



BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

NIIT Learning Systems Limited

SECTION A: GENERAL DISCLOSURES

I. Details of the entity

The Company is not a listed entity as on the date of this report and provisions of the Listing Regulations are not applicable to the Company. The Company shall be listed at the stock exchanges pursuant to the Composite Scheme of Arrangement between NIIT Limited ("Transferor Company" or "NIIT") and NIIT Learning Systems Limited ("Transferee Company" or "NISL") a wholly owned subsidiary of NIIT, as approved by the Hon'ble National Company Law Tribunal ("NCLT"), Chandigarh Bench vide Order dated May 19, 2023. Pursuant to the Scheme becoming effective, the CLG Business Undertaking is demerged from NIIT and transferred to and vested in NLSL with effect from April 1, 2022 i.e., the Appointed Date as per the Scheme. The report is being provided for information, voluntarily as a good governance.

S. No.	D	Details of Entity				
1	Corporate Identity Number (CIN) of the Entity	U72200HR2001PLC099478				
2	Name of the Entity	NIIT Learning Systems Limited ("NLSI"/ "the Company")				
3	Year of incorporation	2001				
4	Registered office address	Plot No. 85, Sector - 32 Institutional Area, Gurugram – 122001, Haryana, India.				
5	Corporate Address	Infocity, A-24, Sector 34, Gurugram - 122001, Haryana, India.				
6	E-mail	investors@niitmts.com				
7	Telephone	+911244293000				
8	Website	www.niitmts.com				
9	Financial year for which reporting is being done	1st April 2022 to 31st March 2023				
10	Name of the Stock Exchange(s) where shares are listed	To be listed pursuant to the Composite Scheme of Arrangement at: Bombay Stock Exchange Limited (BSE), and National Stock Exchange of India Limited (NSE)				
11	Paid-up Capital	As per financial statements as on 31st March 2023 (after the Composite Scheme of Arrangement): Rs. 269,128,720 comprising of 134,564,360 shares of Rs. 2/- each.				
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Jaydip Gupta, Senior Vice President, Audit and Assurance, <u>Esg@niitmts.com</u>				
13	Reporting boundary: Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together).	NIIT Learning Systems Limited (Standalone)				

II. List of Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1		NLSL offers Managed Training Services (MTS), which includes outsourcing of Learning & Development (L&D) and Talent Transformation Services to market-leading companies and institutions headquartered in North America & Europe.	

15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Other Education Delivery	854	100%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	NA	01	01
International	NA	11	11

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (Nos. of States and UTs)	28 states 8 union territories
International (Markets Served)	55

b. What is the contribution of exports as a percentage of the total turnover of the entity? 92%

c. A brief on types of customers

NLSL's comprehensive suite of Managed Training Services includes Custom Content and Curriculum Design, Learning Delivery, Learning Administration, Strategic Sourcing, Learning Technology, and L&D consulting services. NIIT MTS also offers specialized solutions including immersive learning, customer education, talent pipeline as a service, DE&I training, digital transformation and IT training as well as leadership and professional development programs.

IV. Employees

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

C NI-		Total	м	ale	Female				
S. No.	Particulars	(A)	No. (B)	% (B / A)	No. (C)	% (C / A)			
Employees									
1.	Permanent (D)	1559	894	57%	665	43%			
2.	Other than Permanent (E)	84	53	63%	31	37%			
3.	Total employees (D + E)	1643	947	58%	696	42%			
Workers									
4.	Permanent (F)	-	-	-	-	-			
5.	5. Other than Permanent (G)		65	93%	5	7%			
6.	6. Total workers (F+G)		65	93%	5	7%			

b. Differently abled Employees and workers:

S. No.	Particulars	Total	Male		Female				
		(A)	No. (B)	% (B / A)	No. (C)	% (C / A)			
Employee	Employees								
1.	Permanent (D)	2	1	50%	1	50%			
2.	Other than Permanent (E)	0	0	0%	0	0%			
3.	Total differently abled employees (D + E)	2	1	50%	1	50%			
Workers									
4.	Permanent (F)	0	0	0%	0	0%			
5.	Other than permanent (G)	0	0	0%	0	0%			
6.	Total differently abled workers (F + G)	0	0	0%	0	0%			

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females		
		No. (B)	% (B / A)	
Board of Directors	4	1	25%	
Key Management Personnel	3	1	33.33%	

20. Turnover rate for permanent employees and workers (Disclose for past 3 years)

	FY 2022-23			FY 2021-2022			FY 2020-2021		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	13%	14%	13%	16%	19%	17%	12%	14%	13%
Permanent Workers	NIL	NIL	-	NIL	NIL	-	NIL	NIL	-

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

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

S. No.	Name of the holding/ subsidiary /associate companies /joint ventures (A)	Indicate whether holding/ subsidiary/ Associate/ Joint Venture		Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)					
		Indian Subsidia	iries						
	Nil								
		Foreign Subsidi	aries						
1	NIIT USA Inc	Subsidiary	100%	Yes					
2	NIIT UK Limited	Subsidiary	100%	Yes					
3	NIIT (Ireland) Limited	Subsidiary	100%	Yes					
4	NIIT West Africa Limited	Subsidiary	100%	Yes					
5	NIIT Malaysia Sdn Bhd	Subsidiary	100%	Yes					
6	NIIT Learning Solutions (Canada) Limited	Step down Subsidiary	100%	Yes					
7	Stackroute Learning Inc, USA	Step down Subsidiary	100%	Yes					
8	St. Charles Consulting Group, LLC	Step down Subsidiary	100%	Yes					
9	Eagle Training Spain, SLU	Step down Subsidiary	100%	Yes					
10	NIIT Mexico S.DE R.L. DE C.V.	Step down Subsidiary	100%	Yes					
11	NIIT Brazil LTDA	Step down Subsidiary	100%	Yes					

VI. CSR Details

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

- (ii) Turnover (in Rs.): INR 4,038 million
- (iii) Net worth (in Rs.): INR 4,603 million

Transparency and Disclosures Compliances

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

Stakeholder	Grievance Redressal	F	FY 2022-23			FY 2021-22		
group from whom the complaint is received	Mechanism in Place (Yes/No) (If yes, then provide web-link for the grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at the close of the year	Remark	Number of complaints filed during the year	Number of complaints pending resolution at the close of the year	Remark	
Investors (other than shareholders)	Refer below table "Policies associated	NIL	NIL	NIL	NIL	NIL	NIL	
Shareholders	with BRSR principle" in Section B	NIL	NIL	NIL	NIL	NIL	NIL	
Employees and workers	Section B	NIL	NIL	NIL	NIL	NIL	NIL	
Value Chain Partners		NIL	NIL	NIL	NIL	NIL	NIL	
Customers		NIL	NIL	NIL	NIL	NIL	NIL	

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

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

S. No.	Material issue identified	(R/O)	Rationale	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
1	Climate Change and Energy Management	Opportunity	Climate change has resulted in virtual and hybrid working models, propelling the need for NLSL's online training modules. Considering we are already in the space of transition to virtual and hybrid work models; climate change poses a valuable advantage to our business	-	Positive
2	Talent Attraction and Development	Opportunity	Being a talent development corporation, developing our own human capital is a key strategic imperative for us at NLSL. We provide a strong learning culture within the organization. We also place a disproportionate focus and continuous investment in growing a pool of leaders. We have executive development programs running for all levels of the company: for individual contributors, managers and leaders. We employ technology solutions to improve employee experience, eg. we are implementing Success Factors; we have an Al BOT for engagement surveys; and we use an online portal for wellness initiatives.	-	Positive
3	Employee Health and Safety	Opportunity	Poor work environments and unsafe practices can deter employee retention and discourage workplace efficiency or productivity. Lost time injuries create loss of productivity and mental dissatisfaction of employees. Given the COVID-19 pandemic, employee demands have shifted to mental and emotional wellness rather than only that of physical. Employee well-being has been an important focus area for NLSL. When COVID first impacted us, we already had in place a wellness portal called Round Glass which was used for various health and wellness programs. We also had a panel of expents to take care of mental wellness. During the COVID period, we took care of the complete expenses related to treatment for employees and for their dependents. We also extended monthly monetary support, and educational support to the children of bereaved families. Our online wellness portal has more than 50% of employees participating in webinars on areas related to health and wellbeing. We also drive health and wellness initiatives through a tie up with Cultfit, and provide free sponsorship of membership to our employees. We take continuous feedback from NIITians through engagement surveys and feedback to design and incorporate newer initiatives in the area of wellbeing.		Positive

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S.	Material issue			In case of risk,	Financial
No.	identified	(R/O)	Rationale	approach to adapt or mitigate	implications of the risk or opportunity
4	Data Privacy and Cyber Security	Risk	Risks from cyber threats which may arise are malware attack, social engineering attack and software supply chain attacks. There is a high risk of theft of sensitive customer data, which is not only a data privacy risk but also reputational risk to the organization.	NLSL has multiple controls in place for example SOD, MFA, disk encryption and disablement of USB to ensure protection from IT risks and data privacy. We have a stringent cyber security and data privacy policy to ensure timely evasion of threats and management of data, to deter any risks that emerge from data privacy and cyber security.	Negative
5	Business Ethics and Corporate Governance	Opportunity	Business ethics are cornerstones of ensuring transparent and sustainable corporate governance frameworks. Upholding policies such as code of conduct and anti-bribery & corruption and good-governance measures to effectively implement stringent actions, among others tantamount to strong business ethics. When such business ethics are not complied with it often leads to significant reputational damage. NLSL has a Code of Conduct in place to ensure compliance with standards of business practices and legal requirements for all its employees and workers. We also have comprehensive anti-bribery and anti-corruption policy and measures to ensure compliance and whistleblower, related party transactions, etc. are also existent and material to business.	-	Positive
6	Supply chain Management	Risk	Supply chain management affects product and service quality, delivery, costs, customer experience and ultimately, profitability. Increased supply chain disruptions at the wake of geopolitical transitions, and crises such as the pandemic result in loss of business continuity. Lack of inclusive supply chains creates vacuum at the time of a crises and a robust supply chain includes local sourcing, also boosting local economies and disadvantaged communities. The organization operation depends significantly on value chain partner and it maintains a very wide base of such partners globally with ability to sources at very short interval to meet customer demands. The value proposition to its enterprise customers that the organization provides is the ability to meet certain surges of demand while, on the other hand, not requiring customers to have any fixed commitment.		Positive
7	Customer Concentration	Opportunity	The organization functions in multiple enterprise sectors and is mostly focused on Fortune 1000 organizations and 500 global organization around the world. The organization sets into its customer training and upskilling in an integral manner, which results in fewer customers having a large share or contribution towards revenue. Usually, the customer maturity process is long- term for the business.	many Fortune 1000 and Global 500 companies in over 30 countries over the past 41 years. Trusted by the world's leading companies,	



SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

					Р 1	P 2		Р 3	P 4	F 5		P 6		Р 7		P 8	Р 9
Policy and management processes	;																
 a. Whether your entity's policy, principle and its core eleme (Yes/No) 					Yes	Ye	s	Yes	No	Ye	es	Ye	s	No)	les	Yes
 b. Has the policy been approved No) 	d by	the Bo	oard? (\	′es/	Yes	Ye	s	Yes	No	Ye	es	Yes	s	No	Ì	les	Yes
c. Web link of the policies, if avai	ilable)				Refer	belo	w tabl	e "Polic	ies a	ssoci	iated	with	BRSR	princi	iple″	
 Whether the entity has transla procedures. (Yes / No) 	ited	the I	policy i	nto	Yes	Ye	s	Yes	No	Ye	es	Yes	s	No	Ì	les	Yes
3. Do the enlisted policies extend partners? (Yes/No)	to yo	our v	alue ch	ain	No	No		No	No	٨	10	N	0	No	1	۷o	No
 Name of the national and certifications/labels/ standards 	interr	nation	al cod		SO 90 SO 22			SO 14	001:20	15, IS	0 2	7001:	201	3, ISO	4500	01:20	8,
5. Specific commitments, goals, an entity with defined timelines, if any		rgets	set by	the						١	٧o						
 Performance of the entity a commitments, goals, and targets case the same are not met. 										1	٩٨						
Governance, leadership, and over	sight	ł															
by identifying various areas of init towards its employees and toward 8. Details of the highest autho implementation and oversight	ls you rity	uth of respc	the soc onsible	iety. for E									mult	iple so	cial re	spons	ibilitie
Kesponsibility policies		the	Busin	ess													
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 Does the entity have a specifier Board/ Director responsible for 	deci	ommit ision-i	tee of making	the Y on is ails.	ssues. Comm Mr. Rav Mr. Raj Mr. Vija	The me ittee N vinder endra ay K Th	ember 1embe Singh S Pav nadan	rs of the ers var ni	e comm Desi Cha Men Men	iittee i ignatio iirmar nber nber	decisi incluc		follo DIN 083 000	owing: of Mer 98231 42516 42527	mber	bility r	elated
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Questions	P	Р	Р	P	Р	P	Р	Р	Р
	1	2	3	4	5	6	7	8	9
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)	-	-	-	-	-	-	Yes	-	-

Policies associated with BRSR principle.

Principle	Policy Name	Policy Weblink
2, 5, 6	Code of Conduct	https://info.niit.com/hubfs/section46-of-the-lodr/code-of-conduct-policies/Code%20of%20Conduct.pdf
4 & 8	CSR	https://info.niit.com/hubfs/section46-of-the-lodr/code-of-conduct-policies/CSR%20Policy.pdf
9	Equal Opportunity	https://info.niit.com/hubfs/section46-of-the-lodr/BRSR-policies/equal-opportunity-policy.pdf_
4	Grievance Redressal	https://info.niit.com/hubfs/section46-of-the-lodr/BRSR-policies/grievance-redressal-policy.pdf_
3,6	Health & Safety	https://info.niit.com/hubfs/section46-of-the-lodr/BRSR-policies/health-and-wellness-policy.pdf
3	Nomination &	https://info.niit.com/hubfs/section46-of-the-lodr/code-of-conduct-policies/Nomination%20and%20
	Remuneration	Remuneration%20Policy.pdf
9	Privacy	https://info.niit.com/hubfs/section46-of-the-lodr/BRSR-policies/privacy-policy.pdf
1	Whistleblower	https://info.niit.com/hubfs/section46-of-the-lodr/code-of-conduct-policies/Whistle%20Blower%20Policy.
		pdf
3	Workplace Monitoring	https://info.niit.com/hubfs/section46-of-the-lodr/BRSR-policies/workplace-monitoring-policy.pdf

SECTION C: PRINCIPLE WISE DISCLOSURES

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

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/ principles covered under the training and its impact	% Of persons in respective category covered by the awareness programmes
Board of Directors	14	Competition and Anti-Trust, Code of Conduct, Risk Assessment and Risk Management and Compliances	100%
Key Managerial Personnel	13	Corporate strategy, leadership communication, innovation culture, stakeholder management, towards sustainability, digital disruption and transformation. Its impact was to navigate changes and strategy to drive the organization. For NLSL to have plan and strategy to not only expand businesses but to have better operational efficiency.	
Employees other than BoD & KMPs	56	Health & Safety at workplace, ISO awareness and policies, science of mind, security awareness training, POSH, Code of Conduct. Psychological wellbeing and mental wellness program.	64%
Workers	14	POSH, COVID 19 Precautions, Environment, Health and Safety Fire and safety, Physical security surveillance, Hazard Identification & Risk Assessment, First aid emergency and CPR Procedure.	83%

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

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

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

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

- 4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web link to the policy. Yes. NLSL has a Code of Conduct which defines the anti-corruption and anti-bribery guidelines incorporated in it. The link to the Code of Conduct can be accesses here: <u>https://info.niit.com/hubfs/</u>section46-of-the-lodr/code-of-conduct-policies/Code%20cf%20Conduct.pdf
- 5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

	FY 2022-23	FY 2021-22
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

	FY 202	22-23	FY 20	21-22
	Number	Remarks	Number	Remarks
No. of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NIL	NIL	NIL
No. of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	NIL	NIL	NIL

 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. NA

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered under the awareness programmes
169	The trainers/ professional engagement via contract mode covers principles like confidentiality, privacy and ethical practices in line with NGRBC Principle 1. Discussions are held with the trainers on standard of governance NLSL expects from its value chain partners.	100%

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. Firstly, NLSL takes annual affirmation from Board of Directors with reference to Conflict of Interest. Secondly, NLSL's Related Party Policy defines the process and procedures to identifying and managing conflicts of interests involving members of the Board. The policy elaborates on the guidance and mechanism in place for board members to address potential conflict of interests that may arise in certain business transactions. Before entering any transaction with a Related Party of a Board member, NLSL ensures that the Audit Committee approval is taken. Where any director is interested in any contract or arrangement with a Related Party, the director shall not participate during discussions on the subject matter of the resolution relating to such contract or arrangement.

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.

	FY 2022-23	FY 2021-22	Details of improvements in environment and social impacts
R&D	INR 65 million	INR 22 million	NLSL took the initiative of phasing out old computers with energy efficient laptops. NLSL further migrated our owned data center to the cloud, having a significant reduction in our carbon footprint.
Capex	INR 142 million	NIL	Capex has been channelized towards infrastructure improvements by NLSL. Improved equipment and better buildings enable energy efficiency and accessibility, along with a safe and healthy workplace for all our employees and workers.

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

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

NLSL has a procedure in place to onboard suppliers' basis sustainability parameters. NLSL follows a procurement process which factors MSME participation and evaluation of environment standards among our vendors. NLSL while selecting electrical, electronic and computer items, considers environmental parameters as one of the selection criteria. However, currently NLSL does not record the exact percentage of inputs sourced sustainably.

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.

Waste Type	Processes to reclaim through reuse, recycle, disposal at end of life
Plastics	NLSL follows a zero-plastic policy. If any plastic waste is generated through mechanical packaging, the same is disposed of by an authorized waste management vendor for further reuse.
E-Waste	NLSL disposes all E-Waste generated to an authorized e-waste management vendor and obtains certificate of compliance post safe disposal.
Hazardous Waste	Lubricant oil generated from DG sets is collected by an authorized waste vendor for its safe disposal.
Other Waste	All other waste such as cloths used for lubricant oils, etc. is provided to authorized waste vendor for further processing and disposal.

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

No. EPR is not applicable for NLSL.

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 communicate in public domain (Yes/No) If yes, provide the web-link.				
	Not Available								

NUT

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
Not Available	Not Available	Not Available

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

	Recycled or re-used input material to total material			
	FY 2022 - 23	FY 2021 - 22		
Not Available		Not Available		

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

		FY 2022 -	23	FY 2021 - 22			
	Re-Used Recycled Safely Disposed		Re-Used	Recycled	Safely Disposed		
Plastics (including packaging)	NIL	NIL	Yes	NIL	NIL	NIL	
E-waste	NIL	NIL	Yes	NIL	NIL	NIL	
Hazardous waste	NIL	NIL	Yes	NIL	NIL	NIL	
Other waste	NIL	NIL	Yes	NIL	NIL	NIL	

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
	Not Applicable

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

Essential Indicators

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

			C .	% Of en	nployees o	overed b	у				
Category	Total	Health i	nsurance	Acc	cident	Maternit	y benefits	Paternity	/ Benefits	Day Care facilities	
	(A)			insu	rance						
		No. (B)	% (B / A)	No. C	% (C / A)	No. (D)	% (D / A)	No.(E)	% (E / A)	No. (F)	% (F / A)
Permanent Employ	ees										
Male	894	894	100%	894	100%	-	-	894	100%	-	-
Female	665	665	100%	665	100%	665	100%	-	-	-	-
Total	1,559	1,559	100%	1,559	100%	665	100%	894	100%	-	-
Other Than Perma	nent Em	ployees									
Male	53	53	100%	53	100%	NA	NA	NA	NA	-	-
Female	31	31	100%	31	100%	NA	NA	NA	NA	-	-
Total	84	84	100%	84	100%	NA	NA	NA	NA	-	-

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

	% Of workers covered by										
	Total (A)	Health i	nsurance		cident vrance	Mat	ternity bene	efits	Paternity Benefits	Day Car	e facilities
Category		No. (B)	% (B / A)	No. C	% (C / A)	No. (D)	% (D / A)	No.(E)	% (E / A)	No. (F)	% (F / A)
Permanent Workers											
Male	-	-	-	-	-	-	-	-	-		-
Female	-	-	-	-	-	-	-	-	-		-
Total	-	-	-	-	-	-	-	-	-		-
Other Than Permane	nt Worke	ers									
Male	65	65	100%	65	100%	NA	NA	NA	NA	NA	NA
Female	5	5	100%	5	100%	NA	NA	NA	NA	NA	NA
Total	70	70	100%	70	100%	NA	NA	NA	NA	NA	NA

2.	Details of retirement benefits,	for Current Financial	Year and Previous Financial Year.
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Benefits		FY 2022-23		FY 2021-22			
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	
PF	100%	100%	Y	100%	100%	Y	
Gratuity	100%	100%	Y	100%	100%	Y	
ESI	100%	100%	Y	100%	100%	Y	

3. Accessibility of workplaces

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

NLSL is an equal opportunity employer and upholds its commitment to non-discrimination as an utmost priority. In this backdrop, NLSL recognizes accessibility is critical to ensure rights to persons with disabilities and has taken the requisite steps to ensure that it is an accessible workplace across its offices in form of infrastructural investments in form of ramps, elevators and accessible washrooms for persons with disabilities.

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

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

Gender	Permanent e	mployees	Permanent workers		
	Return to work rate Retention rate		Return to work rate	Retention Rate	
Male	100%	100%	0	0	
Female	100%	100%	0	0	
Total	100%	100%	0	0	

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	NA
Other than Permanent Workers	Yes, NLSL has a multi-tiered grievance handling mechanism that includes dedicated channels
Permanent Employees	for addressing harassment, whistle-blower, security incidents, discrimination, general grievances, etc. which applies to all permanent and non-permanent employees.
Other than Permanent Employees	

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

While NLSL does not restrict any employee from being a member of any employee-related association and provides freedom, it ensures that it abides by the local laws across the geographies that it operates in.

		FY 2022-23		FY 2021-22				
Category	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Unions (B)	% (B / A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Unions (D)	% (D / C)		
Total Permanent Employees	0	0	0	0	0	0		
Male	0	0	0	0	0	0		
Female	0	0	0	0	0	0		
Total Permanent Workers	0	0	0	0	0	0		
Male	0	0	0	0	0	0		
Female	0	0	0	0	0	0		

8. Details of training given to employees and workers

	FY 2022-23				FY 2021-22					
Category	Total (A)				On Skill upgradation			ealth and neasures	On Skill upgra- dation	
		No. (B)	% (B / A)	No (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Permanent Employees									· ·	
Male	894	568	64%	362	40%	802	643	80%	73	9%
Female	665	448	67%	195	29%	523	491	94%	50	10%
Total	1559	1016	65%	557	36%	1325	1134	86%	123	9%
Other Than Permanent Employees										
Male	53	27	51%	43	81%	25	0	0%	1	4%
Female	31	6	19%	25	81%	33	0	0%	2	6%
Total	84	33	39%	68	81%	58	0	0%	3	5%
Permanent Workers										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Total	-	-	-	-	-	-	-	-	-	-
Other Than Permanent Workers										
Male	65	65	100%	65	100%	53	33	62%	33	62%
Female	5	5	100%	5	100%	2	2	100%	2	100%
Total	70	70	100%	70	100%	55	35	64%	35	64%

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

Category	F	FY 2021-22				
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	947	819	86%	827	660	80%
Female	696	509	73%	556	400	72%
Total	1,643	1,328	81%	1,383	1,060	77%
Workers						
Male	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA

Performance and career development reviews are held only for the employees who have completed a minimum of six months of service during the financial year.

10. Health and safety management system

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

Yes, NLSL has a Health, Safety and Environment policy which governs creating a safe and health workplace for all employees and workers. NLSL follows policies and standards as recommended by ISO 45001 across its primary locations. The coverage of its occupational health and safety management system extends to all employees and workers. The Management of the company regularly monitors the compliance to health and safety norms. It also conducts mock drill at periodic intervals to ensure preparedness.

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

NLSL has assigned a one-point contact i.e., a project coordinator to oversee and resolve risks and concerns related to work-related hazards on a routine and non-routine basis. Provisions such as Job Safety Analysis (JSA) and toolbox talk create a conducive environment for employees and workers to regularly assess, identify and report risks.

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

Yes, NLSL has a safety incident reporting and management process to ensure that all work-related incidents (which include accidents, near-misses, unsafe conditions and unsafe acts) are reported and closed after taking necessary corrective actions. The organization also conduct multiple training and safety drills to create awareness about how to remove themselves from such risk.

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

Yes, The employees are eligible for annual medical health check up completely sponsored by the company. Further in key locations there are visiting doctors where employees and workers can consult without any fee. The workers are covered under the ESI scheme.

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

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

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

NLSL provides end to end health care solutions to employees as per medical insurance for them and their family members including added services such as lab services, virtual specialist doctor consultations, eye care solutions and dental services. We believe our workforce is our most valuable asset and it is towards this, that we have ensured safe and healthy workplaces for our employees across our offices in form of clean air, clean water, clean environment, air purifiers, and conducive work environment through engagement.

To deter any unsafe or unhealthy practices, NLSL observes stringent measures to ensure health and safety, beyond its above-mentioned initiatives. This includes having self-illuminated tape, anti-skid tape, battery operated emergency light across staircases and indoor purification of air to create a safe-environment and maintain health of employees and workers.

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

		FY 2022-23		FY 2021-22			
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks	
Working Conditions	NIL	NIL	-	NIL	NIL	-	
Health & Safety	NIL	NIL	-	NIL	NIL	-	

14. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or hird parties)					
Health and safety practices	100%					
Working Conditions	100%					

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

Leadership Indicators

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

Yes, to employees and workers

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

Yes, ECR challans (PF &ESIC) from the service provider are verified on a monthly basis to ensure statutory dues are deducted and deposited, in case NLSL stands as a principal employer.

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 affe workers	1,	No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment				
	FY 2022-23	FY2021-22	FY 2022-23	FY2021-22			
Employees	NIL		NIL				
Workers	NIL		NIL				

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

Yes, Based on requirement of the company in rare cases, the company either extends the service period by one to two years or contracts them as consultants for short periods. NLSL follows the practice of giving opportunity to perform, hence, non-performing employees are first put under performance improvement plan and only in case of nonperformance, thereafter, can be terminated. NLSL also out counsels people in case of redundancy after providing them with adequate time to look for alternative employment opportunities.

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	Shall commence this activity shortly.
Working Conditions	Shall commence this activity shortly.

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

Not Applicable as no such risks or concerns have emerged.

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.

NLSL Limited is a responsible corporate citizen and is committed to being responsive to all its stakeholders including shareholders, customers, business associates, employees, vendors and suppliers, governments and society at large including communities that it operates in. These approaches are laid out in our Code of Conduct document, which can be found on our <u>website</u>.

- Internal Stakeholders of NLSL include employees, senior leadership and Board of Directors.
- External stakeholders of NLSL include shareholders, customers, value chain partners and communities.

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

Stakeholder Group	Whether identified as Vulnerable	Channels of communication		Purpose and scope of engagement
Employees	No	Surveys, Focus Group Discussions, HR, internal trainings, requirements (virtual and in -person modes), Townhalls conducted quarterly, Self service portal iNIITians , Amber the friendly BOT.	quarterly, annually	Feedback & Grievance Redressal; Employee engagement (fun at work / motivation / happiness / passion / wellbeing, engagement for self-performance improvement and team productivity improvement and Career support programs.

BUSINESS RESPONSIBILITY AND	SUSTAINABILITY REPORT (Contd.)
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Stakeholder Group	Whether identified as Vulnerable	Channels of communication	Frequency of Engagement	Purpose and scope of engagement
Shareholders	No	Annual General Meetings, Focus Group Discussions, Shareholder Grievance Process, Investor meets , continuous disclosures.	Quarterly	Shareholders to be kept in loop throughout processes of the organization, to provide information through stock exchanges timely on the evolving market trends. Notices of AGMs on website of NLSL on a regular basis, regular updation of website. Investor calls after quarterly closings and publication of results.
Communities	Yes	Skilling, education, and livelihood generation. Media releases, electronic media and social media.	Half Yearly	Need Assessment for CSR Projects & Grievance Redressal
Customers	No	Training modules, online discussions, feedback sessions, Customer satisfaction surveys, account management for enterprise customers and customer experience management team for retail customers.	Weekly, monthly, annually	Resolution of any delivery challenges. And feedback on technology & services being implemented.
Value Chain Partners	No	Training sessions, online discussions, monitoring and feedback sessions, specified vendor management team for onboarding and dispute resolution	On actual need – basis	At the time of onboarding, each value chain partner is onboarded on the pre-condition of compliance to privacy, anti- corruption, anti-bribery, human rights and ethical practices. Value chain partners are also explained their rights and grievance redressal mechanism.

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

There are multiple committees of the board (risk management committee, audit committee, stakeholders relationship committee nomination and remuneration committee), where the management provides updates on matters like environmental changes, environmental risk, and other topics having a significant impact like people policy, etc. The respective business leadership team provides quarterly inputs on performance and yearly perspective planning for three years with budgets for the next year to the board members as per schedule. External professionals like statutory auditors, cost auditors, secretarial auditors, and other professional experts on matters like tax and M&A are regularly invited to submit their reports either to subcommittees or to the board directly. In fact, the NLSL Board conducts townhall meetings for its employees as the first stakeholders to be informed post the board's quarterly meeting to ensure a conducive environment to work in. Fire-side chats are also conducted for employees to voice their feedback directly to the NLSL Managing Director as well as CEO.

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 the policies and activities of the entity.

Yes, the inputs received from board members, shareholders in the AGM, employee suggestions, and customer inputs through surveys are duly addressed with a specific action plan and timeline, which are monitored and then reported back to the respective stakeholders.

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

NLSL is an equal opportunity organization, and each employee has equal rights. The concerns of our stakeholder groups are heard with utmost sensitivity, and we have a transparent process for raising their concerns independently through human resources. HR also ensures anonymity and keeps the complainant's information confidential from any and every other employee of our organization. During community programs, our point of contact creates a two-way and conducive communication pathway and our grievance redressal policy also helps take the necessary recourse for concerns of stakeholder groups.

NUT

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 2022-23		FY 2021-22			
	Total (A)	No. Of Employee / Workers Covered (B)	% (B / A)	Total (C)	No. Of Employee / Workers Covered (C)	% (D / C)	
Employee							
Permanent	1,559	1,559	100%	1,325	1,325	100%	
Other than permanent	84	84	100%	58	58	100%	
Total Employees	1,643	1,643	100%	1,383	1,383	100%	
Workers							
Permanent	-	-	-	-	-	-	
Other than permanent	70	70	100%	55	55	100%	
Total Workers	70	70	100%	55	55	100%	

2. Details of remuneration/ salary/ wages (including differently abled):

Category		FY	2022-2	23		FY 2021-22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More Minin Way	าบm
		No. B	% (B / A)	No. C	% (C / A)		No. E	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent										
Male	894	-	-	894	100%	802	-	-	802	100%
Female	665	-	-	665	100%	523	-	-	523	100%
Other than Permanent										
Male	53	-	-	53	100%	25	-	-	25	100%
Female	31	-	-	31	100%	33	-	-	33	100%
Workers										
Permanent										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
Other than Permanent										
Male	65	49	75%	16	25%	53	37	70%	16	30%
Female	5	4	80%	1	20%	2	1	50%	1	50%

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

Category	2022-2023		2021-2022	
	Number Median remuneration/ salary/ wages of respective		Number	Median remuneration/ salary/ wages of respective
		category		category
Board of Directors (BoD)	Due to the restructuring of NIIT in FY23 this information is not applicable / relevant he			
Key Managerial Personnel	not provided			
Employees other than BoD and KMP	1643	6,90,450	1383	6,57,895
Workers	70	2,28,599	55	2,09,375

(NIIT)

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

The policy and processes comply with the prevailing laws, specifically the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013." In case any employee experiences any form of sexual harassment, they can report the incident by directly writing to the <u>care4women@niitmts.com</u> / <u>grievancecell@niitmts.com</u>. The complaints raised via this channel, are investigated, and handled with utmost fairness, equality and confidentiality by the Internal Complaints Committee (ICC). The ICC includes independent professional(s) from all walks of life. NIIT further ensures that standard SLAs as per law are met timely and in a just manner.

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

6. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)				
Child Labour					
Forced or Involuntary Labour	NLSL has conducted self-assessment for 100% of its offices. The organization's				
Sexual Harassment	Code of Conduct requires engagement of people considering child labor, mc slavery, and ethical practices. NLSL also has an Internal Complaints Committee				
Discrimination at Workplace	has clear channels of reporting any workplace sexual harassment. NLSL creates				
Wages	awareness of human rights through various modes of communication.				
Others- Please specify					

7. 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.

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

NLSL is committed to providing a fair, safe and productive work environment where grievances, if any, are dealt sensitively and expeditiously. A grievance policy and process is in place for NIITians to voice their concerns so they could be effectively addressed. A grievance may be about an act, omission, situation, or decision that the NIITian feels is unfair, discriminatory, or unjustified.

NIITians are encouraged to come forward with their grievances in the knowledge that the organization will take appropriate action to address those grievances. This can be done in an informal way by verbally communicating the issue to the Manager or HR and then getting it addressed along with a member from the Grievance Redressal Committee (GRC). The other option is to submit the complaint in writing to either Manager/Business HR or posting at email id GrievanceCell@niitmts.com which is accessible by an authorized representative from the Leadership team of HR. There is another email ID CPO@niitmts.com which is directly accessed by the CHRO of the company to deal with grievance matters directly.

Yet another option is to post an Anonymous message on the Amber portal (Al powered HR Engagement portal). The link for this Anonymous link called 'Anonymous Bat' is shared with by Amber with the NIITian once s/he has completed his/her first digital chat with Amber. This stays with the NIITian and can be used at any time during one's association with NLSL. This message directly reaches the CEO and CHRO of the company.

9. Number of complaints made by employees and workers

		FY 2022-23			FY 2021-22		
Complaints	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks	
Total	NIL	NIL		NIL	NIL		
Sexual Harassment	NIL	NIL]	NIL	NIL		
Discrimination at workplace	NIL	NIL]	NIL	NIL		
Child Labour	NIL	NIL	- 1	NIL	NIL	-	
Forced Labour/Involuntary Labour	NIL	NIL	1	NIL	NIL		
Wages	NIL	NIL]	NIL	NIL		
Other Human Rights related issues	NIL	NIL		NIL	NIL		

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

Leadership Indicators

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

No business processes were modified or introduced as a result of addressing human rights grievances or complaints in the reporting period as no such complaints and grievances were raised.

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

Human rights due diligence was not conducted in the reporting period.

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?

NLSL recognizes accessibility is critical to ensure rights to persons with disabilities and has taken the requisite steps to ensure that it is an accessible workplace across its offices in form of infrastructural investments in form of ramps, elevators, and accessible washrooms for persons with disabilities.

4. Details on assessment of value chain partners:

	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	
Forced or Involuntary Labour	
Sexual Harassment	No external assessment was done.
Discrimination at Workplace	ino external assessment was done.
Wages	
Others- Please specify	

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

Not applicable.

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

Essential Indicators

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

Parameter	Unit	FY 2022 - 23	FY 2021 - 22
Total electricity consumption (A)	GJ	3,749.26	4,000.16
Total fuel consumption (B)	GJ	0.00045	0.00014
Energy consumption through other sources (C)	GJ	188.43	192.03
Total energy consumption (A+B+C)	GJ	3,937.70	4,192.19
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees)	Joules/ INR	9750 Joules / INR	1270 Joules / INR

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

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

Not Applicable.

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

5	0	
Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in Kilolitre	s)	
(i) Surface water	NIL	NIL
(ii) Groundwater	6,628	2,500
(iii) Third party water	NIL	NIL
(iv) Seawater / desalinated water	NIL	NIL
(v) Others	NIL	NIL
Total volume of water withdrawal (i + ii + iii + iv + v)	6,628	2,500
Total volume of water consumption (in KL)	6628	2500
Water intensity per rupee of turnover (Water consumed / turnover)	1.64 ML/ INR	7.61 ML/ INR

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

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

While NLSL does not have a Zero Liquid Discharge, 44 kiloliters of sewage water is treated on a daily basis by NLSL's Sewage Treatment Plants and is reused in landscaping and horticulture.

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

Parameter	Please specify unit	FY 2022 - 23	FY 2021 - 22
NOx	g/kwh	1.87	Did not monitor
SOx	g/kwh	0.19	Did not monitor
Particulate matter (PM)	g/kwh	0.13	Did not monitor
Persistent organic pollutants (POP)	μ g/m ³	NA	Did not monitor
Volatile organic compounds (VOC)	μ g/m ³	NA	Did not monitor
Hazardous air pollutants (HAP)	μ g/m ³	NA	Did not monitor

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

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

Parameter	Unit	FY 2022 - 23	FY 2021-22
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric Tonnes of CO2	414.41	102.54
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric Tonnes of CO2	739.44	788.92
Total Scope 1 and Scope 2 emissions per rupee of turnover	Grams / INR	0.28	0.27

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

The Scope 1 emissions increased in FY 23 from the previous year FY 22 in view of increase in energy consumption as offices reopened post Covid 19. In addition to this were refilled refrigerants and new air conditioner units were installed. Accounting of mobile combustion data was also initiated during FY 23.

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

NLSL continuously puts efforts to reduce Greenhouse Gas emissions by way of selecting energy efficient air conditioning, the choice of natural lighting, reducing oil leakages, and investments in renewable energy. NLSL prioritizes solar energy for its power consumption and reduces dependency on grid electricity. The company took the initiative of phasing out old computers with energy efficient laptops. NLSL also migrated its on-premise data center to cloud, significantly reducing the carbon footprint. The company moved from paper-based documents to digital documents both for customers as well as vendors. The company actively promotes online training delivery instead of offline to reduce travel, lowering carbon emission. In FY23 the majority of training programs were delivered online.

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

Parameter	FY 2022 - 23	FY 2021 - 22
Total Waste Generated (in metric tones)		
Plastic waste (A)	0.001	0.001
E-waste (B)	13.269	0.071
Bio-medical waste (C)	NIL	NIL
Construction and demolition waste (D)	0.00	0.00
Battery waste (E)	0.524	0.00
Radioactive waste (F)	0.00	0.00

Parameter	FY 2022 - 23	FY 2021 - 22
Other Hazardous waste. Please specify, if any. (G)	0.49	0
Solid Waste	NIL	NIL
Iron Scrap + Garbage (Empty drums, boxes etc.)	NIL	NIL
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) (Food Waste)	1.491	0.37
Total (A+B + C + D + E + F + G + H)	15.775	0.442
For each category of waste generated, total waste recovered through recycling, re metric tonnes)	e-using or other recov	ery operations (in
Category of waste		
(i) Recycled	9.58	0.32
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.00	0.00
Total	9.58	0.32
For each category of waste generated, total waste disposed by nature of disposal m	ethod (in metric tons)	
Category of waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	0.00	0.00

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

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.

NLSL provides all its non-hazardous and hazardous wastes through its authorized waste management vendor. Hazardous wastes include e-waste, oils from DG Sets, etc. which are all provided to authorized waste management vendors wherein the vendor recycles, reuses and disposes the waste. A certificate is also obtained from vendors to ensure proper management of hazardous waste.

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

S. No.	Location	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.				
No approvals were required considering no operations are conducted in ecologically sensitive areas							

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
			Has not undertaken		

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

Yes, NLSL is compliant with all Water, Air and Environment Protection and Control Acts. No non-compliances have been recorded against NLSL.

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Unit	FY 2022 - 23	FY 2021 - 22
GJ	188.43	192.03
GJ	NIL	NIL
GJ	NIL	NIL
GJ	188.43	192.03
	·	
GJ	3,749.26	4,000.16
GJ	0.00045	0.00014
GJ	NIL	NIL
GJ	3,749.26	4,000.16
	GJ GJ GJ GJ GJ GJ GJ GJ	GJ 188.43 GJ NIL GJ NIL GJ 188.43 GJ 188.43 GJ 188.43 GJ 188.43 GJ 0.00045 GJ 0.00045 GJ NIL

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

:

2. Provide the following details related to water discharged

Parameter	FY 2022 - 23	FY 2021 - 22			
Water discharge by destination and level of treatment (in kiloliters)					
(i) To Surface water	NIL	NIL			
- No treatment	NIL	NIL			
- With treatment – please specify level of treatment	NIL	NIL			
(ii) To Groundwater	6628	2500			
- No treatment	NIL	NIL			
- With treatment – please specify level of treatment	NLSL has sewage tree through which sewag and used it in	ge water is recycled			
(iii) Third party water	NIL	NIL			
- No treatment	NIL	NIL			
- With treatment – please specify level of treatment	NIL	NIL			
(iv) To Seawater	NA	NA			
- No treatment	NA	NA			
- With treatment – please specify level of treatment	NA	NA			
(v) Sent to third-parties	NIL	NIL			
- No treatment	NIL	NIL			
- With treatment – please specify level of treatment	NIL	NIL			
(vi) Others	NIL	NIL			
- No treatment	NIL	NIL			
- With treatment – please specify level of treatment	NIL	NIL			
Total water discharged (in kiloliters)	0	0			

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

3. 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: Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022 - 23	FY 2021 - 22
Water withdrawal by source (in kilo	liters)	
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others	Not Applicable as N	ILSL does not withdraw
Total volume of water withdrawal (in kilolitres)	water from any	water stress areas
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed / turnover)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treat	tment (in kilolitres)	
(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	Not Applicable as N	ILSL does not withdraw
- With treatment – please specify level of treatment		water stress areas
(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 kilolitres)		

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

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

Parameter	Unit	FY 2022 - 23	FY 2021 - 22
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, FCs, SF6, NF3, if available)	Metric tonnes of CO2	1881.08	Did not monitor
Total Scope 3 emissions per rupee of turnover	Grams of CO2 / INR	0.46	Did not monitor

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

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

No significant direct or indirect impact of the entity on biodiversity hence no prevention or remediation activities required.

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

No such initiatives have been undertaken by NIIT. However, NLSL follows best practices with selection of technology, managing waste as per industry standards. Further NLSL shall consider exploring innovative solutions to improve resource efficiency, reduce impact due to emissions and waste generated.

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

NLSL has a strong Business Continuity Management System (BCMS) committed to implement Business Continuity Management in accordance with ISO 22301:2019. NLSLs Business Continuity Plan (BCP) identifies Emergency Response Team (ERT), Incident Response Team (IRT), Functional Response Team (FRT) and Damage Assessment Recovery Team (DART) specific action tasks needed to be taken during an incident.

NLSL has an alternate recovery site in a secured environment with adequate infrastructure, technology, system, and resources required for recovery in place.

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

NLSL consistently monitors its impact on the environment, however, except for the above-mentioned environmental indicators on consumption, among other metrics. For its value chain partners, NLSL selects value chain partners having ethical practices as criteria but does not monitor its value chain for any such activities.

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

Do not record.

Principle 7: Businesses when engaging in influencing public and regulatory bodies, should do so in a transparent and responsible manner

Essential Indicators

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

NIIT Group has affiliations with five industry chambers/associations.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations Reach of trade a chambers/ associations (State/Nat			
1	National Association of Software and Service Companies (NASSCOM)	National		
2	Confederation of Indian Industries (CII) National			
3	IT-ITeS Sector Skills Council, NASSCOM	National		
4	Federation of Indian Chambers of Commerce & Industry (FICCI)	National		
5	PHD Chamber of Commerce and Industry (PHDCCI)	National		

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

Name of Authority	Brief of the Case	Corrective Action Taken
NIL	NIL	NIL

Leadership Indicators

1. Details of public policy positions advocated by the entity

S. No.	Policy advocated	Method for such advocacy	Whether information is in public domain (Y/N)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	
1	Membership with industry body	The Company works with apex industry institutions that are engaged in policy advocacy, like the National Association of Software and Service Companies (NASSCOM), Confederation of Indian Industries (CII), IT-ITeS Sector Skills Council, NASSCOM, and various other forums including regional Chambers of Commerce. The Company's engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and taking into consideration interests of all stakeholders.		As and when required	Yes

MIT 1

S. No.	Policy advocated	Method for such advocacy	Whether information is in public domain (Y/N)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link if Available
2	Sector-wise matters taken having national priorities.	Mr. Rajendra S Pawar (Non-Executive Chairman of NLSL Ltd) currently as Vice Chairman of NCARE (National Council of Applied Economic Research) governing body and is director in Data Security council of India, actively involves in advocating policies of data security and Al impact on economic development of the country.		As and when required	Yes
		Mr. Vijay K Thadani (Vice Chairman and MD NLSL Ltd) currently serves on the Governing Council of All India Management Association (AIMA), is a member of Board of Governors of Management & Entrepreneurship and Professional Skills Council (MEPSC) and co-chairs the CII Centre for Digital Transformation. He actively takes part in the digital transformation initiative of the government as part of the council.			
3	Platform for Environmental awareness at global level	NLSL has been chosen as a delivery partner of the InnoEnergy Skills Institute, providing services including onboarding, learning journey creation, and training of teaching staff. InnoEnergy Skills Institute is an evolution of EIT InnoEnergy's highly successful European Battery Alliance (EBA) Academy, expanding to also include green hydrogen and solar photovoltaics (PV) value chains. Together this partnership will bring agile, modular approach to training with adaptable, customizable courses and programs that meet specific needs, regardless of location, size, or technology. Greater numbers benefitting from industry-leading training is a vital step in equipping the global workforce with the knowledge and expertise needed to decarbonize the energy economy.		Quarterly business presentation	Yes

Principle 8: All 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 of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Y/N)	Results communicated in public domain (Y/N)	Relevant Web Link
			NIL		

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

S. No.	Name of project for which R&R is ongoing	Date of notification	State	District	No. of Project Affected Families	% PAFs covered by R&R	Amount paid to PAFs
	Not Applicable						

3. Describe the mechanisms to receive grievances of the local community

NIIT Group conducts regular discussions and focused group sessions with the communities it impacts through CSR initiatives.

4. Percentage of inputs directly sourced from MSMEs / small producer

	FY 2022-23 Current financial year	FY 2021-22 Previous financial year
Directly sourced from MSMEs/Small Producers	10.69%	25.00%
Sourced directly from within the district and neighboring districts	This shall be mor	nitored in future

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
NIL	NA

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

NIIT Foundation (https://niitfoundation.org) is a not-for-profit entity which partners with other organizations and corporates through which it focuses on driving projects in aspirational districts. These projects are run with the objective to provide mass awareness, skill development and improve employability in order to create better sustenance for the lives we impact. NIIT Foundation is a registered CSR implementation agency.

State	Aspirational District	Amount In (K)	
Andhra pradesh	Vizianagaram	181	
Assam	Udalguri	348	
Gujarat	Morbi	227	
Maharashtra	Nandurbar	236	
West bengal	Birbhum	156	
Bihar	Aurangabad, Banka, Begusarai, Jamui, Muzaffarpur, Purnia & Sheikhpura	4,868	
Chhattisgarh	Bastar,Korba & Mahasamund	703	
Jharkhand	Bokaro, Gumla, Khunti & Ranchi	1,705	
Odisha	Balangir, Dhenkanal, Gajapati, Kalahandi, Koraput & Rayagada	2,380	
Total		10,804	

- 3. a. Procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes/No) Shall start monitoring in future.
 - 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

S. No.	Intellectual Property based on traditional knowledge	Owned/Acquired (Yes or No)	Benefit shared (Yes or No)	Basis of calculating benefit share	
No benefits derived or shared from intellectual properties owned or acquired based on traditional knowledge					

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

Name of authority	thority Brief of the authority Corrective Action Taken			
Not Applicable				

6. Details of CSR projects.

In FY23, NIIT Foundation enrolled 58097 of participants for their short and medium term program in digital awareness, data entry, software development training etc. in urban and rural area for the under served communities. For the students who pursued the career programs job offers for 15682 were received i.e. approximately 100 working per day.

Principle 9: Business should engage with and provide value to their customers in a responsible manner

Essential Indicators

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

NLSL has a Data Subject Request Portal in place where a consumer can exercise their privacy rights. The link is provided here https://www.NIIT.com/DSR/index.html.

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	No services carry such information hence turnover as a
Safe and responsible usage	percentage is not applicable
Recycling and/or safe disposal	

		FY 2022- 23		FY 2021-22		Remarks
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	
Data privacy	1	1		0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	0	0	-	0	0	-

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

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

	Number	Reasons for recall
Voluntary recalls	Not material to business	Not material to business
Forced recalls	Not material to business	Not material to business

 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, NLSL has a framework/policy on cyber security and risks related to data privacy. The web link of the policy is: https://www.niit.com/en/learning-outsourcing/privacy-policy

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services. No such complaint received, or action taken against the company.

Leadership Indicators

- 1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available) All of NLSL's services are available on <u>www.niitmts.com</u>
- Steps taken to inform and educate consumers about safe and responsible usage of products and/or services. NLSL engages with each customer through transparent contracting process before any service commitment is made. All the disclosures pertaining to the usage of products including services and its inclusions are provided to all customers as a prerequisite.
- 3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services. NLSL agrees with service level agreements for uptime with each of its customer in its contract wherein mechanism to intimate the customer for any disruption is also provided. All measures to report any disruptions and discontinuations are also provided via full disclosure to NLSL's customers.
- 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 regards to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No). Yes, NLSL displays all information regarding its education delivery programs, in compliance with the regulatory requirements. NLSL also upholds transparency when providing information around all its services. For more details, refer to our website <u>www.niitmts.com</u>. Yes NLSL carries customer satisfaction survey relating to major products and services.
- 5. Provide the following information relating to data breaches:
 - a. Number of instances of data breaches along-with impact. 01 incidents of low level severity with no impact of individual data being compromised.
 - b. Percentage of data breaches involving personally identifiable information of customers. NIL