retirement, ensuring a smooth and well-prepared transition. These programs are designed to provide guidance, skill enhancement, and financial awareness, empowering employees to effectively navigate their post-retirement journey.

Furthermore, KPIL has adopted a policy to extend medical insurance coverage to retired employees and their spouses, ensuring continued healthcare support even after retirement.

5. Details on assessment of value chain partners:

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

In FY 2025, we initiated our Supply Chain Sustainability Initiative by identifying 111 significant suppliers. Sustainability engagement and assessment process has been launched for 28 of these suppliers, focusing on key environmental, social, and governance (ESG) parameters. We plan to expand the scope of these assessments in the coming years to enhance ESG integration across our supply chain.

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

While formal assessments of health and safety practices within our value chain are yet to be conducted, KPIL remains proactive in managing safety risks across its operations. All LTIFR incidents, involving all employees and workers are thoroughly investigated, with key learnings shared across project sites and corrective actions promptly initiated. The HIRA is updated accordingly and circulated to relevant stakeholders. Planned safety measures for FY 2024 and FY 2025 have been effectively implemented and closed.

To strengthen on-ground safety culture, focused counselling and refresher training sessions are conducted for contractor workers at identified sites, aiming to enhance their awareness and adherence to safety protocols. Dedicated efforts are also made to ensure contractor workers are briefed on site-specific risks and are equipped with appropriate protective gear and safety instructions before commencing work.

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.

KPIL has established a comprehensive stakeholder identification process tailored to the specifics of its business operations and activities. This involves mapping both internal and external stakeholders by evaluating their influence, impact, and significance to the company's operations, growth, and revenue generation. To identify relevant stakeholders, KPIL has developed a matrix that prioritizes key stakeholders. The company maintains regular coordination, monitoring, and engagement with all stakeholders to foster strong relationships. The stakeholder identification process includes detailed steps such as identifying stakeholders, conducting reviews, selecting communication channels, and determining the frequency of engagement.

- a. **Stakeholder Identification:** The process for identifying stakeholders considers key factors such as their impact, interest, legitimacy, influence, and criticality. By encompassing all stakeholders, the Company aims to understand their concerns, needs, and expectations, allowing it to prioritize actions accordingly.
- b. **Review Process:** The Company regularly reviews and updates its stakeholder identification process in response to changes in regulatory guidelines, business operations, market trends, and significant shifts in ESG-related practices. Continuous interaction with stakeholders is maintained, and feedback is promptly collected to address their concerns.
- c. **Channels of Communication:** Stakeholders are engaged through various channels, including direct and virtual meetings, site visits, feedback surveys, focus group discussions, email communication, and periodic meetings. The most suitable method is selected based on factors such as accessibility, the number of members in each stakeholder group, and their availability.
- d. **Frequency of Engagement:** The engagement frequency is tailored to each stakeholder group according to the needs and priorities identified by the Company through its review process. Engagement timelines may include daily, weekly, quarterly, semi-annual, or annual interactions.

Based on the stakeholder identification process, the Company has established accountability by allocating resources, defining roles and responsibilities, and implementing proactive, customized engagement programs that consider the unique needs and importance of each stakeholder. Regular awareness programs are conducted to educate about stakeholder engagement practices and to address concerns while monitoring related activities.

Below are the internal and external stakeholders identified by the Company -

- **Employees:** They contribute to the Company's overall productivity, performance and achievement of its sustainable vision.
- **Investors & Shareholders:** They influence both the financial and non-financial performance of the Company significantly.
- **Customers:** They may impact the Company's overall growth, and all products and services are tailored to meet their needs.
- **Suppliers:** They facilitate the timely supply of materials, products, and services.
- **Communities:** Contributing to the socio-economic development of local communities and fostering an ecosystem of inclusive and sustainable growth.
- **Governments and Regulatory Bodies:** They are responsible for creating and enforcing laws, regulations, and guidelines that ensure business operations are conducted ethically, with transparency and accountability.

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

Stakeholder group	Whether identified as Vulnerable and Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Engagement surveys, newsletters and notices, training and development initiatives, town-halls, get-togethers, cultural events.	Regularly	Employee engagement, employee capability development, career progression, reward and recognition, fair remuneration, effective performance management and recognition, diverse, inclusive, and enabling work culture, work-life balance.
Investors and Shareholders	No	Quarterly Earnings Calls, Investor conferences, Investor meetings, Company website, investor presentations, press releases and financial reports, communication of financial results via prominent newspapers, Information pertaining to dividends, notices and AGM communicated via e-mail.	Quarterly (In case of AGM, annually)	Financial performance, ethical, anti-bribery & anti-corruption practices, risk modeling, protection of rights of all stakeholders, robust strategy for long-term value creation.
Customers	No	Client meetings, periodic project, review meetings, performance reports	Regularly	Customer service and claim settlement, ethical, anti-bribery and anti-corruption practices, customized solutions, product / project pricing, customer privacy and data protection.
Suppliers	No	Site visits and inspection, supplier's visits, regular interactions	Periodically	Ethical, anti-bribery and anti-corruption practices, transparency, on-time settlement of invoices, fair registration, and procurement process, sustained business opportunities

Stakeholder group	Whether identified as Vulnerable and 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
Communities	Yes	Through on-ground NGO partners	Ongoing	Advancing sustainability, ethical, anti-bribery and anti-corruption practices, contribution to community welfare, healthier and safer societies
Government and Regulatory Authorities	No	Responding to government circulated notifications, statutory filings and disclosures	As and when required	Disclosures, corporate governance, adequacy of solvency, fair and transparent reporting, timely compliances, statutory and legal compliance, support for government policy

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.

KPIL conducts regular consultations with stakeholders on economic, environmental, and social topics through direct interactions, surveys, and various other platforms, as detailed in Principle 4 Question 2. Feedback received from these consultations is carefully analyzed by the relevant business heads and committees, such as the Stakeholder Relationship Committee, the Corporate Social Responsibility Committee, and the Risk Management Committee. These Committees review the feedback and provide recommendations to the Board during meetings to guide further proceedings and decision-making in line with the Company's sustainability and business strategy. The Board's decisions and the Company's actions addressing stakeholder concerns, as identified through this feedback mechanism, are then communicated to the stakeholders.

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, KPIL has conducted a materiality assessment to identify ESG issues relevant to its operations. This comprehensive approach to ESG materiality assessment involved several key aspects:

- Survey responses from senior management, employees of KPIL, and other stakeholders identified through the stakeholder identification process were considered.
- The significance and emphasis placed on ESG material issues by various sustainability frameworks were evaluated.
- The priorities of peer companies regarding ESG material issues were analyzed.

Based on these survey results and assessment criteria, the Company prioritized ESG material issues and integrated them into its sustainability strategy and policies, including setting goals, targets, and commitments. The progress and achievements related to the sustainability strategy are reviewed annually.

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

Vulnerable or marginalized stakeholder groups raised no concerns during the reporting period.

Principle

5



Businesses should respect and promote human rights.

ESSENTIAL INDICATORS >>

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

Category	FY 2025			FY 2024		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	9,870	9,870	100	8,428	8,428	100
Other than permanent	3,001	3,001	100	1,453	1,453	100
Total employees	12,871	12,871	100	9,881	9,881	100
Workers						
Permanent	11	11	100	13	13	100
Other than permanent	7,509	7,509	100	12,331	12,331	100
Total workers	7,520	7,520	100	12,344	12,344	100

Note: The data for 'other than permanent workers' covers contract workers directly engaged by KPIL and excludes sub-contracted workers.

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

Category	FY 2025					FY 2024				
	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	9,870	-	-	9,870	100	8,428	-	-	8,428	100
Male	9,520	-	-	9,520	100	8,158	-	-	8,158	100
Female	350			350	100	270			270	100
Other than permanent	3,001			3,001	100	1,453			1,453	100
Male	2,947	-	-	2,947	100	1,431	-	-	1,431	100
Female	54	-	-	54	100	22	-	-	22	100
	Workers									
Permanent	11			11	100	13			13	100
Male	11	-	-	11	100	13	-	-	13	100
Female	-	-	-	-	-	0	-	-	NA	NA
Other than permanent	7,509			7,509	100	12,331			12,331	100
Male	7,350	-	-	7,350	100	12,194	-	-	12,194	100
Female	159	-	-	159	100	137	-	-	137	100

Note: The data for 'other than permanent workers' covers contract workers directly engaged by KPIL and excludes sub-contracted workers.

3. Details of remuneration/salary/wages:

a. Median Remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (INR)	Number	Median remuneration/ salary/ wages of respective category (INR)
Board of Directors (BoD)	7	343 lakhs	1	64 lakhs
Key Managerial Personnel	3	650.4 lakhs	1	120 lakhs
Employees other than BoD and KMP	9,517	8.1 lakhs	349	6.5 lakhs
Workers	11	5.5 lakhs	0	0

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

	FY 2025	FY 2024
Gross wages paid to females as % of total wages	2.82%	2.81%

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. At KPIL, the Chief Human Resources Officer (CHRO) plays a key role in guiding the organization's approach to human rights, with a focus on non-discrimination, equal opportunity, and fair treatment across operations and the value chain. HR representatives at plants and sites support the CHRO and project sites who help facilitate awareness and support the adoption of the Corporate Human Rights Policy. The Policy sets expectations for subsidiaries, joint ventures, suppliers, and contractors to respect applicable human rights standards and legal requirements.

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

All KPIL employees and workers are required to adhere strictly to the Human Rights and Code of Conduct policies and guidelines, which apply to everyone regardless of race, gender, nationality, ethnicity, language, religion, or any other status. These human rights policies and principles are implemented across all business operations, value chain partners, and other stakeholders with whom we interact. We ensure that all employees and workers enjoy basic human rights and freedoms in the workplace, providing an environment of dignity, fairness, respect, and equality. Human rights-related complaints or issues—such as injustice, unfairness, or violation of dignity—can be reported through the site management team, one-on-one interactions, safety meetings, periodic assessments, and other forums. Additionally, we have an HR Helpdesk portal, where employees can submit complaints that are managed by a dedicated team, allowing them to track the status and resolution of their grievances.

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

	FY 2025			FY 2024		
	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	NIL	NIL	-	NIL	NIL	-
Discrimination at workplace	NIL	NIL	-	NIL	NIL	-
Child Labor	NIL	NIL	-	NIL	NIL	-
Forced Labor/ Involuntary Labor	NIL	NIL	-	NIL	NIL	-
Wages	NIL	NIL	-	NIL	NIL	-
Other human rights related issues	NIL	NIL	-	NIL	NIL	-

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

	FY 2025	FY 2024
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	NIL	1
Complaints on POSH as a % of female employees/workers	NA	0.23
Complaints on POSH upheld	NIL	NIL

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

KPIL is committed to fostering a respectful and inclusive work environment that upholds the dignity and rights of all individuals. Mechanisms are in place to ensure that complainants in cases of discrimination, harassment, or other rights violations are protected from any form of retaliation, victimization, or adverse consequences. These protections apply across all complaint categories, including but not limited to sexual harassment, workplace discrimination, and human rights concerns.

In addition to a structured POSH Committee that addresses complaints in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company's Whistleblower Policy provides clear safeguards for any stakeholder who raises concerns in good faith. This includes confidentiality of the complainant's identity, non-retaliation assurances, and access to independent reporting channels such as the ABMS Committee or the Chairman of the Audit Committee.

The policy ensures that whistleblowers are protected from unfair treatment, dismissal, or prejudice and are encouraged to report any unethical practices without fear. The Whistleblower Policy is available publicly and forms a core part of KPIL's governance framework.

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

Yes

10. Assessments for the year

Section	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Sexual Harassment	100
Discrimination at workplace	100
Child Labor	100
Forced Labor/ Involuntary Labor	100
Wages	100

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

No significant risks or concerns were identified during the assessment conducted in FY 2025, and therefore, no corrective actions were deemed necessary.

LEADERSHIP INDICATORS

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

KPIL has established procedures to handle human rights grievances or complaints, such as a Grievance Redressal Policy, a Prevention of Sexual Harassment at Workplace Policy, and a Corporate Human Rights Policy. Additionally, we have implemented new policies to enhance employee benefits, including parental leaves, sabbatical leaves, and support for higher education.

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

KPIL did not undertake a Human Rights Due Diligence Assessment during the year.

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?

KPIL's premises and facilities are designed to be completely accessible, allowing employees and visitors with disabilities to move around easily and safely.

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	NIL
Discrimination at workplace	NIL
Child Labor	NIL
Forced Labor/Involuntary Labor	NIL
Wages	NIL
Others	NIL

Note – Value chain partners, including material suppliers and contractors, are evaluated at regular intervals. Key suppliers - such as those providing raw materials, capital machinery, and high-value inputs - are assessed against the Kalpataru Supplier Code of Conduct and Supplier Sustainability Initiative, focusing on parameters like child labour, forced labour, sexual harassment, discrimination and other ESG topics.

In FY 2025, we initiated our Supply Chain Sustainability Initiative and have identified 111 significant suppliers. Moreover, we have launched sustainability engagement and assessment processes for 28 of these suppliers, focusing on key ESG parameters. We plan on expanding the scope of these assessments in the coming years to further integrate ESG principles throughout our supply chain.

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

While we have not conducted a formal assessment of value chain partners during the reporting year, we have established a Supplier Code of Conduct that outlines our expectations regarding ethical practices, including the upholding of human rights. Through this framework, we seek to promote responsible behavior and ensure that our value chain partners align with our core principles on human rights and fair working conditions.

Principle

6


Businesses should respect and make efforts to protect and restore the environment.

ESSENTIAL INDICATORS

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

Parameter	FY 2025	FY 2024
From renewable sources		
Total electricity consumption (A)	51,655	47,095
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	51,655	47,095
From non-renewable sources		
Total electricity consumption (D)	127,480	114,201
Total fuel consumption (E)	1,213,507	1,024,165
Energy consumption through other sources (F)	-	-
Total energy consumed from non-renewable sources (D+E+F)	1,340,987	1,138,366
Total energy consumed (A+B+C+D+E+F)	1,392,642	1,185,461
Energy Intensity per rupee of turnover (Total energy consumed/Revenue from operations) (in GJ/Rs. Crore)	73.7	70.7
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP) (in GJ/Rs. Crore)	80.3	70.2
Energy intensity in terms of physical output*	NA	NA
Energy intensity (optional)- the relevant metric may be selected by the entity- GJ/Employee	103.3	119.9

Our energy consumption and intensity have increased due to the varying size, scope, and location of projects, along with staggered execution timelines. Remote project sites with limited grid access often require diesel-based energy setups, adding to consumption. Since project progress does not follow uniform patterns, energy use does not always align with revenue trends. To address this, we are proactively implementing a range of measures --such as solar installations, energy-efficient equipment, and better resource planning --to reduce energy consumption and lower emissions, reinforcing our commitment to sustainable project execution.

*Given the diversity of our business operations, energy intensity as per physical output cannot be estimated.

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

Yes, independent limited assurance has been undertaken by TÜV SÜD South Asia Pvt. Ltd.

2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (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, none of our plants or project sites have been classified as Designated Consumers (DCs).

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

Parameter	FY 2025	FY 2024
Water withdrawal by source (in kiloliters)		
(i) Surface water	554,558	588,795
(ii) Groundwater	1,098,545	635,905
(iii) Third party water	1,773,653	1,410,279
(iv) Seawater/desalinated water	-	123
(v) Others	15,500	56,684
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	3,442,256	2,691,786
Total volume of water consumption (in kiloliters)	3,298,373	2,454,699
Water intensity per rupee of turnover (Water consumed in kL/ Revenue) (in kL/Rs. Crore)	174.6	146.4
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption in kL/Revenue from operations adjusted for PPP) (in kL/Rs. Crore)	190.1	145.4
Water intensity in terms of physical output*	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity – kL/ Employee	244.7	248.4

With over 300 project sites spread across diverse locations, tracking water usage remains a challenge due to varying sources, availability, and consumption patterns. Wherever possible, direct measurements are taken through meters and other tracking mechanisms; however, at some locations, indirect estimations are used based on activity data. To improve accuracy and consistency, we are updating our site-level practices and building awareness among teams for better water monitoring and conservation.

*Given the diversity of our business operations, water intensity as per physical output cannot be estimated.

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

Yes, independent limited assurance has been undertaken by TÜV SÜD South Asia Pvt. Ltd.

4. Provide the following details related to water discharged:

Parameter	FY 2025	FY 2024
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water		
- No treatment	19,879	49,188
- With treatment – please specify level of treatment		
(ii) To Groundwater		
- No treatment	120,540	176,272
- With treatment – please specify level of treatment		
(iii) To Seawater		
- No treatment	-	5.86
- With treatment – please specify level of treatment		
(iv) Sent to third parties		
- No treatment		
- With treatment – please specify level of treatment	3,463 – Secondary treatment	11,621 – Secondary treatment
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kiloliters)	143,882	237,087

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

Note: With 300+ sites in diverse conditions, water discharge monitoring is challenging. We are standardizing practices and building team awareness to improve data accuracy. Unused water is safely discharged, while used water is treated to ensure safe disposal.

Yes, independent limited assurance has been undertaken by TÜV SÜD South Asia Pvt. Ltd

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

Yes, all four of KPIL's facilities—two in Rajasthan, one in Gandhinagar, and one in Raipur—operate with a Zero Liquid Discharge system, ensuring that no liquid waste is released. The water is repurposed for landscaping and toilet flushing.

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

Parameter	Please specify unit	FY 2025	FY 2024
NO _x	µg/m ³	31	33
SO _x	µg/m ³	27	42
Particulate matter (PM)	µg/m ³	43	40
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	mg/m ³	NIL	NIL
Others- please specify	PPM	NIL	NIL

Note: Air emission values are collected from our operations and the average value is disclosed. However, the parameters from operations are compliant to applicable emission limits.

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

Yes, independent limited assurance has been undertaken by TÜV SÜD South Asia Pvt. Ltd.

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

Parameter	Please specify unit	FY 2025	FY 2024
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	82,563	69,933
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	25,682	22,523
Total Scope 1 and Scope 2 emissions intensity rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations) (in tCO ₂ e/Rs. Crore)	tCO ₂ e/INR Cr.	5.73	5.52
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 emissions/Revenue from operations adjusted for PPP) (in tCO ₂ e/Rs. Crore)	tCO ₂ e/INR Cr.	6.24	5.48
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	tCO ₂ e/employee	8.03	9.36

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

Yes, independent limited assurance has been undertaken by TÜV SÜD South Asia Pvt. Ltd.

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

During FY 2025, KPIL made substantial progress in its dedication to lowering greenhouse gas emissions by strategically improving its use of renewable energy and boosting operational efficiencies. The main initiatives involved:

- Solar Energy Expansion:**

The entity has initiated the installation of a 3 MWp solar photovoltaic project at Uniara, with a projected clean energy generation of approximately 4,500 MWh per year.

This initiative is expected to avoid approximately 3,200 tCO₂e emissions annually.

Additionally, 214 kWp of solar panels were installed across 27 projects in the Building & Factories (B&F) Business, generating 257 MWh of clean energy and avoiding approximately 200 tCO₂e emissions.

- **Biomass Plant Optimization (Padampur):**

The entity optimized turbine efficiency and replaced aluminium fans with E-glass epoxy blades, resulting in enhanced energy efficiency.

Achieved a daily clean energy generation of 10.75 MWh, avoiding approximately 2,800 tCO₂e emissions annually.

- **Fuel Catalyst Installation for Emission Reduction:**

A total of 14 fuel catalysts were installed across 54 equipment units within the Oil & Gas Business, enhancing fuel efficiency and reducing diesel consumption.

Achieved a reduction of 75,853 liters of diesel consumption, avoiding approximately 201 tCO₂e emissions.

- **Energy-Efficient Lighting Upgrades:**

Conventional lighting was replaced with LED lighting across multiple project sites under the Building & Factories (B&F) Business.

This measure reduced lighting energy consumption by 50%, avoiding approximately 250 tCO₂e emissions.

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

Parameter	FY 2025	FY 2024
Total Waste generated (in MT)		
Plastic waste (A)	138.4	644.3
E-waste (B)	83.0	5.1
Bio-medical waste (C)	4.5	2.34
Construction and demolition waste (D)	16,182.6	36,561.9
Battery waste (E)	17.5	7.07
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	7,891.6	4,490.7
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	36,888.6	24,820.9
Total (A + B + C + D + E + F + G + H)	61,206	66,532
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations) (in MT/Rs. Crore)	3.24	3.97
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operations adjusted for PPP) (in MT/Rs. Crore)	3.53	3.94
Waste intensity in terms of physical output*	NA	NA
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)		
Category of waste		
(i) Recycled	2,896	29,237
(ii) Re-used	2,391	2,368
(iii) Other recovery operations	5,580	34
Total	10,867	31,639
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)		
Category of waste		
(i) Incineration	-	4.7
(ii) Landfilling	14,195	30,316
(iii) Other disposal operations	3,539	-
Total	17,734	30,320

With over 300 project sites that are temporary and spread out, tracking waste accurately is a challenge due to different types of activities and disposal timelines at each site. This makes it difficult to collect complete and verifiable data for reporting. To improve this, we are updating our SOPs and building more awareness at site level for better waste tracking.

*Given the diversity of our business operations, waste intensity as per physical output cannot be estimated.

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

Yes, independent limited assurance has been undertaken by TÜV SÜD South Asia Pvt. Ltd.

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.

KPIL's systems and practices align with industry best practices and comply with pollution control board regulations. We focus on minimizing waste by implementing the 3R waste management hierarchy: Reduce, Reuse, and Recycle. We also create value-added products, recover energy through waste combustion, and reduce landfill waste. Our hazardous waste management adheres to the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016, set by the Central Pollution Control Board. Waste disposal is conducted only through agencies authorized by the urban local body and pollution control boards. We are committed to continuously improving our products, processes, and systems to decrease the use of hazardous and toxic chemicals, ensuring any such waste is disposed of safely and responsibly.

During FY 2025, we undertook a comprehensive Waste Footprint Assessment to align with sustainable practices and circular economy principles. Through the assessment we identified various waste reuse and recycling opportunities including sustainable waste management through circular economy principles, including technologies for processing construction waste and innovative solutions for food, plastic, and e-waste, which will help us achieve our target of achieving 100% circularity in construction and demolition waste by 2035.

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, 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.
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KPIL does not operate any facilities or offices in the aforementioned areas. As an Engineering, Procurement, and Construction (EPC) company, its activities are carried out at project sites where all necessary environmental approvals and clearances are obtained by the respective clients or project owners.

12. 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 the project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
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As an EPC company, KPIL executes its operations at project sites where environmental impact assessments are conducted by the respective clients or project owners.

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

Yes, KPIL adheres to relevant laws related to the Water (Prevention and Control of Pollution) Act, the Air (Prevention and Control of Pollution) Act, and the Environment Protection Act, along with the associated regulations.

S No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
None				

LEADERSHIP INDICATORS >>

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

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

- Name of the area: Uniara & Padampur (Rajasthan), Gandhinagar (Gujarat), Raipur (Chhattisgarh)
- Nature of operations*: Biomass Power Plants and Tower Manufacturing plants
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2025	FY 2024
Water withdrawal by source (in kiloliters)		
(i) Surface water	516,334	-
(ii) Groundwater	27,856	-
(iii) Third party water	9,547	-
(iv) Seawater/desalinated water	-	-
(v) Others	15,500	-
Total volume of water withdrawal (in kiloliters)	569,237	-
Total volume of water consumption (in kiloliters)	553,737	-
Water intensity per rupee of turnover (Water consumed in kL/ Revenue) (in kL/Rs. Crore)	72.34	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kiloliters)		
(i) Into Surface water		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) Into Groundwater		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) Into Seawater		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third parties		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
Total water discharged (in kiloliters)	0.00	-

*The disclosed data is for water stress areas, limited to our permanent assets, specifically our Manufacturing Plants and Biomass Power Plants. We have undertaken water risk assessment in FY 2025, thus the reporting has been initiated this year.

Note: Indicate if any independent assessment/ evaluation has been carried out by an external agency? (Y/N) If yes, name of the external agency - No

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

Note: We have identified nine categories of Scope 3 emissions as material to our business and are currently engaged in benchmarking and validating the emission trends. Formal reporting of Scope 3 emissions will commence from FY 2026.

Parameter	Unit	FY 2025	FY 2024
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	-	-
Total Scope 3 emissions per rupee of turnover	tCO ₂ e/INR Cr.	-	-
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	tCO ₂ e/employee	-	-

Note: Indicate if any independent assessment/ evaluation has been carried out by an external agency? (Y/N) If yes, name of the external agency - Not Applicable

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

Not Applicable

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Energy Optimization in Welding Operations	Replaced conventional SMAW inverter-based welders with 5 semi-automatic welding machines and used automatic welding for over 3,000 welding joints at the international Oil & Gas projects.	Achieved a combined energy savings of 70 MWh, avoiding ~50 tCO ₂ e emissions.
2	Fuel Catalyst Installation	Installed 14 fuel catalysts across 54 equipment in Oil & Gas Business.	Reduced diesel consumption by 75,853 liters, avoiding ~201 tCO ₂ e emissions.
3	Solar Capacity Expansion (Railway Business)	Initiated installation of 60 kWp solar capacity at upcoming projects.	Projected clean energy generation: 72 MWh/year, avoiding ~50 tCO ₂ e emissions.
4	Carbon Neutrality for T&D (International)	Achieved Carbon Neutrality for Scope 1 & Scope 2 emissions for FY 2025 (ISO 14068:2023).	Achieved 100% carbon neutrality for 12,000 tCO ₂ e emissions.
5	Energy-Efficient LED Lighting (B&F Business)	Replaced conventional lights with LED lighting across project sites.	Reduced lighting energy consumption by 50%, avoiding ~250 tCO ₂ e emissions.
6	Solar Capacity Enhancement (B&F Business)	Installed 214 kWp of solar panels across 27 projects.	Generated 257 MWh of clean energy, avoiding ~200 tCO ₂ e emissions.
7	Construction Waste Recycling	Segregated and reused around 8,500 m ³ of construction waste at B&F project sites.	Avoided ~400 tCO ₂ e emissions through material reuse.
8	Biomass Plant Optimization (Padampur)	Optimized turbine loading and replaced aluminium fans with E-glass epoxy blades.	Achieved 10.75 MWh daily generation, avoiding ~2,800 tCO ₂ e emissions annually.
9	Solar Project Installation (Uniara)	Initiated installation of 3 MWp solar photovoltaic project.	Projected clean energy generation: ~4,500 MWh/year, avoiding ~3,200 tCO ₂ e emissions.
10	LPG-Fired Boilers (Urban Infra)	Replaced HSD-fired boilers with LPG-fired boilers.	Reduced emissions by 45%

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

KPIL has developed a comprehensive emergency preparedness plan that encompasses all project sites and business operations. This plan includes detailed guidelines, procedures, and action plans designed to address and mitigate risks and impacts promptly. In the event of major disruptions, such as process hazards or natural disasters, we have established action plans to effectively respond to identified risks, mitigate their effects, and restore operations. We have conducted training and awareness programs for all employees and workers, which cover signaling mechanisms, roles and responsibilities, assembly points, and medical arrangements to be followed during business disruptions. Our systems, procedures, and mechanisms are designed to address various risks through the implementation of the emergency preparedness plan and guidelines on best practices to be followed in the event of any disaster.

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

There have been no reported instances of significant adverse environmental impacts across our value chain. To proactively manage potential risks and encourage sustainable practices, all vendors and service providers are required to adhere to the Kalpataru Supplier Code of Conduct. This code outlines compliance with environmental regulations and incorporates standards related to health and safety, labour practices, human rights, and ethical conduct. It also includes strict prohibitions on child and forced labour, mandates compliance with minimum wage laws, upholds freedom of association, and promotes environmental stewardship. These requirements form a core part of our commitment to responsible and sustainable business practices.

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

In FY 2025, we launched our Supply Chain Sustainability Initiative by identifying 111 significant suppliers based on materiality and business relevance. Sustainability assessments have commenced for 28 of these suppliers, focusing on key Environmental, Social, and Governance (ESG) parameters. The Company maintains strict compliance with internal policies throughout its value chain, and all key material suppliers are mandated to confirm adherence to the Kalpataru Supplier Code of Conduct, which includes commitments to environmental regulations. We are continuously strengthening our evaluation and audit mechanisms to better align with defined sustainability criteria and other key material issues. These efforts reflect our ongoing commitment to fostering environmental responsibility and enhancing ESG integration across our value chain.

8. How many Green Credits have been generated or procured:

- by the listed Entity: NIL
- by the top ten (in terms of value of purchases and sales, respectively) value chain partners : The Company is engaging with its top value chain partners through our Supply Chain Sustainability Initiative to promote sustainability. We are aiming to disclose their Green Credits in the coming years.

Principle

7



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

ESSENTIAL INDICATORS

- Number of affiliations with trade and industry chambers/associations: 8
 - List the top 10 trade and industry chambers/associations (determined based on the total members of such a body) the entity is a member of/affiliated to.

Sr. 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 Chamber of Commerce and Industry (FICCI)	National
3.	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
4.	Indian Electrical & Electronics Manufacturers' Association (IEEMA)	National
5.	Project Exports Promotion Council of India (PEPCI)	National
6.	Cable and Conductors Manufacturers Association of India (CCMAI)	National
7.	Central Board of Irrigation and Power (CBIP)	National
8.	Gujarat Chamber of Commerce and Industry (GCCI)	State

- Provide details of corrective action taken or underway on any issues related to anticompetitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of authority	Brief of the case	Corrective action taken
Nil	Nil	Nil

LEADERSHIP INDICATORS

- Details of public policy positions advocated by the entity:

Sr. No.	Public Policy Advocated	Method resorted for such advocacy	Whether information available in public domain (Yes / No)	Frequency of Review by Board (Annually/Half yearly/Quarterly/ Others- please specify)	Relevant Web link
1.	None	None	None	None	None

Principle

8



Businesses should promote inclusive growth and equitable development.

ESSENTIAL INDICATORS

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

Name and brief details of the 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
We did not conduct SIA in FY 2025.					

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

Sr. 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 INR)
The entity did not undertake any rehabilitation or resettlement activities during the reporting year.						

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

Our CSR team, through our NGO partners and the Projects/Plant teams consistently engage with the community at both the Plant and Project site locations. This continuous interaction with important community stakeholders allows for grievances to be resolved locally. The Plant & Site location teams act as the main point of contact for local communities, and grievance resolution is mainly handled through direct, face-to-face interactions.

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

Category of waste	FY 2025	FY 2024
Directly sourced from MSMEs/small producers	7.75%	10.48%
Directly from within India	90%	88.70%

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.**

Location	FY 2025	FY 2024
Rural	0.64%	3.80%
Semi-urban	21.41%	5.76%
Urban	21.99%	20.79%
Metropolitan	55.95%	69.64%

Note:

For FY 2025, the data disclosed is for all employees as on March 31, 2025.

For FY 2024, the data is of 2,471 employees, who joined in FY 2024.

LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken
None	None

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

Sr. No	State	Aspirational District	Amount spent (In INR)
1	Odisha	Kandhamal	170,846
2	Odisha	Koraput	170,846
3	Bihar	Aurangabad	1,039,500
4	Chhattisgarh	Dantewada	572,880
5	Jharkhand	Dumka	483,000
6	Jharkhand	Gumla	336,000
7	Jharkhand	Khunti	567,000
8	Jharkhand	Palamu	315,000
9	Jharkhand	Garhwa	231,000

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

KPIL is one of the leading global power transmission and infrastructure EPC companies. Our procurement strategy primarily involves sourcing industry-specific standard items from client-approved vendors. While we do not currently operate under a preferential procurement policy targeting marginalized or vulnerable groups, we are committed to ethical practices and diversity in our supply chain. In FY 2025, 7.75% of our total procurement was sourced from MSMEs and small vendors.

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

Not applicable

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

Not applicable

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

Sr. No	Intellectual Property based on traditional knowledge	Owned/Acquired (Yes/No)	Benefit Shared (Yes/No)	Basis of calculating benefit share
Since KPIL operates within the EPC sector, the concept of obtaining and distributing benefits from intellectual properties rooted in traditional knowledge does not pertain to our activities.				

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

Name of the authority	Brief of the Case	Corrective actions taken
As KPIL operates in the EPC sector, the concept of deriving and sharing benefits from intellectual properties based on traditional knowledge does not apply to our activities.		

6. Details of CSR Beneficiaries.

Sr. No	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1.	Kalpa Aarogya Seva (KARE)	29,100	100% (Rural communities, Geriatric population, Persons With Disabilities, Individuals with medical needs)
2.	Kalpa Vidya Kalpa Kaushal (KVKK)	23,412	100% (Youth, Women and Children from Government & low-income schools)
3.	Other Need-based Community Projects	468	100% (Girl students from Government School)
4.	SAVIOUR	435 Beneficiaries, 12,886 Animals	Capacity building of Animal Welfare NGO members; Supported animals in distress

Principle

9



Businesses should engage with and provide value to their consumers in a responsible manner.

ESSENTIAL INDICATORS >>

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

At KPIL, we focus on supplying industrial materials & developing EPC projects for commercial use and do not directly interact with individual consumers. Our method of handling customer feedback revolves around the successful completion of infrastructure projects, from which we obtain comprehensive project completion reports. These reports showcase and highlight our proficiency in executing projects, our ethical business practices, and our adherence to specified requirements and contractual agreements, guaranteeing a high level of customer satisfaction.

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	Being an EPC company, our primary business operations do not require detailed labeling concerning environmental and social factors, safe usage, or recycling and disposal. Therefore, this metric does not apply to our activities.
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2025			FY 2024		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	NIL	NIL	NIL	NIL	NIL	NIL
Advertising	NIL	NIL	NIL	NIL	NIL	NIL
Cyber-security	NIL	NIL	NIL	NIL	NIL	NIL
Delivery of essential services	NIL	NIL	NIL	NIL	NIL	NIL
Restrictive Trade Practices	NIL	NIL	NIL	NIL	NIL	NIL
Unfair Trade Practices	NIL	NIL	NIL	NIL	NIL	NIL
Other	-	-	-	-	-	-

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

	Number	Reasons for recall
Voluntary recalls	As an EPC company, we are not involved in producing or selling consumer goods; hence, the occurrence of product recalls, whether voluntary or mandated due to safety concerns, is not applicable to our operations.	
Forced recalls		

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

Yes, at KPIL, we are dedicated to upholding exceptional standards in cybersecurity and data privacy, under the supervision of our Risk Management Committee. Our robust Cybersecurity Policy and Cyber Security Assurance Framework targets three essential areas: personnel, processes, and technology. To enhance awareness, we regularly run online campaigns that emphasize phishing prevention and email security. We also ensure that our network devices, server operating systems, and hardware are routinely updated to counteract emerging threats effectively. By actively monitoring security logs, we can swiftly identify and address any malicious activities. Data protection is strictly enforced during all phases, including creation, storage, transit, and retrieval. We have established and implemented a comprehensive [Cybersecurity Policy](#), which is available on our website.

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.

Being an EPC company specializing in infrastructure development for corporate clients, we do not participate in customer-facing or retail activities. Moreover, matters related to advertising, product recalls, and regulatory penalties associated with consumer goods and services do not apply to our operations.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches.

NIL

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

NA, as number of instances of data breaches in NIL.

c. Impact, if any, of the data breaches.

None, as number of instances of data breaches in NIL.

LEADERSHIP INDICATORS >>

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

<https://kalpataruprojects.com/our-businesses>

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

KPIL operates in the EPC sector, concentrating on infrastructure development for corporate clients, and therefore does not partake in consumer-oriented activities that necessitate guidance on the safe and responsible use of products.

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

As an EPC company focused on serving corporate clients, KPIL does not engage in consumer services. Consequently, protocols for informing consumers about potential disruptions to essential services are not relevant to our operations.

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

KPIL complies with local regulations by providing comprehensive labeling and informational codes on our manufactured towers. This includes required details as well as client-specific information like the client's name and the project for which the tower is intended. We actively seek feedback from our clients at the end of each project. Customer satisfaction is formally acknowledged through 'Project Completion Certificates.'

During FY 2025, we received numerous commendations and certificates from various clients, showcasing our dedication to excellence and client satisfaction across multiple operational locations.



Assurance statement on third-party verification of sustainability information

Unique identification no.: 3153113822

TÜV SÜD South Asia Pvt Ltd. (hereinafter TÜV SÜD) has been engaged by **Kalpataru Projects International Limited, 7th Floor, Kalpataru Synergy, Opp. Grand Hyatt, Santacruz (E), Mumbai – 400055** to perform a **Limited Assurance** and verification of sustainability information in the "**Business Responsibility & Sustainability Report (BRSR)**" of **Kalpataru Projects International Limited** (here-in after "Company") for the period from **April 01, 2024 to March 31, 2025**. The verification was carried out according to the steps and methods described below.

Scope of the verification

The third-party verification was conducted to obtain independent assurance about whether the Sustainability information is prepared in reference to BRSR standard/framework (hereinafter referred as "Reporting Criteria").

Reporting standard/framework

The disclosures have been prepared by **Kalpataru Projects International Limited** in reference to:

BRSR reporting guidelines (Annexure II) as per SEBI Circular No. SEBI/HO/CFD/CMD-2/P/CIR/2021/562 dated May 10, 2021, and incorporated Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023

And

SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated on December 20, 2024 with the Industry Standards on Business Responsibility and Sustainability Report BRSR (Core).

The following sustainability indicators' reporting are included in the scope of the assurance engagement during the reporting period Financial Year FY **2024-25** as listed below

Limited level of assurance for the rest non-financial quantitative disclosures in BRSR (Ref: Annexure II of Security Exchange Board of India-SEBI circular) for –

Section A: General Disclosures- 20-a, b, 21, 22, 25

Section C: Principle Wise Performance Disclosure-

Principle 1: Essential Indicator 1, 8, 9

Principle 2: Essential Indicator 4

Principle 3: Essential Indicator 1, 2, 3, 5, 8, 9, 11, 13, 14

Principle 5: Essential Indicator 1, 2, 3, 5, 6, 7

Principle 6: Essential Indicator 1, 3, 4, 6, 7, 9

Principle 8: Essential Indicators 4, 5

Principle 9: Essential Indicators 7

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the BRSR reporting, and accordingly, we do not express a conclusion on this information.

It was not part of our engagement to review product- or service-related information, references to external information sources, expert opinions and future-related statements in the Report.



Responsibility of the Company

The legal representatives of the Company are responsible for the preparation of the BRSR report in accordance with the Reporting Criteria. This responsibility includes in particular the selection and use of appropriate methods for measurement, calculation, collection and compilation of information and the making of appropriate assumptions or, where appropriate, the making of appropriate estimates. Furthermore, the legal representatives are responsible for necessary internal controls to enable the preparation of a BRSR report that is free of material - intentional or unintentional - erroneous information.

Verification methodology and procedures performed

The verification engagement has been planned and performed in accordance with the verification methodology developed by the TÜV SÜD Group which is based on ISAE 3000 assurance engagement standard and ISO 17029.

Level of Assurance

Limited Level of assurance for the rest non-financial quantitative disclosures of BRSR report (Ref: Annexure II of SEBI circular).

The verification was based on a systematic and evidence-based assurance process limited as stated above. The selection of assurance procedures is subject to the auditor's own judgment.

- Inquiries of personnel who are responsible for the stakeholder engagement and materiality analysis to understand the reporting boundaries
- Evaluation of the design and implementation of the systems and processes for compiling, analysing, and aggregating sustainability information as well as for internal controls
- Inquiries of company's representatives responsible for collecting, preparing and consolidating sustainability information and performing internal controls
- Analytical procedures and inspection of sustainability information as reported at group level by all locations
- Assessment of local data collection and management procedures and control mechanisms through a sample survey through on site & remote verification at selected sample sites as mentioned below:

Sl. No.	Company Name	Site Address
1	Kalpataru Projects International Limited.	Registered office address: Plot No. 101, Part III, GIDC Estate, Sector 28, Gandhinagar – 382028, Gujarat, India
2		Corporate office address: 7th Floor, Kalpataru Synergy, Opp. Grand Hyatt, Santacruz (E), Mumbai – 400055, India
3		Division : Railways, Site : EPC NCR Railway KM- 1355/26 Bharua Sumerpur Railway station Dist- Hamirpur Pin- 210502
4		Division : Railways, Site : Chandigarh-Baddi Vill. Rampur Jangi (Proposed Nanakpur Railway Station) The. Kalka, Distt. Panchkula (HR) Pin Code: 134102
5		Division : Building & Factory- SIO, Site : SAP1, Bengaluru SAP LABS BLR11 URBAN ECO PHASE 1 Plot No. 26, 27, 28, 29 & 29 - P Hitech Defence & Aerospace Park.Sy. No.6 Block 70, 71, 76, 77, 78, 79 & 86Singahalli, Arebinnamangala, Bengaluru - 562149
6		Division : Building & Factory- SIO, Site : DNR PARKLINK PROJECT (DPLB) DNR Parklink- DPLB Survey No 129&130, ByRathi Village, Bidarahalli Hobli, Bangalore East, Urban - 560077
7		Division : Urban Infra, Site : BHOPAL UNDERGROUND METRO PROJECT Gulermak Joint Venture ,BH-04 Bhopal UG Metro Project, Lily Tradewing, 5th Floor Plot No.3,Zawabit Line, Lily Square, Opp. Lower Lake, Jahangirabad, Bhopal- 462008, Madhya Pradesh



Sl. No.	Company Name	Site Address
8		Division : Transmission & Distribution- International Site : WO-437, Saudi Arabia 3496 - DDJA3496 - 35 الورش - Al Hanakiyah - Al Madinah Province - 42644 - 7677 - Hinakeya
9		Division : Transmission & Distribution- International Site : Solar power project, Sierra Leone Bathkanu Road, Makoth Viillage, Makarie Cheifdom, Bombali District, Lunsar - Makeni Highway, Northern Province, Sierra Leone.
10		Division : Transmission & Distribution- Domestic & SAARC Site : WO 453, Gujrat- 765 KV DC LAKADIA TO AHMEDABAD TL. Survey No.61, d- TLD, N.H.27, KM Stone 18, Opp. Marquina Ceramics, Juna Nagdvas, Morbi, Gujrat, 363641
11		Division : Division : Transmission & Distribution- Domestic & SAARC Site : WO 456 & 467 C1 (Pckg G & F), Rajasthan 765 KV DC FATEGARH-BEAWAR T/L, WO-456 PKG-F&G New Ward No-30, Parihar Krishi Farm, Diwan Jee Ka Pyau, Sojat Road, Bilara-Jodhpur, Rajasthan-342602
12		Division : Biomass Site : Padampur Plant, Padampur, Rajasthan Chak 27 BB, Padampur District Sri Ganganagar (Raj.) 335041
13		Division : Biomass Site : Uniara Plant, Uniara, Rajasthan Village- Khatoli, Tehsil: Uniara, B3Uniara , Rajasthan, Pin 304024
14		Division : Oil & Gas Site : KA-OG69-FWSS-FLUEGAS WETGAS SCRUBBER SYSTEM Flat No. 103, Crystal Apartment, Sai Matha Garden, MRPL Road Ganesh Beedi Kana, Surathkal, Dist: Dakshin Kannada – Mangalore.KARNATAKA – PIN: 575 014
15		Division : Oil & Gas Site : NEW MUNDRA PANIPAT PIPELINE PROJECT(MPPL) Panipat MOHINI COMPLEX, CP-12, PHASE-2, RIICO NEAR GAHLOT MOTORS, JHUNJHUNU RAJ-333001
16		Division : Building & Factory - NIO Site : SHIV NADAR HOSTEL DADRI (SNHD), Noida Shiv Nadar University Campus -: Hostel06 & 07(SNHD) Village - Chithera, Tehsil Dadri, Dist. Gautam Budh Nagar, Uttar Pradesh -201314
17		Division : Building & Factory SIO Site : INFOSYS LIMITED-SEZ-DEVELOPER (ISP1) Hyderabad C/o. INFOSYS LIMITED-SEZ-DEVELOPER, SY 50P, 51, 54, 49, 48, 44 AND 45, SINGAPORE TOWNSHIP, POCHARAM VILLAGE, GHATKESAR MAN- DAL, RANGAREDDY, MEDCHAL MALKAJGIRI, HYDERABAD - 500088, TEL- ANGANA.
18		Division : Water Site : AMRISAR WATER SUPPLY PROJECT(AWSP) Amrisar Fatehgarh chudian road Oxford International school majjupura.143601
19		Division : Water Site : BALESWAR MAYURBHANJ WATER SUPPLY-BHOGARAI(BMWS) Bhogarai 3rd floor , Kamila Bhawan, Thanachak, Bhograi, Baleswar, Odisha, Pin-756036
20		Division : Building & Factory SIO Site : B&F SIO, THE TRILIGHT-TELANGANA(PDTL) The Trilight Project De Blue Oak and P Mangatram Properties LLP Near GAR SEZ Tower-05 Plot 1, Golden Mile, Kokapet, Hyderabad - 500 075, Telangana
21		Division : Water Site : JAL JIVAN MISSION BULANDSAHAR(JJMM) Noida 181 Uday Farms, chandpur road, Naya Gaon, Near Sugar Mill, Bulandshahr UP-203001.
22		Division : Building & Factory SIO Site : BIRLA TISYA LLP (BTRP), Bengaluru



Sl. No.	Company Name	Site Address
		Birla Tisya LLP- BTRP, #11, PID NO. 21-11-77 CTS, #3730, Magadi Road, Agrahara Dasarahalli, Bengaluru- 560079
23		Division : Building & Factory SIO Site : PROVIDENT EQUINOX PHASE-01 (PENX), Bengaluru Provident Equinox, SY No 1 and 26, Venkatapura Village, Kegeri hobli, Bengaluru - 560060
24		Division : Tower Manufacturing Plants Site : Gandhinagar, Gujrat GIDC Estate, Sector-28, Gandhinagar 382028
25		Division : Tower Manufacturing Plants Site : Raipur, Raipur Old Dhamtari Road, Village - Khorpa Tehsil- Abhanpur, Dist.- Raipur 493661. C.G. India

Conclusion

Limited Level of Assurance- BRSR Reporting Format

On the basis of the assessment procedures carried out from 10.04.25 to 23.05.2025 TÜV SÜD has not become aware of any facts that lead to the conclusion that the selected indicators have not been prepared, in all material aspects, in accordance with the Reporting Criteria.

Limitations

The assurance process was subject to the following limitations:

- The subject matter information covered by the engagement are described in the "scope of the engagement". Assurance of further information included in the BRSR reporting was not performed. Accordingly, TÜV SÜD do not express a conclusion on this information.
- The assurance scope excluded forward-looking statements, product- or service-related information, external information sources and expert opinions.

Use of this Statement

The Company must reproduce the TÜV SÜD statement and possible attachments like Assurance report in full and without omissions, changes, or additions.

This statement is by the scope of the engagement solely intended to inform the Company as to the results of the mandated assessment. TÜV SÜD has not considered the interest of any other party in the selected sustainability information, this assurance report or the conclusions TÜV SÜD has reached. Therefore, nothing in the engagement or this statement provides third parties with any rights or claims whatsoever.

Independence and competence of the verifier

TÜV SÜD South Asia Pvt Ltd. is an independent certification and testing organization and member of the international TÜV SÜD Group, with accreditations also in the areas of social responsibility and environmental protection. The assurance team was assembled based on the knowledge, experience and qualification of the auditors. TÜV SÜD South Asia Pvt Ltd. hereby declares that there is no conflict of interest with the Company.

Mumbai, 05-06-2025

Prosenjit Mitra

GM- Verification, Validation and Audit
Management System Assurance

Pratik Pancholi

Verification Team Leader, TÜV SÜD
Management System Assurance