

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING

## SECTION A: GENERAL DISCLOSURES

### I. DETAILS OF THE LISTED ENTITY

1	<b>Corporate Identity Number (CIN) of the Listed Entity</b>	L99999MH1946PLC004768												
2	<b>Name of the Listed Entity</b>	Larsen & Toubro Limited												
3	<b>Year of incorporation</b>	07-02-1946												
4	<b>Registered office address</b>	L&T House, Ballard Estate, Mumbai- 400001, Maharashtra												
5	<b>Corporate address</b>	L&T House, Ballard Estate, Mumbai- 400001, Maharashtra												
6	<b>E-mail</b>	infodesk@larsentoubro.com												
7	<b>Telephone</b>	+91 22 67525656												
8	<b>Website</b>	www.larsentoubro.com												
9	<b>Date of start of Financial Year</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 35%;">Start Date</th> <th style="width: 35%;">End Date</th> </tr> </thead> <tbody> <tr> <td>Financial Year</td> <td>01-04-2023</td> <td>31-03-2024</td> </tr> <tr> <td>Previous Year</td> <td>01-04-2022</td> <td>31-03-2023</td> </tr> <tr> <td>Prior To Previous Year</td> <td>01-04-2021</td> <td>31-03-2022</td> </tr> </tbody> </table>		Start Date	End Date	Financial Year	01-04-2023	31-03-2024	Previous Year	01-04-2022	31-03-2023	Prior To Previous Year	01-04-2021	31-03-2022
	Start Date	End Date												
Financial Year	01-04-2023	31-03-2024												
Previous Year	01-04-2022	31-03-2023												
Prior To Previous Year	01-04-2021	31-03-2022												
10	<b>Name of the Stock Exchange(s) where shares are listed</b>													
	1. BSE Limited													
	2. National Stock Exchange of India Limited													
11	<b>Paid-up Capital</b>	₹ 274.93 Crore												
12	<b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report</b>													
	Name of contact person	Dr. Pradeep Panigrahi, Head Corporate Sustainability												
	Contact Number of contact person	+91 22 61238639												
	Email of Contact Person	pradeep.panigrahi@larsentoubro.com												
13	<b>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).</b>	The disclosure under this report is made on a standalone basis.												
14	<b>Name of assurance provider</b>	Deloitte Haskins & Sells LLP												
15	<b>Type of assurance obtained</b>	Reasonable Assurance for Core KPIs												

## II. PRODUCTS/SERVICES

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

S. No.	Description of Main Activity	Description of Business Activity	% of turnover
1	Infrastructure Projects	Engineering and Construction of (a) Building and Factories, (b) Transportation Infrastructure, (c) Heavy Civil Infrastructure, (d) Power Transmission & Distribution, (e) Water & Effluent Treatment and (f) Minerals and Metals	75
2	Energy Projects	EPC/turnkey solutions in (a) Hydrocarbon business covering Oil and Gas industry from front-end design through detailed engineering, modular fabrication, procurement, project management, construction, installation and commissioning, (b) Power business covering Coal-based and Gas-based thermal power plants including power generation equipment with associated systems and/or balance-of-plant packages and (c) EPC solutions in Green Energy space	15
3	Hi-Tech Manufacturing	Design, manufacture/construct, supply, revamp/retrofit of (a) Heavy Engineering business covering custom designed, engineered critical equipment and systems to the process plant, nuclear energy and green hydrogen sectors and (b) Precision Engineering & Systems covering marine and land platforms including related equipment & systems; aerospace products & systems; precision and electronic products and systems for defence, security, space and industrial sectors	6

### 17. Products/Services sold by the entity (accounting for 90% of the entity's turnover):

S. No	NIC Code			Product/Services	% of total turnover contributed
	Group	Class	Sub Class		
1	251	2513	25132/33/39	Manufacture of nuclear reactors, except isotope separators and auxiliary plant for use with steam generators	3
2	282	2824	28246	Manufacture of parts and accessories for machinery/equipment used by construction and mining industries	6
3	410	4100	41001	Construction of buildings carried out on own-account basis or on a fee or contract basis	13
4	421	4210	42101	Construction and maintenance of motorways, streets, roads, other vehicular and pedestrian ways, highways, bridges, tunnels and subways	29
			42102	Construction and maintenance of railways and rail-bridges	
5	422	4220	42201	Construction and maintenance of power plants	2
			42202	Construction/erection and maintenance of power, telecommunication and transmission lines	14
			42204	Construction and maintenance of water main and line connection, water reservoirs including irrigation system (canal)	13
			42205	Construction and repair of sewer systems including sewage disposal plants and pumping stations	
6	429	4290	42901	Construction and maintenance of industrial facilities such as refineries, chemical plants, etc.	13

### III. OPERATIONS

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

Location	Number of plants	Number of offices	Total
National	18	28	46
International	0	13	13

#### 19. Markets served by the entity:

##### a. Number of locations

Location	Number
National (No. of States)	Pan India
International (No. of Countries)	64

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

21%

##### c. A brief on types of customers

The Company's primary businesses are EPC projects in infrastructure and energy and hi-tech manufacturing of equipment and process for industries. Government (sovereign, sub-national, local) and related entities (govt. owned/controlled corporations) are the largest clients of the Company. Other clients are private companies, including foreign companies, in various sectors and industries.

### IV. EMPLOYEES

#### 20. Details as at the end of Financial Year:

##### a. Employees and workers (including differently abled):

S. No	Particulars <sup>1</sup>	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	52,224	48,019	91.9	4,205	8.1
2.	Other than Permanent (E)	5,041	4,793	95.1	248	4.9
3.	<b>Total employees (D + E)</b>	57,265	52,812	92.2	4,453	7.8
<b>WORKERS</b>						
4.	Permanent (F)	2,079	2,073	99.7	6	0.3
5.	Other than Permanent (G)	3,48,094	3,45,287	99.2	2,807	0.8
6.	<b>Total workers (F + G)</b>	3,50,173	3,47,360	99.2	2,813	0.8

<sup>1</sup> Other than permanent employees comprise Fixed Term Employees (FTEs). 'Permanent' workers include only those workers who are employed for full-time or part-time work for an indeterminate period with the Company. 'Other than Permanent' workers include workers on third-party roll and contractual categories.

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

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	45	42	93.3	3	6.7
2.	Other than Permanent (E)	0	0	0	0	0
3.	<b>Total differently abled employees (D + E)</b>	45	42	93.3	3	6.7
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	15	15	100	0	0
5.	Other than Permanent (G)	13	13	100	0	0
6.	<b>Total differently abled workers (F + G)</b>	28	28	100	0	0

## 21. Participation/Inclusion/Representation of women

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors <sup>2</sup>	17	1	5.9
Key Management Personnel	1	0	0

<sup>2</sup> The Chairman & MD and CFO are included in the Board of Directors.

## 22. Turnover rate for permanent employees and workers

Particulars	FY 2023-24 [values in %]			FY 2022-23 [values in %]			FY 2021-22 [values in %]		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	11.5	14.0	11.7	11.8	20.1	12.5	14.3	20.6	14.7
Permanent Workers	9.5	0	9.5	1.8	0	1.8	Not tracked		

## V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

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

S. No.	Name of the Company (A)	Holding/ Subsidiary/ Associate/Joint Venture	% of shares held by the listed entity	Does the entity indicated at column (A), participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Ahmedabad-Maliya Tollway Limited *	Joint Venture	51.00	No
2	Avenue Techpark (Bangalore) Private Limited	Subsidiary	100.00	No
3	Bangalore Fortune Techpark Private Limited	Subsidiary	100.00	No
4	Bangalore Galaxy Techpark Private Limited	Subsidiary	100.00	No
5	Bangalore Spectrum Techpark Private Limited	Subsidiary	100.00	No
6	Bhilai Power Supply Company Limited	Subsidiary	99.90	No
7	Bluefin Solutions Sdn. Bhd. ®	Subsidiary	68.60	No
8	Business Park (Powai) Private Limited	Subsidiary	100.00	No
9	Chennai Nova Techpark Private Limited	Subsidiary	100.00	No
10	Chennai Vision Developers Private Limited	Subsidiary	100.00	No
11	Corporate Park (Powai) Private Limited	Subsidiary	100.00	No
12	Graphene Solutions Sdn. Bhd.	Subsidiary	73.74	No
13	Graphene Solutions Taiwan Limited	Subsidiary	73.74	No
14	Hydrocarbon Arabia Limited Company	Joint Venture	60.00	No
15	Hi-Tech Rock Products & Aggregate Limited	Subsidiary	100.00	No
16	Kudgi Transmission Limited *	Joint Venture	51.00	No
17	L&T Aviation Services Private Limited	Subsidiary	100.00	No
18	L&T Capital Company Limited	Subsidiary	100.00	No
19	L&T Chennai Tada Tollways Limited *	Joint Venture	51.00	No
20	L&T Community Welfare Association ^	Subsidiary	100.00	No
21	L&T Construction Equipment Limited	Subsidiary	100.00	No
22	L&T Deccan Tollways Limited *	Joint Venture	51.00	No
23	L&T Electrolysers Limited	Subsidiary	100.00	No
24	L&T Energy Green Tech Limited (Formerly known as L&T Power Limited)	Subsidiary	100.00	No

S. No.	Name of the Company (A)	Holding/ Subsidiary/ Associate/Joint Venture	% of shares held by the listed entity	Does the entity indicated at column (A), participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
25	L&T Energy Hydrocarbon Engineering Limited (Formerly known as L&T-Chiyoda Limited)	Subsidiary	100.00	No
26	L&T Finance Limited <sup>§</sup> (Formerly known as L&T Finance Holdings Limited)	Subsidiary	65.86	No &
27	L&T Financial Consultants Limited	Subsidiary	65.86	No
28	L&T Geostructure Private Limited	Subsidiary	100.00	No
29	L&T Global Holdings Limited	Subsidiary	100.00	No
30	L&T Himachal Hydropower Limited	Subsidiary	100.00	No
31	L&T Howden Private Limited	Joint Venture	50.10	No
32	L&T Hydrocarbon Saudi Company LLC (Formerly known as Larsen & Toubro Atco Saudi LLC)	Subsidiary	100.00	No
33	L&T Infra Investment Partners Advisory Private Limited	Subsidiary	65.86	No
34	L&T Infra Investment Partners Trustee Private Limited	Subsidiary	65.86	No
35	L&T Infrastructure Development Projects Limited *	Joint Venture	51.00	No
36	L&T Interstate Road Corridor Limited *	Joint Venture	51.00	No
37	L&T MBDA Missile Systems Limited	Joint Venture	51.00	No
38	L&T Metro Rail (Hyderabad) Limited	Subsidiary	99.99	No
39	L&T-MHI Power Boilers Private Limited	Joint Venture	51.00	No
40	L&T-MHI Power Turbine Generators Private Limited	Joint Venture	51.00	No
41	L&T Modular Fabrication Yard LLC	Subsidiary	70.00	No
42	L&T Network Services Private Limited	Subsidiary	100.00	No
43	L&T Offshore Private Limited # (Formerly known as L&T Sapura Offshore Private Limited)	Subsidiary	100.00	No
44	L&T Parel Project Private Limited	Subsidiary	100.00	No
45	L&T Power Development Limited	Subsidiary	100.00	No
46	L&T Rajkot-Vadinar Tollway Limited *	Joint Venture	51.00	No
47	L&T Realty Developers Limited	Subsidiary	100.00	No
48	L&T Samakhiali Gandhidham Tollway Limited *	Joint Venture	51.00	No
49	L&T Sambalpur - Rourkela Tollway Limited *	Joint Venture	51.00	No
50	L&T Sapura Shipping Private Limited	Joint Venture	60.00	No
51	L&T-Sargent & Lundy Limited	Joint Venture	50.01	No
52	L&T Seawoods Limited	Subsidiary	100.00	No
53	L&T Semiconductor Technologies Limited	Subsidiary	100.00	No
54	L&T Special Steels and Heavy Forgings Private Limited	Joint Venture	74.00	No
55	L&T Technology Services (Canada) Limited	Subsidiary	73.74	No
56	L&T Technology Services Limited	Subsidiary	73.74	No &
57	L&T Technology Services LLC	Subsidiary	73.74	No
58	L&T Technology Services Poland Spółka Z Ograniczoną... Odpowiedzialnością...	Subsidiary	73.74	No
59	L&T Technology Services Pte. Ltd. (Formerly known as Graphene Solutions Pte. Ltd.)	Subsidiary	73.74	No
60	L&T Technology Services (Shanghai) Co. Ltd.	Subsidiary	73.74	No

S. No.	Name of the Company (A)	Holding/ Subsidiary/ Associate/Joint Venture	% of shares held by the listed entity	Does the entity indicated at column (A), participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
61	L&T Thales Technology Services Private Limited	Subsidiary	54.57	No
62	L&T Transportation Infrastructure Limited*	Joint Venture	51.00	No
63	L&T Valves Arabia Manufacturing LLC	Subsidiary	100.00	No
64	L&T Valves Limited	Subsidiary	100.00	No
65	L&T Valves USA LLC	Subsidiary	100.00	No
66	Larsen & Toubro (East Asia) Sdn. Bhd.+	Subsidiary	30.00	No
67	Larsen & Toubro Electromech LLC	Subsidiary	70.00	No
68	Larsen & Toubro Heavy Engineering LLC	Subsidiary	70.00	No
69	Larsen & Toubro International FZE	Subsidiary	100.00	No
70	Larsen & Toubro Kuwait Construction General Contracting Company (With Limited Liability)+	Subsidiary	49.00	No
71	Larsen & Toubro Oman LLC	Subsidiary	65.00	No
72	Larsen & Toubro Saudi Arabia LLC	Subsidiary	100.00	No
73	Larsen & Toubro T&D SA (Pty) Limited	Subsidiary	72.50	No
74	GH4India Private Limited	Joint Venture	33.33	No
75	Larsen & Toubro Qatar LLC @+	Subsidiary	49.00	No
76	Larsen Toubro Arabia LLC	Subsidiary	75.00	No
77	LH Residential Housing Private Limited	Subsidiary	100.00	No
78	LH Uttarayan Premium Realty Private Limited	Subsidiary	100.00	No
79	LTIMindtree Canada Limited (Formerly known as Larsen & Toubro Infotech Canada Limited)	Subsidiary	68.60	No
80	LTIMindtree Financial Services Technologies Inc. (Formerly known as L&T Infotech Financial Services Technologies Inc.)	Subsidiary	68.60	No
81	LTIMindtree GmbH (Formerly known as Larsen & Toubro Infotech GmbH)	Subsidiary	68.60	No
82	LTIMindtree Information Technology Services (Shanghai) Co. [Formerly known as L&T Information Technology Services (Shanghai) Co. Ltd.]	Subsidiary	68.60	No
83	LTIMindtree Limited (Formerly known as Larsen & Toubro Infotech Limited)	Subsidiary	68.60	No &
84	LTIMindtree LLC (Formerly known as Larsen & Toubro Infotech LLC)	Subsidiary	68.60	No
85	LTIMindtree Middle East FZ-LLC (Formerly known as LTI Middle East FZ-LLC)	Subsidiary	68.60	No
86	LTIMindtree Norge AS (Formerly known as Larsen & Toubro Infotech Norge AS)	Subsidiary	68.60	No
87	LTIMindtree PSF S.A. (Formerly known as Syncordis PSF S.A. )	Subsidiary	68.60	No
88	LTIMindtree S.A. (Formerly known as Syncordis S.A. Luxembourg )	Subsidiary	68.60	No
89	LTIMindtree, Sociedad De Responsabilidad Limitada De Capital Variable (Formerly known as L&T Infotech S. De. Rl. De. Cv.)	Subsidiary	68.60	No

S. No.	Name of the Company (A)	Holding/ Subsidiary/ Associate/Joint Venture	% of shares held by the listed entity	Does the entity indicated at column (A), participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
90	LTIMindtree South Africa (Pty) Limited [Formerly known as Larsen and Toubro Infotech South Africa (Pty) Limited]	Subsidiary	47.73	No
91	LTIMindtree Spain SL (Formerly known as L&T Information Technology Spain SL)	Subsidiary	68.60	No
92	LTIMindtree Switzerland AG (Formerly known as Nielsen+Partner Unternehmensberater AG)	Subsidiary	68.60	No
93	LTIMindtree (Thailand) Limited (Formerly known as Nielsen & Partner Company Limited)	Subsidiary	68.60	No
94	LTIMindtree UK Limited (Formerly known as Larsen & Toubro Infotech UK Limited)	Subsidiary	68.60	No
95	LTIMindtree USA Inc. (Formerly known as Lymbyc Solutions Inc.)	Subsidiary	68.60	No
96	LTH Milcom Private Limited	Subsidiary	56.67	No
97	Millennium Techpark (Chennai) Private Limited	Subsidiary	100.00	No
98	Nabha Power Limited	Subsidiary	100.00	No
99	Nielsen & Partner Pty. Ltd.	Subsidiary	68.60	No
100	Nielsen+Partner Pte. Ltd.	Subsidiary	68.60	No
101	Nielsen+Partner Unternehmensberater GmbH	Subsidiary	68.60	No
102	Panipat Elevated Corridor Limited *	Joint Venture	51.00	No
103	PNG Tollway Limited *	Joint Venture	37.74	No
104	Prime Techpark (Chennai) Private Limited	Subsidiary	100.00	No
105	PT. Larsen & Toubro	Subsidiary	100.00	No
106	Raykal Aluminium Company Private Limited	Joint Venture	75.50	No
107	Rewin Infrastructure Limited *	Joint Venture	51.00	No
108	Syncordis Limited, UK	Subsidiary	68.60	No
109	Syncordis Sarl, France	Subsidiary	68.60	No
110	Vadodara Bharuch Tollway Limited *	Joint Venture	51.00	No
111	Watrak Infrastructure Private Limited *	Joint Venture	51.00	No
112	Indiran Engineering Projects and Systems Kish (LLC)	Joint Venture	50.00	No
113	Gujarat Leather Industries Limited <sup>@</sup>	Associate	50.00	No
114	Grameen Capital India Private Limited <sup>%</sup>	Associate	17.12	No
115	International Seaports (Haldia) Private Limited <sup>%</sup>	Associate	14.25	No
116	L&T Camp Facilities LLC	Associate	49.00	No
117	Magtorq Private Limited	Associate	42.85	No
118	Magtorq Engineering Solutions Private Limited	Associate	39.28	No
119	Larsen & Toubro Qatar & HBK Contracting Co. WLL <sup>&amp;</sup>	Associate	50.00	No

<sup>@</sup> In process of Liquidation.

\* Sold off w.e.f. April 10, 2024.

<sup>^</sup> Subsidiary as per Companies Act, 2013.

<sup>§</sup> L&T Finance Limited, L&T Infra Credit Limited and L&T Mutual Fund Trustee Limited was merged with L&T Finance Holdings Limited. Thereafter, the name of L&T Finance Holdings Limited was changed to L&T Finance Limited w.e.f. March 28, 2024.

<sup>#</sup> Wholly owned subsidiary of the Company w.e.f. December 27, 2023.

<sup>%</sup> Associate of a subsidiary company under Companies Act, 2013.

<sup>+</sup> Subsidiary by virtue of control over composition of Board of Directors.

<sup>&</sup> These subsidiaries have a separate BRSR.

**VI. CSR DETAILS****24. CSR Details**

Whether CSR is applicable as per Section 135 of Companies Act, 2013	Yes
Turnover (in ₹ Crore)	1,26,236
Net worth (in ₹ Crore)	64,416

**VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES****25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

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 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	–	0	0	–
Investors (other than shareholders)	Yes	0	0	–	0	0	–
Shareholders	Yes	0	0	–	0	0	–
Employees and workers <sup>3</sup>	Yes	510	5	–	211	0	–
Customers	Yes	32	10	–	115	7	–
Value Chain Partners	Yes	59	18	–	252	95	–
Others	Yes	52	23	Whistleblower complaints <sup>4</sup>	18	3	Whistleblower complaints

<sup>3</sup> Higher reported cases due to streamlining of complaints and grievances registration system viz HEERA, a bot based system incorporated in MS teams. Includes complaints related to salary, benefits, policies, portals, mediclaim, leave, work facilities. Complaints related to sexual harassment are addressed through the mechanism stated in the POSH Policy and respective Internal Complaints Committee.

<sup>4</sup> Higher reported cases due to increased awareness amongst stakeholders.

Though the Company does not have a formal grievance redressal policy/ies, there are detailed procedures in place for addressing the grievances across different stakeholders.

Details of the grievance redressal mechanism are elucidated below:

**Investors and Shareholders:** The Company has designated an exclusive e-mail id [IGRC@Larsentoubro.com](mailto:IGRC@Larsentoubro.com), to enable investors and shareholders to register their grievances, if any. Other mechanisms to receive the grievances are physical letters to the registered office address, e-mails to the Registrar and Transfer Agent (RTA), KFin Technologies Ltd. (KFinTech) on their designated email id [inward.ris@kfintech.com](mailto:inward.ris@kfintech.com), physical letters or telephone call or physical visit to RTA, designated grievance redressal facilitation platform of SEBI – SCORES, from Stock Exchanges i.e. BSE & NSE through their online portals, letters received from Registrar of Companies (ROC) and complaints received on Smart ODR Portals of BSE and NSE. Each email received through IGRC ID is responded to wherever the details are readily available with the Company. All grievances received by RTA are forwarded to the Company and the Company can view scanned copies of these emails and replies in Karisma system (KFinTech software portal). The Company regularly monitors Inward Report which is available on Karisma Portal of KFinTech to ensure that Service Level Agreement (SLA) timelines are properly followed for closure of queries/complaints received. Complaints received through stock exchanges, regulators, ROC are monitored and the responses are uploaded on the respective regulators' portal. The Company regularly checks the status of closure of these complaints. SLA for resolving all the queries as well as complaints is 30 days. On a quarterly basis, the Company submits a report to Stock Exchanges providing details of complaints received and redressed. These details also placed with the Stakeholders Relationship Committee and the Board on a quarterly basis, for their information.



**Supply Chain Partners:** The grievances are primarily registered and redressed through a dedicated vendor management platform called Partner portal for contractual and Whistleblowing Policy for other than contractual grievances. Partner portal captures the contractual grievances such as administrative and statutory compliances, payment, invoicing, contractual clauses, material and services schedule and delivery, quality non-conformances, global geo-political concerns beyond the contract but affecting contract performance. Typically, in most cases, based on the priority, complexity and severity of the grievance, the resolution time may range from 30-45 working days. In cases of major disputes, the resolution time may be more than 45 days. The entire process entails continuous dialogue and feedback. For grievances other than contractual, the Company has formulated Whistleblower Policy for Vendors & Channel Partners with a view to provide a mechanism for vendors of the Company to express genuine concerns about unethical behaviour, improper practice, any misconduct, any violation of legal or regulatory requirements, actual or suspected fraud, without fear of punishment or unfair treatment. The Policy was also circulated to all registered vendors across the Company and is available at <https://www.larsentoubro.com/corporate/about-lt-group/corporate-policies/>

The grievance redressal mechanism for employees and workers, community and customers are explained in Principle 3, 8 and 9 respectively.

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

The Company conducts materiality assessment to identify and prioritize the key material topics pertaining to ESG and understand the relative importance of these topics to the stakeholders and businesses. In FY 2021-22, the Company engaged with a diverse set of internal and external stakeholders to update its materiality matrix. The material topics, if addressed and strengthened can become a strength and if not, can pose a risk. For certain material topics, the focus is more on the potential risk and the approach taken by the Company to ensure that the risk does not materialize. This is outlined in the table in ‘Understanding Materiality’ section of Integrated Annual Report FY 2023-24.

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURE

Disclosure Questions	Principles								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Policy and management processes</b>									
1. a. Whether your entity’s policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes, each principle and its core elements are covered by one or more policies of the Company.								
b. Has the policy been approved by the Board? (Yes/No)	Yes, the policies are approved by the Board/Board Committee/Executive Committee as applicable								
c. Web Link of the Policies, if available	The policies are available at <a href="https://www.larsentoubro.com/corporate/about-lt-group/corporate-policies/">https://www.larsentoubro.com/corporate/about-lt-group/corporate-policies/</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Most of the policies are implemented through procedures which are either incorporated in the policies or available as separate documents/SOPs/processes.								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes, the Code of Conduct for the supply chain partners cover key aspects of the Company’s policies applicable to the value chain partners. Furthermore, some of the other Company policies such as Whistleblowing Policy for Vendor and Channel partners as relevant are also extended to the supply chain partners.								
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Some of the standards, certifications, codes adopted by the Company are as follows: P1: SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 P2: SA8000 (key manufacturing facilities), ISO 14001, ISO 45001 P3: Factories Act, 1948, Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996, SA8000 (key manufacturing facilities), ISO 45001 P5: Factories Act, 1948, Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996, SA8000 (key manufacturing facilities) P6: ISO 14001, ISO 50001 P8: CSR disclosures pursuant to Section 135 of the Companies Act, 2013 P9: ISO 27001: 2013								

Disclosure Questions	Principles								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Policy and management processes</b>									
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.		(a)	(f) (g)		(g)	(a)(b)(c)(d)		(e)	
6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.		(a)	(f) (g)		(g)	(a)(b)(c)(d)		(e)	

#	Parameter/Metric	Target FY 2025-26	Achieved FY 2023-24
(a)	Green Business portfolio (% of revenue)	40%	50%
(b)	Renewable energy (% electricity)	50% [baseline year FY 2020-21]	9.2%
(c)	Emissions Intensity Reduction	-25% [baseline year FY 2020-21]	-10%
(d)	Tree plantation	1.5 -2 million/yr	~4 million
(e)	CSR beneficiaries <sup>5</sup>	1.7 million	1.6 million
(f)	Diversity ratio	10%	8.1%
(g)	Mission Zero Harm		LTIFR for FY24: 0.04 (Employees)   0.07 (Workers)

<sup>5</sup> The target was to impact 1.6 million beneficiaries by FY 2025-26. Since, the Company already attained its FY 2025-26 target during FY 2023-24, the target has been pushed further and the new target is to impact 1.7 million beneficiaries by FY 2025-26.

Renewable energy (% of total electricity) is significantly lower than the short-term target due to the challenges faced in sourcing renewable energy by the Company. Issues faced for sourcing at project sites are unavailability of adequate area for installing solar modules, difficulties in getting green open access for temporary connections, developers' preference for long term power purchase agreements (10-15 years) and varying regulations and charges across the states.

### Governance, leadership and oversight

#### 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements.

L&T is progressing on various dimensions of ESG by strengthening policies and processes, improving systems, translating plans into action towards achieving targets, continuous monitoring and review and building capacity of the workforce through various channels.

The Company has committed to achieve Carbon Neutrality by 2040 and Water Neutrality by 2035, and in-line with long term targets, the Company has taken interim targets up to FY 2025-26. The Company's overall GHG emission intensity reduced by 12.2% in FY 2023-24 (7.8 tCO<sub>2</sub>e/₹ Cr in FY 2023-24 compared to 8.9 tCO<sub>2</sub>e/₹ Cr of the previous FY 2022-23) and this is in line with the reduction path up to FY 2025-26. Reduction in emission intensity was primarily driven by decrease in energy intensity by 15.9% in FY 2023-24. Emissions reduction would have been higher, had it not been for the challenges faced in increasing sourcing of renewable power, which stood at 9.2% (of electricity consumption) during the year.

The Company's strategy towards achieving Carbon Neutrality is based on two key pillars – reducing fossil fuel consumption and increasing use of renewable energy in electricity consumption. With more than 700 sites, EPC projects present significant challenges in implementing these strategies owing to their temporary operations (typically 3-4 years) at any project site, open boundaries, and extensive spatial coverage, especially in the context of linear projects. The business units of the Company have identified and are implementing several initiatives to progress towards the targets. Furthermore, the Company has formed two high-level taskforces during the year to help increase renewable electricity sourcing and reduce diesel consumption.

Biodiversity promotion is another vital area and the Company has set a target of 1.5-2 million saplings per annum. During the year, the Company planted around 4 million saplings through large scale plantation drives across the country. In recent past, the Company had planted 150 hectares of mangroves near the A. M. Naik Heavy Engineering Complex, Hazira, Surat in Gujarat, which continue to protect coastal villages from incursion of salt water and facilitate storage of blue carbon. The Company is exploring different options for tracking survival and growth of saplings.

The Company is focusing on reducing water consumption intensity for achieving Water Neutrality. This is driven through initiatives such as water use efficiency, recycling of wastewater, rainwater harvesting and use of treated wastewater from municipal corporations. The Company also undertakes significant water conservation and ground water recharge through projects under the Company's CSR programmes across different locations of the country. The Company has initiated steps for a third-party assessment to estimate the positive impact of these CSR initiatives.

Recognizing the importance of Circular Economy on the businesses and the environment, the Company is taking numerous steps, including use of recycled or non-virgin material. In FY 2023-24, approximately 32% of input material was eco-friendly and non-virgin material. L&T Construction Research and Testing Centre (LTCRTC) in Chennai, which is recognized by the Department of Scientific and Industrial Research (DSIR) and accredited by the National Accreditation Board for Testing and Calibration Laboratories (NABL), continues to experiment with new material for replacing traditional material used in construction work. In FY 2023-24, Research & Testing Centre has achieved some encouraging results with design of mixes with low embodied carbon materials e.g., glass fibre textiles and with use of industrial by-products e.g., steel slag. (Further details are provided in Intellectual Capital section of the Integrated Annual Report FY 2023-24.)

During the year, the Company has taken substantial effort and actions to handhold and build awareness of the supply chain partners on ESG. The Company has started assessing its supply chain partners on ESG parameters starting with 25 in FY 2022-23 and 200 in FY 2023-24. The assessment in the coming years will be more comprehensive and structured for improving ESG orientation as well as performance of the suppliers.

The Company had set a target to achieve 40% of total revenue from Green Business by FY 2025-26 and has already exceeded by achieving 50% in FY 2023-24. Green Business is centred around clean mobility, clean energy, water and sanitation infrastructure and other related areas. The Company has been ranked third globally in 'Top 200 Environmental Firms' list consecutively in 2022 and 2023 by Engineering News Record (ENR), a reputed publication for the construction industry worldwide.

The Company is focussed on providing equal opportunity, ensuring diversity and inclusion, safe workplace and wellbeing of its workforce. The Company has implemented multiple initiatives for safeguarding their health and safety. Skill upgradation as well as developing capabilities of the workforce for the future is a continuous thrust area for the Company. During the year, around 24,000 employees and 3,50,000 contract workmen have undergone training on health and safety. Several new initiatives were rolled out during FY 2023-24 to instil a high-performance work culture. For example, the Company launched Project NEEV (Nurture, Educate, Empower to create Value) to inculcate a culture of effective performance and continuous feedback.

The gender diversity stands at 8.1% with a target to reach 10% by FY 2025-26. Over the last two years, the Company has maintained hiring of 30% women Graduate Engineer Trainee (GET) and Post Graduate Engineer Trainee (PGET) and is continuously ramping up the efforts towards diverse and inclusive workplace. Various campaigns were organized, celebrating PRIDE month and people with different abilities, to increase awareness on diversity beyond gender. With the intention of developing a pipeline of women leaders, 495 women employees were handpicked to participate in WINSPIRE series of Leadership Development Programs during the last few years, with a 142% rise in participation rate.

Corporate Social Responsibility has been a primary focus of the Company, much before it became part of the legislation. The overarching theme for our CSR programme is to develop India's Social Infrastructure by focusing on water and sanitation, education, health and skill building. In FY 2023-24, CSR initiatives impacted 1.6 million lives, with a target to reach 1.7 million beneficiaries by FY 2025-26. The Company's Integrated Community Development Programmes (ICDP) initiated 10 years ago, helps in building resilience in rural communities, especially in remote water-scarce locations of Maharashtra, Tamil Nadu and Rajasthan covering an area of ~43,091 hectares. The Company is scaling up and replicating these models in other locations. In all ICDP locations, the water table has risen by an average of 8 meters from the baseline benefitting nearly 25,000 households. Through these consistent efforts, the Company aims to improve quality of life, reduce social inequalities, promote self-sufficiency, and empower individuals in vulnerable and marginalised communities.

The Company is striving to ensure sustainable and inclusive growth. The Company believes in taking a balanced approach for creating enduring long-term value for its multiple stakeholders – customers, suppliers, business partners, shareholders, community, the society, and the planet. The Company is pursuing the path of purposeful progress with enthusiasm and optimism.

8. **Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).**

The Chairman & MD and the Board are the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).

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

Yes, the Company's CSR & Sustainability Committee is responsible for decision making on sustainability related issues. For details of the composition, role and terms of reference, please refer to Annexure 'B' to the Board Report of the Integrated Annual Report FY 2023-24.

10. **Details of Review of NGRBCs by the Company:**

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee					Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)			
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Yes, the performance against policies is reviewed by the Board/Board Committees/Executive Committee on periodic basis.								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Company complies with the extant regulations and principles as are applicable.								

11. **Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.**

P1	P2	P3	P4	P5	P6	P7	P8	P9
The Company has over 350 global certifications across the businesses provided by third party audit agencies such as Deloitte Haskins & Sells LLP, DNV India, TUV-Nord, LRQA. These agencies conduct audits across businesses on standards such as ISO / IEC 27001 (Information Security Management System-ISMS), ISO 14001 (Environment Management System), ISO 45001 (Occupational Health and Safety Management System), ISO 9001 (Quality Management System), AS 9100 (Aerospace), SA8000 (Social Accountability Standard), ISO 29001 (Quality Management System for Oil & Gas Industry), ISO 50001 (Energy Management System), American Society of Mechanical Engineers (ASME), ISO 20000 (IT Service Management), HR Management-ISO 30400 Series, Innovation Management- ISO 50501, ISO 56000 Series, Project Management-ISO 10006, ISO 21500 Series, Risk Management-ISO 31000 Series, Governance-ISO 19600, ISO 37000 Series, Anti-Bribery Management-ISO 37001, ESG assurance – SSAE 3000. During these audits, components such as policies, processes, procedures, records, monitoring and review process are checked and verified by the third party.								

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)									Not applicable
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

**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 programmes on any of the Principles during the financial year:**

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons covered by the awareness programmes
Board of Directors	4	Business, strategy, risk, Induction, ESG, visit to site/operative plants and update of laws	91
Key Managerial Personnel	6	Business, strategy, risk, regulatory discussions, ESG, visit to site/operative plants and update of laws	100
Employees other than BoD and KMPs	5,766	<p>The Company conducts numerous online and offline training led by internal or external faculty/expert throughout the year on key topics such as Safety, Code of Conduct, Prevention of Sexual Harassment, cybersecurity, diversity and inclusion, sustainability for employees across the Company. In addition, employees are provided need-based training as per their job and role requirement, covering aspects such as behavioural competency, leadership development, project management.</p> <p>The Company is also focussed on skill upgradation such as engineering/ designing software, artificial intelligence, machine learning, Behaviour Based Safety, data analysis and visualization, IoT, IS Standards and Codes.</p>	100
Workers	1,32,843	The contractual workforce undergoes numerous trainings which includes but not limited to, health and safety, equipment operation, handling of tools and material, behaviour based safety, waste management, first aid, work at heights.	100

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

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

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

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

No cases have been reported during FY 2023-24.

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, the Company has a policy on anti-bribery and anti-corruption ('ABAC' policy) available at <https://www.larsentoubro.com/corporate/about-It-group/corporate-policies/>. The Company is committed to complying with all applicable laws and regulations which govern the Company's operations across every location. It provides a guiding framework and covers various aspects such as, but not limited to, expected standard of behaviour, having appropriate controls, monitoring, reporting, training and awareness. This Policy is applicable to all employees working at all levels and grades of the Company, including the Board Members and Senior Managerial Personnel (Senior officers), employees, managers, executives, supervisors, workers and other equivalent grades of employees of the Company and fixed term contract employees. This Policy has also been extended to any other person associated with the Company and such person acting on behalf of the Company through the Code of Conduct for Suppliers (which includes Intermediaries including Consultants/Agents/Business Partners/Vendors). Furthermore, the Company has already adopted a Code of Conduct for Board of Directors and Senior Management, Code of Conduct for Supervisory, Executive and Officers, Code of Conduct for Suppliers (which includes intermediaries including Consultants/Agents/ Business Partners/Vendors), Whistle Blower Policy, Whistle-Blowers Policy for Vendor and Channel Partners' and other detailed procedures to ensure compliance and uphold the principles of ABAC policy. All forms of bribery and corruption are prohibited, and adequate measures are in place to prevent such instances. The Company maintains a policy of 'Zero Tolerance' of any practice that may be deemed to be corruption, either active or passive.

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 2023-24	FY 2022-23
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	–	0	–
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	–	0	–

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

No cases or complaints received in the above matters.

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

	FY 2023-24	FY 2022-23
Number of day of accounts payables	142	166

**9. Open-ness of business**

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

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases <sup>6</sup>	a. Purchases from trading houses as % of total purchases	Not estimated	
	b. Number of trading houses where purchases are made from		
	c. Purchases from top 10 trading houses as % of total purchases from trading houses		
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	Not applicable	
	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)	3.26%	3.11%
	b. Sales (Sales to related parties / Total Sales)	1.23%	1.14%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	16.68%	31.85%
	d. Investments (Investments in related parties / Total Investments made)	67.58%	62.87%

<sup>6</sup> Currently not estimated since purchases from trading houses are not tracked.

**LEADERSHIP INDICATORS**
**1. Awareness programmes conducted for value chain partners on any of the Principles during the FY:**

Sr.no	Total number of awareness programmes held	Topics / principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	3	Basics of Sustainability, regulatory landscape and BRSR, L&T's policies and Code of Conduct focusing on health and safety, human rights and environment parameters, ESG maturity assessment conducted by the Company and its results, sharing of good practices on ESG	~410 participants representing various supply chain partners; comprises ~37% of L&T's purchase and work order by value

The Company undertakes several initiatives to create awareness amongst its supply chain partners, contractors and sub-contractors on key issues related to the nine Principles of the National Guidelines for Responsible Business Conduct. The awareness programmes conducted can be broadly classified into two segments i.e. Safety and Sustainability:

- a) **Safety:** There are several training and sensitization sessions conducted for the contractual workmen working in the premises and project sites. This includes EHS induction, toolbox talks, training on use of protective gear, EHS training for front line supervisors, sub-contractors, any job specific trainings such as working at height, excavation, marine safety, emergency response, occupational health, material handling, tunnel safety, hot work, fire. Any individual

including employees, workmen, vendor partners, clients and other personnel need to undergo compulsory safety training before entering the project site/plant/any other location. Safety related trainings are not covered in the table above. For details of trainings provided to the workers, refer to Q1 of this Principle.

- b) **Sustainability and Responsible Business Practices:** In FY 2023-24, the Company scaled up its awareness and training programmes for its supply chain partners on sustainability. Three online sessions were targeting the top 500 supply chain partners and around 410 participants joined these sessions. A two-hour module has been created covering topics such as fundamentals of sustainability, emerging regulatory landscape, BRSR principles, how the Company is incorporating sustainability in supply chain, ESG assessment being conducted by the Company and lastly, preparedness for the forthcoming years. Additionally, during ESG assessment conducted for the top 200 supply chain partners, handholding sessions were conducted to align them with the purpose, parameters, evidence required to complete the assessment.

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.**

The Company has processes for management of conflicts of interests involving members of the Board which may arise due to Directors joining the Boards of other companies, and even conflicts which could take place during normal business activities. The process allows the Directors to recuse themselves from the discussions pertaining to the conflict of interest. The Directors must exercise their responsibilities in a bona fide manner in the interests of the Company. They should not allow any extraneous considerations that may vitiate their exercise of objective independent judgment in the paramount interest of the Company and not abuse their position to the detriment of the Company for the purpose of gaining direct or indirect personal advantage. Any conflict of interest arising with the Board Members needs to be reported to the Chairman of the Audit Committee/Chairman of the Board.

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

### ESSENTIAL INDICATORS

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

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D	5.7% [9.6 Cr]	2.3% [3 Cr]	Replacing old equipment with new or higher energy efficiency or productivity;
Capex	3.3% [76.5 Cr]	3.6% [68.7 Cr]	Trucks/vehicles using low emission fuel e.g., CNG trucks; solar PV modules for rooftop solar, solar powered equipment e.g., light masts, equipment for recycling waste or non-virgin materials into usable materials e.g., manufactured sand plants, RO treatment plant, sewage treatment plant, water flowmeters for monitoring, bio-digester for canteen waste, facilities for skill training institutes

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

L&T is committed to incorporating sustainability that encompasses its supply chain partners viz. vendors, contractors, service providers and distributors through a dedicated Green Supply Chain Policy and its Code of Conduct. Furthermore, L&T expects and urges its suppliers to introduce suitable processes, functions and management systems within their organisations that support such compliance and drive continuous improvement with regards to the requirements included in the Code of Conduct. This Code of Conduct guides all supply chain partners to engage in ethical, responsible and legal business practices in their operations and adhere to ESG standards. L&T expects the suppliers to comply with all applicable regulatory requirements and implement policies and procedures, and provide training, as deemed necessary within their organisation. The Code of Conduct is built on three pillars:

- A. **Promote Environmental Sustainability:** All suppliers to support a precautionary approach to environmental issues and undertake initiatives to promote better environmental responsibility.
- B. **Commitment to Human Rights, Labour and the Society:** Suppliers to support, respect and protect human and labour rights and make sure their organisation/entity is not complicit in any kind of abuses and/or violations.
- C. **Ethical Integrity and Legality:** Suppliers to demonstrate the highest standard of integrity, ethics and business conduct.



The Company has adopted various methodologies for sustainable sourcing. Some are stated below:

- The supply chain partners were evaluated for sustainable sourcing wherein the Company checked their adherence to ISO 14001:2015, 45001:2018, SA8000 and any other related standards and frameworks.
- It is mandatory for supply chain partners to acknowledge the clauses and sign the Code of Conduct of Company, which includes commitment to environmental protection and conservation such as reduction of resource consumption, waste generation, pollution prevention; social aspects such as commitment to human rights, community engagement, ethics and various governance parameters. This is a mandatory step during vendor registration and onboarding process.
- The Company has also started assessing its supply chain partners on ESG parameters. It was initiated in FY 2022-23 with 25 partners and scaled up to top 200 (186 unique) in FY 2023-24. The assessment is based on the response and evidence provided to the Company on parameters related to the environment, human rights, CSR, health, safety and governance.
- Three awareness sessions were conducted targeting the top 500 supply chain partners during the year to orient them towards ESG requirements and expectation of the Company.

The assessment in the coming years will be more comprehensive and structured for improving ESG orientation as well as the performance of the suppliers. Additionally, the awareness sessions will also be ramped up to bring the partners up to speed keeping in mind the increased scrutiny and regulatory requirements on the subject. The overall governance, oversight and review of the supply chain initiatives is undertaken by Material Council along with the supply chain management functions led by senior leadership and supported by Corporate Sustainability.

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

Accounts for 32% of L&T procurement spend by value.

**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):** NA
- (b) **E-waste:** NA
- (c) **Hazardous waste:** NA
- (d) **Other waste:** NA

The Company does not manufacture or sells any products which could be reclaimed at the end of life. However, at project sites and manufacturing facilities, the Company has put in place systems and processes for waste management i.e., segregation, recycling, reuse and disposal as applicable for category of waste and complying to the relevant regulatory requirements.

**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, in 2022, the Ministry of Environment, Forest and Climate Change (MoEFCC) made amendments to EPR Rules related to plastic waste, e-waste and battery waste. As a result, the coverage of the Rules was extended to importers who could generate plastic waste from packaging of imported materials, e-waste which could be generated from imported electronic or electrical items as well as battery waste which could be generated from imported batteries or equipment containing batteries. The Company has obtained registration as an importer under the EPR Rules for all three waste categories. To comply with EPR Rules as well as to improve the waste management system, the Company has improved its processes including conducting awareness sessions for the relevant departments/functions and onboarded service providers for meeting compliance requirement.

**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. If NA, provide details.**

Product portfolio constitutes ~6% of the Company's revenue. In the past, the Company has conducted LCA for certain products, please refer to BRSR of Integrated Annual Report FY 2022-23.

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

Not applicable.

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Fly ash and Ground Granulated Blast-furnace Slag (GGBS) in place of Cement by value	8.7	6.5

Note: Previously reported as 10.2% in FY 2022-23 was based on consumption quantity of fly ash and GGBS as a % of total bulk material (fly ash, GGBS and cement)

The data reported above is based on the procurement value as a percentage of total bulk material procured (fly ash, GGBS and cement). In projects related to infrastructure sector (contracts from the clients), IS or other relevant codes prescribe limits of using fly ash and GGBS based on concrete use and requirements of the structure. While the Company tries to maximize use of recycled (waste) materials, the design mix of concrete and approval for use of the same in the project is controlled by the clients.

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:**

Particulars	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)						
E-waste		Not Applicable			Not Applicable	
Hazardous waste						

The Company operates on the B2B model, and the product portfolio is ~6% of total turnover. Some of the key products include reactors and pressure vessels, heat transfer equipment, process plant internals, etc; primarily made from stainless steel, titanium and have a long life-cycle, in few cases, may be up to 35 years. The products or packaging of these products do not generate any material which could be reclaimed at the end of life.

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' for the Company; reason stated above in Q4.

### 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	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity Benefits <sup>^</sup>		Paternity Benefits <sup>7</sup>		Day Care facilities <sup>8</sup>	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E /A)	Number (F)	% (F /A)
<b>Permanent Employees</b>											
Male	48,019	48,019	100	48,019	100	Not applicable		0	0	8,255	17.2
Female	4,205	4,205	100	4,205	100	4,205	100	Not applicable		1,827	43.4
<b>Total</b>	<b>52,224</b>	<b>52,224</b>	<b>100</b>	<b>52,224</b>	<b>100</b>	<b>4,205</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>10,082</b>	<b>19.3</b>
<b>Other than Permanent Employees</b>											
Male	4,793	4,793	100	4,793	100	Not applicable		0	0	1,328	27.7
Female	248	248	100	248	100	0	0	Not applicable		214	86.3
<b>Total</b>	<b>5,041</b>	<b>5,041</b>	<b>100</b>	<b>5,041</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,542</b>	<b>30.6</b>

<sup>7</sup> The Company does not have a paternity leave policy.

<sup>8</sup> Data is based on the coverage of creche facility i.e. available to the employees in a particular location and not as per usage of creche facility.

<sup>^</sup> Percentage calculated is based on the coverage of female employees only.

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity Benefits <sup>^</sup>		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent Workers</b>											
Male	2,073	2,073	100	2,073	100	Not applicable		0	0	1,303	63
Female	6	6	100	6	100	6	100	Not applicable		4	67
<b>Total</b>	<b>2,079</b>	<b>2,079</b>	<b>100</b>	<b>2,079</b>	<b>100</b>	<b>6</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>1,307</b>	<b>63</b>
<b>Other than Permanent Workers</b>											
Male	3,45,287	60,390	17.5	3,45,287	100	Not applicable		0	0	11,228	3.3
Female	2,807	794	28.3	2,807	100	1,530	54.5	Not applicable		515	18.3
<b>Total</b>	<b>3,48,094</b>	<b>61,184</b>	<b>17.6</b>	<b>3,48,094</b>	<b>100</b>	<b>1,530</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>11,743</b>	<b>3.4</b>

<sup>^</sup> Percentage calculated is based on the coverage of female employees only.

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

Particulars	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the Company	0.73%	0.74%
	927.3 Cr	819.0 Cr

Well-being measures considered are expenditure towards life insurance, health insurance, medical insurance, workmen compensation, staff welfare. The Company spends considerable amount towards protective gear and safety related items; currently not estimated separately.

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

Benefits	FY 2023-24			FY 2022-23		
	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	Yes	100	100	Yes
ESI	100	100	Yes	100	100	Yes

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?**

Most of the Company's permanent premises are accessible to differently abled people with wheelchairs (viz. through ramps, toilets, lifts). The Company is taking steps to provide the right infrastructure to support the needs of individuals with disabilities and preparing the remaining premises for accessibility infrastructure.

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, the Policy is available at <https://www.larsentoubro.com/corporate/about-it-group/corporate-policies/>. The Company is committed to providing equal opportunities in employment and creating an inclusive work environment. The Policy clearly sets out the guiding principles which drive the Company to ensure equal and equitable opportunity for all and uphold the highest standards of ethics, values and governance across the people practices.

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		Not applicable		
Female	89.6	85.9	Not tracked	
<b>Total</b>	89.6	85.9	–	–

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.**

Particulars	Yes/No	If Yes, then give details of the mechanism in brief
Permanent Workers	Yes	Registration and redressal are done through Union and standing orders/Joint Management Council/ Complaints and Grievance Committee.
Other than Permanent Workers	Yes	During the year, the redressal mechanism has been more formalized and structured especially for the construction business. Any grievance may be raised by the worker oneself or on behalf of the group. It may be related to working conditions, living conditions at the workmen habitat/labour colony, wage-related issues or any other issues related to their employment.  Any project location/establishments with 20 or more workers should have a Grievance Redressal Officer (GRO), appointed by the Project Manager from any of the personnel from the functions (Project Accounts and Admin In charge, Project Safety In charge) and communicated to the relevant stakeholders (Admin/Industrial Relations/Accounts head). The mechanism includes registration of grievance, resolution, timeline for resolution, escalation, feedback and closure, record-keeping and reporting and periodic review and audits.

Particulars	Yes/No	If Yes, then give details of the mechanism in brief
		Over 500 GROs have been appointed across project sites to ensure grievance registering, resolving, meeting timelines, managing escalations, closing cases, generating reports, and facilitating regular reviews and audits in a systematic way. Grievance may cover issues related to health and safety, working conditions, wages, living conditions, and so on. A toll-free number is available for recording grievances of the workers, operational 24x7 over and above the oral and/or written complaints which were already being recorded. This provides a fair and transparent process for resolving complaints and ensuring equal and fair treatment.
Permanent Employees	Yes	<p>The digital platform HEERA serves as the primary channel for addressing employee grievances. The grievances may be related to concerns regarding work, working relation, workplace and working conditions, salary-related matters, disputes related to claims settlement, reimbursement, and recovery of dues and leaves, issues pertaining medical insurance and policy, inconsistencies in policy implementation, violation of Code of Conduct, miscellaneous issues such as system portal functionality or any other issue affecting the employment of an employee.</p> <p>Grievances should first be addressed by employees with their Immediate Supervisor seeking resolution. In the absence of an assigned Immediate Supervisor, employees may escalate the matter to the next level supervisor. If the employee remains dissatisfied then alternately, they can initiate a grievance ticket via HEERA chatbot. The designated HR officer is responsible for resolution of the grievance and based on the severity and complexity, the timelines and escalation (with a maximum of three level) may vary.</p>
Other than Permanent Employees	Yes	Grievances are submitted to respective HR coordinators who are responsible for resolution.

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

Category	FY 2023-24			FY 2022-23		
	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)
<b>Permanent Employees</b>	52,224	0	0	46,935	0	0
- Male	48,019	0	0	43,448	0	0
- Female	4,205	0	0	3,487	0	0
<b>Permanent Workers</b>	2,079	2,079	100	2,104	2,104	100
- Male	2,073	2,073	100	2,098	2,098	100
- Female	6	6	100	6	6	100

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

Category	FY 2023-24					FY 2022-23				
	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)
<b>Employees</b>										
Male	52,812	21,692	41	52,462	99	46,935	34,046	73	25,928	55
Female	4,453	2,197	49	5,837	100	6,163	3,125	51	2,503	41
<b>Total</b>	<b>57,265</b>	<b>23,889</b>	<b>42</b>	<b>58,299</b>	<b>100</b>	<b>53,098</b>	<b>37,171</b>	<b>70</b>	<b>28,431</b>	<b>54</b>
<b>Workers</b>										
Male	3,47,360	3,91,715	100	90,802	26	2,76,633	3,06,801	100	45,180	16
Female	2,813	1,284	46	135	5	1,224	1,125	92	174	14
<b>Total</b>	<b>3,50,173</b>	<b>3,92,999</b>	<b>100</b>	<b>90,937</b>	<b>26</b>	<b>2,77,857</b>	<b>3,07,926</b>	<b>100</b>	<b>45,354</b>	<b>16</b>

\*The number of trainings conducted are higher than the number of employees and workers due to the attrition and new joinees.

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	48,019	48,019	100	43,448	41,286	95
Female	4,205	4,205	100	3,487	3,487	100
<b>Total</b>	<b>52,224</b>	<b>52,224</b>	<b>100</b>	<b>46,935</b>	<b>44,773</b>	<b>95</b>
<b>Workers</b>						
Male	2,073	2,073	100	2,098	1,766	84.2
Female	6	6	100	6	6	100
<b>Total</b>	<b>2,079</b>	<b>2,079</b>	<b>100</b>	<b>2,104</b>	<b>1,772</b>	<b>84.2</b>

## 10. Health and Safety Management Systems:

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

Yes, the occupational health and safety management system has been implemented by the Company and the work locations i.e., project sites, manufacturing facilities, campuses and offices are covered. In line with L&T's EHS vision of Zero Harm and Corporate Environment, Health & Safety Policy, management systems have been implemented in accordance with ISO 45001:2018. The EHS Management System outlines a structured approach necessary to manage risks and performance improvement in a consistent manner. The management system is assessed by third party assurance agencies e.g., DNV, TUV and certified according to the requirements of applicable standards viz. ISO 45001:2018.

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

The Company's EHS Management System has risk evaluation and management as one of its key components. The work locations are required to undertake to implement the EHS risk management as an integral part of their business operations. EHS risk management process covers five steps: hazard identification, risk evaluation and assessment, risk mitigation and control measures, monitoring and documentation, and periodic reporting and update. Hazard identification and risk assessment is one of the crucial processes followed across work locations. The relevant stakeholders including construction engineers, design and planning engineers, production-in-charge personnel and EHS team members as well as workmen are involved in the risk assessment and risk management process. Safe Work Method Statements, as relevant for processes, have been developed and deployed prior to the start of any work.

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

Yes, the Company has implemented systems and processes for workers to report work and health related hazards and remove themselves from such risks. EHS-conscious workmen are identified and deployed at workplaces to

identify hazards and report them for immediate corrective action. Worker representatives are also part of the Project EHS Committee. Monthly EHS Committee meetings are conducted where workmen’s representatives participate to report the work and health related hazards, risks, concerns at the workplace and discuss the mitigation measures.

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

Yes, medical centres and first aid facilities are available for both employees and workers. In addition, there are location specific tie-ups with hospitals and nursing homes proximal to the project sites to ensure a prioritized access to medical facilities. Work locations such as project sites, manufacturing locations also have ambulances on standby to handle any emergencies.

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

Safety Incident/Number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.04	0.04
	Workers	0.07	0.06
Total recordable work-related injuries	Employees	6	8
	Workers	79	70
Number of fatalities*	Employees	0	1
	Workers	23	13
High consequence work-related injury or ill-health (excluding fatalities)	Employees	1	1
	Workers	1	15

*\*Mission Zero Harm is the guiding principle for the Company with respect to safety performance, and it is extremely unfortunate to report an increase in fatalities in FY 2023-24 (13 in FY 2022-23). The Company has taken this as a matter of significant concern and all the incidents were investigated in depth. Key reasons which contributed to the increase were poor strength of supporting structure resulting in cave-ins/landslides and inadequate safety protocols while working at heights. The issue has been compounded by significant jump in number of contract workmen, and high degree of churn. The Company has taken corrective actions such as enhanced supervision, more intensive toolbox talks, different coloured helmets for newly inducted workers, expert consultation for high-risk activities (specially for remote areas), more engagement with larger subcontractors. The Company is fully committed to improving safety performance and ensuring a safer workplace.*

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

The Company is committed to ensuring that all employees and workers are working in a safe environment and have the necessary support to lead a healthy life. EHS, HR, Admin and Medical teams are the key functions undertaking initiatives on a continuous basis to ensure all needs for a safe and healthy workplace are met. Safety is a priority for the Management due to nature of the business i.e., projects executed with use of substantial involvement of workers and encapsulated in L&T’s Mission Zero Harm as well as driving force behind L&T’s L.I.F.E. (Live Injury-Free Everyday) Framework. The Management provides strong, demonstrable, and visible leadership and commitment towards implementation of this framework through allocation of adequate resources, assigning responsibilities and through personal examples and actions. As a part of the EHS Management System, each project site is required to prepare a project specific EHS plan before commencing the execution. This plan identifies the hazardous operations in the scope of work, assesses risks from such hazards and management of risks through proactive measures and controls. Similar process is followed for the manufacturing facilities/campuses. To strengthen the processes and systems, internal audits are conducted at various levels both by the businesses themselves as well as inter-businesses and external audits are carried out through accredited third-party agencies. For certain high importance/priority project sites, frequency and depth of audit is increased depending on the risk profile of such projects. Digital systems/applications play a significant role in identifying hazards as well as enabling capturing of risks as well as learnings from execution. Use of advanced technology such as vision analytics/AI in enhancing these applications. Digital technologies e.g., AR/VR are also leveraged to enhance training and awareness of employees and workers. To enhance the standard practices recommended, the Company has taken other measures which include Implementation of HSE Surveillance Rating, Knowledge management through capturing of lessons learnt and special sessions by SMEs (Subject Matter Experts), Implementation of Behaviour Based Safety systems, and specialized training modules for high-risk activities. 11 project teams of the Company demonstrated the strong commitment to EHS management and performance by winning the coveted Sword of Honour by British Safety Council.

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

Benefits	FY 2023-24			FY 2022-23		
	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	117	NIL	–	11	NIL	–
Health & Safety	135	NIL	–	14	NIL	–

14. **Assessments for the year:**

Percentage of your plants and offices that were assessed (by entity or statutory authorities or third parties)	
Health and safety practices	Majority of the locations are either certified by an independent third party or complying with ISO 45001:2018. The units undergo periodic external audits to ensure adherence and verify compliance with the applicable standards and guidelines. Also, the key manufacturing facilities are certified by an independent third party on SA8000 standards, a globally recognized social certification programme on human rights and labour management. Furthermore, an internal assessment was conducted for manufacturing facilities, offices to understand potential human rights risks through Admin/IR/Project/HR/EHS in charge.
Working Conditions	

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.**

The Company's commitment to safety is encapsulated in 'Mission Zero Harm', driving the safety performance initiatives. Health, Safety, and Environment (HSE) in the Company is based on the ISO 45000 and 14000, ensuring continual improvement. In response to recent incidents, thorough investigations have been conducted to identify root causes and corrective actions have been implemented.

The leadership's commitment to HSE considerations fosters a robust safety culture. To enhance the existing HSE risk control measures, the permit-to-work system has been strengthened and reinforced controls for scaffolding, work at height, material handling, excavations, hot works, and lifting operations. These measures are complemented by increased cross functional audits and inspections, intensive toolbox talks, and the use of distinctively coloured helmets for new workers to ensure they receive special attention. Comprehensive Behavioural Based Safety (BBS) training has been conducted to reduce at-risk behaviour, and we have engaged experts for high-risk activities, especially in remote areas, to mitigate risks.

The Company invests in ongoing training to enhance employee competency in identifying and mitigating HSE risks. Initiatives like HSE observations, interventions, and proactive knowledge sharing enable to address potential hazards. Continuous reinforcement of HSE mechanisms, along with effective supervision and safety leadership, further ensure a safe working environment.

The Company leverages technology and use digital tools for real-time monitoring, drone surveillance, VR training, AI-powered predictive risk mapping, digitalized permit-to-work systems, inspection and audit processes, and data management. These initiatives reflect the dedication of the Company to improve safety performance and create a safer workplace.

**LEADERSHIP INDICATORS**

1. **Does the entity extend any life insurance or any compensatory package in the event of death of**

- Employees (Y/N):** Yes
- Workers (Y/N):** Yes

The Company extends life insurance coverage through a comprehensive health insurance policy which covers death of its employees and workers.

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

The Company ensures that statutory dues payable are deposited on time. Proof of payment, deposit of statutory dues e.g., records for PF deposit for workmen is maintained, GST payment by the suppliers is matched through GST portal to ensure compliance, amongst other controls.



**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:**

Benefits	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 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	1	2	0	0
Workers	24	28	0	10

**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, the Company provides transition assistance programmes to facilitate continued employability and the management of career endings resulting from retirement based on merit.

**5. Details on assessment of value chain partners:**

	Percentage of value chain partners (by value of business done) that were assessed
Health and safety practices Working Conditions	The Company identified top 200 (unique 186) supply chain partners comprising 38% of FY 2022-23 spend. During the year, the Company assessed these supply chain partners on certain ESG parameters that includes environmental management, performance, human rights, CSR, health and safety practices, corporate governance, and ethical business practices through a questionnaire. This questionnaire was developed keeping in mind the regulatory compliances, BRSR disclosures, global standards and so on. The remote/desktop assessment was based on interactions with the supply chain partners, documents and evidence shared. Post assessment, the gaps identified during the assessment were shared with the supply chain partners along with suggestions on the course of action for improving overall sustainability performance.

**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.**

No significant risks or concerns arose from the assessment during the year. It is ensured that the supply chain partners engaged with the Company understand and sign the Code of Conduct of the Company, a mandatory requirement during vendor registration and onboarding process. During the year, the sessions conducted for the supply chain partners on ESG covered the Company policies viz. Green Supply Chain Policy, Sustainability Policy, Whistleblower Policy and Code of Conduct. In case any concern/observations/risks are arising, may not be limited to during assessment, the Company takes suitable corrective and preventive action as necessary.

**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.**

L&T’s businesses are in EPC projects (Engineering, Procurement, Construction) and Hi-Tech Manufacturing. The Company aims to balance the needs, interests and expectations of various stakeholders with those of the business and deliver long-term value. The Company undertakes a structured materiality assessment process through an independent third party, to identify key stakeholder groups and take the inputs from these stakeholders to finalize the material topics for the Company. As a part of the exercise, the stakeholders were identified based on the following parameters:

- **Degree of Dependency:** groups who are directly dependent on the Company’s activities, products, services, performance, or on whom the Company is dependent to operate. For example, customers, government as clients, employees including workmen, supply chain partners, investors.
- **Degree of Responsibility:** groups or individuals to whom the organization has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities. For example, community, shareholders.

- **Sphere of Influence:** groups or individuals who can have an impact (direct or indirect) on the Company's strategic decision-making and operations. For example, senior management and leadership, regulatory bodies.
  - **Diverse perspectives:** groups or individuals with different perspectives who facilitate understanding the state of affairs, national and global. For example: media, NGO partners.
2. **List of stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.**

The key stakeholders of the Company are Government, customers including private sector and public sector entities, employees and workers, suppliers, shareholders, investors, communities and NGO partners, Regulatory bodies and media. The detail of engagement is covered in the 'Stakeholder Engagement' section of the Integrated Annual Report FY 2023-24.

## LEADERSHIP INDICATORS

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

The Company has set up various committees for managing and monitoring ESG related areas. Few of these are: CSR & Sustainability Committee<sup>9</sup>, Risk Management Committee, Stakeholders' Relationship Committee, Investor Relations, EHS Council, Material Council, Green Campus Steering Committee. The CSR & Sustainability Committee<sup>9</sup>, Board Risk Management Committee and Stakeholders' Relationship Committee are constituted by the Board and are chaired by an Independent Director. Other Committees have been internally constituted. As per their respective terms of reference, the various Committees (statutory as well as internal) meet periodically to review the performance of the Company in relevant areas. Performance, concerns and issues related to ESG related topics are extracted from these reviews and a consolidated performance report/outcome is presented to the Board in their quarterly meeting. The Company has also been conducting stakeholder engagement exercises from time to time on ESG topics. These stakeholder engagement exercises follow a structured approach with respect to the frequency, delegation and reporting of outcome, including stakeholders' feedback to the Board.

<sup>9</sup> Earlier called CSR Committee

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

The Company continuously engages with its stakeholders to strengthen relationships, foster trust and thus enable the Company to be informed of their expectations, concerns as well as opportunities for value creation. A structured approach and process is in place for engaging with the stakeholders for identifying, prioritising and addressing their needs and concerns in a consistent and systematic manner. Below are a few instances of how stakeholder inputs have been incorporated into policies and activities:

- A. **Communities:** CSR projects are chosen based on social and developmental needs in the regions where the Company is operating, with the overall goal of promoting inclusive growth by empowering communities and accelerating development especially the vulnerable and marginalized communities. This is being accomplished by providing access to water and sanitation facilities, education and healthcare services, and skill building for underprivileged youth. L&T works along with the communities around its factories, campuses and establishments for health and education services. Water-stressed blocks are selected for water and sanitation projects. Skills development centres are located across India to mobilize youth from different states. The Company may partner with the government and communities to create multiplier effect of its social programmes. The mode of implementation of CSR programmes will include a combination of direct implementation and/or through partners such as NGOs, trusts, academic institutions, business associates, registered societies.

After identifying a location, a need assessment is conducted, and a detailed project report is prepared. The project report specifies socio economic status of the location viz. number of villages or urban slum pockets, number of students or trainees, the schools/households to be covered, current facilities, and specific vulnerable community groups such as the SC/ST population and their needs and concerns. The need assessment involves participatory rural appraisal (PRA), wherein beneficiaries participate in identifying specific issues, vulnerable populations, stakeholders, and potential challenges in implementing the interventions. The project report includes proposed interventions,

outcomes and measurable indicators. Based on the project report, proposals are invited from reputed NGOs with a presence in the selected location and the implementation partner is carefully selected after thorough due diligence.

During implementation, stakeholder groups are formed, such as Self-Help Groups, Village Development Committees, School Management Committees, and Health Committees, to participate in decision-making and implementation. These groups guide and monitor the interventions at the community level, such as monitoring the use of water from a common source created by the project, regulating the use of water under the water distribution system, measuring and recording water levels in intervention wells, encouraging communities to use household toilets, and monitoring and regulating the use of common pasture lands. There is continuous dialogue between the implementation partners, communities and CSR teams to ensure clear understanding of the issues the communities face and the possible solutions. The initiatives are re-aligned, if the need be, for the best interests of the community.

For details of CSR intervention, please refer to 'Social and Relationship Capital' section of the Integrated Annual Report FY 2023-24.

- B. **Employees and Workmen:** There are structured systems for employee communication and engagement that starts from project director/business heads/senior management visits and interactions with employees, HR manager visits and townhalls are held from time-to-time for interactions with employees and the workers. There are Employee Relation Officers at the project sites and with support of the Workmen Development Centres, they oversee and interact, take workers' feedback from time-to-time on various aspects of living, work conditions, health and welfare. Depending on the feedback received from the channels as stated above, including the survey findings, HR heads of individual businesses, with the support of their cluster/project HR managers, also undertake surveys as per the need on various topics related to employee development, engagement and effectiveness. The findings are discussed with project/business heads and corrective actions are taken to enhance the organisational effectiveness. Additionally, there are designated Grievance Redressal Officers (GRO), Industrial Relation, Admin functions who oversee the health, safety, wellbeing, working conditions, living conditions of the workmen. These GROs are also responsible for communication with all workers at the time of Screening/Induction/Onboarding and at regular intervals such as pep-talk about channels (toll free number, WhatsApp, verbal, registers) to raise grievances, and the mechanism for settlement of grievances and similar communication with the sub-contractors working at the project site. Remediation and corrective action are taken as deemed necessary to resolve the grievances.
- C. **Shareholders:** In addition to its ongoing interactions with analysts representing institutional equity investors, the Company conducted an investor feedback survey to build into its long-term strategic plan - 'Lakshya 2026'. As part of this exercise, several suggestions from key investors and analysts were received on ESG related aspects such as energy transition, diversity and inclusion, governance. The Company also received suggestions from ESG rating agencies and funds as well as improving granularity of ESG disclosures. This has resulted in improvement of processes wherever necessary and feasible. The quality and granularity of ESG disclosures have also enhanced in the past couple of years especially after the introduction of BRSR and Core KPIs. Recognising the growing interest in this area and factoring in feedback from investor interactions, the Company has been conducting regular interactions with relevant stakeholders including global funds, institutional investors, rating agencies, etc., to keep them updated about activities and progress on various initiatives being undertaken to achieve its carbon and water neutrality goals.

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

The engagement with vulnerable groups is through Integrated Community Development Project (ICDP) and health initiatives. Some are given below:

Vulnerable group	Concerns	Action Taken	Impact
Farmer community in water stressed and drought prone locations	Drought, Poverty, Migration	<ul style="list-style-type: none"> <li>Organised farmers community to form Village Development Committees (VDC) and Farmers Producer Organisation (FPO)</li> <li>Water made available with waste water and conservation intervention</li> <li>Capacity building in sustainable agricultural practices</li> <li>Maintenance of water structures by the VDC along with Panchayat</li> </ul>	<ul style="list-style-type: none"> <li>Rise in ground water table and water made available to population of 1,16,637 from 9 ICDP Locations and 980 hectares land protected from direct run-off in three ICDP locations</li> <li>Increase in household agricultural income</li> <li>Reverse migration</li> </ul>
Rural population without access to proper sanitation facilities	Open defecation leading to health issues and social disgrace	<ul style="list-style-type: none"> <li>Community awareness regarding making villages open defecation free (ODF)</li> <li>Construction of toilets after ensuring water availability</li> <li>Village level monitoring committee formed to ensure ODF status of the village</li> </ul>	<ul style="list-style-type: none"> <li>4,821 toilets constructed and 41 villages are made ODF and 26 are under construction</li> <li>Women felt safe to use household toilet and saved from embarrassment and social disgrace</li> </ul>
Disadvantaged rural women	Gender related issues viz. no decision making power in household and community related issues	<ul style="list-style-type: none"> <li>Women were part of need assessment, and their critical concerns were prioritised</li> <li>Village level women groups formed and organised in Self Help Groups (SHGs)</li> <li>Ensured equal representation of women in VDCs and Community level decision making</li> </ul>	<ul style="list-style-type: none"> <li>237 SHGs formed in three ICDP locations with ₹ 125.6 lakh savings</li> <li>Women are assuming community leadership positions e.g. President of VDC, FPO formed with all women board members</li> </ul>
Underprivileged community from urban and peri-urban areas	Unaffordable and inaccessible health services  Patients cannot afford the dialysis treatment in private hospitals  Unskilled-Unemployed youth	<ul style="list-style-type: none"> <li>Affordable general health services along with consultations in specialised clinics provided through nine health centres across India and mobile health vans</li> <li>Provision of dialysis services at a concessional rate</li> <li>Unemployed youth trained in L&amp;T's Construction Skills Training Institutes and facilitation for job placements</li> </ul>	<ul style="list-style-type: none"> <li>1,78,239 population accessing the services</li> <li>Dialysis patients taking regular treatment at the L&amp;T health centre</li> <li>10,000 youth trained every year of which 60-70% get job placements</li> </ul>
Students in tribal/rural schools or urban resource poor schools	Students have difficulties in learning science and maths subjects and no access to digital and hands on education	<ul style="list-style-type: none"> <li>Providing Science, Technology, Engineering and Math (STEM) Kits for hands on learning in science and math and digital infrastructure, digital content mapped to the curriculum and training to teachers to conduct classes using digital media</li> <li>National STEM Challenge was conducted to funnel STEM talent by showcasing students' Innovative Ideas, and create opportunities to connect children to higher level STEM learning</li> </ul>	<ul style="list-style-type: none"> <li>41,000 students took part in science exhibitions</li> <li>Students making their own STEM models and presenting solutions to everyday problem by using technology</li> <li>Approximately 6,000 students of Grades VI-VIII participated in the intra and inter-school level competitions. From among them, 300 teams (600 children) were chosen to participate at regional level, of which 24 teams (50 children) from Chennai, Coimbatore, Hazira, Vadodara, Talegaon and Mumbai made it to the L&amp;T National STEM Challenge. Three winning teams and their schools were awarded prizes that included advanced STEM kits and support to upgrade Science lab</li> </ul>
School students without access to clean toilets	School Toilets dilapidated or not functional	<ul style="list-style-type: none"> <li>Constructed toilet blocks in the schools for students</li> </ul>	<ul style="list-style-type: none"> <li>Increase in attendance of girls</li> </ul>

## 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 2023-24			FY 2022-23		
	Total (A)	No. of employees/workers covered (B)	% (B/A) <sup>10</sup>	Total (C)	No. of employees/workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	52,224	21,646	41	47,757	12,082	25
Other than permanent	5,041	5,873	100	5,489	3,292	60
<b>Total Employees</b>	57,265	27,519	48	53,246	15,374	29
<b>Workers</b>						
Permanent	2,079	2,079	100	2,104	2,104	100
Other than permanent	3,48,094	3,48,094	100	2,75,753	2,75,753	100
<b>Total Workers</b>	3,50,173	3,50,173	100	2,77,857	2,77,857	100

<sup>10</sup> As on 31st March'24, the number of trainings conducted are higher than the number of employees and workers considering the attrition and new joinees.

Human rights awareness is covered through various informal processes for the workmen. Induction is a mandatory requirement for any workmen joining at any site/location/project. Induction includes, but not limited to, topics such as wage breakup, PF deduction, health and safety, account creation for wage deposit, KYC. Additionally, there are systems in place to ensure that there is no child labour (submission of Aadhar card as proof of age), no forced labour through proof of employment (wage slip, issuance of gate pass/ID card). Also, there are daily toolbox talks which covers few of the above aspects, apart from job role. The key locations of the Company are also certified by SA8000 by an independent third party which covers elements such as child labour, forced labour, discrimination, working hours, remuneration, freedom of association, grievance redressal mechanism.

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

Category	FY 2023-24					FY 2022-23				
	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)
<b>Employees</b>										
<b>Permanent</b>	52,224	0	0	52,224	100	46,935	0	0	46,935	100
Male	48,019	0	0	48,019	100	43,448	0	0	43,448	100
Female	4,205	0	0	4,205	100	3,487	0	0	3,487	100
<b>Other than permanent</b>	5,041	0	0	5,041	100	6,163	279	4.5	5,884	95.5
Male	4,793	0	0	4,793	100	5,893	271	4.6	5,622	95.4
Female	248	0	0	248	100	270	8	2.9	262	97
<b>Workers</b>										
<b>Permanent</b>	2,079	0	0	2,079	100	2,104	0	0	2,104	100
Male	2,073	0	0	2,073	100	2,098	0	0	2,098	100
Female	6	0	0	6	100	6	0	0	6	100
<b>Other than permanent</b>	3,48,094	3,04,005	87.3	44,088	12.7	2,75,753	2,71,035	98.3	4,718	1.7
Male	3,45,287	3,01,677	87.4	43,609	12.6	2,74,535	2,69,855	98.3	4,680	1.7
Female	2,807	2,328	83	479	17	1,218	1,180	97	38	3.1

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

a. **Median remuneration/wages:**

Particulars	Male		Female	
	Number	Median remuneration/ salary/wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD) - Whole Time Directors	7	13,62,83,963	0	0
Key Managerial Personnel (KMP)	1	1,71,76,859	0	0
Employees other than BoD and KMP	52,804	9,77,099	4,453	6,76,867
Workers	2,073	9,77,315	6	12,21,632

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages <sup>11</sup>	5.4	4.9

<sup>11</sup> Wage data reported is based on the salary paid to the staff which includes permanent and other than permanent employees, and permanent workers. It comprises total salary, perquisite, employer PF and does not include gratuity and other benefits claimed as reimbursement. Wages paid to other than permanent workers is not considered. The Company employs around 3,50,000 other than permanent workers across more than 700 project sites and locations within India and abroad. Wages to other than permanent workers are directly paid by the third party contractors. The Company monitors the wages and statutory compliances based on the wage register submitted by the third party contractors along with the monthly invoice at project site level manually. The Company is capturing the total payment made to contractors but the wages included therein is not tracked / collated separately. Going forward in the coming years, the Company will explore options to capture, track and report the wages paid to other than permanent workers.

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)**

The Chief Human Resources Officer is the focal point for human rights related issues at the Company level. For implementation across the sites and manufacturing facilities, designated personnel from IR/Admin/EHS functions are responsible for human rights and labour management. At business level, IR/Admin Heads of respective businesses are the focal point supported by HR heads.

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

Respect and commitment to human rights is one of the elements of the Code of Conduct for employees. As a practice, any violation of Code of Conduct can be reported to the 1<sup>st</sup> Level Reporting Authority, who will investigate and take necessary action. However, if the violation is by the 1<sup>st</sup> Level Reporting Authority itself, then it is to be reported to the 2<sup>nd</sup> Level Reporting Authority. In case the Reporting Authority concludes that the violation is of a grave nature, the same shall be reported to the Whistleblower Investigation Committee for further action within a reasonable time frame.

L&T is committed to foster and create a workplace which is safe and free from any act of sexual harassment. The Policy for protection of women's rights at workplace has been formulated to guide the Company for redressal of sexual harassment related complaints. This Policy is based on the laws of India and therefore the Policy is applicable to all L&T establishments located in India including all employees, workmen, contract workers. This Policy also protects anyone visiting the establishments of the Company, that may include clients, customers, third party contractors, vendors, suppliers, business representatives. When sexual harassment has occurred because of an act of any third party, the Company takes necessary and reasonable steps to assist the affected person/victim. To adhere with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) and ensure coverage across the locations in India, there are several Internal Complaints Committee (ICC) constituted as per the provision of the POSH Act with different administrative units under their jurisdiction. These ICCs are responsible for registering, investigating, concluding and redressing complaints received. Furthermore, the ICCs also organize workshops and awareness sessions at regular intervals and take necessary actions needed to implement the provisions of the Act. Additionally, two Apex Committees have also been constituted, the highest body to ensure implementation and compliance with the Act. The Apex Committees comprise representatives of few ICCs and other senior leaders of the Company.

Whistleblowing is a structured process, which encourages and facilitates employees to report without fear, any wrongdoings or unethical or improper practice which may adversely impact the reputation and/or the financials of the Company, through an appropriate forum. The Company has also formulated Whistleblower Policy for its employees and

vendors to provide a mechanism for expressing concerns about any unethical behaviour, improper practice, misconduct, violation of legal or regulatory requirement, unfair treatment that could adversely impact the Company's operations, business performance and/or reputation. The Company investigates such reported incidents in an impartial manner and takes appropriate action to ensure that the requisite standards of professional and ethical conduct are always upheld.

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

Particulars	FY 2023-24			FY 2022-23		
	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	3	2	Complaints registered and redressed under the POSH Act	2	0	Complaints registered and redressed under the POSH Act
Discrimination at workplace	0	0	–	0	0	–
Child Labour	0	0	–	0	0	–
Forced Labour/ Involuntary Labour	0	0	–	0	0	–
Wages	0	0	–	0	0	–
Other human rights related issues	0	0	–	0	0	–

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

Particulars	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	3	2
Complaints on POSH as a % of female employees / workers <sup>12</sup>	0.04	0.04
Complaints on POSH upheld <sup>13</sup>	1	2

<sup>12</sup> Include all females from employee and worker category, both permanent and other than permanent.

<sup>13</sup> 'Upheld' is interpreted by the Company as the complaints concluded and redressed.

There are three cases reported in FY 2023-24 under the POSH Act. One complaint has been concluded and redressed as per the provisions of the Act and Rules. The remaining two complaints were received during Q4 FY 2023-24 and are under inquiry within the timelines as per the Act and the Rules.

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

The mechanism is same as mentioned above in Question 5. The Code of Conduct for employees, senior management and Board members sets the standard of behaviour and professional conduct expected by the Company. The Company has Committee for the protection of women at workplace to ensure their rights, receive grievances, conduct investigations, and redressal. The Company has a Whistle Blower Policy wherein the employees can report any wrong practices, unethical behaviour or non-compliance, which may have a detrimental effect on the organisation, including financial damage and impact on brand image. Violations of the Code of Conduct should be reported as per the Reporting Matrix which is an integral part of our policy document. The Code of Conduct policy covers the procedure of complaint redressal and necessary preventive actions being taken by the Company.

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

Yes, commitment to Human Rights, Labour and the Society is one of the pillars in the Code of Conduct for suppliers. The supply chain partners are expected to understand, acknowledge and adhere to the norms of the Code. Signing the Code of Conduct is a mandatory step during vendor onboarding process. The Code of Conduct covers fair working conditions, health & safety, child labour, forced labour, non-discrimination, wages, zero tolerance for harassment. Also, adherence to regulatory compliances such as health and quality, payment of wages, PF deduction forms a part of the agreements and contracts.

## 10. Assessments for the year:

Particulars	Percentage of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	
Forced/involuntary labour	The key manufacturing facilities are certified by an independent third party on SA8000 standards, world's leading social certification programme on human rights and labour management. The units undergo periodic audits to ensure adherence and verify compliance with the applicable standards and guidelines. Furthermore, an internal assessment was conducted for manufacturing facilities, offices to understand any potential human rights risks through the Admin/IR/Project/HR/EHS in charge.
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	

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

No significant risks/concerns arose that required any corrective actions with respect to human rights related issues.

### LEADERSHIP INDICATORS

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

Though no complaints received in FY 2023-24 related to human rights, the grievance redressal mechanism has been strengthened and modified during the year for the contractual workmen. The details of the grievance redressal mechanism for contractual workmen have already been discussed in Section A 'VII. Transparency and disclosures compliances.'

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

The scope and coverage of human rights due diligence extends to the Company's own manufacturing facilities and offices covering its contractual workers. This assessment covers aspects such as child labour, forced/involuntary labour, wages, sexual harassment, discrimination at workplace, health and safety, working conditions and grievance mechanism. Additionally, the top 200 supply chain partners have also been evaluated on various ESG parameters including human rights.

#### 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?

Most of the Company's permanent premises are accessible to differently abled people with wheelchairs (viz. through ramps, toilets, lifts). The Company is taking steps to provide the right infrastructure to support the needs of individuals with disabilities and preparing the remaining premises for accessibility infrastructure.

#### 4. Details on assessment of value chain partners:

Particulars	Percentage of value chain partners (by value of business done with such partners) that were assessed
Child labour	The Company identified top 200 (unique 186) supply chain partners comprising 38% of FY 2022-23 spend. During the year, the Company assessed these supply chain partners on certain ESG parameters that includes environmental management, performance, human rights, CSR, health and safety practices, corporate governance, and ethical business practices through a questionnaire. This questionnaire was developed keeping in mind the regulatory compliances, BRSR disclosures, global standards and so on. The remote/desktop assessment was based on interactions with the supply chain partners and documents shared with the Company. Post assessment, the gaps identified during the assessment were shared with the supply chain partners along with suggestions on the course of action for improving overall sustainability performance.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
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.**

No significant risks or concerns arose from the assessment during the year. It is ensured that the supply chain partners engaged with the Company understand and sign off the Code of Conduct of the Company, a mandatory requirement during vendor registration and onboarding process. During the year, the sessions conducted for the supply chain partners on ESG covered the Company policies viz. Green Supply Chain Policy, Sustainability Policy, Whistleblower Policy and Code of Conduct. In case any concern or risk arising during the year, may not be limited to during assessment, the Company takes suitable corrective and preventive action as necessary.

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

**ESSENTIAL INDICATORS**

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

Parameter	FY 2023-24	FY 2022-23
<b>From renewable sources (in Gigajoules)</b>		
Total electricity consumption (A)	1,55,046	1,29,410
Total fuel consumption (B)	38,552	0
Energy consumption through other sources (C)	0	0
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>1,93,598</b>	<b>1,29,410</b>
<b>From non-renewable sources (in Gigajoules)</b>		
Total electricity consumption (D)	15,29,592	12,17,321
Total fuel consumption (E)	87,64,602	93,95,966
Energy consumption through other sources (F)	0	0
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>1,02,94,194</b>	<b>1,06,13,287</b>
<b>Total energy consumed (A+B+C+D+E+F) (in Gigajoules)</b>	<b>1,04,87,792</b>	<b>1,07,42,697</b>
<b>Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) (in GJ/₹ Cr)</b>	<b>83.1</b>	<b>98.8</b>
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) (in GJ/Mn USD)</b>	<b>186.1</b>	<b>219.1</b>

Note: Purchasing Power Parity (PPP)-total income is adjusted as per International Monetary Fund Implied PPP conversion rate.

Energy reported for fuel consumption from renewable sources is for the energy consumed from use of compressed bio-gas (CBG) sourced by the Company's manufacturing unit at Pithampur from Indore Municipal Corporation.

Energy consumption and energy intensity has decreased due to reduction in diesel consumption driven by switching to electricity grid supply and optimization initiatives across different businesses. Additionally, closure or tapering down of certain projects e.g., Mumbai Trans Harbour Link (MTHL), Mumbai Coastal Road Project (MCRP) Package 01, Dwarka Expressway, building projects in Delhi, international water treatment plant projects and reduction in onsite civil construction activities in a few projects e.g., Mumbai Ahmedabad High-Speed Rail (MAHSR) C4 Package, Chennai Metro Rail Ltd (CMRL) project contributed to lower diesel consumption compared to last year.

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

Yes, independent data assurance has been carried out by Deloitte Haskins & Sells LLP.

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)**

No, the Company does not have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	23,14,470	23,79,231
(ii) Groundwater	78,73,240	29,91,910
(iii) Third party water	20,53,537	14,57,540
(iv) Seawater / desalinated water	7,344	0
(v) Others	38,76,733	43,48,015
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>1,61,25,324</b>	<b>1,11,76,696</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>1,28,76,481</b>	<b>1,10,38,686</b>
<b>Water intensity per rupee of turnover (Total water consumption/ Revenue from operations) (in kilolitres/₹ Cr)</b>	<b>102</b>	<b>101.5</b>
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) (in kilolitres/Mn USD)</b>	<b>228.5</b>	<b>225.1</b>

Note: Purchasing Power Parity (PPP)-total income is adjusted as per International Monetary Fund Implied PPP conversion rate.

The Company has made improvements in FY 2023-24 for capturing data related to water withdrawal, consumption and discharge. However, the Company has more than 700 project sites in operation, and which are by definition temporary and with open boundaries. Water is taken from multiple sources, as per site conditions and discharged through multiple points. These issues create significant challenge in putting direct measurement systems and therefore, indirect estimation has to be made which presents difficulty in completeness and traceability of the data as required for reasonable assurance standards. To improve data collection and reporting, the Company is redesigning the Standard Operating Procedures (SOPs) which will be based on reasonable assurance requirements, and this will be rolled out to all the sites/locations. Additionally, the Company is finalizing the digital solutions which would enable direct measurement without manual intervention.

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

Yes, independent data assurance has been carried out by Deloitte Haskins & Sells LLP.

## 4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	5,26,691 (Primary)	2,53,587 (Primary)
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	10,91,480 (Primary)	2,73,052 (Primary)
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	16,448 (Secondary)	0
(iv) Sent to third parties <sup>@</sup>		
- No treatment	2,36,188	5,41,499
- With treatment – please specify level of treatment	60,336 (Primary)	0
(v) Others <sup>@</sup>		
- No treatment	8,94,733	26,522
- With treatment – please specify level of treatment	4,18,234 (Primary)	1,64,681 (Primary)
<b>Total water discharged (in kilolitres) (i + ii + iii + iv + v)</b>	<b>32,44,110</b>	<b>12,59,341</b>

<sup>@</sup> Sent to third parties and others-without treatment is water discharged through municipal sewer connections or given to approved vendors for wastewater treatment.

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

Yes, independent data assurance has been carried out by Deloitte Haskins & Sells LLP.

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

Yes, the A. M. Naik Heavy Engineering Complex, Hazira is a ZLD certified facility, and 100% of wastewater generated is either recycled and reused or stored for future use. Other manufacturing facilities at Kattupalli, Powai, Talegaon, Coimbatore, Kancheepuram, Kansbahal have also implemented Zero Liquid Discharge systems at respective locations. The wastewater generated from business processes and domestic uses is collected, treated, and reused for non-potable purposes such as gardening, toilet flushing, firefighting, topping up the cooling tower, road washing, dust suppression.

**6. Please provide details of air emissions (other than GHG emissions) by the entity:**

Data disclosed for the following manufacturing facilities:

Parameter	UOM	FY 2023-24			FY 2022-23		
		Hazira	Pithampur	Kancheepuram	Hazira	Pithampur	Kancheepuram
SOx	mg/m <sup>3</sup>	24	16	10	18	22	11
NOx	mg/m <sup>3</sup>	19	14	46	26	21	44
Particulate Matter (PM)	mg/m <sup>3</sup>	45	26	37	15	61	38
Persistent organic pollutants	-	-	-	-	-	-	-
Volatile organic compounds	-	-	-	-	-	-	-
Hazardous air pollutants	-	-	-	-	-	-	-
Others	-	-	-	-	-	-	-

Increase in air emissions for Hazira is due to increase in consumption of natural gas. However, the emissions are within the permissible limit.

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

Yes, stack emissions from chimney stacks at respective manufacturing facilities are analyzed by government approved laboratories and the reports are reviewed by the internal team to ensure compliance to the consent to operate (CTO) conditions. Testing reports are submitted to State Pollution Control Boards as per compliance.

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

Parameter	UOM	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	6,35,646	6,93,115
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	3,49,682	2,73,719
Total Scope 1 and Scope 2 emissions per Rupee of turnover	tCO <sub>2</sub> e/₹ Cr	7.8	8.9
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)	tCO <sub>2</sub> e/Mn USD	17.5	19.7

*Note: Purchasing Power Parity (PPP)-total income is adjusted as per International Monetary Fund Implied PPP conversion rate.*

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

Yes, independent data assurance has been carried out by Deloitte Haskins & Sells LLP.

**8. Does the entity have any project related to reducing Green House Gas emission?**

Details of some initiatives linked to GHG emissions reduction have been included in Principle-6 Leadership Indicator-Question 4 as the answer provided in Principle-6 Leadership Indicator-Question 4 also include other initiatives related to resource efficiency and waste reuse.

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

Parameter	FY 2023-24	FY 2022-23
<b>Total Waste generated (in metric tonnes)</b>		
Plastic Waste (A)	506	126
E-waste (B)	86	26
Bio-medical waste (C)	0.5	0.3
Construction and demolition waste (D)	2,36,846	2,22,748
Battery waste (E)	56	11
Radioactive waste (F)	5	0
Other Hazardous waste. Please specify, if any. (G)	7,326	4,201
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	2,09,271	99,762
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>4,54,097</b>	<b>3,26,875</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	3.6	3.0
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (in tonnes/Mn USD)	8.1	6.7
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
(i) Recycled	2,05,822	184,852
(ii) Re-used	1,57,590	0
(iii) Other recovery operations	0	0
<b>Total</b>	<b>3,63,412</b>	<b>184,852</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
(i) Incineration	0	0
(ii) Landfilling	73,535	2,352
((iii) Other disposal operations	3,633	140
<b>Total</b>	<b>77,168</b>	<b>2,492</b>

Note: Purchasing Power Parity (PPP)-total income is adjusted as per International Monetary Fund Implied PPP conversion rate.

The Company has made improvements in FY 2023-24 for capturing data related to waste generation, reuse and disposal. However, the Company has more than 700 project sites in operation, and which are by definition temporary and with open boundaries. Waste gets generated at multiple locations, depending on type of activities at sites and reused and disposed at varying times through the project lifecycle. These issues create significant challenge in putting direct measurement systems and therefore, indirect estimation has to be made which presents difficulty in completeness and traceability of the data as required for reasonable assurance standards. To improve data collection and reporting, the Company is redesigning the Standard Operating Procedures (SOPs) which will be based on reasonable assurance requirements, and this will be rolled out to all the sites/locations. Additionally, the Company is exploring some digital solutions which could be used to enable direct measurement without manual intervention.

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

Yes, independent data assurance has been carried out by Deloitte Haskins & Sells LLP.

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

Waste management is an integral part of the EHS management system. Each location (project site, manufacturing facilities and campuses) has a location specific waste management plan, which is based on types of waste generated and applicable disposal methods. Waste management guidelines and procedures focus on Reduce, Reuse, Recycle principles and ensure proper waste identification, segregation, recycling (if applicable) and disposal. All businesses assess the waste generated from operations for reuse potential and after exhausting the feasible options, opt for relevant disposal methods. For hazardous waste, waste management is done complying to the requirements of applicable hazardous waste management rules e.g., Battery Waste Management Rules, 2022 and as per the guidelines issued by Central and State Pollution Control Boards. Hazardous waste is stored at specially designated areas/locations at project sites or manufacturing facilities and the disposal is done through govt approved/registered waste handling agencies. The Company also conducts regular training and awareness programmes on waste management for employees and workers focusing on waste minimization and proper waste handling. The Company also ensures suitable storage requirements e.g., fire-fighting equipment, spill kits, drip trays for safe storage of waste before disposal. The Company manufactures certain products which are meant for industrial and defence use and no hazardous or toxic chemicals are used in these products.

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

Sl. No.	Location of operations/offices	Type of Operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	A. M. Naik Heavy Engineering Complex, Hazira (Gujarat)- Company's manufacturing facility, located along the banks of River Tapi, 8 kms from the Arabian Sea	Manufacturing facility	Yes
2	Modular Fabrication Facility (Kattupalli)- Company's manufacturing facility located 40 kms from Chennai, adjoining the Bay of Bengal	Manufacturing facility	Yes
3	Kachchi Dargah Bridge (Bihar) – Contracted project for construction of a bridge which spans the Ganges, connecting Kacchi Dargah in Patna and Bidupur in Hajipur	EPC Project site	Yes
4	Thane Creek Bridge, Thane (Maharashtra) - Contracted project for expansion of existing road bridge on Sion-Panvel Road across Thane creek	EPC Project site	Yes
5	New Dry Dock, Kochi (Kerala) - Contracted project for construction of a dock along the Ernakulam Channel	EPC Project site	Yes
6	Mumbai Coastal Road, Mumbai (Maharashtra) - Contracted project for construction 8-lane expressway from Marine Drive to Worli abutting the seacoast of Mumbai	EPC Project site	Yes
7	Mumbai Ahmedabad High Speed Rail Package C3 (Maharashtra) - Contracted project for construction of high-speed rail corridor comprising viaducts and tunnels falling in forest area and coastal regulation zones	EPC Project site	Yes

12. **Details of Environmental Impact Assessments (EIA) of projects undertaken by the entity based on applicable laws, in the current financial year:**

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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EIA for the projects, given as a contract by the clients, is under the scope of the clients.

13. **Is the entity compliant with the applicable environmental laws/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)?**

Yes, the Company is compliant with applicable Acts and rules.

**LEADERSHIP INDICATORS**

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

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

- (i) **Name of the area(s):** Water-stressed areas in parts of western Uttar Pradesh, central Maharashtra, Bangalore, Tamil Nadu, Rajasthan, Punjab and Haryana.
- (ii) **Nature of operations:** EPC projects related to highways, railways, metro rail, water supply, irrigation, and oil & gas facilities
- (iii) **Water withdrawal, consumption, and discharge in the following format:**

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
Surface water	10,367	5,116
Groundwater	5,30,724	2,12,684
Third party water	2,43,695	9,13,602
Seawater / desalinated water	0	0
Others	15,64,155	2,29,725
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>23,48,941</b>	<b>13,61,127</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>15,93,189</b>	<b>13,61,127</b>
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>	<b>12.6</b>	<b>12.5</b>
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	1,72,767 (Primary)	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	46,616 (Primary)	3,650 (Primary)
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties@		
- No treatment	1,61,597	1,44,011
- With treatment – please specify level of treatment	21,358 (Primary)	0
(v) Others@		
- No treatment	2,12,141	22,619
- With treatment – please specify level of treatment	1,41,274 (Primary)	44,962 (Primary)
<b>Total water discharged (in kilolitres) (i + ii + iii + iv + v)</b>	<b>7,55,753</b>	<b>2,15,242</b>

@ Sent to third parties and others-without treatment is water discharged through municipal sewer connections or given to approved vendors for wastewater treatment.

Though the data related to water is still partial, the Company has improved capture of data related to water stressed areas in FY 2023-24.

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

Parameter	UOM	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up of GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	70,73,536	71,28,687
Total Scope 3 emissions per rupee of turnover	tCO <sub>2</sub> e/₹ Cr.	56	65.6

Scope 3 emissions for the Company is being reported for 4 categories i.e., purchase of goods and services, upstream transportation and distribution, business travel and employee commuting. The methodology to estimate these emissions is according to the Scope 3 Calculation Guidance of GHG Protocol. More than 95% of Scope 3 emissions comes from purchase of goods and within that category, 90% is contributed by consumption of steel and cement used at project sites.

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N).**

No.

**3. 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.**

Sl. No.	Location of operations/offices	Actions taken
1	A. M. Naik Heavy Engineering Complex, Hazira- Company's manufacturing facility, located along the banks of River Tapi, 8 kms from the Arabian Sea	Implementation of Zero Liquid Discharge (ZLD) system, planting of mangroves, restoration of biodiversity by converting turf to meadow
2	Modular Fabrication Facility, Kattupalli and Shipbuilding Facility, Kattupalli- Company's manufacturing facilities located 40 kms from Chennai, adjoining the Bay of Bengal	Implementation of Zero Liquid Discharge (ZLD) system; Phosphating & Galvanizing activities are carried out beyond Coastal Regulation Zone boundaries
3	Kachchi Dargah Bridge (Bihar) – Client contracted project for construction of a bridge which spans the Ganges, connecting Kachhi Dargah in Patna and Bidupur in Hajipur	Location and spacing of bridge piers are designed in a manner to avoid key habitat areas such as breeding and feeding grounds, migration routes of animals, etc., Construction activity is avoided to the extent possible during key seasonal wildlife activities and breeding seasons
4	Thane Creek Bridge, Thane (Maharashtra) - Contracted project for expansion of existing road bridge on Sion-Panvel Road across Thane creek	Monitoring of implementation of Environment Management Plan by third-party agencies, construction of piers in the creek without disturbing the tidal flow
5	New Dry Dock, Kochi (Kerala) - Contracted project for construction of a dock along the Ernakulam Channel	Plantation of mangroves, use of equipment compliant with noise emission limits and monitoring of movement of machineries to protect marine life, lighting arrangement to direct light away from sea
6	Mumbai Coastal Road, Mumbai (Maharashtra) - Contracted project for construction 8-lane expressway from Marine Drive to Worli abutting the seacoast of Mumbai	Creation of rock intertidal habitat, translocation of coral patches, noise and vibration minimization through proper machinery maintenance, development and implementation of a marine biodiversity plan, regular marine environment monitoring
7	Mumbai Ahmedabad High Speed Rail Package C3 (Maharashtra) - Contracted project for construction of high-speed rail corridor comprising viaducts and tunnels falling in forest area and coastal regulation zones	Preservation and planting of mangroves, controlled lighting during night-time to minimize impact on wildlife, noise and vibration minimization through proper machinery maintenance

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:**

Sl. No.	Initiatives undertaken	Details of the initiative (web-link, if any, may be provided along with summary)	Outcome of initiative
1	Reduction in Diesel Consumption through optimization initiatives	Construction Machinery, used at project sites, are typically powered by diesel. As part of cost optimization initiatives, all project teams constantly look for ways to maximize the utilization of these machinery as well as optimize the deployment. These initiatives are enabled through use of sensor-based technologies and digital tools.	Emissions avoided in FY 2023-24: 22,207 tCO <sub>2</sub> e
2	Reduction in Diesel Consumption by Switching to Grid electricity	Construction project sites have historically been powered by Diesel Generator sets due to remote locations as well as hurdles in getting the grid connection. The Company has taken initiatives across various project sites to get grid electricity connections and help reduce diesel consumption.	Emissions avoided in FY 2023-24: 12,952 tCO <sub>2</sub> e
3	Groundwater Recharge	In some underground metro projects, dewatering is required to enable proper working conditions. Typically, the water extracted in the dewatering process is sent to storm water drain. In CMRL TU02 project, site faced a challenge in not having proper facility for safe discharge of this water. The project team came up with a design to process the water from dewatering process and then feed it back to groundwater through recharge borewells. This enabled not only safe discharge of the water but also helped in replenishing the ground water.	~ 21 kL per day of dewatered quantity was sent to recharge wells. In FY 2023-24, the site was able to recharge ~3,520 kL of water.
4	Rainwater Harvesting	In MAHSR project, one section has implemented a large Rainwater Harvesting system. The facility was incorporated at design stage itself during construction of a temporary facility (Noise Barrier factory). Water conserved is stored in a storage tank for further use in site activities as well as provided to the community for irrigation and other uses.	~6,500 kL water was conserved, avoiding extraction from other sources. Additionally, the energy spent in sourcing water is also avoided.
5	C&D Waste Recycling	Concrete waste gets generated in civil works related to infrastructure projects. Typically, this is disposed through assigned agencies, and which use it typically for landfilling. Additionally, the concrete waste also consumes space at project site. In Kundankulam Nuclear Power Project, the project team established a crusher plant to process this concrete waste into aggregates of different sizes. This was reused in making solid blocks for construction as well as for aggregate use in workmen colony PCC works, infra works, fill-crete at site.	Concrete waste of ~160 tonnes was crushed and processed into aggregates of different sizes and thereby, avoiding sourcing of equivalent volume from other sources.

Other significant initiatives are covered in 'Natural Capital' and 'Intellectual Capital' sections of the Integrated Annual Report FY 2023-24.

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

Disaster management is an important component of EHS management system. At the EPC Project sites and Manufacturing facilities/campuses, the Company has implemented disaster management and emergency preparedness plans (EPPs) that address emergencies such as flooding, earthquake, major fires, disease outbreaks etc. These plans are focussed on Mitigation, Preparedness, Response, Recovery to ensure minimal disruptions to the business operations in face of emergencies. Key locations are equipped with emergency sirens, first aid, medical treatment facilities, and identification of assembly points. To maintain a high level of preparedness, relevant training, and capacity-building programmes, including mock drills, are undertaken for employees and workers. Disaster management plans are readily available and easily accessible to all relevant stakeholders, including contractors and emergency services personnel.



Overall, the Company's disaster management and emergency preparedness plans aim to ensure business continuity in face of emergencies or disasters and ensure safety of all personnel, assets and other resources.

**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?**

No significant risks/concerns have been raised during the year. The Company ensures that the contractors, vendors, suppliers comply with policies and guidelines including need for compliance with various regulations and ethical practices including environmental regulations.

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

The Company identified top 200 (unique 186) supply chain partners comprising 38% of FY 2022-23 spend. During the year, the Company assessed these supply chain partners on certain ESG parameters that includes environmental management, performance, human rights, CSR, health and safety practices, corporate governance, and ethical business practices through a questionnaire. This questionnaire was developed keeping in mind the regulatory compliances, BRSR disclosures, global standards. The remote/desktop assessment was based on interactions with the supply chain partners, response to the questionnaire and evidence shared with the Company. Post assessment, the gaps identified during the assessment were shared with the supply chain partners along with suggestions on the course of action for improving overall sustainability performance.

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

**ESSENTIAL INDICATORS**

1. a. **Number of affiliations with trade and industry chambers/associations:** 75
- b. **List the top 10 trade and industry chambers/associations (determined based on the total members of such body) the entity is a member of/affiliated to.**

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National/International)
1	Confederation of Indian Industry (CII)	National
2	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
3	National Safety Council (NSC)	National
4	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
5	Construction Industry Development Council (CIDC)	National
6	Quality Circle Forum of India (QCFI)	National
7	American Society of Concrete Contractors (ASCC)	International
8	British Safety Council (BSC)	International
9	International Chamber of Commerce (ICC)	International
10	Saudi Standards Organization (SASO)	International

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

There was no issue related to anti-competitive conduct by the entity during the year.

**LEADERSHIP INDICATORS**

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

The Company proactively engages with different stakeholders including industry chambers, associations, government ministries and regulators and provides its inputs on various areas such as infrastructure sector, renewable energy, space,

health and safety etc. Over the years, the Company executives have played a key role in helping shape public policy and have been invited to join (in certain cases also lead) several committees and task forces. A few examples from FY 2023-24:

- (i) Amendment to RBI's guideline for green taxonomy to include nuclear energy, hydropower more than 25 MW, biomass based energy.
- (ii) Incentives for chip design to be available for all companies.
- (iii) Policy aspects related to Small Modular Reactors (SMR).
- (iv) Direct Tax Avoidance Treaty with Algeria.

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

### ESSENTIAL INDICATORS

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

Name and brief details of project	SIA notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes / No)	Relevant Web Link
Not applicable					

SIA for the projects, executed by the Company as a contract from the clients, is under the scope of the client.

- 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	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
Not applicable						

R&R for the projects executed by the Company, is under the contractual scope of the client.

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

Complaints and grievances of the community are collected at work locations i.e., project sites, manufacturing facilities, campuses, and offices by the respective Admin and/or Industrial Relations teams. At EPC project sites, a Public Relations Officer is also deployed to engage with the local community and address their concerns, if any. Grievances are collected through complaint/suggestion boxes at these locations. The Company also has a toll-free number (18002094545), email id (infodesk@larsentoubro.com), social media handles (LinkedIn: <https://www.linkedin.com/company/larsen-&-toubro-limited/>, X: @larsentoubro) to collect such inputs. Complaints or grievances received are forwarded to the relevant person or department for resolution and they also monitor the resolution of the complaint/grievance. Issues, which remain unresolved or require management intervention, are escalated to the respective business heads.

#### For CSR Projects

The implementation of services is through collaboration and partnerships with NGOs, Government agencies and L&T teams from campuses, sites and operations. The aim is to improve the quality of life for individuals, communities and facilitate a positive and sustainable change. The grievance redressal mechanism provides a platform for the community to highlight their concerns with a view to addressing the issues in a manner that safeguards the interests of the individual as well as the larger community. The endeavour will continue to be to seek ongoing feedback from stakeholders regarding CSR projects.

Grievances may be submitted in writing through an email/letter addressed to the concerned Project Head Coordinator at the local CSR site. The Project Head will record the grievance, examine the issues involved and prepare an action plan for resolution. Feedback on status of action may be provided within 20 days of receipt of the grievance. Grievances may

also be submitted via email/letter to Corporate CSR at [grievance.csr@larsentoubro.com](mailto:grievance.csr@larsentoubro.com). Feedback on status of action may be provided within 20 days of receipt of the email. Suggestions regarding scope of projects, additional activities to be undertaken, request for support for projects and initiating activities in new locations and geographies will not be within the scope of the grievance redressal mechanism.

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

Particulars	FY 2023-24 (%)	FY 2022-23 (%)
Directly sourced from MSMEs/small producers	8	7
Directly from within India	68	71

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**

The wage data comprises the salary paid to the staff which includes permanent and other than permanent employees, and permanent workers. The jobs created and respective location have been mapped for the aforementioned categories of employees and workers and does not include other than permanent workers.

The Company employs around 3,50,000 other than permanent workers across more than 700 project sites and locations within India and abroad. Wages to other than permanent workers are directly paid by the third party contractors. The Company monitors the wages and statutory compliances based on the wage register submitted by the third party contractors along with the monthly invoice at project site level manually. The Company is capturing the total payment made to contractors but the wages included therein is not tracked / collated separately. Going forward in the coming years, the Company will explore options to capture, track and report the wages paid to other than permanent workers.

Location	FY 2023-24 (%)	FY 2022-23 (%)
Rural	4	Not estimated
Semi-urban	2	
Urban	4	
Metropolitan	70	

Around 20% of the jobs are created outside India.

**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).**

No actions required by the Company.

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

S. No.	State	Aspirational District	Amount spent (In ₹)
1	Chhattisgarh	Bastar	2,10,000
2	Jharkhand	Hazaribagh	9,94,325
3	Jharkhand	Ranchi	5,87,906
4	Jharkhand	Dumka	1,05,728
5	Odisha	Balangir	3,79,742
6	Punjab	Moga	2,37,000
<b>Total</b>			<b>25,14,701</b>

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

Though the Company does not have any preferential procurement policy, but it encourages and engages with suppliers from marginalised and vulnerable groups wherever possible. Due to the nature of business and bulk

material requirement, there are very limited options to procure from these groups and has to be sourced from large scale companies.

(b) **From which marginalized/vulnerable groups do you procure?**

List of identified marginalized and vulnerable groups:

- I. Gender based: women/transgenders
- II. Person with disability

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

The Company engages with a few marginalized and vulnerable groups (women SHGs, local farmers, small businessmen) for food supplies to canteens in the manufacturing facilities. However, the overall value is negligible as compared to the total purchase by the Company. Due to the nature of business and bulk material requirement, there are very limited options to procure from these groups and mostly sourced from large and mid-sized companies. The material mostly comprises items such as cement, steel, fuel, pipes, cables, ready mix concrete and services may include logistics, IT, ITES, subcontracting for manpower.

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.**

The Company does not have any intellectual property owned, created, or acquired based on traditional knowledge during the year.

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.**

The Company does not have any intellectual property owned, created, or acquired based on traditional knowledge during the year.

6. **Details of beneficiaries of CSR Projects:**

Sr. No	Project Name	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Construction Skills Training Institutes and Other skilling programs for women & youth	38,475	100
2	Enhancing educational infrastructure in Schools	3,13,796	100
3	Promoting STEM Education in Schools & Improving quality of education	44,611	100
4	Water conservation initiatives and Integrated Community Development Programme for Rural Areas	1,29,680	100
5	Environment Conservation Initiatives	3,95,743	100
6	Community Health Initiatives	7,22,383	100
<b>Total</b>		<b>16,44,688</b>	

## 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.**

Consumers for the Company are clients (referred to hereafter as customers) for its businesses in EPC Projects and Hi-Tech Manufacturing. Customer complaints are received through email, transmittal letters, customer complaint registers and even verbally directly by project teams or facility admins. The Company also has a toll-free number and email address ([infodesk@larsentoubro.com](mailto:infodesk@larsentoubro.com)) for collecting the customer inputs/feedback. Feedback from the customers is collected

through a structured feedback form on a periodic basis (semi-annually or annually as the case may be). Formats to record the complaints/feedback as well as SOPs to handle them are part of the Quality Management System. Inputs received from the customers are categorized and forwarded to the relevant teams or departments, which take the necessary action to resolve the complaints and respond to the customers. Each business unit maintains a record of complaints received and resolutions provided. These are reviewed at regular intervals at different management levels, starting from project teams and up to Business Head and Executive Committee level.

**2. Turnover of products and/or services as a percentage of turnover from all products/services that carry information about:**

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	
Safe and responsible usage	Not applicable
Recycling and/or safe disposal	

The Company does not manufacture or sell consumer products. The products manufactured by the Company are equipment, modules, sub-systems etc. which are for industrial and defence use. Relevant operating parameters and other required information are provided for these products.

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

Particulars	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	–	0	0	–
Advertising	0	0	–	0	0	–
Cyber-security	0	0	–	0	0	–
Delivery of essential services	0	0	–	0	0	–
Restrictive Trade Practices	0	0	–	0	0	–
Unfair Trade Practices	0	0	–	0	0	–
Other	0	0	–	0	0	–

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

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

The Company manufactures products which are for industrial and defence use. There were no product recalls (voluntary or forced) made on ground of safety in FY 2023-24.

**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. If NA, provide details.**

Yes, it is available at <https://www.larsentoubro.com/corporate/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 cases/complaints received in above matters.

7. **Provide the following information relating to data breaches:**

- a. **Number of instances of data breaches along-with impact**
- b. **Percentage of data breaches involving personally identifiable information of customers**
- c. **Impact, if any, of the data breaches**

There were no data breaches during the year.

**LEADERSHIP INDICATORS**

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

The Company's business offerings can be found at <https://www.larsentoubro.com/corporate/our-businesses/>

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

The Company does not operate in B2C space and products manufactured are made according to client/customer specifications. The products' business manufactures heavy machines and machine parts for industrial and defence use. The Company engages with its clients/customers on a regular basis to explain about its products, innovations, new technologies and techniques that are implemented or proposed to be implemented to enhance product quality and features.

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

The Company does not have any direct presence or role in provision of essential services. However, during execution of projects and transportation of machinery/equipment, the clients and concerned public departments/authorities are informed in advance through transmittal letters and their permissions are sought for road closure, traffic diversion, isolation of utility supplies etc.

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. If NA, provide details. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No) If NA, provide details.**

The Company does not manufacture or sell products which are covered under such laws. Various business verticals conduct customer satisfaction surveys and feedback in a systematic manner and is a process included in Quality Management System. The feedback is collected through a structured questionnaire based relevant parameters and based on 10-point Likert scale. The feedback is usually collected on a half-yearly or annual basis. Key points related to areas of improvement are captured in the feedback report which is reviewed by the senior management of the relevant business on a regular basis.