# Analysis and Insights from ESG Disclosures Submitted by 1012 Indian Businesses under BRSR Guidelines (2022–23)

**Environmental**
179 of 1012 businesses explicitly mentioned either Net Zero commitment or carbon neutrality
(17.7%)

**Social**
Average percentage of female executives in businesses
(11.3%)

## ESG Disclosures Submitted under Business Responsibility and Sustainability Reporting (BRSR) by 1012 Indian Businesses (2022–23)

**Governance**
Procedures in place for sustainable sourcing
(71.8%)

IIMA
विद्याविनियोगाद्विकासः

NATIONAL INVESTMENT & INFRASTRUCTURE FUND

These are a few sample results from this report

# Analysis and Insights from ESG Disclosures Submitted by 1012 Indian Businesses under BRSR Guidelines (2022–23)


Authors

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# From the Desk of NIIF Chair in ESG, Prof. Amit Garg

Environmental, Social, and Corporate Governance (ESG) criteria have increasingly become standard benchmarks for international investment practices. Sustainable investing has experienced significant global growth, with the market size reaching USD 30.3 trillion, as outlined in the Global Sustainable Investment Review (GSIR) 2022. The report also found a 20% increase in assets under management (AUM) for sustainable investments compared to 2020[1]. The number of investors prioritising ESG ratings and carefully evaluating ESG-related risks as critical factors in their investment decision-making processes is increasing rapidly.

I am immensely pleased to present this comprehensive analysis of Business Responsibility and Sustainability Reports (BRSR) submitted by 1012 Indian companies for FY2022–23. This report marks a significant milestone in the journey of India's corporate sector towards embracing ESG principles.

In 2019, after multiple revisions, the revamped version of the National Voluntary Guidelines (NVGs) was introduced as the National Guidelines on Responsible Business Conduct (NGRBC) by the Ministry of Corporate Affairs, Government of India. These changes were introduced to help companies take a step forward by incorporating sustainability into their operations, rather than merely complying with regulations. Soon after, SEBI mandated that the top 1000 companies (by market capitalisation) furnish a Business Responsibility Report (BRR) in their annual reports. Both the NGRBC and BRR laid the foundation for the BRSR framework. SEBI introduced the BRSR to address the ever-increasing investor concerns about transparency and nonfinancial disclosures. The main objective was to provide companies with a standardised format that could help various companies access sustainability-related disclosures easily and engage with their stakeholders more fruitfully. By this time, many countries had already established similar guidelines. For example, the United Kingdom had climate change reporting based on TCFD recommendations, and the European Union had the Non-Financial Reporting Directive. Other countries such as New Zealand, the USA, Hong Kong, and Taiwan had either required or were planning to require companies to disclose sustainability information.

In this report, we analysed BRSR reports submitted by 1012 companies to gain insights into the prevailing levels of disclosures reported. The main results indicate that, although companies report higher levels of disclosures for principles 3, 4, 5, and 9, there is still significant room for

[1]Global Sustainable Investment Review 2022. https://www.gsi-alliance.org/members-resources/gsir2022/

improvement of principles 1, 7, and 8. Companies should aspire to improve disclosure reporting related to value chain partners. This is a strategic decision each company has to take individually to disclose their supply chains and greenhouse gas (GHG) emissions. Insights into the Net Zero (NZ) or carbon-neutrality commitments of Indian businesses indicate that 179 out of 1012 (17.7%) companies have made explicit commitments. Businesses are encouraged to intensify their efforts, particularly in sectors with higher GHG emissions and GHG emission intensity (GHG per turnover or per unit energy consumption). The increase in renewable energy adoption among companies committed to NZ could be a positive sign for the overall sector and the country. These three parameters are aligned with India's long-term climate strategy (Net Zero by 2070) and the two important nationally determined contributions (NDC) as per Paris Climate Change Agreement. These are 45% reduction in GHG intensity of Indian GDP during 2005–2030 and 50% share of non-fossil capacity in electricity by 2030.

Based on our analysis, we have made several recommendations for making BRSR reporting a more transparent, accurate, and useful tool for various stakeholders. Businesses are motivated to opt for third-party verification to enhance the accuracy and transparency of their reported data. We suggest that leadership indicators with more than 75% reporting levels may be included as essential indicators in the BRSR format for the next reporting cycle. Additionally, businesses are encouraged to build their capacity to disclose more leadership indicators in the next few reporting cycles to enhance their performance. SEBI may coordinate the development of a centralised repository or an online portal where businesses could submit their reports, making them easier for all to access. Moreover, regulated entities (listed entities) are encouraged to play a critical role in guiding nonregulated entities (value chain partners), thus strengthening the overall BRSR ecosystem.

We have also suggested including several ratios in the list of essential indicators to enhance the relevance of BRSR reporting in the Indian context. These ratios could be estimated by combining relevant data points from the BRSR and the companies' annual reports.

I am sure that incorporating these recommendations will lead to better BRSR reporting for businesses and regulatory authorities, as well as informed decision-making among stakeholders, creating a win–win–win scenario for all. We may plan to continue analysing Indian BRSR reporting in future years and suggest critical ESG indicators.

I gratefully acknowledge the unwavering support provided by

the National Investment and Infrastructure Fund Limited (NIIF) in their continued sponsorship of the ESG Chair position at IIMA.

I would like to express my gratitude to my colleagues for their deep involvement in my research work – Ms Kruti Upadhyay (overall ESG coordination, sustainable finance), Ms Divya Arora (ESG database assimilation and analysis), Dr Vidhee Avashia (overall disclosures and sustainable finance lead, climate change risks, and Impacts Vulnerability and Adaptation), Mr Jigar Shah (ESG database analysis and Administration lead), and Mr Vishal Gupta (GHG inventory assessment and ESG qualitative data analysis). They are all pushing their professional domains and expanding their knowledge bases and analytical competence. This work would not have been possible without their involvement and support.

I especially would like to thank Mr Vatsal Gupta for creating India-specific financial ratios and suggesting innovative approaches to ESG analysis, and Mr Shreyash Gupta (Summer Intern) for supporting initial data analysis.

Additionally, I extend my thanks to Mr Jaypalsinh Chauhan (GHG inventory lead and UNFCCC reporting expert), Dr Jyoti Maheshwari (GHG mitigation assessments, energy efficiency, and energy and technology transitions), Prof Saritha Sudharmma Vishwanathan (advice on energy efficiency and climate commitments), and Ms Rutva Patel (GIS lead) for their inputs, and Ms Dhara Thakkar (administration and finance) for her administrative support in the successful completion of this work.

I would like to acknowledge Mr Shahid Qureshi for his valuable assistance in editing and proofreading this report.

I thank Mr Paresh Amleshwarwala for his support in styling visualisations and designing this report.

# Message: Prof. Bharat Bhasker, Director, IIMA

Businesses are increasingly prioritising the integration of Environmental, Social, and Corporate Governance (ESG) principles at the core of their business strategies and operations. Successful implementation of these strategies and progress towards a sustainable future are essential for both long- and short-term success. In response to this industry need, and in alignment with IIM Ahmedabad's vision to impact policy and practice, I am pleased that the "NIIF Research Chair in ESG at IIMA" is presenting this report, titled "Analysis and Insights from Disclosures Submitted by 1012 Indian Businesses under BRSR Guidelines (2022–23)".

With the regulatory introduction of the BRSR framework by the Securities and Exchange Board of India (SEBI), businesses are now mandated to disclose their ESG performance and initiatives in a standardised and transparent manner. The findings of this report highlight how Indian businesses are integrating sustainability into their core operations and aligning with India's Net Zero emissions target by 2070. This report provides a detailed overview of the progress Indian companies have made in ESG disclosures through BRSR submissions while also identifying areas where further effort is required. As we move forward, businesses, regulators, and stakeholders should continue to collaborate towards creating a sustainable and inclusive future.

I congratulate the companies that have demonstrated leadership in BRSR disclosures. Indian companies have the potential to set global benchmarks in ESG performance, and the insights drawn from this analysis can serve as a roadmap for continuous improvement.

The report demonstrates that this extensive and ambitious initiative has been made possible through the ongoing collaboration and strong support of a dedicated and enthusiastic partner like NIIF, along with the exceptional efforts of our research team. This partnership exemplifies the institute's commitment to advancing ESG practices within India's business landscape while fostering meaningful engagement with one of the country's key stakeholders.

I am sure that readers will find the content of this report both engaging and enriching.

# Message: Shri Sanjiv Aggarwal, CEO and MD, NIIF

Globally, investments in sustainable assets and businesses stand at USD 30.3 trillion[2] in 2022. This has been partly driven by global commitments viz. the Paris Agreement and the UN Sustainable Development Goals, which have emphasised the need for responsible growth aligned with environmental priorities.

Environmental, social, and corporate governance (ESG) reporting has emerged as a crucial tool for businesses to integrate these priorities into their strategies. Many countries now require ESG disclosures alongside financial reports, underscoring the growing importance of transparency in corporate sustainability efforts.

In India, the Securities and Exchange Board of India (SEBI) has taken a significant step forward in strengthening corporate governance and transparency by introducing the Business Responsibility and Sustainability Reporting (BRSR) guidelines. The BRSR framework empowers investors to make more informed decisions and encourages companies across India to embrace sustainable, responsible practices.

NIIF is committed to integrating environmental and social governance (ESG) considerations into its investment decision-making process. We recognise E&S's critical role in shaping portfolio performance by unlocking value and mitigating risks. This study helps us to understand the issues and how we manage such risks in an informed way.

The current study by Prof. Amit Garg, NIIF ESG Chair at IIMA, analyses the ESG disclosures of more than 1,000 listed companies submitted to SEBI for 2022-23. This report provides valuable insights into these companies' sustainability journeys and highlights the potential for non-regulated entities, including value chain partners, to contribute to a more sustainable economy. This study highlights the collaborative power of NIIF and IIMA in advancing critical discussions on sustainable development and climate preservation.

[2] Global Sustainable Investment Review 2022. https://www.gsi-alliance.org/members-resources/gsir2022/

# Acknowledgements

We extend our deepest gratitude to the many individuals whose support and genuine contributions made this report possible. Our discussions with research colleagues and industry professionals were of great value in completing this work.

We would like to convey our gratitude to SEBI for creating BRSR guidelines, supporting its implementation, and thus guiding Indian companies to a more conscious environmental, social, and corporate governance reporting. Of course, Indian businesses have reciprocated very enthusiastically through their reporting.

We are particularly grateful to the National Investment & Infrastructure Fund (NIIF) for their continuous support in undertaking ESG-focused research activities. Special thanks go to Mr Ashok Emani, Ms Akshata Kalloor, and Mr Akhilesh Tilotia (previous coordinator) from the NIIF for their strong engagement and facilitation.

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We would like to thank Ms Chhavi Moodgal (CEO of the Endowment Fund at IIMA) and her colleagues for their support.

We express appreciation for our research colleagues, Mr Jaypalsinh Chauhan, Dr Jyoti Maheswari, Prof Saritha Sudharmma Vishwanathan, and Ms Rutva Patel for their invaluable inputs and research support, as well as for Ms Dhara Thakkar for her administrative support in the successful completion of this work.

We would like to acknowledge Mr Shahid Qureshi for his valuable assistance in editing and proofreading this report.

Finally, thanks to Mr Paresh Amleshwarwala for his support in visualisation styling and report designing.

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Mr Jigar Shah is a research associate (ESG) and project administrator at IIM Ahmedabad. He holds a Master of Business Administration (MBA) degree in finance. His current research interests include ESG analysis, BRSR analysis, ESG investing, ESG rating of companies, Sustainable Finance Disclosure Regulation (SFDR), workshop/conference management, project administration, and international financial reporting.

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Mr Vishal Gupta is a research associate at IIM Ahmedabad. He holds a Master's degree in statistics. He has previously worked as a research associate with the Accreditation and Ranking office of IIM Kozhikode. His current research interests include greenhouse gas accounting, just sustainable energy transition, BRSR reporting, and the inverse Gaussian frailty model (Copula).

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# List of Abbreviations

AUM: Assets under management
BMC: Brihanmumbai Municipal Corporation
BRR: Business Responsibility Report
BRSR: Business Responsibility and Sustainability Reporting
BSE: Bombay Stock Exchange
Capex: Capital expenditure
CCD: Climate Change Department
CFO: Cash flow from operations
CIN: Corporate identification number
COP26: 26th Conference of Parties held at Glasgow
CSR: Corporate social responsibility
DCs: Designated consumers
EPR: Extended producer responsibility
ESG: Environmental, social, and corporate governance
E-waste: Electronic waste
FMCG: Fast-moving consumer goods
FSB: Financial Stability Board
FY: Financial year
GDP: Gross domestic product
GHG: Greenhouse gas
GJ: Gigajoule
GRI: Global Reporting Initiative
GSIR: Global Sustainable Investment Review
INR: Indian rupee
ISSB: International Sustainability Standards Board
KMP: Key managerial personnel
LCA: Life cycle assessment
LiFE: Lifestyle for environment
MCA: Ministry of Corporate Affairs
MMT: Million Metric Tonne
MT: Metric Tonne
NDCs: Nationally Determined Contributions
NGRBC: National Guidelines on Responsible Business Conduct
NSE: National Stock Exchange

| | |
|---|---|
| NVGs: | National Voluntary Guidelines |
| NZ: | Net Zero |
| PAF: | Project-affected familie |
| PAT: | Performance, Achieve, and Trade |
| PWM: | Plastic Waste Management |
| R&D: | Research and development |
| R&R: | Rehabilitation and resettlement |
| SASB: | Sustainability Accounting Standards Board |
| SBTi: | Science-Based Target Initiative |
| SDGs: | Sustainable Development Goals |
| SEBI: | Securities and Exchange Board of India |
| SIA: | Social impact assessment |
| SRI: | Socially responsible investing |
| TCFD: | Task Force on Climate-related Financial Disclosures |
| TJ: | Terajoule |
| UN: | United Nations |
| UNFCCC: | United Nations Framework Convention on Climate Change |
| UNGPs: | United Nations Guiding Principles on Business and Human Rights |
| UNHRC: | United Nations Human Rights Council |
| USD: | United States Dollar |

# Executive Summary

# Executive Summary

Sustainable investing has gained considerable traction, with a total investment of USD 30.3 trillion, as reported in the Global Sustainable Investment Review 2022 (GSIR). The report also highlights a 20% growth in assets under management (AUM) for sustainable investments compared to the 2020 levels (GSIA, 2023). Businesses have started realising the value addition arising from adopting sustainable practices, especially after the introduction of the Paris Agreement (UNFCCC, 2015) and the UN Sustainable Development Goals (SDGs) (UN, 2015). Environmental, social, and corporate governance (ESG) reporting has emerged as a tool to let businesses align themselves with these targets. Over the past few years, many countries have mandated companies to share ESG disclosures along with their financial reports. Typically, financial statements and traditional investments focus mainly on monetary performance, which may often end up negatively impacting the environmental and social aspects. Acknowledging the need to address this, companies in the recent past have transformed, reconstructed, remoulded, or modified key investing elements such as investment structures, flows, and patterns to incorporate the ESG and sustainability aspects into them.

Traditional financial statements do not cover the useful nonfinancial information that investors and customers may consider when making different decisions, such as environmental performance on greenhouse gas (GHG) emissions, water consumption, and waste management. According to a recent study, approximately 80% of investors reported having sustainable investment policies in place. For the study, as many as 1000 asset owners, asset managers, and investment advisers across different geographies, such as North America, Europe, and Asia, were surveyed (Deloitte & Touche LLP and The Fletcher School at Tufts University, 2024).

Mainstreaming of ESG, rapidly growing investor appetite for sustainability investments, and pressure of regulatory requirements and more transparent disclosures are a few reasons behind the increase in the number of businesses adopting ESG practices. Also, integrating the ESG brings advantages such as heightened production, better efficiency, and improved risk management approaches (Rau & Yu, 2024). These developments require better nonfinancial reporting formats to maintain transparency and consistency and to measure the impacts due to the integration of sustainability in business operations (or by the steps taken) (Diwan & Amarayil Sreeraman, 2023).

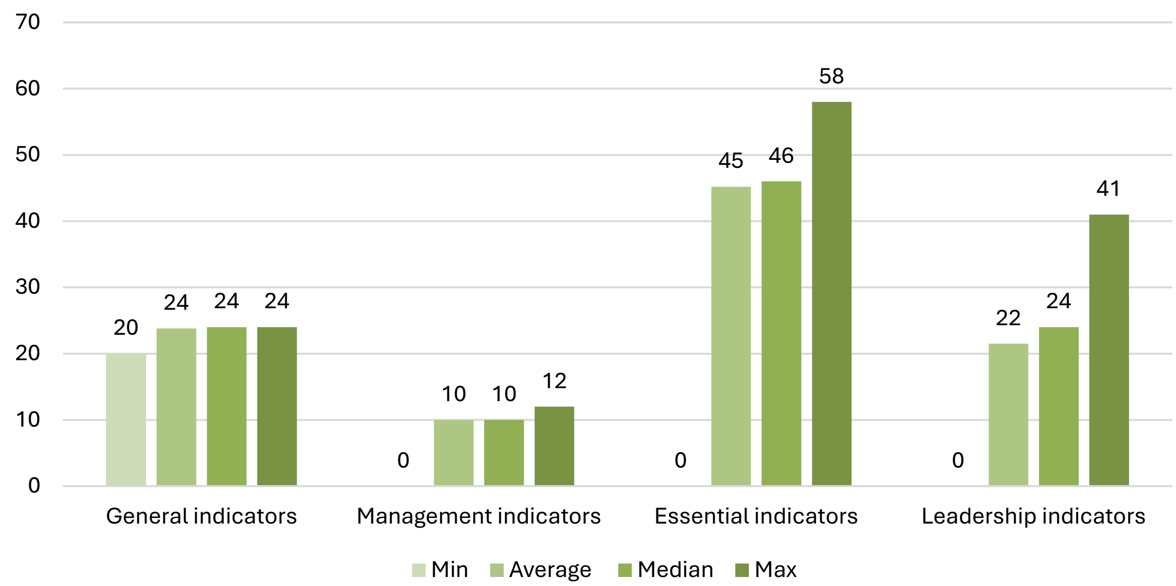
Considering the significant increase in sustainability investments and investor expectations related to ESG integration and its impacts, SEBI introduced the Business Responsibility and Sustainability Reporting (BRSR) guidelines in 2021. The top 1000 companies (by market capitalisation) were required to submit the

BRSR disclosures for FY2021–22 voluntarily and from FY2022–23 onwards mandatorily. However, other businesses were motivated to be early adopters and flagbearers of sustainability reporting. The BRSR framework is structured into three distinct sections: Section A – General Disclosures (24 indicators), Section B – Management and Process Disclosures (12 indicators), and Section C – Principle-wise Performance Disclosures (104 indicators). Nine principles of Section C (for details, see Section 2.3 of Chapter 2 titled "Section C – Principle-Wise Deep Dive in Disclosures") have been crafted to include two distinct indicator categories: essential indicators (62 indicators) and leadership indicators (42 indicators). The BRSR format extensively covers the ESG-related indicators through all three sections. Companies can communicate their disclosures related to these indicators as numbers, text, or a combination of both numbers and text, depending on the nature of the information required. This approach enables companies to provide more comprehensive and precise disclosures (SEBI, 2021b). One thousand twelve companies have reported their BRSR disclosures for 2022–23. We provide our analysis of these companies in this report.

### Nine-Principle-Level Analysis

Figure A.1 gives a broad overview of the reporting levels of general (24), management (12), essential (62), and leadership (42) indicators for all 1012 companies. Businesses have disclosed as high as 58 of the 62 essential and 41 of the 42 leadership indicators. On average, businesses have disclosed 45 essential and 21 leadership indicators. This difference between the average number of essential and leadership indicators reported may be due to the mandatory and nonmandatory (voluntary) nature of the indicators.

***Figure A.1 Number of general, management, essential, and leadership indicators disclosed by individual companies under the BRSR***



See Table A.1 for the key findings of our principle-wise analysis. For each company, all 104 indicators were allocated "1" or "0", depending on the presence or absence of the indicator-related information. To calculate overall principle reporting levels, we divided principle-level disclosures by all (1012) companies by the number of maximum possible principle-level disclosures. For example, for principle 1, the maximum possible disclosures for the overall principle (9 indicators) would be 1012 × 9 = 9108 disclosures. All 1012 companies put together reported 4541 disclosures for principle 1. Therefore, as shown in Table A.1 for principle 1, the disclosure reporting level is 49.9% (4541/9108). That is, all (1012) companies have reported approximately 4.5 out of 9 indicators of the overall principle 1. Similar calculations were undertaken for essential and leadership indicators of other principles. Table A.1 shows that businesses have substantial disclosure levels while reporting principles 3, 4, 5, and 9 and moderate disclosures while reporting principles 2 and 6, and there is room for improvement. Businesses should aspire to make more efforts to disclose principles 1, 7, and 8. Businesses are encouraged to start focusing on (under-reported) principles that need their attention and work towards improving the disclosure levels to achieve more balanced and comprehensive sustainability reporting.

***Table A.1 Snapshot of principle-wise reporting level for 1012 companies***

All numbers are in %.[3]

| Principles | No of overall indicators | Overall indicators' disclosure levels | No of essential indicators | Essential indicators' disclosure levels | No of leadership indicators | Leadership indicators' disclosure levels |
|---|---|---|---|---|---|---|
| Principle 1: Business ethics | 9 | 49.9 | 7 | 47.0 | 2 | 59.7 |
| Principle 2: Sustainable delivery of products | 9 | 56.5 | 4 | 76.2 | 5 | 40.8 |
| Principle 3: Focus on employee health and well-being | 21 | 75.8 | 15 | 84.4 | 6 | 54.2 |
| Principle 4: Consideration of stakeholder interests | 5 | 81.5 | 2 | 98.3 | 3 | 70.4 |
| Principle 5: Advocacy for human rights | 15 | 77.3 | 10 | 85.9 | 5 | 60.1 |
| Principle 6: Environmental conservation | 21 | 61.9 | 12 | 71.7 | 9 | 48.8 |
| Principle 7: Clear policies and active public involvement | 3 | 43.2 | 2 | 53.8 | 1 | 53.8 |
| Principle 8: Inclusive growth and fair development | 10 | 38.4 | 4 | 47.4 | 6 | 32.5 |
| Principle 9: Responsible value delivery to consumers | 11 | 67.4 | 6 | 67.9 | 5 | 66.7 |

[3] The following is the colour coding range for presenting results:

Principle- and sector-level analyses provide an in-depth understanding of the disclosure reporting levels. An indicator-level analysis of the 1012 companies provides insights into the indicator-specific disclosure reporting levels, such as the most and least reported indicators.

For principle 1 (nine principles), disclosure levels range from 36% to 65% across the 22 sectors. Oil, Gas & Consumable Fuels and Metals & Mining sectors take the lead in reporting for this principle. For principle 2 (nine principles), 3 sectors have reported disclosures in the 66–80% range and 19 in the 36–65% range. For this principle, essential indicators were reported more consistently, maybe due to existing regulatory requirements and data availability. On the other hand, leadership indicators were comparatively less disclosed; this may be because businesses are possibly facing challenges related to indicators focusing on life cycle assessment (LCA) and data availability. For principle 3 (21 indicators), all 22 sectors have reported disclosures in the 65–84% range. Essential indicators focusing on the health and safety areas have noticeably high levels of disclosure. However, more attention needs to be paid to leadership indicators related to compliance with the supply chain and tracking and monitoring the affected workers of principle 3.

Businesses have widely disclosed principle 4 (five indicators), with 12 sectors reporting 81% of the indicators and all 22 sectors disclosing a minimum of 70% of the indicators related to this overarching principle. This result indicates a high level of commitment by businesses to engage with stakeholders. The consistency in reporting essential indicators means that stakeholder engagement is a common practice. However, the lower disclosure reporting level of leadership indicators allows for improvement. For principle 5 (15 indicators), all 22 sectors have reported overarching principle-related disclosures in the 66–95% range, showing higher commitment to respecting and promoting human rights, which is the focus of this principle. Essential indicators also have similar disclosure reporting levels. However, leadership indicators of principle 5 present room for improvement by addressing challenges related to inadequate resources and expertise to conduct thorough human rights due diligence and assessments, sensitivity and confidentiality concerns related to human resource grievances, and implementing and tracking challenges related to value chains. All 22 sectors have reported at least 48% of the disclosures for principle 6 (21 indicators). Similar results were obtained for the essential indicators, where all 22 sectors reported a minimum of 56% of the disclosures. However, the leadership indicators demand attention from the businesses. These leadership indicators include renewable energy usage, water management in stressed areas, and biodiversity-impact-related indicators. Moreover, businesses are urged to close the reporting gap between essential and leadership indicators by specifically improving reporting levels of areas such as water management and scope 3 emissions.

Even though principle 7 comprises only three indicators, it is probably among the least disclosed principles. Most sectors have reported disclosures in the 36–50% range for this principle. Essential indicators also have similar reporting levels. However, reporting levels of the leadership indicators are low, with most sectors reporting these indicators in the 6–35% range. Such reporting levels of essential and leadership indicators imply that businesses may be shying away from disclosing their public policy positions and anticompetitive conduct because of potential reputational risks and legal implications.

Principle 8 (10 indicators) is probably the least-disclosed principle. All 22 sectors have reported the disclosures in the 21–50% range. This means that sectors have disclosed fewer than five indicators for the entire principle 8. Such reporting levels may be attributed to reasons such as challenges and complexities related to social impact assessment (SIA) and rehabilitation and resettlement (R&R) processes and documentation, limited capacity to undertake these activities, fear of reputational risk due to possible negative social impacts on project-affected families (PAFs), difficulties in gathering material sourcing information (especially intellectual property based on traditional knowledge), and challenges related to preferential procurement-related information in CSR projects. Another possibility is that businesses are silent on these indicators as they are not required to perform indicator-specific activities. Businesses are motivated to enhance their capacity to make appropriate disclosures for principles 7 and 8. For the overall principle 9 (11 indicators), out of 22 sectors, 16 have reported disclosures within the 66–80% range. Both essential and leadership indicators show almost similar types of results. Essential indicators related to consumer complaints and grievance mechanisms are the most commonly disclosed. This may be due to prevailing regulatory requirements and data availability. Leadership indicators associated with customer issues have also shown substantial reporting levels, reflecting the importance businesses place on maintaining transparency and proactive communication with consumers.

The analysis of the disclosures submitted under the BRSR guidelines throws light on some critical insights and areas for improvement. The BRSR framework provides a standardised approach for reporting different sustainability-related aspects. However, businesses are encouraged to enhance objectivity and transparency in their disclosures. This improvement is key for deriving better information and making the BRSR reporting more stakeholder-oriented and useful.

### Ratio Analysis

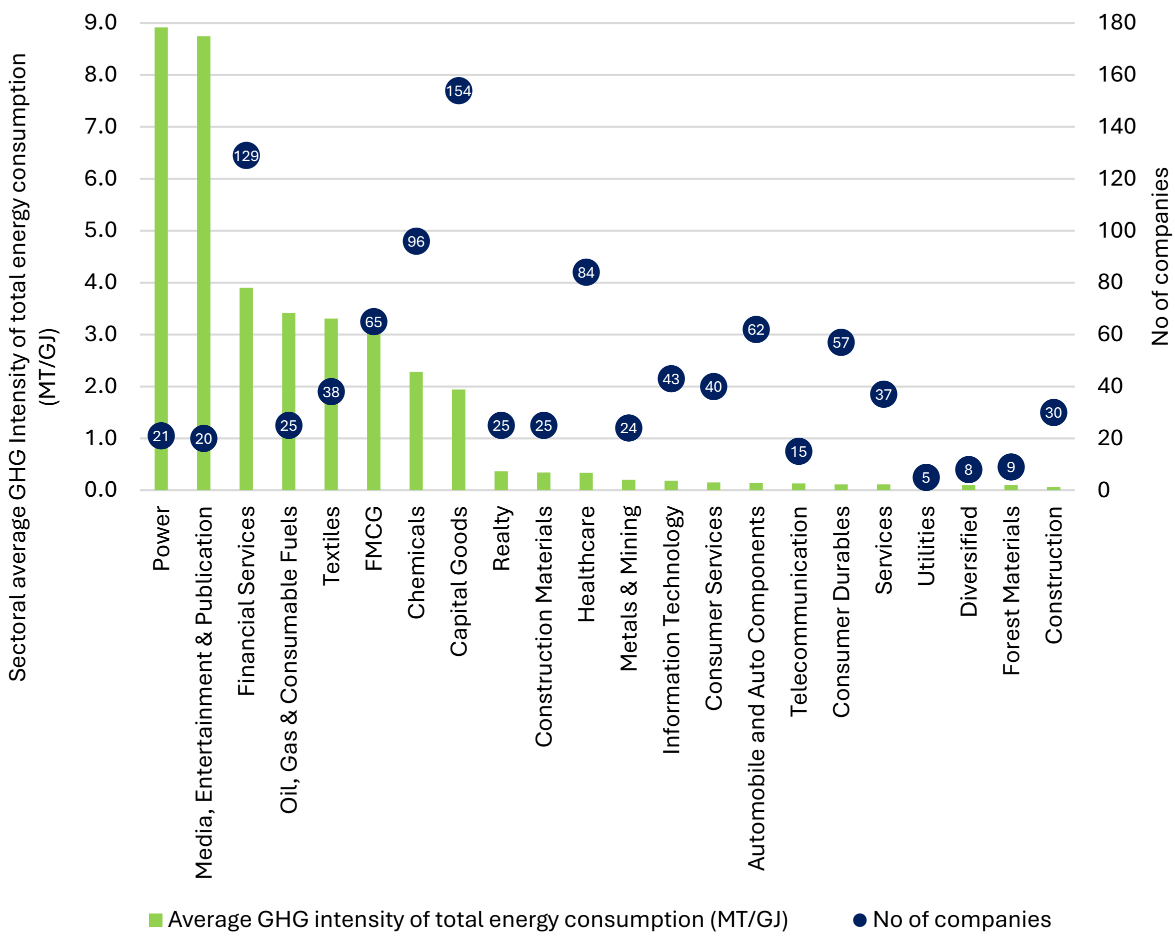
We created the following 10 ratios on the basis of the 140 indicators of the BRSR:

1. GHG intensity of total energy consumption (metric tonnes (MT)/ gigajoule (GJ))

2. Share of total electricity consumption in total energy consumption (GJ)
3. GHG emission intensity (scope 1 and scope 2) per turnover (MT/INR crores[4])
4. Total energy consumption per turnover (TJ/INR crores)
5. Total renewable energy share of total energy consumption (GJ)
6. Total renewable energy consumption per turnover (GJ/INR crores)
7. Plastic waste as a share of total waste generated (MT)
8. Total recycled, reused, and recovered waste as a share of total waste generated (MT)
9. Percentage of women on the Board
10. Percentage of female executives

These ratios allow us to draw insights in terms of sector-specific emissions, energy consumption, waste, and renewable energy. This analysis may also draw the attention of the sectors to improve their performance for these indicators.

***Figure A.2 Sector-wise average GHG intensity of total energy consumption***

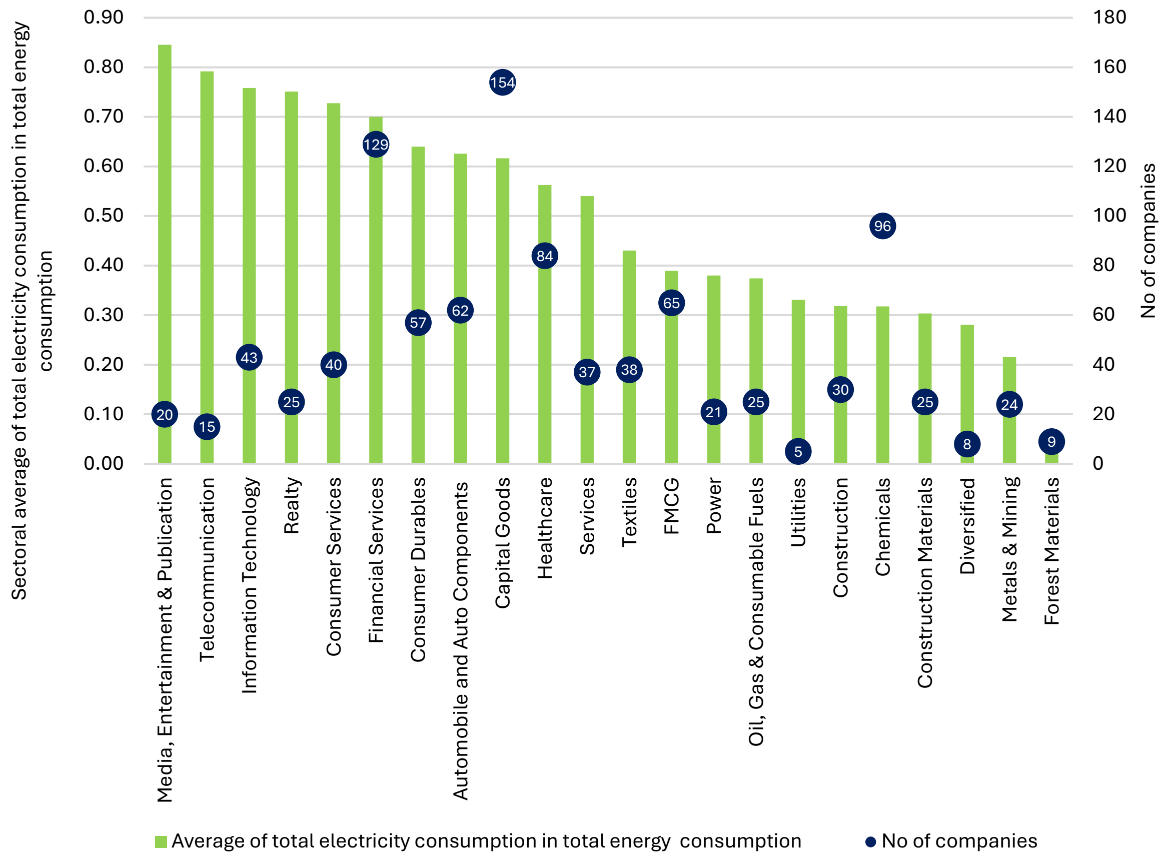



The GHG intensity of total energy consumption ratio measures the amount of GHG produced per unit of total energy consumption by a company. Figure A.2 depicts that the Power,

[4] 1 crore = 10 million.

Media, Entertainment & Publication, and Financial Services sectors have higher GHG intensity per unit of energy consumed, implying that these sectors need to increase emission reduction efforts significantly.

*Figure A.3 Sector-wise share of total electricity consumption in total energy consumption*




As per the results of the electricity consumption of total energy consumption ratio (GJ, as shown in Figure A.3), the Media, Entertainment & Publication, Telecommunication, Information Technology, and Realty sectors have a higher dependency on electricity, reflecting that their energy needs may be due to their current operational practices. On the other hand, sectors such as Forest Materials and Metals & Mining depend more on cleaner energy sources. Noteworthily, the Construction sector has emerged as an outlier due to its exceptionally high electricity consumption and total energy consumption ratio.

Total GHG emission intensity (scope 1 and 2 emissions) per turnover (MT/INR crores) quantifies the total GHG emissions generated (scope 1 and 2 emissions) within a company relative to its turnover. The Consumer Services, Construction Materials, Oil, Gas & Consumable Fuels, Power, and Realty sectors have higher GHG emission intensities relative to their turnover. This highlights the urgent need for the companies in these sectors to reduce GHG emissions while growing their turnover.

According to the results of the total energy consumption per turnover ratio, sectors such as FMCG, Textiles, Forest Materials, and Metals & Mining have higher energy consumption relative to their turnover. These sectors are encouraged to make efforts to improve their energy efficiency. However, sectors such as Oil, Gas & Consumable Fuels, Automobile and Auto Components, and Financial Services have lower energy consumption per turnover.

The Realty, Capital Goods, and Chemicals sectors have taken the lead in renewable energy adoption, with over half of their energy consumed from renewable sources as per the results of the "average renewable energy share of total energy consumption" ratio. On the other hand, most sectors, particularly Telecommunication, Media, Entertainment & Publication, Metals & Mining, Construction Materials, and Power, have a renewable energy share below 50%. These results indicate the need for these sectors to increase their share of renewable energy consumption.

The Forest Materials, Construction Materials, and Capital Goods sectors have higher renewable energy consumption relative to their turnover. Sectors such as Telecommunication, Media, Entertainment & Publication, Construction, Utilities, and Automobile and Auto Components are encouraged to enhance their renewable energy use.

As per the results of the plastic waste as a share of total waste generated ratio, the FMCG, Construction Materials, Telecommunication, Consumer Durables, Capital Goods, and Automobile and Auto Components sectors have higher proportions of plastic waste than the total waste generated. This is possibly because of a higher dependency on plastic for packaging purposes in these sectors.

The Diversified, Power, and FMCG sectors lead in recycling, reusing, and recovering waste as a proportion of the total waste generated. However, sectors such as Financial Services, Media, Entertainment & Publication, Consumer Services, and Information Technology should aspire to focus more on these practices. However, out of 1012 companies, 49 reported more waste recovered than generated.

The percentage of women on the board and the percentage of female executives show the women's participation in the businesses. Media, Entertainment & Publication, Consumer Services, Healthcare, Diversified, Information Technology, and Consumer Durables have higher percentages of women (14–23%) on their boards. The Information Technology, Consumer Services, and Financial Services sectors have a higher proportion of female executives. An interesting trend is observed in the Consumer Services, Financial Services, and Information Technology sectors, where the percentage of female executives exceeds that of women on the board. This possibly reflects more opportunities for women in executive roles because of the nature of operations in these sectors.

Ratio analysis highlights the different challenges and opportunities different sectors face to improve their emissions, energy consumption, renewable energy use, and waste-management-related indicators. Moreover, the analysis highlights the need to improve women's representation at various levels. While some sectors are leading the way, others are encouraged to improve these indicators. To enhance the performance of the relevant indicators across the board, sectors are encouraged to expedite their transition to non-fossil fuel energy options, reduce emissions, improve resource efficiency, and foster further women participation in the workforce. Businesses are motivated to work towards improving these indicators to enhance their sustainability performance and engage with different stakeholders more effectively.

### Climate Commitments and Indian Businesses

In addition to the disclosure reporting levels, this report dives deep into providing insights on the alignment of Indian businesses with India's national goal to achieve Net Zero (NZ) emissions by 2070. Out of the 1012 companies considered, 179 have made explicit commitments to achieve NZ or carbon neutrality. Of these 179 companies, 119 companies have explicitly mentioned the year in which they aim to achieve this goal. Seventy-five companies are aiming for NZ between 2031 and 2050. However, only 26 companies are targeting 2030, while 18 companies have aligned their targets with India's NZ targets. The commitment to NZ varies significantly across sectors. A significant number of companies from the Information Technology (15), Capital Goods (14), Automobile and Auto Components (11), and Healthcare (10) sectors have set a goal for the NZ within defined timeframes. Sixty companies have not specified a year for their commitment.

The Construction Materials sector has substantial variations in scope 1 and 2 emissions, with maximum values reaching 62.5 MMT for scope 1 and 1.7 MMT for scope 2. This indicates significant direct and indirect emissions, likely due to heavy manufacturing processes and extensive electricity use. The Metals & Mining sector has high maximum values for scope 1 emissions at 75.8 MMT and scope 3 emissions at 17.9 MMT, reflecting the sector's intensive energy and material use along with significant supply chain emissions. Similarly, the Oil, Gas & Consumable Fuels sector reported high emission values across all scopes, with scope 3 emissions peaking at 277 MMT, underscoring the extensive downstream impacts of this sector. These variations highlight the diverse emission profiles and environmental challenges different sectors face. Even diverse sectors such as the Construction and Automobile and Auto Components have reported substantial emissions across all scopes, reflecting the energy-intensive nature of material production and vehicle manufacturing. These insights underscore the varied emission profiles across different sectors and the need for tailored emission reduction strategies.

We performed a ratio analysis of GHG emissions per turnover and GHG intensity per total energy consumption of different sectors relative to the timelines set by companies from these sectors to achieve NZ.

***Figure A.4 Sector-wise average GHG emissions per turnover and number of companies committed to NZ***

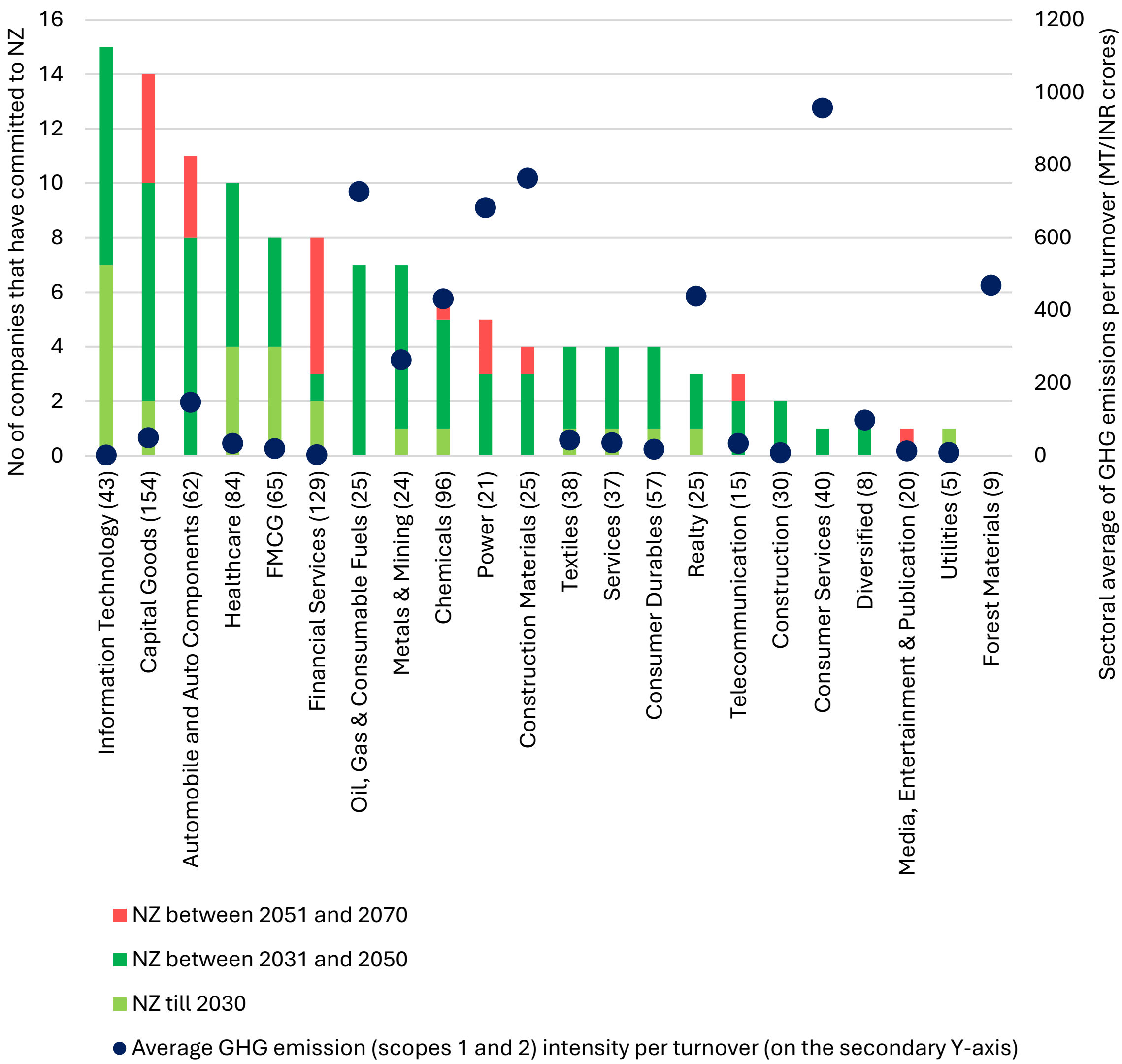



Figure A.4 shows that the Consumer Services, Construction Materials, and Oil, Gas & Consumable Fuels sectors have the highest GHG emissions per turnover; however, the number of companies from these sectors that have committed to achieving NZ is relatively low, i.e., one from the Consumer Services sector, four from the Construction Materials sector, and seven from the Oil, Gas & Consumable Fuels sector.

The sectors with a relatively lower number of companies making an NZ commitment, such as Power, Utilities, and Oil, Gas & Consumable Fuels, are GHG intensive and hence "hard-to-take-actions-to-abate" in some aspects compared to the sectors that are more service oriented. For the businesses in these GHG-intensive sectors, the need to transition to and align with the national commitments on NDC and NZ is higher so as to mitigate some of the risks they face in the light of the changing climate. Companies in these sectors are, therefore, encouraged to take greater responsibility for achieving NZ emissions, and more companies should have climate commitments.

***Figure A.5 Sector-wise average GHG intensity per total energy consumption and number of companies committed to NZ***

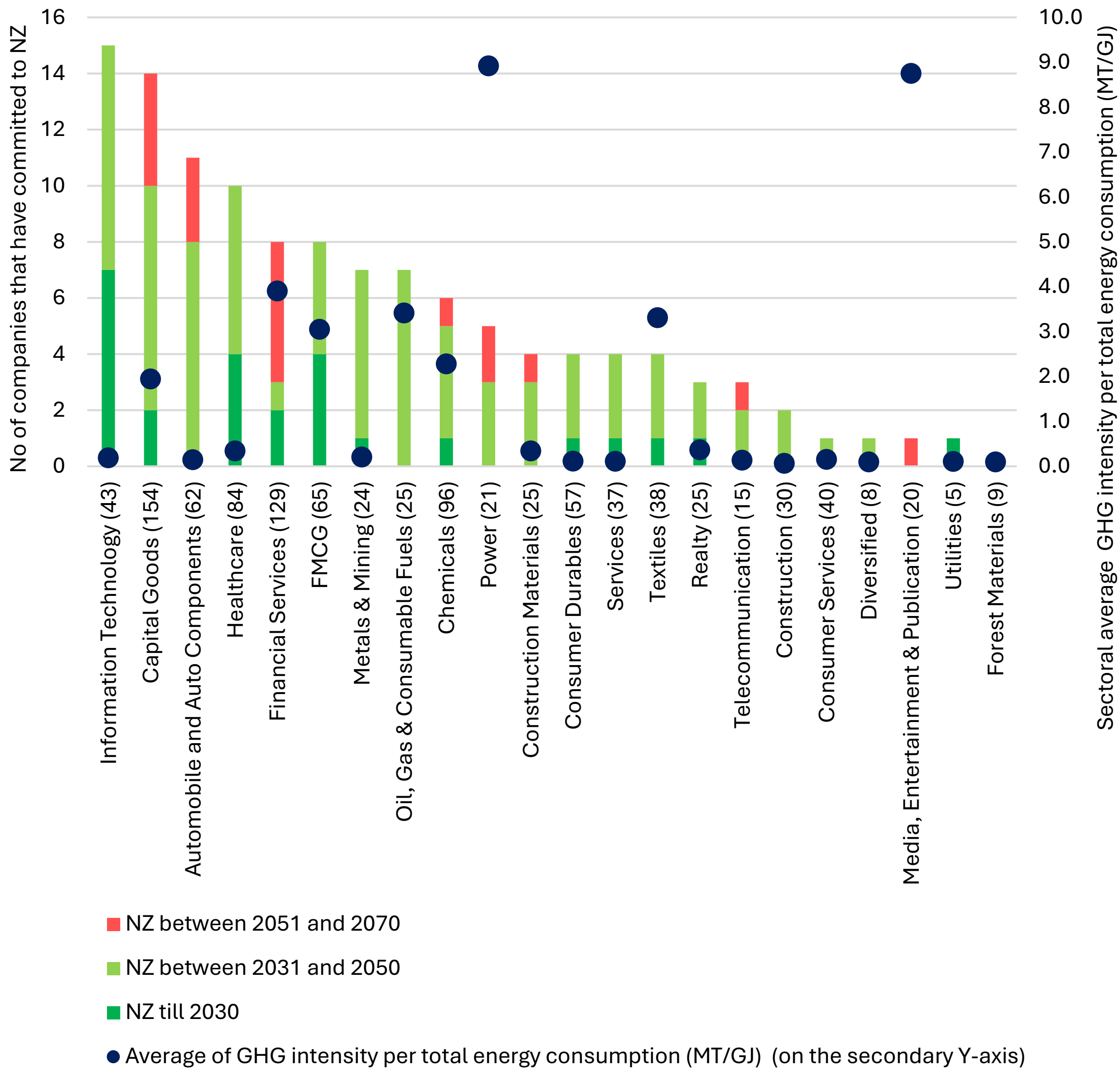



Figure A.5 shows sector-level averages for the GHG intensity relative to the total energy consumption and companies with NZ targets in specific years. The Power sector shows the highest GHG intensity at 8.9 MT/GJ, with just three out of 21 companies aiming to achieve NZ emissions by 2050.

The Media, Entertainment & Publication sector has a GHG intensity of 8.7 MT/GJ, with only 1 company out of 20 targeting NZ by 2050. The Oil, Gas & Consumable Fuels sector has a GHG intensity of 3.4 MT/GJ, with 7 companies out of 25 targeting NZ by 2050. The Information Technology sector has a lower GHG intensity of 0.2 MT/GJ, and as many as 15 companies out of 43 are aiming for NZ. Out of these 15 companies, 7 have committed to becoming NZ by 2030 and 8 between 2031 and 2050.

This report also covers a detailed analysis of the adoption of renewable energy sources by Indian businesses as part of their emission reduction strategy. The results of this analysis unveil sector-level trends and variations in the use of renewable energy, particularly solar, wind, and hydro energy. Out of 1012 businesses, 502 explicitly mentioned using, investing in, or promoting solar energy. Solar energy adoption has significantly spread across the Capital Goods, Healthcare, Chemicals, Automobile and Auto Components, and FMCG sectors. Wind energy is also adopted widely, with 195 companies explicitly mentioning its use. Capital Goods, Chemicals, and Healthcare are the key sectors that are adopting wind energy. However, hydro energy is the least reported (explicitly mentioned by businesses), with only 17 companies indicating its use. Out of 179 businesses committed to NZ or carbon neutrality, only 90 businesses increased their renewable energy consumption (in absolute terms). Notably, the renewable energy consumption of the remaining 84 companies has not increased or may have reduced. Of 179 companies, 5 (4 from Construction and 1 from Media, Entertainment & Publication) did not report any increase in renewable energy consumption. Our results indicate that fewer companies from the sectors with high "average GHG emissions per turnover" ratio, i.e., Consumer Services, Construction Materials, Oil, Gas & Consumable Fuels, and Power, have increased their renewable energy consumption. This implies that companies from these sectors have committed to NZ; however, this is not reflected in their renewable energy consumption – one of the most common methods for reducing emissions.

Overall, the results indicate that while many Indian businesses are making significant strides towards achieving the NZ targets, there is a lot of variability in commitments and emission levels across sectors. However, it is important that businesses intensify their efforts, particularly the sectors that have higher GHG emissions per turnover and GHG intensity per total energy consumption ratios. The increase in renewable energy adoption among companies committed to NZ is a positive sign for the overall sector and country. This analysis highlights the need for continuous monitoring and support for businesses as they try to progress further.

## Observed Limitations and Way Forward

### Observed limitations

1. We faced data-assimilation-related challenges, i.e., the BRSR format defines how businesses should report information, which can be presented as a percentage or in a table form, depending on the indicator. However, some businesses have strayed from using this format. For example, while the BRSR requests R&D data to be reported in percentage terms, some companies have instead reported this data in absolute terms. Also, data should be provided in the report itself instead of in the annexures. Some companies have made changes to the reporting format as well.
2. One of the main objectives of BRSR reporting is to enable stakeholders to access sustainability-related information in a standardised format. Therefore, companies are encouraged to adhere to the BRSR format for reporting their disclosures. However, many companies have changed the format in the current reporting cycle to suit their feasibility. This, in turn, defies the main objective of the BRSR and makes data extraction even more difficult. Conversely, improving the quality of the reporting format could make data extraction easier, allowing various stakeholders to access relevant information and ultimately helping the BRSR fulfil its main objectives.
3. Many companies (49) have reported higher waste recovered than waste generated. This has been addressed in the ratio analysis section as well.
4. There should be consistency in terms of the units used for disclosing indicators. Specific guidance may be provided separately to bring consistency to the reporting process.
5. Our analysis is restricted to the BRSR reports submitted by the businesses for FY 2022–23.

We performed data clean-up and accuracy checks after data extraction. The data was retrieved from reports such as the BRSR and annual reports available in the public domain. The analysis was conducted using publicly available data and, therefore, relies on information available from the relevant reports. We assumed the data to be true and used it without further cross-verification for analysis purposes, as it is beyond the scope of this work. We performed this analysis with the utmost care, objectivity, and due diligence. Data validations and accuracy checks were conducted to ensure the highest level of accuracy. However, because of our rigorous data validation and accuracy check processes, missed data points are unlikely to have any material impact on the results of the analysis.

### Way forward

1. Companies should aspire to report their sustainability disclosures more thoroughly as these reports will guide their future sustainability efforts while addressing stakeholder concerns and attracting investor interest.

2. Companies are encouraged to get third-party verification. This will improve data accuracy, transparency, and accountability in reporting.
3. Companies should aim to improve disclosure reporting related to value chain partners. This will help them deliver better outcomes in their sustainability journey. This is a strategic decision each company has to take individually to disclose their supply chains and GHG emissions. We understand that it will require large efforts, but it may be desirable to enhance the credibility of Indian businesses in global supply chains.
4. The main results indicate that although companies have higher reporting levels of disclosures for principles 3, 4, 5, and 9, there is still a lot of room for improvement for principles 1, 7, and 8. This presents an area of improvement for all the companies. Businesses and policymakers are advised to address the concerns of businesses to improve the reporting levels in future reporting cycles.
5. Businesses are encouraged to frame disclosures in such a way that it brings more objectivity and transparency, leading to better insights and making the BRSR report more stakeholder-friendly.
6. Regulated entities are motivated to guide the dependent (nonregulated) entities, as this will help make the BRSR ecosystem stronger.
7. We suggest the following ratios to be included in the BRSR reporting:
   - 7.1. GHG intensity of total energy consumption (MT/GJ)
   - 7.2. Share of total electricity consumption in total energy consumption (GJ)
   - 7.3. GHG emission intensity (scope 1 and scope 2) per turnover (MT/INR crores)
   - 7.4. Total energy consumption per turnover (TJ/INR crores)
   - 7.5. Total renewable energy share of total energy consumption (GJ)
   - 7.6. Total renewable energy consumption per turnover (GJ/INR crores)
   - 7.7. Plastic waste as a share of total waste generated (MT)
   - 7.8. Total recycled, reused, and recovered waste as a share of total waste generated (MT)
8. Moreover, we suggest including the following social and governance ratios[5] in the BRSR, keeping the Indian context in mind:
   - 8.1. Ratio of percentage increase in managing director's remuneration to increase in profit before tax (social focus)

[5] The authors acknowledge the contribution of **Vatsal Gupta** and **Shreyash Gupta** in developing these ratios.

8.2. Cash yield = Other income/(current investments + cash and bank) (governance focus)

8.3. Depreciation rate = Depreciation/gross block (governance focus)

8.4. Auditor cost as a percentage of revenue

8.5. Earnings before interest and depreciation as a percentage of cash flow from operations (CFO)

8.6. Related party transactions as a percentage of the previous 3 years' cumulative CFO (governance focus)

The suggested ratios can be derived by combining the relevant data points from the companies' annual reports. Incorporating such data disclosures in the BRSR format will allow various stakeholders to access such information from a single source, and these ratios will provide more relevant insights into the Indian context.

9. It is suggested to explore the possibility of creating a centralised repository for BRSR annual data as submitted by all companies. This would make it easier for different stakeholders to access and analyse the relevant data and make informed decisions. SEBI may coordinate the development of such a centralised repository or an online portal where businesses could submit their reports.
10. Capacity-building sessions may be conducted to hone the skills of companies in developing their BRSR reports and increasing stakeholder engagement.
11. For some leadership indicators, businesses have done more than 75% of disclosure reporting. These leadership indicators may be included as essential indicators of the BRSR format in the next reporting cycle. These indicators are leadership indicator 2 of principle 1, leadership indicator 1 of principle 2, leadership indicators 1 and 7 of principle 6, leadership indicator 3 of principle 8, and leadership indicator 1 of principle 9.
12. Businesses should be encouraged to build their capacity to disclose more leadership indicators in the next few reporting cycles to enhance their performance. We suggest that companies should be mandated to gradually start reporting leadership indicators as well based on some logical criteria, such as companies with a turnover of more than INR 90,000 crores (25 companies) may be mandated to start reporting the leadership indicators from the immediate reporting cycle. Businesses with a turnover between INR 51,000 and 90,000 crores (17 companies) should start reporting leadership indicators in the next reporting cycle. Similarly, businesses with a turnover ranging from INR 9,000 to 50,000 crores (114 companies) should report leadership indicators in the next two reporting cycles. Meanwhile, companies with a turnover below INR 9,000 crores (856 companies) may start working on capacity building to report these indicators and gradually disclose them.

13. Sector-specific additional indicators may be introduced (apart from the existing ones) to understand the actual impact of ESG activities undertaken by the specific sector. It will provide more relevant data to the stakeholders (in a further standardised way) and enable better benchmarking within the sector. For example, disclosure for the financial sector may include green/sectoral-lending-data-specific indicators. Other examples may include (but are not limited to) the Construction and Metal & Mining sectors.

We believe that incorporating these recommendations would lead to better enhanced BRSR reporting for the businesses and regulatory authority and informed decision-making among stakeholders, creating a win–win–win scenario for the stakeholders.

To conclude, BRSR reports submitted by businesses for the first round have laid a strong foundation for future reporting cycles. Continuous improvement will lead to improved disclosure reporting of the principles. Businesses are urged to address the gaps and adopt the best practices highlighted in this report. This will help the businesses enhance their BRSR disclosures and align themselves with the stakeholder expectations. Businesses are encouraged to consider the BRSR format as a tool (rather than a reporting mandate) that can guide and help them have a sustainable and fruitful outcome of adopting ESG practices. This attitude shift can work as a catalyst for driving higher and better BRSR reporting by the businesses.

# 1 Introduction

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# Introduction

Traditional financial statements alone cannot cover the nonfinancial information.

Globally, businesses have started mainstreaming sustainability in their operations to tackle their negative impact on the environment, better manage risks, build trust, and be viable in the long term through environmental, social, and corporate governance (ESG) reporting. In the early 1970s, companies started acknowledging the need to disclose their environmental impact because of increasing environmental concerns (Deshmukh & Tare, 2024). During the 1980s, socially responsible investing (SRI) caught investor attention, as it considered social and ethical aspects in addition to environmental ones (Man Institute, 2020; The Sustainable Business Case Book, 2024). The emergence of modern ESG can be traced back to the 1990s (Townsend, 2020). Established in 1997, the Global Reporting Initiative (GRI) provided the much-needed foundation for sustainability reporting by developing guidelines for companies to disclose their environmental, social, and economic impacts. Today, GRI is one of the most widely used reporting standards (GRI, 2024). In 1999, the United Nations Global Compact initiative motivated companies to commit to 10 principles covering different social, environmental, and ethical aspects and share the progress through annual reports (which advocated ESG reporting) (Kingo, 2024). Throughout the 2000s, companies started to rapidly adopt ESG as they realised the value addition brought about by ESG in terms of long-term business sustainability, better risk management, and improved brand value (Eccles et al., 2020; Team IRIS CARBON, 2023).

In the 2010s, ESG made its presence felt globally because of the introduction of the Paris Agreement (UNFCCC, 2015) and the UN Sustainable Development Goals (SDGs) (UN, 2015). ESG reporting provided the support required to let the companies align themselves with these targets. Over the past few years, many countries have mandated companies to share ESG disclosures along with their financial reports. As highlighted above, sustainable investing has gained considerable traction, with a total investment of USD 30.3 trillion, as reported in the Global Sustainable Investment Review (GSIR) 2022. The report also highlights a 20% growth in assets under management (AUM) for sustainable investments compared to the 2020 levels (GSIA, 2023).

Traditionally, financial statements were restricted to monetary performance. Traditional investments focus only on the bottom line in monetary terms and often end up negatively impacting the environmental and social aspects. Thus, in the recent past, key investing elements such as investment structures, flows, and patterns have been transformed, reconstructed, remoulded, or modified to incorporate the ESG and sustainability aspects into them. As traditional financial statements alone cannot cover the nonfinancial information that can be very useful for

The increasing adoption of ESG practices is driven by mainstreaming of ESG, growing investor appetite for sustainability investments, and regulatory pressure for more transparent disclosures.

investors and customers in decision-making, foreign and domestic investors have started considering ESG disclosures along with traditional financial statements. The ESG's origin can be traced back to 2004 when initial efforts were led by the United Nations (Sarangi, 2021). A recent study states that almost 80% of the investors reported having sustainable investment policies. This study surveyed as many as 1000 asset owners, asset managers, and investment advisers across different geographies such as North America, Europe, and Asia (Deloitte & Touche LLP and The Fletcher School at Tufts University, 2024).

Mainstreaming of ESG, rapidly growing investor appetite for sustainability investments, and pressure of regulatory requirements and more transparent disclosures are some of the reasons behind the growing number of businesses adopting ESG practices. Moreover, integrating the ESG brings advantages such as heightened production, better efficiency, and improved risk management approaches (Rau & Yu, 2024). These developments require better nonfinancial reporting formats to maintain transparency and consistency and to measure the impacts of the integration of sustainability in business operations (or by the steps taken) (Diwan & Amarayil Sreeraman, 2023). Thus, different institutions, such as the Task Force on Climate-Related Financial Disclosures (TCFD), the GRI, and the Sustainability Accounting Standards Board (SASB), have developed reporting formats for nonfinancial disclosures. Businesses around the world adopt these frameworks to report their ESG-related disclosures, and these frameworks have played a crucial role in shaping up the global ESG landscape.

### 1.1. Indian Context

Indian businesses are aligning with India's commitments to the Paris Agreement, mirroring their global counterparts.

In 2021, India officially announced its commitment to achieving Net Zero (NZ) emissions by 2070 during the COP26 conference held in Glasgow. For the near future, India has set ambitious goals for 2030 through its Nationally Determined Contributions (NDCs). These include reducing the emissions intensity of its GDP by 45% by 2030, from 2005 level, reaching 50% cumulative electric power installed capacity from non-fossil fuel based energy resources by 2030, and creating an additional carbon sink of 2.5 to 3 billion tonnes of $CO_2$ equivalent through additional forest and tree cover by 2030 (MoEFCC, 2022a). In 2024, 55% of India's energy requirements are met through fossil fuels (Ministry of Coal, 2024). According to projections from the International Energy Agency, India will need an annual investment of approximately USD 160 billion until 2030 to achieve its 2070 targets (Birol & Kant, 2022). Many state governments such as Assam, Bihar, Chhattisgarh, Kerala, Maharashtra, and Odisha have started using the tools to assess the "climate change relevance" of different initiatives to understand how much any initiative is addressing the issue of climate change (Agarwala, 2022). Gujarat has established a Climate Change Department (CCD) that prepares a separate budget, "Climate Change Budget Scheme", to focus on addressing the issue of climate change (Agarwala, 2022). Recently, Brihanmumbai Municipal Corporation (BMC) announced a pioneering initiative to release a green book (climate) budget by the end of 2024. This announcement was part of BMC's financial budget (FY2024–25) (BMC, 2024).

Indian businesses are aligning with the nation's commitment to fulfilling the goals outlined in the Paris Agreement, mirroring their global counterparts. These businesses have started integrating ESG principles into their strategies and operations. For example, ESG-focused equity funds in India have witnessed remarkable growth, surging from USD 330 million in 2019 to USD 1.3 billion in June 2023 (Mascarenhas, 2023). Two hundred ninety-six Indian companies have already registered for the Science-Based Target Initiative (SBTi) (SBTi, 2024), and some of these companies registered themselves as early as 2018 (SBTi, 2024).

Recently, climate change, ESG principles, emission reduction, governance, transparency, corporate responsibility, and nonfinancial disclosures have emerged as prominent discussion topics within the Indian business landscape. A recent survey reported that 90% of Indian businesses believe that ESG reporting will help them improve their brand value and 88% believe that ESG reporting regulations do impact their businesses. A total of 150 businesses participated in this survey (Deloitte, 2023). A diverse set of stakeholders, including investors, consumers, and governmental entities, now anticipate businesses to report nonfinancial information about ESG principles. In this context, the ESG framework acts as a catalyst for any business aspiring to take impactful measures in this direction. In 2021, the Securities and Exchange Board of India (SEBI) introduced the Business Responsibility and Sustainability Reporting (BRSR) framework to provide much-needed guidance to Indian enterprises in the seamless integration of ESG principles into their operational paradigms (SEBI, 2021b).

### 1.2. Evolution of BRSR Reporting

In 2009, the Ministry of Corporate Affairs (MCA) introduced "Voluntary Guidelines on Corporate Social Responsibility" as a concept for mainstreaming business responsibility. In 2011, India endorsed the United Nations Guiding Principles on Business and Human Rights (UNGPs) introduced by the United Nations Human Rights Council (UNHRC). The Ministry of Corporate Affairs released The National Voluntary Guidelines (NVGs) on Social, Environmental, and Economic Responsibilities of Business in July 2011. These guidelines covered nine principles to guide Indian businesses to integrate responsible business conduct into their operations (MCA, 2020; MCA CSR, 2024).

The BRSR framework for ESG reporting improves India's credibility globally and enables comparison with global peers.

In 2012, SEBI mandated the top 100 companies (by market capitalisation) to file ESG reports on the basis of the Business Responsibility Report (BRR) guidelines. SEBI introduced this guideline to address the ever-increasing investor concerns about company transparency and nonfinancial disclosures. The main objective of this guideline was to help companies engage with their stakeholders in a more fruitful manner (MCA, 2020).

After the United Nations' SDGs were implemented in 2015, the revision process of the NVGs started to align these guidelines with the SDGs. Around the same period, SEBI increased the number of companies that were mandated to follow BRR guidelines from FY2015–16 and onwards from the top 100 to the top 500 (by market capitalisation). SEBI introduced this change because of ever-growing investor awareness and increased scrutiny in terms of sustainability reporting. In 2019, after multiple revisions, the revamped version of NVGs was introduced as National Guidelines on Responsible Business Conduct (NGRBC) (MCA, 2020). These changes were introduced to help companies take a step forward by incorporating sustainability into their operations rather than merely complying with the regulations. Soon, SEBI also mandated the top 1000 companies (by market capitalisation) to furnish their BRRs in their annual reports (SEBI, 2021b).

Numerous studies have explored the relationship between a company's financial performance and its ESG disclosures, consistently finding a positive correlation between the two (Aydoğmuş et al., 2022; Fu & Li, 2023; Loew et al., 2024). Studies by Bodhanwala and Bodhanwala (2023) and Pasupuleti et al. (2024) further support this conclusion in the Indian context. The committee report on the BRR also highlights that companies can anticipate enhanced performance relative to their peers by incorporating ESG practices into their operations (MCA, 2020).

Indian businesses have always been considered to be crucial partners in achieving the near-term (2030) and long-term (2070) global goals.

In 2021, SEBI set out with Business Responsibility and Sustainability Reporting guidelines, recognising the sizeable increase in sustainability investments and investor expectations related to ESG integration and its impacts. The top 1000 companies (by market capitalisation) had to submit the BRSR disclosures for FY2021–22 voluntarily and from FY2022–23 onwards mandatorily. Moreover, other businesses were encouraged to be early adopters and trendsetters in reporting BRSR disclosures (SEBI, 2021b).

By then, many countries globally had already set such guidelines – the United Kingdom had climate change reporting based on TCFD recommendations and the European Union had Non-Financial Reporting Directive. Countries such as New Zealand, the USA, Hong Kong, and Taiwan have either shown intention or mandated companies to make disclosures based on sustainability (SEBI, 2021b).

The BRR and NGRBC provided the foundation for laying out the BRSR framework. The framework is structured into three distinct sections: Section A – General Disclosures (24 indicators), Section B – Management and Process Disclosures (12 indicators), and Section C – Principle-Wise Performance Disclosures (104 indicators). Section C comprises nine principles that address various facets of environmental (E), social (S), and corporate governance (G). These nine principles have been crafted to include two distinct categories of components: essential indicators (62) and leadership indicators (42). If we consider indicator categorisation as per E, S, and G of the BRSR format (irrespective of the sections), there are 13 basic indicators, 28 environmental indicators, 38 social indicators, and 61 governance indicators. Companies can communicate their disclosures related to these indicators in the number (quantitative), subjective (qualitative), or mixed (a combination of both numbers and subjective) formats, depending on the nature of the information required. This approach enables companies to provide more comprehensive and precise reporting (SEBI, 2021a).

### 1.3. Why Reporting under the BRSR Guidelines Is Important?

Prominent business groups had already started to integrate ESG practices into their businesses well before the SEBI guidelines, considering the need to reorient the processes and products because of climate change and investor and regulatory pressure. In addition, integrating sustainable practices and innovation helps companies improve their brand name and position themselves better than their peers. Earlier, Indian businesses followed globally recognised standards to report their ESG efforts. However, they followed different standards as per their needs. Thus, it was a challenge for different stakeholders to compare the ESG performances of different companies. The companies also found it difficult to compare their performance against that of their peers and their own past performance. Thus, introducing the BRSR framework has provided businesses with a standard framework to report their ESG activities. Standard guidelines allow companies to be more precise, transparent, and consistent regarding their disclosures (Deloitte, 2023; EY, 2023).

The standard ESG framework is vital for India's Net Zero journey.

BRSR reporting offers a wide range of benefits to different sets of stakeholders. Investors derive great value from ESG reports. Reports give investors crucial and transparent information about companies' ESG performance to make investment decisions. Moreover, adherence to BRSR reporting and the substantial commitment to sustainability make companies more attractive to investors. The investor community believes that the ESG approach would yield sustainable returns in the long run.

Disclosure of nonfinancial information through BRSR reporting will lead to improved trust among different stakeholders, such as investors, customers, and regulatory and government authorities, as these types of disclosures encourage higher transparency. BRSR reporting motivates companies to devise strong governance structures. This can help companies implement sustainability-related policies and practices smoothly. Institutional investors can make companies conduct business responsibly. There have been instances where companies faced reputational and financial risks from litigation related to their role in climate change through higher emissions. Thus, reporting can help companies formulate risk management approaches to tackle relevant environmental and social risks (MCA, 2020; SEBI, 2021b).

The BRSR principles align with other globally accepted standards such as the GRI and the International Sustainability Standards Board (ISSB). The Financial Stability Board (FSB) acknowledged that the ISSB is "the culmination of the work of the TCFD" and has assigned the ISSB to monitor the progress of climate-related disclosures of companies from 2024 onwards (IFRS Foundation, 2024). Hence, the BRSR framework improves India's credibility globally and enables comparison with its peers. Also, Indian businesses have always been considered to be crucial partners in achieving the near-term (2030) and long-term (2070) goals. Hence, a standard ESG framework is vital for India's journey to achieve NZ goals at both company and country levels.

## 1.4. Research Objectives and Methods

The primary objective of this report is to share insights into the prevailing levels of disclosures reported through the BRSR guidelines.

The primary objective of this report is to share insights into the prevailing levels of disclosures reported through the BRSR guidelines as mandated by SEBI for the top 1000 listed companies. For this study, we collected and analysed data from BRSR reports of 1012 companies. We conducted the analysis at three distinct levels: an overall assessment providing insights into the BRSR landscape of the examined companies, a principle-level evaluation across various sectors, and an indicator-level examination to provide deeper insights.

To arrive at the disclosure reporting levels, if the company disclosed the information, we assigned "1" to that indicator. However, "0" was allocated for the indicator if the company did not disclose the information (either the field was left blank or nil was mentioned). This type of scoring approach helped us calculate the percentages at the principle and indicator (essential and leadership) level, and thus, allowed us to analyse the BRSR reporting practices in detail.

After a thorough discussion,[6] we segregated these indicators into relevant E, S, and G baskets (see Annexure 1) to provide deeper insights into the ESG disclosures. E, S, and G indicators can be essential or leadership indicators, as included in the BRSR reporting format. See Annexure 2 for the results of this analysis. To communicate the results effectively, we have highlighted results as per the colour code mentioned in Figure 1.1. We have used this colour coding specifically to present the principle-wise results in Section 2.3 and Annexure 2.

[6]Segregation of indicators in the E, S, and G basket is based on our assessment.

*Figure 1.1 Colour coding used for presenting principle-wise results*

Lowest
value in %

Highest
value in %

Furthermore, on the basis of the availability of quantifiable data (presented in numbers), we envisaged the following ratios to derive a deeper understanding of emissions, resource efficiency, and workforce- and management-related disclosures:

- GHG intensity of total energy consumption (MT/GJ)
- Share of total electricity consumption in total energy consumption (GJ)
- GHG emission intensity (scope 1 and scope 2) per turnover (MT/INR crores)
- Total energy consumption per turnover (TJ/INR crores)
- Total renewable energy share of total energy consumption (GJ)
- Total renewable energy consumption per turnover (GJ/INR crores)
- Plastic waste as a share of total waste generated (MT)
- Total recycled, reused, and recovered waste as a share of total waste generated (MT)
- Percentage of women on the Board and percentage of female executives

Another interesting objective of this study is to provide insights into the NZ alignment of the Indian businesses. We used a combination of content analysis methods and ratio calculations to gain insights into this topic. For content analysis, all the indicators that can be answered using textual description are considered and thoroughly analysed. We considered specific categories such as emissions and renewable energy-related quantifiable data points for the ratio calculations. This method provided us with the flexibility of addressing different aspects of NZ alignment, such as setting an NZ goal, using renewable energy, or establishing renewable energy projects and emission disclosures (scopes 1, 2, and 3) using the information disclosed by the businesses.

### 1.5. Data Collection

From FY2022–23, SEBI mandated the top 1000 companies (by market capitalisation) to make sustainability-related disclosures using the BRSR reporting format. Hence, the analysis focuses only on these companies. Companies can include BRSR reporting as part of their annual report or as a separate document. We collected data for this analysis from the NSE website's BRSR Excel data extract and PDF reports for FY2022–23 (NSE, 2023). Noteworthily, these indicators/BRSR report format questions (140) comprise sub-indicators (2952). Table 1.1 shows the sector-wise segregation of companies.

*Table 1.1 Number of companies in each sector*

| Sr. No. | Sector | No of companies |
|---|---|---|
| 1 | Automobile and Auto Components | 62 |
| 2 | Capital Goods | 154 |
| 3 | Chemicals | 96 |
| 4 | Construction | 30 |
| 5 | Construction Materials | 25 |
| 6 | Consumer Durables | 57 |
| 7 | Consumer Services | 40 |
| 8 | Diversified | 8 |
| 9 | Fast Moving Consumer Goods (FMCG) | 65 |
| 10 | Financial Services | 129 |
| 11 | Forest Materials | 9 |
| 12 | Healthcare | 84 |
| 13 | Information Technology | 43 |
| 14 | Media, Entertainment & Publication | 20 |
| 15 | Metals & Mining | 24 |
| 16 | Oil, Gas & Consumable Fuels | 25 |
| 17 | Power | 21 |
| 18 | Realty | 25 |
| 19 | Services | 37 |
| 20 | Telecommunication | 15 |
| 21 | Textiles | 38 |
| 22 | Utilities | 5 |
| Total number of companies that have submitted BRSR reports for 2022–23 | | 1012 |

For the analysis, we used the standardised sector segregation provided by SEBI to segregate companies by sector. Out of 1012 companies, 985 are listed on both the Bombay Stock Exchange (BSE) and the National Stock Exchange (NSE). However, 8 companies are listed only on the BSE and 19 are listed only on the NSE.

[7]Standardization of industry classification – Applicability to Credit Rating Agencies (CRAs). https://www.sebi.gov.in/legal/circulars/apr-2022/standardization-of-industry-classification-applicability-to-credit-rating-agencies-cras-_57531.html

# 2

# BRSR Reporting Trends in India – Analysis

# BRSR Reporting Trends in India – Analysis

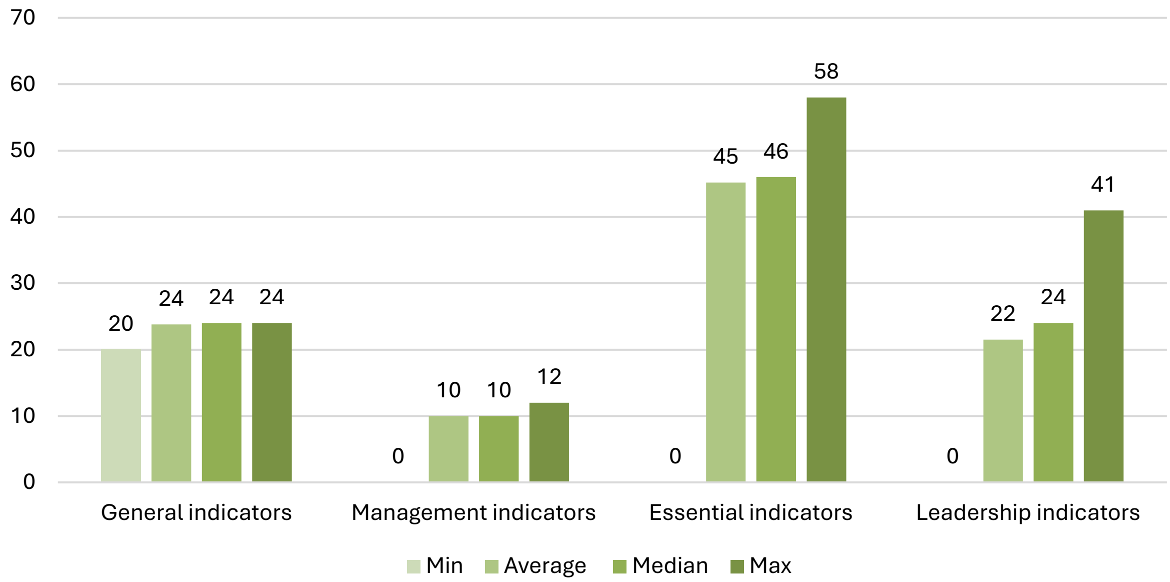
## 2.1. Overview

As highlighted in the methodology section, we collected data on 140 indicators from BRSR disclosures of 1012 companies for performing this analysis. Companies have disclosed as high as 134 of 140 indicators. However, the average number of indicators disclosed is 100.5 (approximately 71.8%). Some companies have disclosed as low as 24 (just above 17.1%) of 140 indicators.

Data on 140 indicators across 1012 companies for 2022–23 was analysed for this analysis. These include general (24), management (12), essential (62), and leadership (42) indicators.

Figure 2.1 presents results of the disclosure levels of the general (24 indicators), management (12 indicators), essential (62 indicators), and leadership (42) indicators for all 1012 companies. The minimum number of reported management, essential, and leadership indicators is as low as zero. However, companies have disclosed as many as 58 of the 62 essential and 41 of the 42 leadership indicators. On average, companies reported 45 essential indicators and 21 leadership indicators. The results of this analysis highlight that the mean of essential indicator disclosures is 13 points lower than the highest number of essential indicator disclosures. However, there is a sizable gap of 19 points (almost half) in reporting levels of the maximum and mean leadership indicators. These findings suggest that companies are less willing to report nonmandatory disclosures, such as leadership indicators. This could be because this is the first mandatory reporting cycle, and hopefully, there will be more and better reporting as the companies progress on the learning curve.

***Figure 2.1 Number of general, management, essential, and leadership indicators disclosed by individual companies under BRSR***




The BRSR framework is structured into three distinct sections: Section A (General Disclosures), Section B (Management and

Out of 140 indicators 28 are Environmental (E), 38 Social (S) and 61 Governance (G) and 13 Basic.

Process Disclosures), and Section C (Principle-Wise Performance Disclosures). Each principle of Section C is divided into two types of indicators – essential and leadership indicators. Essential indicators are mandatory indicators that a company needs to disclose. Some of the essential indicators cover disclosures related to emissions, energy, water, waste, initiative(s) focusing on community development and their impacts, and training(s) conducted. Leadership indicators are not mandatory indicators, but companies are encouraged to disclose these indicators to provide better transparency and accountability. These indicators provide deeper insights into sustainability integration into a company's operations. Some leadership indicators include scope3 emissions, disclosures on energy consumption, and health and safety indicators of the value chain partners.

***Table 2.1 Sector-level disclosures by companies for general, management, essential, and leadership indicators***

All numbers are in %.[8]

| Sector (no of companies) | General indicators (24) | Management indicators (12) | Essential indicators (62) | Leadership indicators (42) |
|---|---|---|---|---|
| Automobile and Auto Components (62) | 99.7 | 85.9 | 77.0 | 60.6 |
| Capital Goods (154) | 99.4 | 83.6 | 74.6 | 51.2 |
| Chemicals (96) | 99.7 | 84.3 | 76.4 | 53.8 |
| Construction (30) | 99.2 | 80.6 | 70.5 | 39.0 |
| Construction Materials (25) | 98.5 | 83.0 | 78.1 | 51.5 |
| Consumer Durables (57) | 99.0 | 83.9 | 74.0 | 49.7 |
| Consumer Services (40) | 99.6 | 82.3 | 71.9 | 50.1 |
| Diversified (8) | 99.5 | 87.5 | 74.4 | 63.1 |
| FMCG (65) | 98.9 | 84.5 | 74.5 | 49.5 |
| Financial Services (129) | 98.8 | 82.0 | 64.8 | 51.7 |
| Forest Materials (9) | 97.2 | 86.1 | 77.6 | 53.4 |
| Healthcare (84) | 99.3 | 81.8 | 75.8 | 52.4 |
| Information Technology (43) | 99.5 | 84.5 | 66.2 | 45.5 |
| Media, Entertainment & Publication (20) | 99.6 | 80.4 | 69.2 | 34.9 |
| Metals & Mining (24) | 98.6 | 86.5 | 80.2 | 61.3 |
| Oil, Gas & Consumable Fuels (25) | 99.2 | 82.7 | 76.3 | 60.4 |
| Power (21) | 99.4 | 82.1 | 72.8 | 52.7 |
| Realty (25) | 99.3 | 81.3 | 71.7 | 47.0 |
| Services (37) | 99.5 | 80.6 | 68.5 | 44.9 |
| Telecommunication (15) | 99.2 | 83.3 | 71.2 | 42.1 |
| Textiles (38) | 98.6 | 84.0 | 73.6 | 50.6 |
| Utilities (5) | 99.2 | 90.0 | 77.1 | 59.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

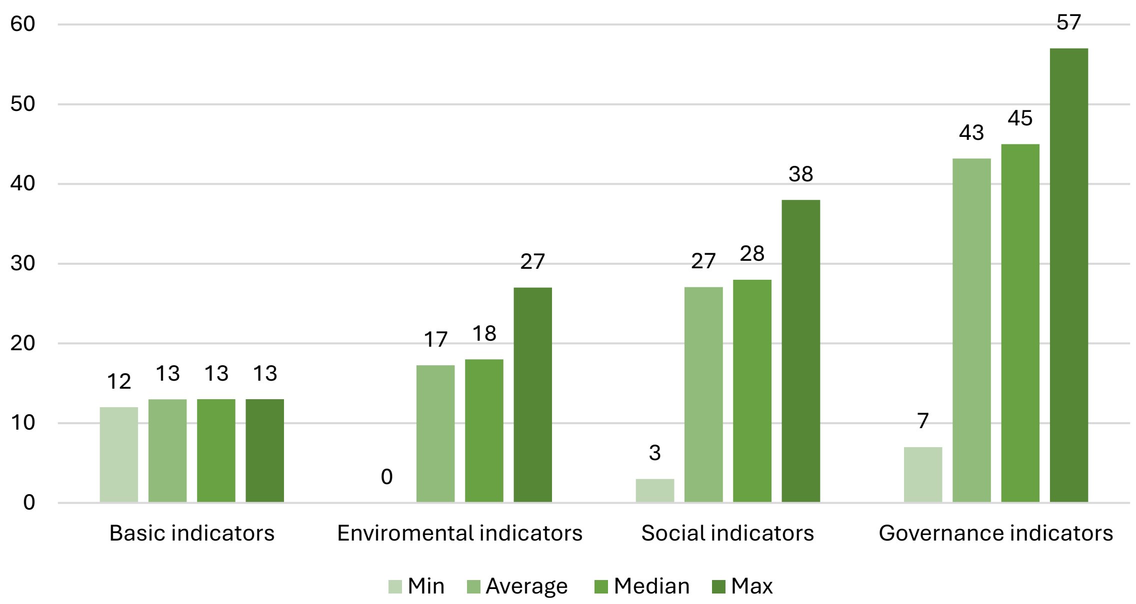
[8] The following is the colour coding range for presenting results:

Table 2.1 shows the results of sector-specific disclosure levels in terms of general, management, essential, and leadership indicators. As highlighted in the methodology section, for each company, all 140 indicators were allocated "1" or "0", depending on the presence of the information. To calculate sector-wise reporting levels, we divided the total number of disclosures by companies from a specific sector by the maximum number of sector-level possible disclosures. For example, for the Automobile and Auto Components sector (62 companies), the maximum possible disclosures for essential indicators (62 indicators) would be 62 × 62 = 3844. All companies from the Automobile and Auto Components sector reported 2959 disclosures. Therefore, as shown in Table 2.1 for the Automobile and Auto Components sector, the disclosure reporting level of essential indicators is 77.0% (2959/3844). Table 2.1 presents the same percentage levels for all the other indicators and sectors. The Metals & Mining sector tops the essential indicators, and the Diversified sector tops the leadership indicators. It is important to reiterate that the leadership indicators are voluntary disclosures. Thus, disclosure of higher leadership indicators means these sectors are also aspiring to go further in their ESG journey.

Disclosures by individual companies are in the range of 24-134 indicators out of 140.

Figure 2.2 provides an overview of the E, S, and G disclosure levels of these companies[9]. As the name suggests, basic information indicators include company-information-related indicators, such as CIN and address. Thirteen indicators form a group of basic information indicators. For the environmental component, the highest number of indicators disclosed stands at 27 and the least at 0. A maximum of 28 indicators can be disclosed for the environmental component.

***Figure 2.2 BRSR and overall ESG indicators***




[9] Segregation of indicators in the E, S, and G basket is based on our assessment.

Similarly, the social component has 38 indicators and the governance component has 61 indicators. For the social component, the highest number of indicators disclosed by the companies is 38 and the least is 3. Meanwhile, for the governance component, the highest number of indicators disclosed by the companies stands at 57 indicators and the lowest number at 7.

Table 2.2 presents information on the sector-specific performance in terms of their E, S, and G component disclosures. For each company, all 140 indicators were allocated “1” or “0”, depending on the presence of the information. To calculate sector-wise reporting levels, we divided the number of sector-level disclosures of all companies by the number of sector-level maximum possible disclosures. For example, for the Automobile and Auto Components (62 companies) sector, the maximum possible disclosures for the environmental component (28 indicators) would be 62 × 28 = 1736. All companies from the Automobile and Auto Components sector reported 1209 disclosures. Therefore, as shown in Table 2.2, the disclosure reporting level for the Automobile and Auto Components sector is 69.6% (1209/1736). Similarly, we calculated reporting levels for all other components and sectors. The Metals & Mining sector tops both the environmental and social components. However, the Diversified sector stands out in reporting the governance component.

***Table 2.2 Sector-level disclosures by companies for ESG indicators***

All numbers are in %.[10]

| Sector (no of companies) | Basic indicators (13) | Environmental indicators (28) | Social indicators (38) | Governance indicators (61) |
|---|---|---|---|---|
| Automobile and Auto Components (62) | 100.0 | 69.6 | 76.9 | 74.9 |
| Capital Goods (154) | 100.0 | 62.5 | 73.3 | 70.9 |
| Chemicals (96) | 99.9 | 68.1 | 72.8 | 72.6 |
| Construction (30) | 100.0 | 53.1 | 69.5 | 64.4 |
| Construction Materials (25) | 100.0 | 67.9 | 74.4 | 71.1 |
| Consumer Durables (57) | 100.0 | 63.9 | 71.1 | 69.9 |
| Consumer Services (40) | 100.0 | 59.6 | 68.9 | 71.4 |
| Diversified (8) | 100.0 | 69.2 | 73.7 | 76.4 |
| FMCG (65) | 100.0 | 64.5 | 70.8 | 70.3 |
| Financial Services (129) | 100.0 | 49.5 | 67.1 | 70.7 |
| Forest Materials (9) | 100.0 | 72.6 | 73.1 | 70.7 |
| Healthcare (84) | 99.8 | 66.1 | 71.9 | 71.9 |

[10] The following is the colour coding range for presenting results:

Lowest value in %

Highest value in %

| Sector (no of companies) | Basic indicators (13) | Environmental indicators (28) | Social indicators (38) | Governance indicators (61) |
|---|---|---|---|---|
| Information Technology (43) | 100.0 | 54.3 | 65.5 | 67.3 |
| Media, Entertainment & Publication (20) | 100.0 | 51.3 | 62.0 | 65.9 |
| Metals & Mining (24) | 100.0 | 74.3 | 79.1 | 74.9 |
| Oil, Gas & Consumable Fuels (25) | 99.7 | 69.9 | 75.3 | 74.2 |
| Power (21) | 100.0 | 62.2 | 73.4 | 69.9 |
| Realty (25) | 99.7 | 58.9 | 69.3 | 68.9 |
| Services (37) | 100.0 | 52.5 | 68.3 | 67.6 |
| Telecommunication (15) | 100.0 | 56.7 | 66.3 | 68.1 |
| Textiles (38) | 100.0 | 64.3 | 71.2 | 69.8 |
| Utilities (5) | 100.0 | 66.4 | 76.8 | 76.1 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector

### Essential and leadership indicators

We performed further analysis to understand how different companies disclosed BRSR indicators as general, essential, and leadership indicators. Table 2.3 shows the disclosure levels of the ESG indicators in terms of whether their disclosure is general, management, mandatory, or voluntary. For example, for the essential indicator – environmental component – companies disclosed as low as 0 of the 15 disclosures and, at the max, all the 15 disclosures. On average, companies disclosed almost 11 of the 15 essential indicators that focus on environmental component.

***Table 2.3 General, management, essential, and leadership indicators and BRSR ESG indicators***

| Indicators | Minimum | Maximum | Mean | Median |
|---|---|---|---|---|
| Management and process disclosures governance indicator (12) | 0 | 12 | 10 | 10 |
| General basic information indicator (13) | 12 | 13 | 13 | 13 |
| General environmental indicator (1) | 0 | 1 | 1 | 1 |
| General social indicator (3) | 2 | 3 | 3 | 3 |
| General governance indicator (7) | 3 | 7 | 7 | 7 |
| Essential environmental indicator (15) | 0 | 15 | 11 | 11 |
| Essential social indicator (23) | 0 | 23 | 18 | 18 |
| Essential governance indicator (24) | 0 | 23 | 16 | 16 |

| Indicators | Minimum | Maximum | Mean | Median |
|---|---|---|---|---|
| Leadership environmental indicator (12) | 0 | 12 | 5 | 6 |
| Leadership social indicator (12) | 0 | 12 | 6 | 7 |
| Leadership governance indicator (18) | 0 | 18 | 10 | 12 |

For leadership indicators, some companies provided 100% for disclosures related to all three E, S, and G indicators.

Table 2.4 gives details about the general, essential, and leadership indicators for E, S, and G components at the sector level. The Utilities sector is the frontrunner in disclosing the management and process disclosures related to governance indicators. Eighteen sectors have provided 100% disclosures for general indicators for basic-information-related disclosures. Four sectors have provided 100% disclosures for the general indicators of the environmental component. Similarly, 16 sectors have 100% disclosures for general indicators of the social component. The Information Technology sector is the only one to report 100% disclosures for the general indicators of the governance component.

The Metals & Mining sector is the leader in disclosing essential environmental and social indicators. However, the Diversified sector leads in terms of disclosing the essential indicators for the governance component. The Diversified, Metals & Mining, and Utilities sectors have emerged as leaders in disclosing the leadership indicators for E, S, and G components, respectively.

## *Table 2.4 Sector-level disclosure by companies on general, essential, and leadership indicators and BRSR ESG indicators*

All numbers are in %.[11]

| Sector (no of companies) | Management and process disclosures (12) | General indicators (24) | | | | Essential indicators (62) | | | Leadership indicators (42) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Governance indicators (12) | Basic information (13) | Environmental (1) | Social (3) | Governance (7) | Environmental (15) | Social (23) | Governance (24) | Environmental (12) | Social (12) | Governance (18) |
| Automobile and Auto Components (62) | 85.9 | 100.0 | 95.2 | 100.0 | 99.5 | 78.0 | 84.2 | 68.7 | 57.1 | 57.0 | 66.3 |
| Capital Goods (154) | 83.6 | 100.0 | 97.4 | 100.0 | 98.2 | 74.2 | 82.0 | 66.6 | 45.0 | 50.1 | 57.6 |
| Chemicals (96) | 84.3 | 99.9 | 99.0 | 100.0 | 99.1 | 79.2 | 80.9 | 69.3 | 51.6 | 50.6 | 58.7 |
| Construction (30) | 80.6 | 100.0 | 96.7 | 98.9 | 98.1 | 68.2 | 81.3 | 59.9 | 30.6 | 39.4 | 46.7 |
| Construction Materials (25) | 83.0 | 100.0 | 76.0 | 100.0 | 98.3 | 85.3 | 83.0 | 68.0 | 45.3 | 51.7 | 56.9 |
| Consumer Durables (57) | 83.9 | 100.0 | 91.2 | 100.0 | 97.7 | 74.7 | 80.2 | 66.4 | 48.1 | 46.5 | 54.4 |
| Consumer Services (40) | 82.3 | 100.0 | 100.0 | 100.0 | 98.6 | 69.5 | 76.6 | 67.6 | 44.0 | 46.3 | 58.6 |
| Diversified (8) | 87.5 | 100.0 | 100.0 | 100.0 | 98.2 | 72.5 | 77.2 | 71.9 | 62.5 | 60.4 | 66.7 |
| FMCG (65) | 84.5 | 100.0 | 93.8 | 100.0 | 97.1 | 76.0 | 79.7 | 67.6 | 47.7 | 46.3 | 53.9 |
| Financial Services (129) | 82.0 | 100.0 | 90.7 | 99.2 | 97.7 | 56.0 | 69.2 | 65.6 | 37.9 | 55.0 | 59.4 |
| Forest Materials (9) | 86.1 | 100.0 | 77.8 | 100.0 | 93.7 | 85.2 | 84.5 | 65.3 | 56.5 | 44.4 | 58.6 |
| Healthcare (84) | 81.8 | 99.8 | 94.0 | 99.6 | 99.0 | 76.1 | 80.8 | 69.7 | 51.3 | 47.8 | 57.5 |
| Information Technology (43) | 84.5 | 100.0 | 90.7 | 99.2 | 100.0 | 63.9 | 72.2 | 61.1 | 39.3 | 44.2 | 51.4 |
| Media, Entertainment & Publication (20) | 80.4 | 100.0 | 95.0 | 100.0 | 99.3 | 65.0 | 73.5 | 66.0 | 30.4 | 30.4 | 43.1 |
| Metals & Mining (24) | 86.5 | 100.0 | 87.5 | 100.0 | 97.0 | 86.7 | 85.0 | 71.0 | 57.6 | 62.5 | 63.7 |
| Oil, Gas & Consumable Fuels (25) | 82.7 | 99.7 | 96.0 | 100.0 | 98.3 | 80.3 | 80.7 | 69.3 | 54.7 | 58.7 | 65.8 |
| Power (21) | 82.1 | 100.0 | 90.5 | 100.0 | 99.3 | 75.9 | 81.0 | 62.5 | 42.9 | 52.4 | 60.3 |
| Realty (25) | 81.3 | 99.7 | 100.0 | 98.7 | 98.9 | 72.3 | 77.9 | 64.0 | 38.7 | 45.3 | 55.6 |
| Services (37) | 80.6 | 100.0 | 94.6 | 100.0 | 99.2 | 63.1 | 75.4 | 63.6 | 35.8 | 46.8 | 51.8 |
| Telecommunication (15) | 83.3 | 100.0 | 86.7 | 100.0 | 99.0 | 69.3 | 76.2 | 65.6 | 38.3 | 38.9 | 49.3 |
| Textiles (38) | 84.0 | 100.0 | 94.7 | 99.1 | 96.2 | 76.1 | 80.4 | 64.1 | 46.9 | 46.5 | 57.5 |
| Utilities (5) | 90.0 | 100.0 | 100.0 | 100.0 | 97.1 | 80.0 | 84.3 | 68.3 | 46.7 | 56.7 | 68.9 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[11] The following is the colour coding range for presenting results:

Lowest value in % — Highest value in %

## 2.2. Sections A, B, C and Indicator-Level Disclosures

This section provides a deeper understanding of the indicators disclosed at an overall level—Sections A, B, and C. Section C covers principle-wise essential and leadership disclosures, so the next section has been specifically allocated to this aspect.

Section A covers general disclosures, Section B management and process disclosures, and Section C performance across nine principles.

### Overall disclosures

As mentioned earlier, the BRSR reporting format covers 140 indicators. These indicators include a wide range of disclosures, starting from the company's basic information to specific indicators that address ESG components. Table 2.5 provides basic insights into section- and question-wise disclosures in terms of the average, minimum, and maximum indicators reported. For example, principle 1 covers nine indicators, with some companies reporting indicators as low as 0 and as high as 9.

*Table 2.5 Section-and principle-wise disclosures*

| Section | Principle/question number | Minimum | Maximum | Average | Median |
|---|---|---|---|---|---|
| Section A | Question I (13) | 12 | 13 | 13 | 13 |
| Section A | Question II (2) | 0 | 2 | 2 | 2 |
| Section A | Question III (2) | 1 | 2 | 2 | 2 |
| Section A | Question IV (3) | 2 | 3 | 3 | 3 |
| Section A | Question V (1) | 0 | 1 | 1 | 1 |
| Section A | Question VI (1) | 0 | 1 | 1 | 1 |
| Section A | Question VII (2) | 1 | 2 | 2 | 2 |
| Section B | NGRBC principle (12) | 0 | 12 | 10 | 10 |
| Section C | Principle 1 (9) | 0 | 9 | 4 | 4 |
| Section C | Principle 2 (9) | 0 | 9 | 5 | 5 |
| Section C | Principle 3 (21) | 0 | 21 | 16 | 16 |
| Section C | Principle 4 (5) | 0 | 5 | 4 | 5 |
| Section C | Principle 5 (15) | 0 | 15 | 12 | 12 |
| Section C | Principle 6 (21) | 0 | 21 | 13 | 13 |
| Section C | Principle 7 (3) | 0 | 3 | 1 | 1 |
| Section C | Principle 8 (10) | 0 | 10 | 4 | 4 |
| Section C | Principle 9 (11) | 0 | 11 | 7 | 8 |
| BRSR filing | Overall (140) | 24 | 134 | 101 | 103 |

On average, companies disclosed four indicators for principle 1. The last row of Table 2.5 provides information about the total indicators reported (instead of question- or principle-wise). Table 2.5 shows that companies disclosed a minimum of 24 and a maximum of 134 indicators of the 140 total indicators. On average, companies disclose 101 of the total 140 indicators.

When we consider reporting levels of disclosures in Sections A and B, Tables 2.6 and 2.7, respectively, give a broad idea about the percentage levels of the reported indicators. As a large number of indicators (104) are covered in Section C, we have included reporting levels of these indicators along with principle-wise analysis in section 2.3.

**Table 2.6 Overall section-wise indicators' disclosure level – Section A**

| Sr. No | Section A indicator description (general disclosures) | No of companies reporting in % (total 1012 companies) |
|---|---|---|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | 100.0 |
| 2 | Name of the Listed Entity | 100.0 |
| 3 | Year of incorporation | 100.0 |
| 4 | Registered office address | 100.0 |
| 5 | E-mail | 100.0 |
| 6 | Telephone | 100.0 |
| 7 | Website | 100.0 |
| 8 | Financial year for which reporting is being done | 100.0 |
| 9 | Paid-up Capital | 100.0 |
| 10 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | 100.0 |
| 11 | 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). | 100.0 |
| 12 | Details as at the end of Financial Year | 100.0 |
| 13 | Participation/Inclusion/Representation of women | 100.0 |
| 14 | Name of the Stock Exchange(s) where shares are listed | 99.9 |
| 15 | Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct | 99.9 |
| 16 | Markets served by the entity | 99.8 |
| 17 | Products/Services sold by the entity (accounting for 90% of the entity's Turnover) | 99.7 |
| 18 | Number of locations where plants and/or operations/offices of the entity are situated | 99.7 |
| 19 | Details of business activities (accounting for 90% of the turnover) | 99.6 |
| 20 | CSR Details | 99.6 |
| 21 | Corporate address | 99.5 |
| 22 | Turnover rate for permanent employees and workers (Disclose trends for the past 3 years) | 99.2 |
| 23 | 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 | 94.1 |
| 24 | Names of holding / subsidiary / associate companies / joint ventures | 90.0 |

**Source:** For indicator description from Section A: General disclosures. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

*Table 2.7 Overall section-wise indicators' disclosure level – Section B*

| Sr. No | Section B indicator description (management and process disclosures) | No of companies reporting in % (total 1012 companies) |
|---|---|---|
| 1 | Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) Has the policy been approved by the Board? (Yes/No) Web Link of the Policies, if available | 99.9 |
| 2 | Details of Review of NGRBCs by the Company. | 99.8 |
| 3 | Whether the entity has translated the policy into procedures. (Yes / No) | 99.7 |
| 4 | 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. | 99.7 |
| 5 | Do the enlisted policies extend to your value chain partners? (Yes/No) | 98.3 |
| 6 | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | 97.6 |
| 7 | Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) | 95.6 |
| 8 | Specific commitments, goals and targets set by the entity with defined timelines, if any. | 91.5 |
| 9 | Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | 90.5 |
| 10 | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | 82.4 |
| 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. | 34.5 |
| 12 | If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated. | 10.1 |

**Source:** For indicator description from Section B: Management and process disclosures. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

On average, 726 out of 1012 companies (71.7%) disclosed each indicator. However, fewer than 726 companies (lower than average reporting) disclosed 51 of the 140 indicators.

### Section A: General disclosures

In the BRSR reporting format, Section A covers general disclosures about the company. Section A has been covered through 24 indicators in this analysis. This section covers the basic company information (mostly readily available details); hence, all 1012 companies 100% disclose as many as 12 indicators. However, "*Names of holding/subsidiary/associate* *companies/joint ventures*" (disclosed by 911 companies (90.0%)) is the least disclosed indicator for this section. The possibility of the absence of such an arrangement in other companies can be a reason for this.

**Section B: Management and process disclosures**

Section B has 12 indicators that allow the companies to share their disclosures related to the NGRBC principles and core elements. Similar to Section A, companies have mostly disclosed all the indicators in this section. If we consider the least disclosed indicators, for example, *"If the answer to question (1) above is "No", i.e., not all principles are covered by a policy, reasons to be stated" (10.0%)*, the company may not have been required to act and hence may not have reported it.

**Section C: Principle-wise performance disclosure**

Section C focuses most on ESG disclosures; hence, we have included a separate section for detailed analysis after this overview. Section C encompasses 104 indicators – 62 are essential indicators and 42 are leadership indicators. For an in-depth analysis of Section C, see Section 2.3.

### 2.3. Section C – Principle-Wise Deep Dive into Disclosures

It is evident that data on principles 3, 4, 5, and 9 are widely reported.

This section delves deeper into Section C of the BRSR reporting format. It includes an analysis of nine principles that deal with E, S, and G components. The analysis provides insights into sector-wise disclosure levels, allowing for a sector-level comparison. As discussed in Chapter 1, each principle of section C includes essential and leadership indicators. This analysis also reveals sector-wise the disclosure levels of these two indicators for each principle.[12]

Businesses are encouraged to enhance reporting levels of principles 1, 7, and 8.

Table 2.8 provides an overview of the reporting levels for overall principle, essential, and leadership indicators for all 1012 companies (irrespective of their sectors). It is evident that principles 3, 4, 5, and 9 are widely reported, while principles 2 and 6 are moderately disclosed. Businesses are encouraged to push themselves to improve reporting levels of principles 1, 7, and 8. For each company, we allocated all 104 indicators "1" or "0", depending on the presence or absence of the information. To calculate overall principle reporting levels, we divided principle-level disclosures by all companies (1012) by the number of maximum possible principle-level disclosures. For example, for principle 1, the maximum possible disclosures for the overall principle (nine indicators) would be 1012 × 9 = 9108. All 1012 companies put together reported 4541 disclosures for principle 1. Therefore, as shown in Table 2.8 for principle 1, the disclosure reporting level is 49.9% (4541/9108). That is, all companies (1012) have reported approximately 4.5 of the 9 indicators of the overall principle 1. See Table 2.8 for the percentage levels for the other principles, essential, and leadership indicators.

[12]Each principle addresses E, S, G, or a combination of these components. See Annexure 2 for analysis of ESG indicators.

## *Table 2.8 Snapshot of principle-wise reporting level for 1012 companies*

All numbers are in %.[13]

| Principles | No of overall indicators | Overall indicators' disclosure levels | No of essential indicators | Essential indicators' disclosure levels | No of leadership indicators | Leadership indicators' disclosure levels |
|---|---|---|---|---|---|---|
| Principle 1: Business ethics | 9 | 49.9 | 7 | 47.0 | 2 | 59.7 |
| Principle 2: Sustainable delivery of products | 9 | 56.5 | 4 | 76.2 | 5 | 40.8 |
| Principle 3: Focus on employee health and well-being | 21 | 75.8 | 15 | 84.4 | 6 | 54.2 |
| Principle 4: Consideration of stakeholder interests | 5 | 81.5 | 2 | 98.3 | 3 | 70.4 |
| Principle 5: Advocacy for human rights | 15 | 77.3 | 10 | 85.9 | 5 | 60.1 |
| Principle 6: Environmental conservation | 21 | 61.9 | 12 | 71.7 | 9 | 48.8 |
| Principle 7: Clear policies and active public involvement | 3 | 43.2 | 2 | 53.8 | 1 | 53.8 |
| Principle 8: Inclusive growth and fair development | 10 | 38.4 | 4 | 47.4 | 6 | 32.5 |
| Principle 9: Responsible value delivery to consumers | 11 | 67.4 | 6 | 67.9 | 5 | 66.7 |

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

### Principle 1: "Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable." (SEBI, 2021a)

Principle 1 comprises nine indicators and highlights that companies should manage and govern themselves with transparency, integrity, and accountability. Through essential indicators, this principle allows companies to disclose their governance practices and value-chain-partner-related disclosures through leadership indicators. This principle entails essential disclosures related to details of fines, penalties, or punishments as per the SEBI guidelines, mechanisms, and procedures to address bribery and corruption complaints, and coverage of anti-corruption training. Leadership indicators include disclosures about awareness programmes conducted for value chain partners on the principles and processes to avoid or manage conflicts of interest involving board members. Table 2.9 presents results

Ten sectors have submitted disclosures in the range of 51–65% for overall principle 1.

[13] The following is the colour coding range for presenting results:

about disclosure levels of various sectors for principle 1. Of the nine indicators of this principle, seven belong to the essential indicators category and two belong to the leadership indicator category.

*Table 2.9 Sector-wise indicator reporting level of principle 1*

All numbers are in %.[14]

| Sector (no of companies) | Overall principle 1 (9) | Essential indicators (7) | Leadership indicators (2) |
|---|---|---|---|
| Automobile and Auto Components (62) | 53.4 | 46.5 | 77.4 |
| Capital Goods (154) | 48.8 | 45.3 | 61.4 |
| Chemicals (96) | 52.3 | 49.4 | 62.5 |
| Construction (30) | 52.2 | 51.0 | 56.7 |
| Construction Materials (25) | 47.6 | 42.9 | 64.0 |
| Consumer Durables (57) | 48.3 | 44.6 | 61.4 |
| Consumer Services (40) | 49.7 | 46.4 | 61.3 |
| Diversified (8) | 61.1 | 62.5 | 56.3 |
| FMCG (65) | 48.7 | 48.4 | 50.0 |
| Financial Services (129) | 50.9 | 48.4 | 59.7 |
| Forest Materials (9) | 40.7 | 38.1 | 50.0 |
| Healthcare (84) | 47.2 | 44.9 | 55.4 |
| Information Technology (43) | 46.3 | 43.9 | 54.7 |
| Media, Entertainment & Publication (20) | 47.2 | 50.0 | 37.5 |
| Metals & Mining (24) | 55.6 | 52.4 | 66.7 |
| Oil, Gas & Consumable Fuels (25) | 56.0 | 50.9 | 74.0 |
| Power (21) | 48.1 | 43.5 | 64.3 |
| Realty (25) | 48.0 | 46.9 | 52.0 |
| Services (37) | 50.8 | 48.3 | 59.5 |
| Telecommunication (15) | 50.4 | 50.5 | 50.0 |
| Textiles (38) | 46.2 | 45.1 | 50.0 |
| Utilities (5) | 55.6 | 48.6 | 80.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

## Observations:

- For principle 1, 10 sectors have submitted disclosures in the range of 51–65%, while the remaining 12 sectors have provided disclosures in the 36–50% range. For essential indicators, 5 sectors have reported disclosures in the 51–65% range, with the remaining 17 falling within the 36–50% range. For leadership

[14] The following is the colour coding range for presenting results:

Businesses have reported indicators for principle 1 in a wide range of 2–99%.

indicators, 4 sectors have disclosed indicators in the 66–80% range, 13 in the 51–65% range, and 5 in the 36–50% range.

- The Diversified, Oil, Gas & Consumable Fuels and Metals & Mining sectors have emerged as leaders in disclosing the overall principle 1. Diversified and Metals & Mining sectors have excelled in disclosing essential indicators; on the other hand, the Oil, Gas & Consumable Fuels sector has excelled in disclosing leadership indicators. The prevailing regulatory environment may be the reason for higher levels of disclosure within these sectors.
- Sectors should try to improve their disclosure of indicators related to the overall principle 1 and essential and leadership indicators. This will lead to increased transparency and accountability, contribute to better governance, and improve overall performance.

*Table 2.10 Indicator-wise reporting levels for indicators covered under principle 1*

| BRSR format question no | Indicator description of principle 1 | Disclosure level (in %) |
|---|---|---|
| | **Essential indicators** | |
| 1 | Percentage coverage by training and awareness programmes on any of the Principles during the financial year. | 98.7 |
| 2 | Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website) | 22.7 |
| 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. | 13.1 |
| 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. | 99.6 |
| 5 | Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption | 2.9 |
| 6 | Details of complaints with regard to conflict of interest | 28.6 |
| 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. | 63.6 |

| BRSR format question no | Indicator description of principle 1 | Disclosure level (in %) |
|---|---|---|
| **Leadership indicators** | | |
| 1 | Awareness programmes conducted for value chain partners on any of the Principles during the financial year. | 34.8 |
| 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. | 84.7 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

## Observations

- See Table 2.10 for the indicator-wise reporting level. The higher levels of reporting for indicators 1, 4, and 7 from the essential indicators and leadership indicator 2 show the commitment of the companies to conduct and govern themselves with integrity.
- Companies are encouraged to make more efforts in reporting disclosures such as indicators 2, 3, 5, and 6 of essential indicators and leadership indicator 1. Noteworthily, some companies are silent about these indicators, possibly because of the absence of relevant instances.
- The reporting of indicators for this principle has varied widely, ranging from 2% to 99%. Higher reporting levels for certain indicators may be due to the availability of information required for the disclosure or well-established processes. However, challenges in gathering information, the absence of instances, and inadequacy/absence of business policies and processes related to specific indicators may contribute to lower reporting levels. This presents an opportunity for improvement across various indicators of this principle.

Businesses have made higher levels of reporting for indicators 1, 4, and 7 from the essential indicators and leadership indicator 2 of principle 1.

## Principle 2: "Businesses should provide goods and services in a manner that is sustainable and safe." (SEBI, 2021a)

Principle 2 focuses on a company's commitment to sustainable and safe business practices, to make a minimum negative impact on the environment, and to attain maximum resource efficiency during the entire product lifecycle. Essential indicators of this principle cover disclosures about the company's research and development (R&D) and capital expenditure (capex) allocation in specific technologies that can lead to improvement in the environmental and social impacts of the products and processes. This principle also covers disclosures related to sustainable sourcing practices, safe reclamation of products for reuse, recycling, and disposal at the end of life, and extended producer responsibility (EPR). Leadership indicators focus on the LCA conducted for products or services offered by the companies. Table 2.11 presents the results of the analysis of principle 2 for various sectors across three categories. Principle 2 comprises nine indicators, of which four are essential and the remaining five are leadership indicators.

*Table 2.11 Sector-wise indicator reporting level of principle 2*

All numbers are in %.[15]

| Sector (no of companies) | Overall principle 2 (9) | Essential indicators (4) | Leadership indicators (5) |
|---|---|---|---|
| Automobile and Auto Components (62) | 66.3 | 87.1 | 49.7 |
| Capital Goods (154) | 58.2 | 79.5 | 41.0 |
| Chemicals (96) | 62.5 | 87.0 | 42.9 |
| Construction (30) | 43.7 | 59.2 | 31.3 |
| Construction Materials (25) | 63.6 | 93.0 | 40.0 |
| Consumer Durables (57) | 63.9 | 85.1 | 47.0 |
| Consumer Services (40) | 55.0 | 68.8 | 44.0 |
| Diversified (8) | 66.7 | 75.0 | 60.0 |
| FMCG (65) | 62.2 | 88.5 | 41.2 |
| Financial Services (129) | 44.0 | 55.6 | 34.7 |
| Forest Materials (9) | 69.1 | 91.7 | 51.1 |
| Healthcare (84) | 61.0 | 83.0 | 43.3 |
| Information Technology (43) | 48.8 | 66.9 | 34.4 |
| Media, Entertainment & Publication (20) | 51.1 | 68.8 | 37.0 |
| Metals & Mining (24) | 64.4 | 82.3 | 50.0 |
| Oil, Gas & Consumable Fuels (25) | 60.0 | 75.0 | 48.0 |
| Power (21) | 49.7 | 70.2 | 33.3 |
| Realty (25) | 48.4 | 66.0 | 34.4 |
| Services (37) | 45.3 | 60.1 | 33.5 |
| Telecommunication (15) | 51.9 | 73.3 | 34.7 |
| Textiles (38) | 59.6 | 80.3 | 43.2 |
| Utilities (5) | 53.3 | 90.0 | 24.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

## Observations:

- The first column of Table 2.11 displays the overall disclosure levels and the sector's commitment to providing sustainable and safe goods and services. Six sectors have reported disclosures in the 36–50% range for this principle. Thirteen sectors have reported disclosures in the 51–65%, while the remaining three sectors (Forest Materials, Diversified, and Automobile and Auto

[15] The following is the colour coding range for presenting results:

All 22 sectors have reported at least 55% of the essential indicator disclosures for principle 2.

Components) have disclosed in the 66–80% range.

- All 22 sectors have reported at least 55% of the essential disclosures for this principle. Ten sectors have reported disclosures in the 81–95% range and nine in the 66–80% range. The remaining three sectors have reported disclosures in the 51–65% range. On the other hand, only three sectors – Diversified, Forest Materials, and Metals & Mining – have reported 50% or more leadership indicators.
- The higher reporting levels of essential indicators may be attributed to readily available data along with existing business processes due to regulatory compliances or current sector-specific practices. However, a lower reporting level of leadership indicators may potentially be due to challenges related to the process of the LCA and data availability and quality. These results show that there is scope for improvement and capacity building.

*Table 2.12 Indicator-wise reporting levels for indicators covered under principle 2*

| BRSR format question no | Indicator description of principle 2 | Disclosure level (in %) |
|---|---|---|
| **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. | 79.7 |
| 2 | Does the entity have procedures in place for sustainable sourcing? (Yes/ No) If yes, what percentage of inputs were sourced sustainably? | 71.8 |
| 3 | Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste. | 91.0 |
| 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 | 62.1 |
| **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? | 82.6 |
| 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. | 15.8 |
| 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). | 64.1 |

| BRSR format question no | Indicator description of principle 2 | Disclosure level (in %) |
|---|---|---|
| 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. | 28.7 |
| 5 | Reclaimed products and their packaging materials (as percentage of products sold) for each product category. | 13.0 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

A minimum of 62% of the companies have disclosed six (essential indicators 1, 2, 3, and 4 and leadership indicators 1 and 3) of the nine indicators of principle 2.

## Observations:

- See Table 2.12 for the indicator-wise reporting level. A minimum of 62% of the companies have disclosed six (essential indicators 1, 2, 3, and 4 and leadership indicators 1 and 3) of the nine indicators of principle 2. This implies that overall businesses are adopting the practices that help them deliver the goods and services safely and sustainably.
- Higher disclosure levels of essential indicator 3 and leadership indicator 1 highlight the likelihood of businesses having adopted relevant practices and processes or readily available information to facilitate reporting on these indicators. In addition, increased stakeholder awareness and existing regulatory requirements may contribute to higher reporting levels.
- The disclosure of leadership indicators 2, 4, and 5 is relatively low. Lower reporting levels of these indicators may be attributed to the challenges related to data tracking and collection when it comes to supply-chain-related indicators. Businesses may not be willing to disclose information on risks as this may give rise to competitive disadvantages. Also, inadequate processes and systems may potentially make it more difficult for businesses to monitor and verify the reclaimed product percentage. Businesses are encouraged to perceive this as an opportunity to enhance the reporting level of these indicators.

## Principle 3: "Businesses should respect and promote the well-being of all employees, including those in their value chains." (SEBI, 2021a)

Principle 3 includes the indicators about the responsibility of companies to respect and promote the well-being of all employees (also those who are part of their value chains). Essential indicators focus on the basic measures that cover the well-being of the employees and workers, retirement benefits, workplace accessibility for differently abled individuals, equal opportunity policies, return-to-work and retention rates for employees on parental leave, grievance redressal mechanisms, employee association memberships, training initiatives, performance and career development reviews, health and safety management systems, safety-related incidents, and corrective

All sectors have reported overall principle 3 within a small range of 65–84%.

measures. Leadership indicators delve deeper by covering disclosures related to life insurance and compensatory packages, statutory dues compliance, rehabilitation efforts for employees or workers affected by high-consequence work-related incidents, transition assistance programmes, assessment of value chain partners, and corrective actions taken. Table 2.13 presents the results of the analysis of principle 3 across various sectors. This principle includes 21 indicators, of which 15 are essential and 6 are leadership indicators.

### *Table 2.13 Sector-wise indicator reporting level of principle 3*

All numbers are in %.[16]

| Sector (no of companies) | Overall principle 3 (21) | Essential indicators (15) | Leadership indicators (6) |
|---|---|---|---|
| Automobile and Auto Components (62) | 83.3 | 90.0 | 66.7 |
| Capital Goods (154) | 78.3 | 87.6 | 55.0 |
| Chemicals (96) | 77.5 | 86.2 | 55.7 |
| Construction (30) | 75.7 | 87.1 | 47.2 |
| Construction Materials (25) | 78.7 | 88.8 | 53.3 |
| Consumer Durables (57) | 75.3 | 85.7 | 49.1 |
| Consumer Services (40) | 73.5 | 81.5 | 53.3 |
| Diversified (8) | 79.8 | 83.3 | 70.8 |
| FMCG (65) | 75.9 | 85.1 | 52.8 |
| Financial Services (129) | 70.4 | 76.5 | 55.0 |
| Forest Materials (9) | 82.0 | 91.9 | 57.4 |
| Healthcare (84) | 77.0 | 86.7 | 52.8 |
| Information Technology (43) | 67.4 | 76.3 | 45.3 |
| Media, Entertainment & Publication (20) | 65.5 | 78.7 | 32.5 |
| Metals & Mining (24) | 83.1 | 90.0 | 66.0 |
| Oil, Gas & Consumable Fuels (25) | 80.6 | 87.2 | 64.0 |
| Power (21) | 77.6 | 84.8 | 59.5 |
| Realty (25) | 74.7 | 83.7 | 52.0 |
| Services (37) | 71.2 | 80.4 | 48.2 |
| Telecommunication (15) | 70.2 | 81.8 | 41.1 |
| Textiles (38) | 75.8 | 84.2 | 54.8 |
| Utilities (5) | 83.8 | 88.0 | 73.3 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[16] The following is the colour coding range for presenting results:

All sectors have disclosed the essential indicators in the range of 76% to 92%.

**Observations:**

- Principle 3 emphasises the commitment to respecting and promoting the well-being of all employees. The “overall principle 3” column presents the results for this principle. All 22 sectors have reported on this principle within a small range of 65–84%. Specifically, five sectors have reported disclosures in the 81–95% range, while the remaining 17 have in the 66–80% range. The Utilities, Automobile and Auto Components, and Metals & Mining sectors have excelled in disclosing these indicators.
- All sectors have consistently disclosed the essential indicators in the range of 76% to 92%. The Automobile and Auto Components and Metals & Mining sectors stand out for their exemplary disclosure of these indicators. In addition to these two sectors, the Forest Materials sector has emerged as a leader in disclosing essential indicators.
- In the context of leadership indicators, it can be observed that four sectors (Automobile and Auto Components, Diversified, Metals & Mining, and Utilities) have reported disclosures within the 66–80% range. Additionally, 12 sectors have provided disclosures within the 51–65% range. Five of the remaining six sectors have reported disclosures in the 36–50% range, while the remaining one has reported disclosures in the 21–35% range.
- The results show that irrespective of the sectors, businesses are very proactive in reporting the indicators of this principle. Higher reporting of essential indicators may be attributed to existing regulatory compliance and legal mandates, to make the organisation more attractive for top talent and reflect its well-established human resources processes and mechanisms. Over the past few years, focus on the social aspect of ESG has also increased (Baid & Jayaraman, 2022). This may also be one reason that has led to higher reporting of essential indicators of this principle.
- On the other hand, comparatively lower reporting of the leadership indicators is potentially due to challenges revolving around ensuring compliance across the supply chain, difficulties in tracking and monitoring affected workers, and limited resources. Moreover, businesses may not be willing to disclose some sensitive and confidential information related to these indicators. However, businesses and, therefore, sectors are urged to consider the above-mentioned challenges as an opportunity to build the capacity and develop necessary oversight mechanisms to improve the reporting of these indicators.

## *Table 2.14 Indicator-wise reporting levels for indicators covered under principle 3*

| BRSR format question no | Indicator description of principle 3 | Disclosure level (in %) |
|---|---|---|
| **Essential indicators** | | |
| 1 | Details of measures for the well-being of employees. Details of measures for the well-being of workers. | 99.1 |
| 2 | Details of retirement benefits, for Current FY and Previous Financial Year. | 99.7 |
| 3 | Accessibility of workplaces | 99.1 |
| 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. | 99.0 |
| 5 | Return to work and Retention rates of permanent employees and workers that took parental leave. | 75.6 |
| 6 | "Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief." | 98.8 |
| 7 | Membership of employees and worker in association(s) or Unions recognised by the listed entity: | 60.8 |
| 8 | Details of training given to employees and workers. | 97.6 |
| 9 | Details of performance and career development reviews of employees and worker | 96.8 |
| 10 | Health and safety management system. | 99.7 |
| 11 | Details of safety related incidents, in the following format | 52.6 |
| 12 | Describe the measures taken by the entity to ensure a safe and healthy work place | 96.4 |
| 13 | Number of Complaints on the following made by employees and workers (principle 3) | 17.0 |
| 14 | Assessments for the year (principle 3) | 84.4 |
| 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" | 89.1 |
| **Leadership indicators** | | |
| 1 | Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N). | 74.7 |
| 2 | Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners. | 70.1 |
| 3 | Provide the number of employees / workers having suffered high consequence workrelated injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment. | 13.5 |
| 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) | 80.9 |
| 5 | Details on assessment of value chain partners (principle 3) | 29.5 |
| 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 | 56.6 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

**Observations:**

- Table 2.14 shows the overall indicator-wise reporting level. Almost all businesses have reported five essential indicators (1, 2, 3, 4, and 10). This high reporting level suggests that businesses may have well-established relevant policies, procedures, and systems contributing to such reporting levels. Moreover, the increased emphasis on essential indicator 4 indicates a dedication to promoting inclusivity.
- The disclosure range for 10 indicators falls between 70% and 99%. Seven of these indicators are essential indicators (5, 6, 8, 9, 12, 14, and 15), while the remaining three belong to the leadership indicator category (1, 2, and 4). These indicators are low-hanging fruits and, therefore, businesses should aspire to increase the reporting of these indicators to further enhance the principle-level reporting. The reporting levels for three leadership indicators – 1, 2, and 4 – fall between 70% and 81%. These levels are notably higher than those of other leadership indicators.
- The disclosure level of three indicators – essential indicators 7 and 11 and leadership indicator 6 – falls within the 52–61% range. Essential indicator 13 and leadership indicators 3 and 5 are the indicators with the least reporting level of disclosures. It is suggested that businesses increase their disclosure level of these indicators in the future reporting cycle. Better reporting levels enhance transparency and build trust among different stakeholders, such as employees and value chain partners (Benlemlih et al., 2018).

Almost all businesses have reported five essential indicators (1, 2, 3, 4, and 10) of this principle.

**Principle 4: "Businesses should respect the interests of and be responsive to all its stakeholders." (SEBI, 2021a)**

Stakeholder engagement and business responsiveness to stakeholders' needs are at the core of principle 4. Essential indicators of this principle aim to include disclosures on stakeholder identification and post-identification engagement with these groups. Stakeholder groups may include vulnerable and marginalised populations. Different communication channels can include email, community meetings, and website updates. The frequency of stakeholder engagement can be quarterly, biannual, or annual, depending on the stakeholder group and its relevance to the entity's operations. The purpose and scope of engagement should be outlined, highlighting key topics and concerns raised during these interactions. Leadership indicators focus on the consultation processes on the economic, environmental, and social topics between the stakeholders and the board. Moreover, leadership indicators also include whether these engagements are fruitful (in terms of identifying and managing the environmental and social topics) and highlight the instances when the companies have incorporated stakeholders' inputs as policies or processes. Another leadership indicator aims to detail engagement with and actions taken to address the concerns of vulnerable and marginalised stakeholder groups.

All sectors have disclosed at least 70% of the indicators of overarching principle 4.

Overall, this principle attempts to address both the governance and social aspects of the stakeholders and their concerns. Table 2.15 presents the results of the analysis of principle 4. This principle includes five indicators, of which two are essential and the remaining three are leadership indicators.

***Table 2.15 Sector-wise indicator reporting level of principle 4***

All numbers are in %.[17]

| Sector (no of companies) | Overall principle 4 (5) | Essential indicators (2) | Leadership indicators (3) |
|---|---|---|---|
| Automobile and Auto Components (62) | 84.8 | 98.4 | 75.8 |
| Capital Goods (154) | 82.5 | 99.4 | 71.2 |
| Chemicals (96) | 80.0 | 97.9 | 68.1 |
| Construction (30) | 80.7 | 96.7 | 70.0 |
| Construction Materials (25) | 79.2 | 100.0 | 65.3 |
| Consumer Durables (57) | 87.0 | 99.1 | 78.9 |
| Consumer Services (40) | 78.5 | 95.0 | 67.5 |
| Diversified (8) | 70.0 | 100.0 | 50.0 |
| FMCG (65) | 82.5 | 98.5 | 71.8 |
| Financial Services (129) | 83.6 | 98.1 | 73.9 |
| Forest Materials (9) | 86.7 | 100.0 | 77.8 |
| Healthcare (84) | 75.7 | 98.8 | 60.3 |
| Information Technology (43) | 84.7 | 98.8 | 75.2 |
| Media, Entertainment & Publication (20) | 78.0 | 100.0 | 63.3 |
| Metals & Mining (24) | 83.3 | 97.9 | 73.6 |
| Oil, Gas & Consumable Fuels (25) | 75.2 | 100.0 | 58.7 |
| Power (21) | 80.0 | 95.2 | 69.8 |
| Realty (25) | 79.2 | 100.0 | 65.3 |
| Services (37) | 84.3 | 98.6 | 74.8 |
| Telecommunication (15) | 74.7 | 93.3 | 62.2 |
| Textiles (38) | 82.6 | 96.1 | 73.7 |
| Utilities (5) | 84.0 | 100.0 | 73.3 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

20 sectors have reported essential indicators within the 96–100% range.

## Observations:

- Principle 4 pertains to the entity's dedication to respecting and being responsive to stakeholders. All sectors have disclosed at least 70% of the indicators related to this overarching principle. Twelve sectors have made disclosures in the range of 81% to 95% for this principle, while ten sectors have reported in the

[17] The following is the colour coding range for presenting results:

Lowest value in % Highest value in %

65–80% range. The Consumer Durables, Forest Materials, and Automobile and Auto Components sectors have taken the lead in disclosing this principle.

- Currently, 20 sectors have reported essential indicators within the 96–100% range, while the remaining two have disclosed in the 81–95% range. Additionally, 17 sectors have reported leadership indicators within the 66–80% range. Four of the remaining five sectors disclosed leadership indicators in the 51–65% range, and the Diversified sector reported 50% of the disclosures.
- The Forest Materials sector has consistently emerged as a leading performer according to the results of the overall principle and essential leadership indicators. Similarly, the Automobile and Auto Components sector can be recognised as an outstanding performer in both overall and leadership indicators.
- This particular principle is widely discussed, possibly because of two reasons. The first reason may be the proactive involvement of businesses with their stakeholders. The second reason could be the careful documentation of information related to such engagements, making it readily available. It is important to note that compliance, whether from regulators, investors, or lenders, may have played a crucial role.

In this reporting cycle, 17 sectors have reported leadership indicators within the 66–80% range.

*Table 2.16 Indicator-wise reporting levels for indicators covered under principle 4*

| BRSR format question no | Indicator description of principle 4 | Disclosure level (in %) |
|---|---|---|
| **Essential indicators** | | |
| 1 | Describe the processes for identifying key stakeholder groups of the entity. | 98.5 |
| 2 | List stakeholder groups identified as key for your entity and the frequency of | 98.0 |
| **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. | 74.6 |
| 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. | 63.9 |
| 3 | Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups. | 72.4 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

More than 98% disclosure level for both essential indicators (1 and 2) indicates that the companies strongly focus on stakeholder engagement.

**Observations:**

- See Table 2.16 for the indicator-wise reporting level. More than 98% disclosure level for both essential indicators implies that the companies strongly focus on identifying and engaging with key stakeholders. Higher stakeholder engagement helps build robust relationships while facilitating stakeholder participation in relevant forums and discussions, ultimately leading to informed decision-making (Benlemlih et al., 2018).
- All the leadership indicators that have been disclosed fall within the 63–75% range, indicating that businesses are proactively engaging with the stakeholders. This level of disclosure reporting reflects the commendable efforts made by the businesses. However, there is still potential for further improvement.

**Principle 5: "Businesses should respect and promote human rights." (SEBI, 2021a)**

Principle 5 stresses the responsibility of businesses to respect and promote human rights. Essential indicators of this principle include multiple aspects related to human rights practices, such as employment-status-wise number of employees and workers who have received training on human rights issues and policies and minimum wages paid to employees and workers, along with the details about the remuneration by gender and category. These also include details of the committee and grievance redressal mechanisms to address the human rights issues.

All 22 sectors have disclosed overall principle-related disclosures in the 66–95% range.

Disclosures about the complaints made by employees and workers and how they were addressed or prevented through different mechanisms are also part of the essential indicators. Companies are expected to disclose details about assessing human rights issues across their plants and offices and any corrective actions taken.

Leadership indicators go deeper by enquiring about the details of any modifications to business processes resulting from addressing human rights grievances. Apart from that, disclosures about the accessibility of premises to differently abled visitors, assessment of value chain partners for human rights issues, and any corrective actions taken are also included as leadership indicators. Table 2.17 shows the result of the analysis of principle 5. This principle encompasses 15 indicators, of which 10 are essential and 5 are leadership indicators.

## *Table 2.17 Sector-wise indicator reporting level of principle 5*

All numbers are in %.[18]

| Sector (no of companies) | Overall principle 5 (15) | Essential indicators (10) | Leadership indicators (5) |
|---|---|---|---|
| Automobile and Auto Components (62) | 82.0 | 89.0 | 68.1 |
| Capital Goods (154) | 78.8 | 87.0 | 62.5 |
| Chemicals (96) | 75.9 | 85.7 | 56.3 |
| Construction (30) | 70.7 | 83.7 | 44.7 |
| Construction Materials (25) | 76.5 | 86.4 | 56.8 |
| Consumer Durables (57) | 77.0 | 86.1 | 58.6 |
| Consumer Services (40) | 80.0 | 90.5 | 59.0 |
| Diversified (8) | 80.0 | 82.5 | 75.0 |
| FMCG (65) | 75.6 | 84.8 | 57.2 |
| Financial Services (129) | 76.5 | 82.6 | 64.5 |
| Forest Materials (9) | 80.7 | 88.9 | 64.4 |
| Healthcare (84) | 78.9 | 88.2 | 60.2 |
| Information Technology (43) | 75.3 | 83.3 | 59.5 |
| Media, Entertainment & Publication (20) | 69.3 | 86.5 | 35.0 |
| Metals & Mining (24) | 80.6 | 89.2 | 63.3 |
| Oil, Gas & Consumable Fuels (25) | 78.9 | 85.2 | 66.4 |
| Power (21) | 79.7 | 86.7 | 65.7 |
| Realty (25) | 76.3 | 82.8 | 63.2 |
| Services (37) | 73.9 | 84.6 | 52.4 |
| Telecommunication (15) | 75.1 | 86.7 | 52.0 |
| Textiles (38) | 76.8 | 85.0 | 60.5 |
| Utilities (5) | 84.0 | 88.0 | 76.0 |

**Note:** The “numbers in %” means the percentage of indicators reported by all the companies together from that specific sector.

### Observations:

- Principle 5 focuses on the entity’s commitment to respecting and promoting human rights. Among 22 sectors, 4 have disclosed overall principle-related disclosures in the 81–95% range, while 18 have reported within the 66–80% range. Notably, the Utilities, Automobile and Auto Components, and Forest Materials sectors have shown exemplary commitment to disclosing this principle.
- Our analysis shows that all sectors have disclosed essential indicators within the 81–95% range. The disclosure of leadership

[18] The following is the colour coding range for presenting results:

indicators varies, with 5 sectors reporting in the 66–80% range, 15 sectors in the 51–65% range, and 1 sector each reporting in the 36–50% and 21–35% ranges.

All sectors have disclosed essential indicators within the 81–95% range.

- Having well-established human rights practices, processes, and mechanisms at the organisational level and the existing regulatory environment may contribute to the accessibility of relevant information and, ultimately, to the higher disclosure levels of the essential indicators of this principle. Furthermore, companies may like to be transparent in their human resources practices to attract high-quality human capital, socially conscious investors, and customers.
- On the other hand, lower reporting levels of the leadership indicators may be attributed to the challenges related to inadequate resources and expertise to conduct thorough human rights due diligence and assessments, lack of standardised processes and frameworks for capturing and reporting relevant information, sensitivity and confidentiality concerns related to the human resource grievances and implementation, and tracking challenges related to value chains. Companies are encouraged to build their capacity to track and report these indicators in future reporting cycles.

*Table 2.18 Indicator-wise reporting levels for indicators covered under principle 5*

| BRSR format question no | Indicator description of principle 5 | Disclosure level (in %) |
|---|---|---|
| | **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 | 89.2 |
| 2 | Details of minimum wages paid to employees and workers, in the following format | 97.8 |
| 3 | Details of remuneration/salary/wages, in the following format | 98.7 |
| 4 | Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? | 93.2 |
| 5 | Describe the internal mechanisms in place to redress grievances related to human rights issues. | 98.3 |
| 6 | Number of Complaints on the following made by employees and workers (Principle 5) | 31.2 |
| 7 | Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases. | 96.8 |
| 8 | Do human rights requirements form part of your business agreements and contracts? (Yes/No) | 99.0 |
| 9 | Assessments for the year (principle 5) | 71.2 |
| 10 | Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above. | 83.7 |

| BRSR format question no | Indicator description of principle 5 | Disclosure level (in %) |
|---|---|---|
| **Leadership indicators** | | |
| 1 | Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints. | 71.3 |
| 2 | Details of the scope and coverage of any Human rights due-diligence conducted. | 69.5 |
| 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? | 71.3 |
| 4 | Details on assessment of value chain partners (principle 5) | 25.2 |
| 5 | Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above. | 63.0 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

All businesses have reported as many as eight essential indicators (1, 2, 3, 4, 5, 7, 8, and 10) within the 83–100% range.

## Observations:

- See Table 2.18 for the indicator-wise reporting level. Notably, businesses have reported as many as eight essential indicators (1, 2, 3, 4, 5, 7, 8, and 10) within the 83–100% range. This suggests that these businesses are placing significant emphasis on disclosing human-rights-related information. The higher level of disclosures may be attributed to established company policies, mechanisms, and processes focused on human rights, the availability of relevant data, or the prevailing regulatory and legal frameworks.
- Businesses have reported essential indicator 9 and leadership indicators 1, 2, 3, and 5 in the 63–72% range. The reporting levels within this range indicate the proactive approach of businesses in identifying and mitigating human rights issues. However, there is still room for improvement.

Businesses place a higher emphasis on disclosing human-rights-related information.

- The reporting of essential indicator 6 and leadership indicator 4 has been within the 25–32% range. This lower reporting may be due to the sensitivity and confidentiality concerns related to human resource grievances, the possible absence of reported instances (complaints), or the unavailability of data from value chain partners. This analysis shows a need for businesses to improve their reporting on these indicators.

### Principle 6: "Businesses should respect and make efforts to protect and restore the environment." (SEBI, 2021a)

Principle 6 emphasises the importance for businesses to respect and safeguard the environment. Essential indicators make businesses disclose data on their environmental impact, including energy consumption breakdowns, water withdrawal and discharge, waste generation and management, air emissions, GHG emissions, and compliance with environmental laws and regulations. Leadership indicators cover renewable energy usage, All 22 sectors have reported a minimum of 48% of the disclosures for this principle.

water discharge, water consumption in areas of water stress, scope 3 emissions, impact on biodiversity in ecologically sensitive areas, innovative resource efficiency initiatives, business continuity and disaster management plans, and mitigation measures for adverse environmental impacts throughout the value chain. Broadly, this principle evaluates the attitude of a business towards environmental sustainability by appreciating the ongoing efforts while shedding light on possible areas where businesses can improve environmental management practices. Table 2.19 shows the result of the analysis of principle 6. This principle includes 21 indicators and has 12 essential indicators and 9 leadership indicators.

***Table 2.19 Sector-wise indicator reporting level of principle 6***

All numbers are in %.[19]

| Sector (no of companies) | Overall principle 6 (21) | Essential indicators (12) | Leadership indicators (9) |
|---|---|---|---|
| Automobile and Auto Components (62) | 69.7 | 75.8 | 61.5 |
| Capital Goods (154) | 62.5 | 73.5 | 47.7 |
| Chemicals (96) | 68.6 | 77.9 | 56.1 |
| Construction (30) | 54.9 | 71.4 | 33.0 |
| Construction Materials (25) | 68.6 | 83.7 | 48.4 |
| Consumer Durables (57) | 62.0 | 71.9 | 48.7 |
| Consumer Services (40) | 59.0 | 69.6 | 45.0 |
| Diversified (8) | 68.5 | 71.9 | 63.9 |
| FMCG (65) | 63.3 | 72.8 | 50.6 |
| Financial Services (129) | 50.0 | 56.0 | 41.9 |
| Forest Materials (9) | 72.0 | 84.3 | 55.6 |
| Healthcare (84) | 66.6 | 75.0 | 55.3 |
| Information Technology (43) | 55.1 | 64.1 | 43.2 |
| Media, Entertainment & Publication (20) | 48.6 | 63.3 | 28.9 |
| Metals & Mining (24) | 77.2 | 88.9 | 61.6 |
| Oil, Gas & Consumable Fuels (25) | 72.2 | 82.3 | 58.7 |
| Power (21) | 66.2 | 78.2 | 50.3 |
| Realty (25) | 59.6 | 73.7 | 40.9 |
| Services (37) | 53.8 | 64.0 | 40.2 |
| Telecommunication (15) | 55.6 | 67.2 | 40.0 |
| Textiles (38) | 64.2 | 75.0 | 49.7 |
| Utilities (5) | 70.5 | 78.3 | 60.0 |

**Note:** The “numbers in %” means the percentage of indicators reported by all the companies together from that specific sector.

[19] The following is the colour coding range for presenting results:

All 22 sectors have reported at least 56% of the disclosures of essential indicators.

**Observations:**

- Principle 6 focuses on the importance of the commitment to respecting, protecting, and restoring the environment. Among the 22 sectors, 10 have reported disclosures in the 66%–80% range, while another 10 have reported in the 51–65% range. Two remaining sectors have reported in the 36–50% range. All 22 sectors have reported a minimum of 48% of the disclosures for this principle. The Metals & Mining, Oil, Gas & Consumable Fuels, and Forest Materials sectors have emerged as frontrunners in reporting principle 6 indicators.
- All 22 sectors have reported at least 56% of the disclosures of essential indicators. Out of these 22 sectors, Construction Materials, Forest Materials, Metals & Mining, and Oil, Gas & Consumable Fuels have reported disclosures falling within the 81–95% range. This disclosure level from these sectors may be attributed to prevailing sector practices, regulatory compliances, stakeholder pressures, or sector-specific awareness. Furthermore, 14 sectors have reported these indicators in the 66–80% range, while the remaining 4 have reported in the 51–65% range.
- Ten sectors have disclosed leadership indicators in the 51–65% range, which is comparatively higher than the leadership indicators of the other principles. An additional 10 sectors have reported disclosures falling within the 36–50% range, while 2 sectors have reported indicators in the 21–35% range.
- Noteworthily, the Metals & Mining sector has emerged as a leader in disclosing indicators for overall principles, essentials, and leadership.

*Table 2.20 Indicator-wise reporting levels for indicators covered under principle 6*

| BRSR format question no | Indicator description of principle 6 | Disclosure level (in %) |
|---|---|---|
| **Essential indicators** | | |
| 1 | Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format: | 96.4 |
| 2 | Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any | 10.9 |
| 3 | Provide details of the following disclosures related to water, in the following format: | 88.6 |
| 4 | Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation. | 95.6 |
| 5 | Please provide details of air emissions (other than GHG emissions) by the entity, in the following format. | 73.6 |
| 6 | Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format. | 88.9 |
| 7 | Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details. | 97.4 |

| BRSR format question no | Indicator description of principle 6 | Disclosure level (in %) |
|---|---|---|
| 8 | Provide details related to waste management by the entity, in the following format | 84.9 |
| 9 | 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. | 97.0 |
| 10 | If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format. | 18.2 |
| 11 | Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year. | 14.0 |
| 12 | Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not,<br>provide details of all such non-compliances, in the following format. | 94.4 |
| **Leadership indicators** | | |
| 1 | Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format | 75.8 |
| 2 | Provide the following details related to water discharged. | 34.3 |
| 3 | 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 (ii) Nature of operations (iii) Water withdrawal, consumption and discharge in the following format. | 21.9 |
| 4 | Please provide details of total Scope 3 emissions & its intensity, in the following format | 29.5 |
| 5 | With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities. | 54.7 |
| 6 | If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format. | 55.1 |
| 7 | Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link. | 81.0 |
| 8 | Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard | 69.0 |
| 9 | Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts | 18.1 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" mean the percentage of indicators reported by all 1012 companies.

Businesses have reported disclosures for five essential indicators (1, 4, 7, 9, and 12) in the 94–98% range.

**Observations:**

- Table 2.20 shows the overall indicator-wise reporting level. Businesses have reported disclosures for five essential indicators (1, 4, 7, 9, and 12) in the 94–98% range. These findings suggest that businesses place significant emphasis on monitoring and disclosing environmentally critical indicators. For instance, these indicators focus on GHG emissions, energy consumption, water management, and waste practices.
- Six indicators, including four essential and two leadership indicators, have disclosures reported within the 71–90% range. Additionally, three leadership indicators (5, 6, and 8) have been observed to fall within the 54–69% range. The current disclosure levels show the efforts that businesses have already made. However, there is still an opportunity for further improvement.
- Companies have reported three essential indicators – 2, 10, and 11 – falling within the 10–19% range. Lower reporting levels for PAT may be attributed to the difficulty in tracking PAT-scheme-related metrics and targets and hesitancy due to the possibility of not meeting the targets. The same could be said for the other two indicators focused on environmental impacts and their tracking, as companies tend to remain silent on these indicators. However, this presents an opportunity for businesses to improve the reporting of these indicators.
- Leadership indicators 2, 3, 4, and 9 have been reported within the 18–35% range. Indicators 2 and 3 focus on water, while 4 is associated with metrics related to scope 3 emissions. Businesses are encouraged to enhance the disclosure of these indicators in the upcoming reporting cycle. Similarly, companies should strive to improve their reporting on indicator 9, which focuses on the value chain.
- There is an evident contrast in the disclosure levels of water-related indicators. Essential indicator 3 has a reporting level of 88.6%, while leadership indicators 2 and 3 have reporting levels of 34.3% and 21.9%, respectively. A similar contrast can be observed in the disclosure levels of indicators related to scopes 1 and 2 and scope 3. This difference may be due to data availability or the nature of the indicator (mandatory or nonmandatory). However, businesses should aspire to close this disclosure gap by enhancing their capabilities.

There is an evident contrast in the disclosure reporting of water-related essential (3 at 88.7%) and leadership indicators (2 at 34.3% and 3 at 21.9%). Capacity enhancement is required.

**Principle 7: "Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent." (SEBI, 2021a)**

Principle 7 highlights the importance of responsible and transparent engagement of businesses in public and regulatory policy. Essential indicators of this principle encourage businesses to report the number of affiliations and list the top 10 bodies they are affiliated with. Additionally, businesses need to disclose any corrective action taken or in progress regarding issues related to anticompetitive conduct due to adverse orders from

Nineteen sectors have provided disclosures in the 36–50% range for overall principle 7.

regulatory authorities. For leadership indicators, businesses are expected to disclose their public policy positions and the methods used for advocacy. This includes whether the information about these positions is available in the public domain, the frequency of review by the board, and access to the web page containing such information. Table 2.21 shows the results of the analysis of principle 7. Two essential indicators and one leadership indicator form this principle. This principle has the least number of indicators among all nine principles.

### *Table 2.21 Sector-wise indicator reporting level of principle 7*

All numbers are in %.[20]

| Sector (no of companies) | Overall principle 7 (3) | Essential indicators (2) | Leadership indicators (1) |
|---|---|---|---|
| Automobile and Auto Components (62) | 49.5 | 62.9 | 22.6 |
| Capital Goods (154) | 42.0 | 53.6 | 18.8 |
| Chemicals (96) | 44.4 | 55.7 | 21.9 |
| Construction (30) | 36.7 | 50.0 | 10.0 |
| Construction Materials (25) | 52.0 | 62.0 | 32.0 |
| Consumer Durables (57) | 43.9 | 53.5 | 24.6 |
| Consumer Services (40) | 43.3 | 52.5 | 25.0 |
| Diversified (8) | 41.7 | 56.3 | 12.5 |
| FMCG (65) | 42.6 | 52.3 | 23.1 |
| Financial Services (129) | 42.6 | 50.8 | 26.4 |
| Forest Materials (9) | 55.6 | 61.1 | 44.4 |
| Healthcare (84) | 43.7 | 57.7 | 15.5 |
| Information Technology (43) | 35.7 | 46.5 | 14.0 |
| Media, Entertainment & Publication (20) | 38.3 | 52.5 | 10.0 |
| Metals & Mining (24) | 48.6 | 58.3 | 29.2 |
| Oil, Gas & Consumable Fuels (25) | 52.0 | 60.0 | 36.0 |
| Power (21) | 38.1 | 50.0 | 14.3 |
| Realty (25) | 42.7 | 48.0 | 32.0 |
| Services (37) | 38.7 | 48.6 | 18.9 |
| Telecommunication (15) | 42.2 | 53.3 | 20.0 |
| Textiles (38) | 41.2 | 51.3 | 21.1 |
| Utilities (5) | 46.7 | 40.0 | 60.0 |

**Note:** The “numbers in %” mean the percentage of indicators reported by all the companies together from that specific sector.

[20] The following is the colour coding range for presenting results:

Lowest value in %

Highest value in %

**Observations:**

- Principle 7 focuses on the entity's commitment to responsible and transparent engagement in public and regulatory policy. Among 22 sectors, Forest Materials, Construction Materials, and Oil, Gas & Consumable Fuels lead in reporting this principle, with disclosures falling in the 51–65% range. The remaining 19 sectors have provided disclosures in the 36–50% range.
- Sixteen sectors have reported essential indicators within the 51–65% range, while the remaining six have reported indicators within the 36–50% range. These six sectors have not reported at least half of (that is, one out of two) the total essential indicators.
- The Utilities sector has provided disclosures within the 51–65% range, while the Forest Materials and Oil, Gas & Consumable Fuels sectors have reported in the 36–50% range. However, the remaining 19 sectors have provided disclosures within the 6–35% range. The lower reporting levels of this indicator highlight the necessity of directing attention toward enhancing the reporting level of this particular leadership indicator.

Sixteen sectors have reported essential indicators within the 51–65% range.

*Table 2.22 Indicator-wise reporting levels for indicators covered under principle 7*

| BRSR format question no | Indicator description of principle 7 | Disclosure level (in %) |
|---|---|---|
| **Essential indicators** | | |
| 1 | Number of affiliations with trade and industry chambers/ associations. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to. | 94.3 |
| 2 | Provide details of corrective action taken or underway on any issues related to anticompetitive conduct by the entity, based on adverse orders from regulatory authorities. | 13.3 |
| **Leadership Indicators** | | |
| 1 | Details of public policy positions advocated by the entity. | 21.9 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

**Observations:**

- Table 2.22 shows the overall indicator-wise reporting level. More than 94% of businesses have reported essential indicator 1 of this principle. A higher disclosure level implies that businesses may have such affiliations and that they are considering such affiliations as the provider of networking opportunities, a platform to present their views, and influence sector-level decision-making.
- Businesses are encouraged to improve the reporting level of essential indicator 2 and leadership indicator 1. Lower reporting levels may be attributed to sensitivities and potential risks

More than 94% of businesses have reported essential indicator 1 of principle 7.

associated with fully disclosing these two indicators. Companies may be hesitant to disclose information about anticompetitive conduct and corrective actions because of the potential negative impact on their reputation, legal standing, and public policy positions, as it might expose the companies to possible criticism or backlash from stakeholders with differing views.

### Principle 8: "Businesses should promote inclusive growth and equitable development." (SEBI, 2021a)

This principle covers the entity's commitment to promoting inclusive growth and equitable development.

Principle 8 emphasises the crucial role of businesses in promoting inclusive growth and equitable development. Essential indicators of this principle cover aspects such as the entity's SIA of projects, ongoing R&R initiatives, grievance redressal mechanisms, and supplier sourcing practices. For SIA, businesses also need to disclose whether an independent external agency conducted the assessment and whether the assessment results are available in the public domain. Businesses also need to disclose specific details such as the number of PAFs, the percentage of PAFs covered by R&R, amounts paid to PAFs in the current financial year, and grievance redressal mechanisms for the ongoing R&R initiatives. Leadership indicators focus on the actions taken by businesses to mitigate negative social impacts as identified from the SIA, CSR projects undertaken in designated aspirational districts, preferential procurement policies that favour vulnerable groups, benefits derived from intellectual properties based on traditional knowledge, corrective actions in intellectual-property-related disputes, and information about beneficiaries of the CSR projects including the percentage of beneficiaries from vulnerable and marginalised groups. Table 2.23 shows the analysis result of principle 8 for various sectors. This principle comprises 10 indicators, of which 4 are essential and 6 are leadership indicators.

*Table 2.23 Sector-wise indicator reporting level of principle 8*

All numbers are in %.[21]

| Sector (no of companies) | Overall principle 8 (10) | Essential indicators (4) | Leadership indicators (6) |
|---|---|---|---|
| Automobile and Auto Components (62) | 43.7 | 51.2 | 38.7 |
| Capital Goods (154) | 38.4 | 49.5 | 31.1 |
| Chemicals (96) | 41.7 | 50.8 | 35.6 |
| Construction (30) | 36.3 | 50.0 | 27.2 |
| Construction Materials (25) | 43.2 | 52.0 | 37.3 |
| Consumer Durables (57) | 36.7 | 50.0 | 27.8 |
| Consumer Services (40) | 34.8 | 42.5 | 29.6 |
| Diversified (8) | 43.8 | 43.8 | 43.8 |

[21] The following is the colour coding range for presenting results:

| Sector (no of companies) | Overall principle 8 (10) | Essential indicators (4) | Leadership indicators (6) |
|---|---|---|---|
| FMCG (65) | 36.0 | 48.5 | 27.7 |
| Financial Services (129) | 35.9 | 32.4 | 38.2 |
| Forest Materials (9) | 32.2 | 50.0 | 20.4 |
| Healthcare (84) | 38.6 | 49.1 | 31.5 |
| Information Technology (43) | 33.5 | 45.3 | 25.6 |
| Media, Entertainment & Publication (20) | 28.5 | 40.0 | 20.8 |
| Metals & Mining (24) | 48.8 | 59.4 | 41.7 |
| Oil, Gas & Consumable Fuels (25) | 44.8 | 49.0 | 42.0 |
| Power (21) | 42.4 | 57.1 | 32.5 |
| Realty (25) | 35.2 | 50.0 | 25.3 |
| Services (37) | 39.2 | 46.6 | 34.2 |
| Telecommunication (15) | 37.3 | 50.0 | 28.9 |
| Textiles (38) | 39.2 | 53.9 | 29.4 |
| Utilities (5) | 42.0 | 60.0 | 30.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

None of the sectors has managed to cross the 50% threshold for the overall principle 8 disclosures.

**Observations:**

- Principle 8 focuses on the entity's commitment to promoting inclusive growth and equitable development. Out of 22 sectors, 18 have reported disclosures within the 36–50% range, while 4 have reported within the 21–35% range for this principle. The reporting level for this principle falls within a relatively narrow range of 28–49%. Notably, the Metals & Mining, Oil, Gas & Consumable Fuels, and Diversified sectors have taken the lead in disclosing overall principle indicators.
- The reporting level of essential indicators varies across sectors. Seven sectors have reported essential disclosures in the range of 51% to 65%. Fourteen sectors have disclosed indicators within the 36–50% range, while one sector falls in the 21–35% range. Utilities sector has emerged as a leader in disclosing essential indicators. Out of 22 sectors, 7 have reported leadership indicators within the 36–50% range, while the remaining 15 have reported within the 21–35% range for this principle.
- None of the sectors could cross the 50% threshold for the overall principle 8 disclosures. This indicates that sectors have disclosed fewer than five indicators for the entire principle 8. The Metals & Mining sector has proactively reported disclosures of all three categories – overall principle, essential, and leadership indicators. Similarly, the Diversified and Oil, Gas & Consumable Fuels sectors lead in disclosing the overall principle and leadership indicators.
- The lower reporting levels of this principle may be attributed

Lower reporting level of this principle may be attributed to challenges and complexities related to SIA and R&R processes and documentation.

to several reasons. Some of these reasons include challenges and complexities related to SIA and R&R processes and documentation, limited capacity to undertake these activities, fear of reputational risk due to possible negative social impacts on PAFs, difficulty in gathering material sourcing information (especially intellectual property based on traditional knowledge), and challenges related to preferential procurement-related information in CSR projects. On the other hand, businesses may be silent on these indicators because they did not undertake any relevant activities focusing on specific indicators included in this principle. However, businesses are encouraged to build capacity and establish processes that can help them report these indicators more effectively.

*Table 2.24 Indicator-wise reporting levels for indicators covered under principle 8*

| BRSR format question no | Indicator description of principle 8 | Disclosure level (in %) |
|---|---|---|
| **Essential indicators** | | |
| 1 | Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year. | 10.4 |
| 2 | Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format: | 9.1 |
| 3 | Describe the mechanisms to receive and redress grievances of the community. | 93.0 |
| 4 | Percentage of input material (inputs to total inputs by value) sourced from suppliers. | 77.1 |
| **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). | 9.5 |
| 2 | Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies. | 34.6 |
| 3 | Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes/No) From which marginalized /vulnerable groups do you procure? What percentage of total procurement (by value) does it constitute? | 78.8 |
| 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. | 7.8 |
| 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. | 6.7 |
| 6 | Details of beneficiaries of CSR Projects | 57.6 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The "numbers in %" means the percentage of indicators reported by all 1012 companies.

**Observations:**

- See Table 2.24 for the indicator-wise reporting level. Companies have reported indicators in a wide range for this principle, ranging from 6% to 93%. Essential indicator 3, which focuses on mechanisms for receiving and addressing community grievances, has emerged as the most reported indicator. The higher reporting level for this indicator may be attributed to prevailing regulatory requirements, existing processes, and data availability.

Companies have reported indicators in a wide range for this principle, ranging from 6% to 93%.

- The disclosure reporting level for essential indicator 4 and leadership indicators 3 and 6 falls within the 57–79% range. This implies that the companies are already making efforts to report these indicators, but there is room for improvement. Furthermore, companies are encouraged to enhance their disclosures for leadership indicator 2 in the next reporting cycle.
- The reporting level for essential indicators 1 and 2 and leadership indicators 1, 4, and 5 falls within a narrow range of 6% to 11%. These indicators primarily focus on social impacts and intellectual properties. This limited range suggests that many companies may not have undertaken significant activities related to these specific indicators. Also, as highlighted in the sector-wise analysis, challenges related to SIA, R&R, and CSR may deter companies from reporting the relevant indicators. Consequently, the lower reporting level of these indicators reflects an opportunity for the companies to put in efforts to overcome the challenges and ultimately enhance the reporting level.

**Principle 9: "Businesses should engage with and provide value to their consumers in a responsible manner." (SEBI, 2021a)**

This principle underscores the significance of customer engagement and responsibly delivering value to them.

This principle draws the attention of businesses to engaging with the customers and providing value to them responsibly. Essential indicators of this principle cover mechanisms for receiving and responding to consumers complaints and feedback, reporting the turnover of products or services as a percentage of total turnover, and highlighting governance and social indicators. Other aspects include information on safe and responsible usage, recycling or safe disposal of products and/or services, the number of consumer complaints across various categories – including data privacy, advertising, cybersecurity, and delivery of essential services – as well as details of product recalls due to safety issues. Businesses need to disclose whether they have a framework or policy on cybersecurity and risks related to data privacy and details of any corrective actions taken or underway on relevant issues. The leadership indicators of this principle include access to information about products and services of the businesses (different channels, platforms, web links), as well as steps taken to educate customers on the safe and responsible use of products or services. These also include processes to make consumers aware of any risk of disruption or discontinuation of essential services and whether the business provides product information beyond the minimum legal requirements, and discloses information about data breaches. Table 2.25 presents the results of the analysis of principle 9. Principle 9 covers 11 indicators and consists of six essential and five leadership indicators.

### *Table 2.25 Sector-wise indicator reporting level of principle 9*

All numbers are in %.[22]

| Sector (no of companies) | Overall principle 9 (11) | Essential indicators (6) | Leadership indicators (5) |
|---|---|---|---|
| Automobile and Auto Components (62) | 70.1 | 69.6 | 70.6 |
| Capital Goods (154) | 68.8 | 70.0 | 67.3 |
| Chemicals (96) | 71.9 | 74.3 | 69.0 |
| Construction (30) | 47.0 | 47.2 | 46.7 |
| Construction Materials (25) | 70.5 | 73.3 | 67.2 |
| Consumer Durables (57) | 66.8 | 69.9 | 63.2 |
| Consumer Services (40) | 69.8 | 70.8 | 68.5 |
| Diversified (8) | 75.0 | 75.0 | 75.0 |
| FMCG (65) | 68.4 | 72.6 | 63.4 |
| Financial Services (129) | 66.3 | 63.6 | 69.6 |
| Forest Materials (9) | 67.7 | 64.8 | 71.1 |
| Healthcare (84) | 73.6 | 76.4 | 70.2 |
| Information Technology (43) | 57.7 | 54.3 | 61.9 |
| Media, Entertainment & Publication (20) | 62.3 | 66.7 | 57.0 |
| Metals & Mining (24) | 72.7 | 68.8 | 77.5 |
| Oil, Gas & Consumable Fuels (25) | 71.6 | 69.3 | 74.4 |
| Power (21) | 62.8 | 56.3 | 70.5 |
| Realty (25) | 65.1 | 64.7 | 65.6 |
| Services (37) | 60.7 | 62.6 | 58.4 |
| Telecommunication (15) | 57.6 | 60.0 | 54.7 |
| Textiles (38) | 66.3 | 65.4 | 67.4 |
| Utilities (5) | 69.1 | 70.0 | 68.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

## Observations:

- Principle 9 focuses on the organisation's commitment to responsibly engaging with consumers and delivering value to them. Out of the 22 sectors, 16 have reported overall principle 9

[22] The following is the colour coding range for presenting results:

Lowest value in %

Highest value in %

A similar type of reporting pattern emerges for the overall principle and for essential indicators and leadership indicators for principle 9.

disclosures within the 66–80% range. Six sectors have reported varying levels of disclosures, with five falling within the 51–65% range and one (Construction) reporting disclosures in the 36–50% range. Noteworthily, all 22 sectors have provided 46% or more disclosures for this principle.

- A similar type of reporting pattern can be observed for the overall principle, essential indicators, and leadership indicators. Fourteen of the twenty-two sectors have reported essential indicators within the 66–80% range. Among the remaining eight sectors, seven reported indicators within the 51–65% range, while one sector (Construction) reported indicators within the 36–50% range. For leadership indicators, 15 sectors reported results within the 66–80% range. Among the remaining seven sectors, six reported indicators within the 51–65% range, while one sector (Construction) reported indicators within the 36–50% range.
- The Healthcare and Metals & Mining sectors have shown a strong commitment to transparency by consistently reporting a higher number of disclosures and leading in providing overall principle 9 indicators. Both the Diversified and Healthcare sectors are frontrunners in disclosing essential indicators. In addition, the Diversified and Metals & Mining sectors have excelled in reporting leadership indicators.

*Table 2.26 Indicator-wise reporting levels for indicators covered under principle 9*

| BRSR format question no | Indicator description of principle 9 | Disclosure level (in %) |
|---|---|---|
| | **Essential indicators** | |
| 1 | Describe the mechanisms in place to receive and respond to consumer complaints and feedback. | 97.3 |
| 2 | Turnover of products and/ services as a percentage of turnover from all products/service that carry information about. | 50.9 |
| 3 | Number of consumer complaints in respect of the following | 53.0 |
| 4 | Details of instances of product recalls on account of safety issues. | 25.6 |
| 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. | 99.0 |
| 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. | 81.6 |
| | **Leadership indicators** | |
| 1 | Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available). | 79.9 |
| 2 | Steps taken to inform and educate consumers about safe and responsible usage of products and/or services. | 76.8 |

| BRSR format question no | Indicator description of principle 9 | Disclosure level (in %) |
|---|---|---|
| 3 | Mechanisms in place to inform consumers of any risk of disruption/ discontinuation of essential services. | 73.5 |
| 4 | Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No) | 83.8 |
| 5 | Provide the following information relating to data breaches: a-Number of instances of Data Breaches along with impact. ; b- Percentage of DataBreaches involving personally identifiable information of customers. | 19.7 |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

**Note:** The numbers in % mean the percentage of indicators reported by all 1012 companies.

## Observations:

- See Table 2.26 for the indicator-wise reporting level. The most commonly disclosed indicators by businesses are essential indicators 1 and 5, likely due to regulatory requirements, existing laws, or the ready availability of data.

Businesses have most commonly disclosed essential indicators 1 and 5.

- The results of the analysis indicate that companies have reported four leadership indicators (1, 2, 3, and 4) within the 73–84% range. These indicators are directly associated with customer-related issues. The higher reporting levels may be due to increased awareness among businesses about the importance of maintaining transparency, proactively communicating product-related information, and building customer trust, which can lead to increased brand reputation and customer loyalty. The high reporting levels may suggest that companies have readily available data and established processes or are compelled by prevailing regulatory requirements to address these issues. Essential indicator 6 has also been disclosed within a similar range as the above-mentioned leadership indicators.
- Businesses are making efforts to disclose two essential indicators 2 and 3; however, they should aspire to work towards reporting more of these indicators in future reporting cycles.

Companies have reported four leadership indicators (1, 2, 3, and 4) within the 73–84% range.

- Companies should strive to enhance their reporting of essential indicator 4 and leadership indicator 5. The businesses may have chosen to remain silent on these indicators because of the lack of such occurrences. On the other hand, companies may refrain from reporting such occurrences as it may lead to reputational risk and competitive disadvantage. However, companies are encouraged to perceive this as an opportunity to enhance their reporting levels, as higher levels of disclosure for these indicators will lead to improved transparency.

## 2.4. Ratio Analysis

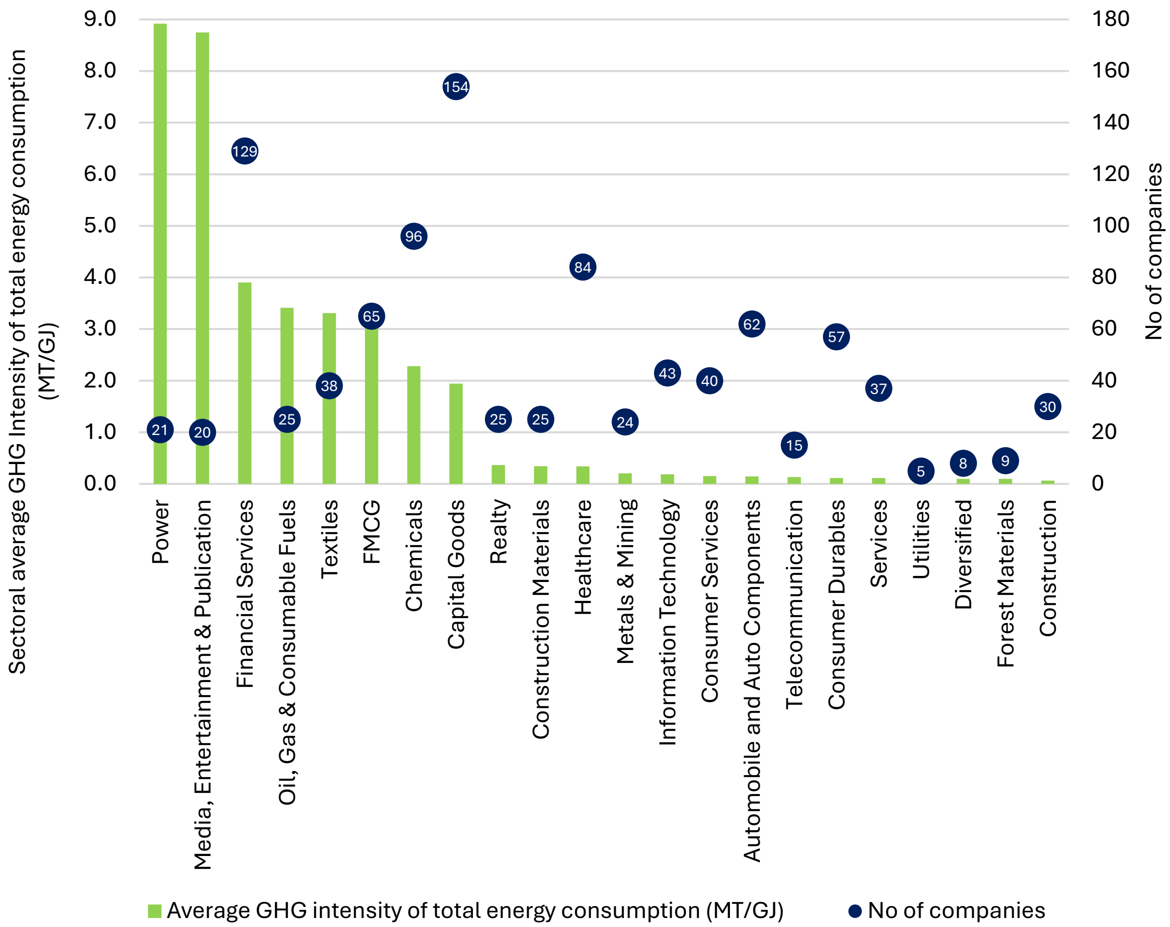
We performed a comprehensive ratio analysis to understand sector-specific trends related to emissions, resource use, and quantifiable workforce and management-related disclosures. The total number of ratios calculated was 10. We derived eight ratios from the environmental disclosures and two from social disclosures.

### Environmental ratios

### GHG intensity of total energy consumption (MT/GJ):

This ratio measures the amount of GHG emitted per unit of total energy consumption of a company.

*Figure 2.3 Sector-wise average GHG intensity of total energy consumption*



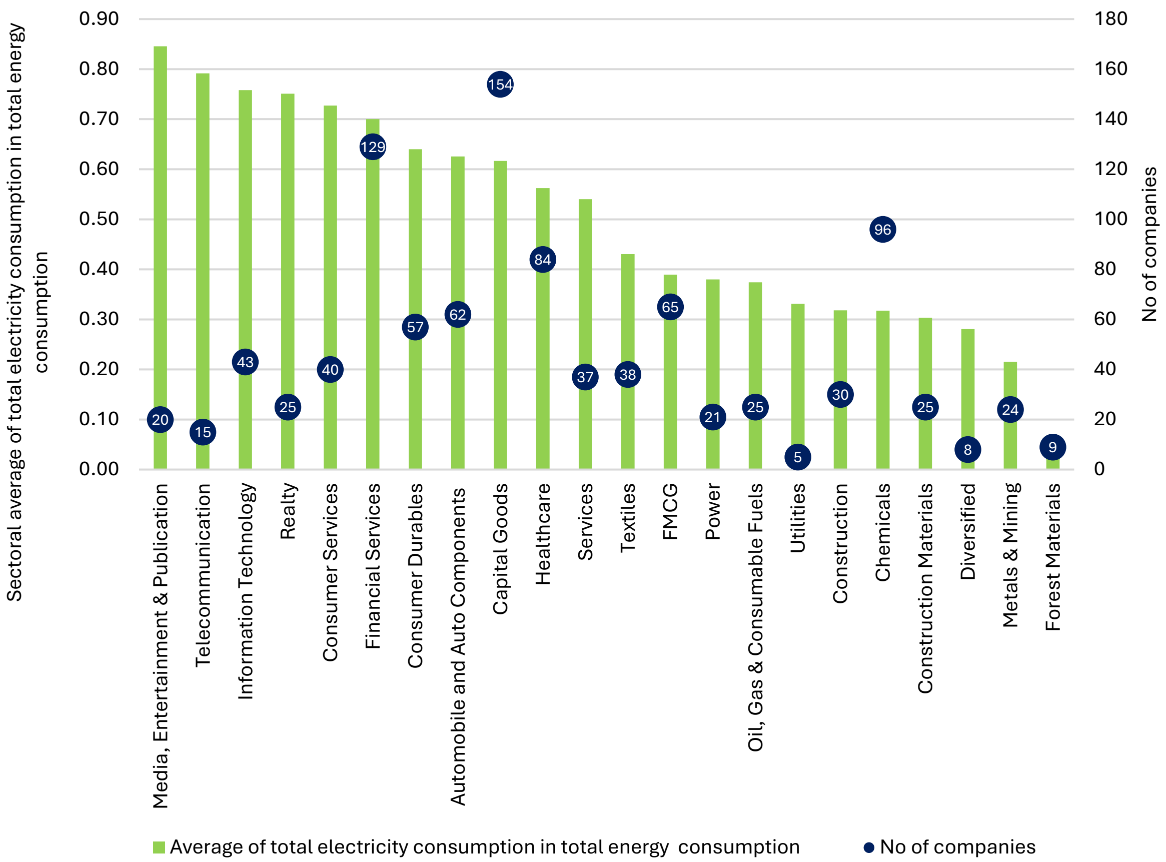

Sectoral average GHG per total energy consumption is in the range of 0.1 to 8.9 MT/GJ.

Figure 2.3 shows the sector-wise average of this ratio and the number of companies in a particular sector. The Power, Media, Entertainment & Publication, and Financial Services sectors have a higher average GHG intensity of total energy consumption. On the other hand, the Construction, Forest Materials, and Diversified sectors have lower average values. Sectors such as Power and Capital Goods are typically energy intensive, leading to higher GHG emissions per unit of energy consumed. Additionally, the Media, Entertainment & Publication and Financial Services sectors may have operational practices that may cause higher emissions. Sectors with higher average GHG intensity of the total energy consumption are encouraged to reduce their emissions and shift from conventional energy sources to cleaner ones. We identified three companies as outliers and excluded them from the calculation of this ratio: two from Automobile and Auto Components (sectoral range is 0.01–0.68 MT/GJ, outlier values are 0.1 and 232.7 MMT/GJ) and one from Financial Services (sector range is 0.01–224.9 MT/GJ and the outlier value is 0.2 MMT/GJ). These three companies seem to be reporting inaccurately on the indicators involved.

### Share of total electricity consumption in total energy consumption

This ratio measures the proportion of electricity consumption as a ratio relative to total energy consumption within a company.

*Figure 2.4 Sector-wise average share of total electricity consumption in total energy consumption*




The sectoral average of total electricity to total energy consumption is in the 3–85% range.

Figure 2.4 shows that this ratio is high for the Media, Entertainment & Publication, Telecommunication, Information Technology, and Realty sectors. This indicates that these sectors are highly dependent on electricity, likely due to the nature of their operations and energy requirements. However, sectors such as Forest Materials, Metals & Mining, Diversified, Construction

Materials, and Chemicals have lower averages of electricity consumption relative to their total energy consumption. They may be relying more on other forms of energy, such as fossil fuels or renewable sources.

### GHG emission intensity (scope 1 and scope 2) per turnover (MT/INR crores)

This ratio quantifies the total GHG emissions generated (scope 1 and scope 2 emissions) within a company relative to its turnover.

***Figure 2.5 Sector-wise average GHG emission intensity (scope 1 and scope 2) per turnover***

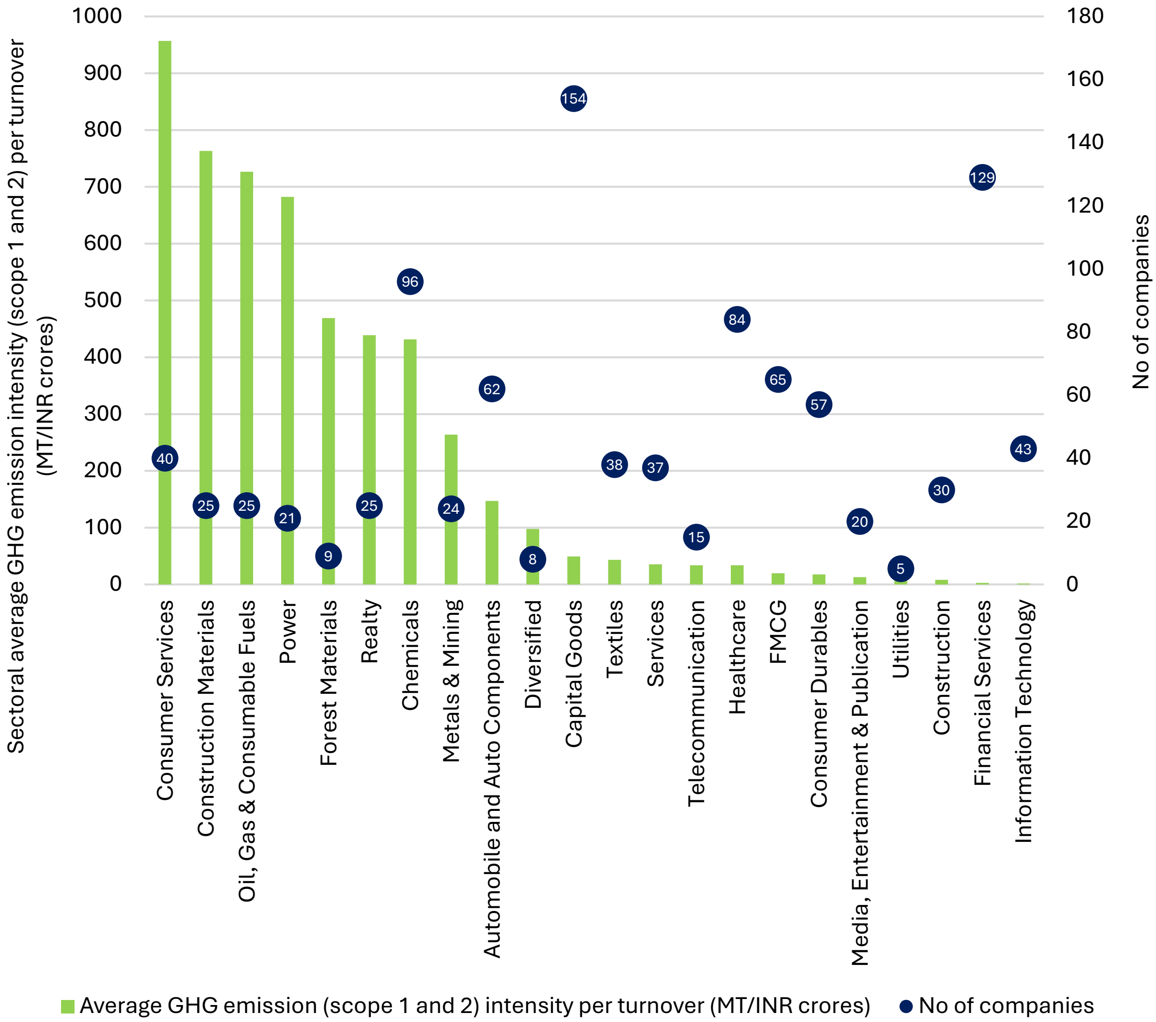



Figure 2.5 shows the sector-wise average emission intensity of a company's turnover (MT/INR crores). The Consumer Services, Construction Materials, Oil, Gas & Consumable Fuels, Power, and Realty sectors have higher average GHG emission intensity. This implies that these sectors have more GHG emissions relative to their revenue, highlighting the need for improved emission reduction strategies and more sustainable practices. However, the Financial Services, Information Technology, Construction, Utilities,

and Media, Entertainment & Publication sectors have lower average GHG emission intensity per turnover.

The sectoral average GHG emission (scope 1 and scope 2) intensity per turnover is in the range of 2–957 MT/INR crores.

We identified six companies as outliers, and two of them are from the Chemicals sector. The sectoral range for this ratio is 0.000–0.027 MMT/INR crores. However, the values of this ratio for two outlier companies are 0.059 and 0.058 MMT/INR crores. One company from the Media, Entertainment & Publication sector is an outlier, with 0.04 MMT/INR crores value for this ratio (the sectoral ratio is within the range of 0.3–85.4 MT/INR crores). For the Metals & Mining sector, this ratio falls within the range of 6.6–789.4 MT/INR crores. However, the outlier company's ratio stands at 0.04 MMT/INR crores. One company from the Utilities sector with a ratio of 9273.3 MT/INR crores emerged as an outlier, and the ratio for this sector is in the range of 0.1–26.9 MT/INR crores. The last outlier is from the Construction Materials sector, with a ratio of 0.01 MMT/INR crores. For this sector, this ratio falls within the range of 1.1 to 1610.6 MT/INR crores. This may be attributed to inaccurate reporting by these companies for specific indicators required for calculating this ratio.

### Total energy consumption per turnover (TJ/INR crores)

Turnover ratios are financial metrics that assess how effectively a company manages and uses its resources to generate revenue. This ratio quantifies the proportion of total energy consumption relative to a company's turnover.

*Figure 2.6 Sector-wise average total energy consumption per turnover*

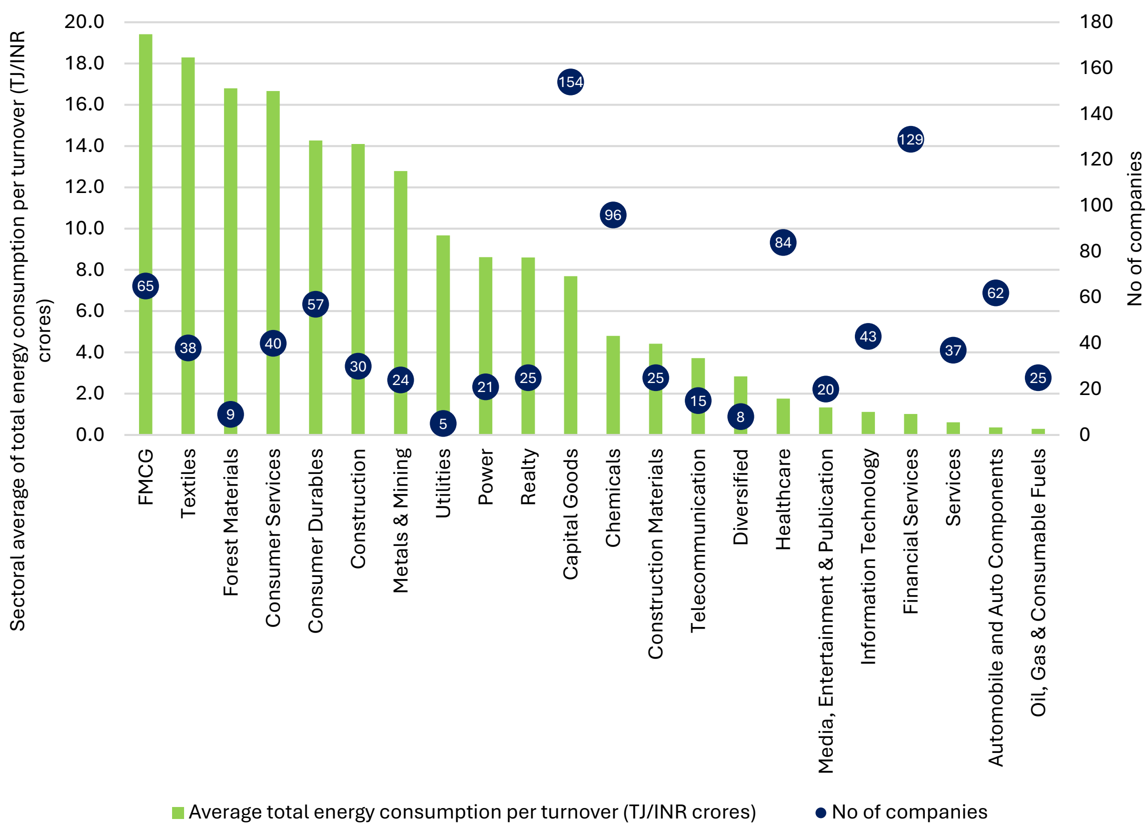


Figure 2.6 indicates that this ratio is relatively high for the FMCG, Textiles, Forest Materials, Consumer Services, Consumer Durables, Construction, and Metals & Mining sectors. This implies that companies from these sectors are encouraged to decrease their total energy consumption. In contrast, sectors such as Oil, Gas & Consumable Fuels, Automobile and Auto Components, Services, and Financial Services should aspire to continue to improve this ratio by further lowering their total energy consumption. This improvement can lead to better resource usage and reduced operational costs.

We identified 12 companies as outliers and excluded them from the calculation of this ratio: Chemicals (3), Construction Materials (2), and one each from the FMCG, Financial Services, Healthcare, Media, Entertainment & Publication, Information Technology, Metals & Mining, and Services sectors. The ratio for the Chemical sector is in the range of 0.0002–261.9 TJ/INR crores, and the ratios for three outliers are 306.6, 69665.7, and 38109.1 TJ/INR crores.

The sectoral average total energy consumption per turnover ratio falls within the range of 0.3–19.4 TJ/INR crores.

Two companies from the Construction Materials sector are outliers, with ratios of 471.9 and 7423.6 TJ/INR crores. The ratio for this sector falls within the range of 0.01–24.6 TJ/INR crores. For the FMCG sector, this ratio is in the range of 0.0–463.8 TJ/INR crores, and the outlier company's ratio is 8688.0 TJ/INR crores. For the Financial Services sector, the ratio is in the range of 0.0–40.7 TJ/INR crores; however, the outlier company's ratio is 6221.4 TJ/INR crores.

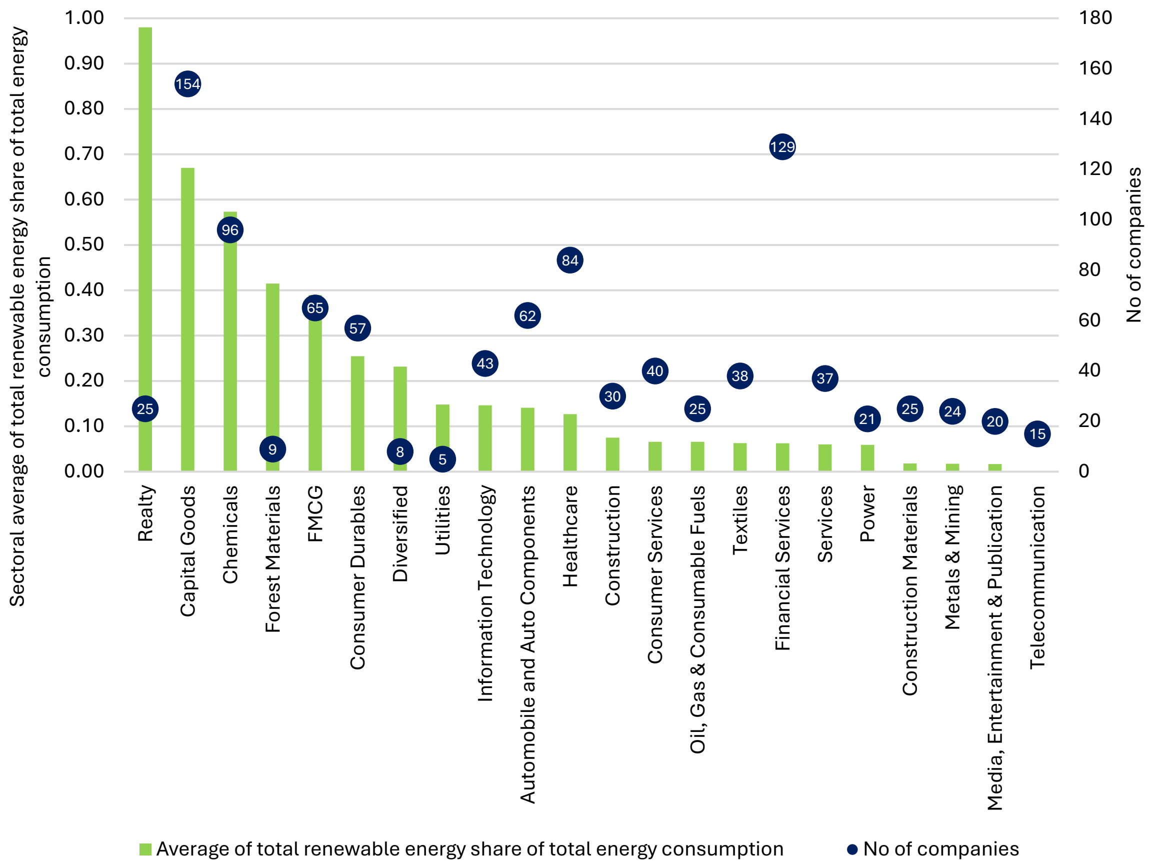
For the Healthcare sector, the ratio is in the range of 0.0–56.2 TJ/INR crores, and the outlier company's ratio is 1130.4 TJ/INR crores. For the Media, Entertainment & Publication sector, the ratio is between 0.0 and 23.2 TJ/INR crores; however, the outlier company's ratio is 7218.3 TJ/INR crores. For the Information Technology sector, the ratio is in the range of 0.0–16.8 TJ/INR crores, and the outlier company's ratio is 17942.9 TJ/INR crores. For the Metals & Mining sector, the ratio is between 0.0 and 236.9 TJ/INR crores; however, the outlier company's ratio is 532.0 TJ/INR crores.

For the Services sector, this ratio is 0.0–6.0 TJ/INR crores, and the outlier company's ratio is 2585.6 PT/INR crores. There seems to be inaccurate reporting by these companies for indicators used to arrive at the ratio.

### Total renewable energy share of total energy consumption

This ratio quantifies the proportion of renewable energy sources used relative to total energy consumption within a sector.

***Figure 2.7 Sector-wise average total renewable energy share of total energy consumption***



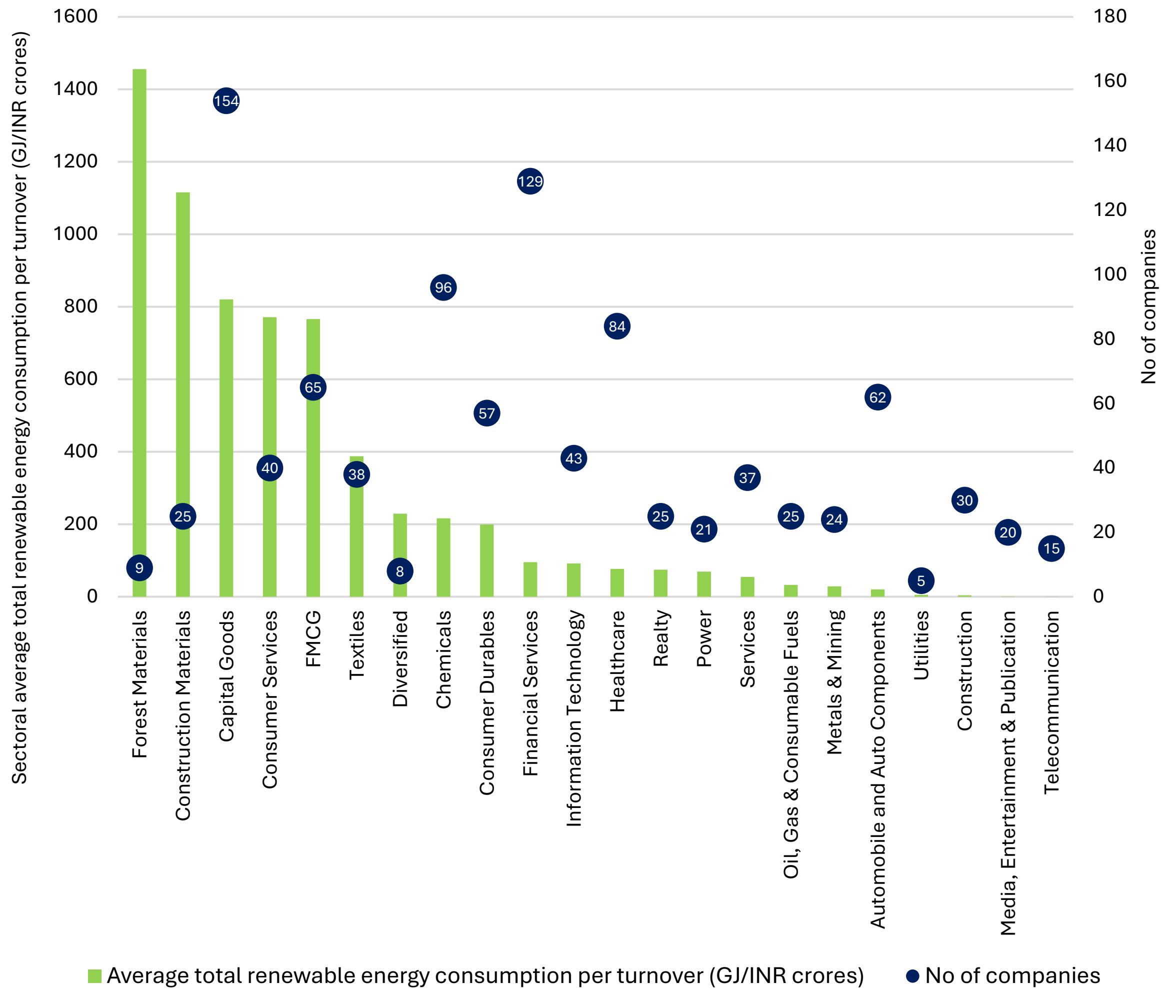

> The sectoral average of the total renewable energy share of total energy consumption ratio is in the 0–98% range.

Figure 2.7 shows that the Realty, Capital Goods, and Chemicals sectors have more than 50% of their energy consumption from renewable energy sources. However, sectors such as Telecommunication, Media, Entertainment & Publication, Metals & Mining, Construction Materials, Power, Services, and Textiles are encouraged to increase their proportion of renewable energy consumption. Overall, 19 of the 22 sectors have this ratio below 0.5%. This indicates that most sectors can significantly increase their renewable energy consumption. The Forest Materials, FMCG, Consumer Durables, Information Technology, Financial Services, Consumer Services, Services, Media, Entertainment & Publication, and Telecommunication sectors should strive to have renewable energy consumption above 50% to accomplish Paris Agreement-compliant targets. We identified three companies as outliers and excluded them from the calculation of this ratio: two from the Financial Services sector and one from the Healthcare. The ratio value is more than 300 for all three outliers. This ratio for the Financial Services sector falls within the 0–100% range and for the Healthcare in the range of 0–70%. This may be attributed to inaccurate reporting by these companies for specific indicators required to calculate this ratio.

### Total renewable energy consumption per turnover (GJ/INR crores)

This ratio quantifies the proportion of total renewable energy sources consumed relative to a company's turnover.

*Figure 2.8 Sector-wise average total renewable energy consumption per turnover*




The sectoral average total renewable energy consumption per turnover falls in a very wide range of 0 to 1456 GJ/INR crores.

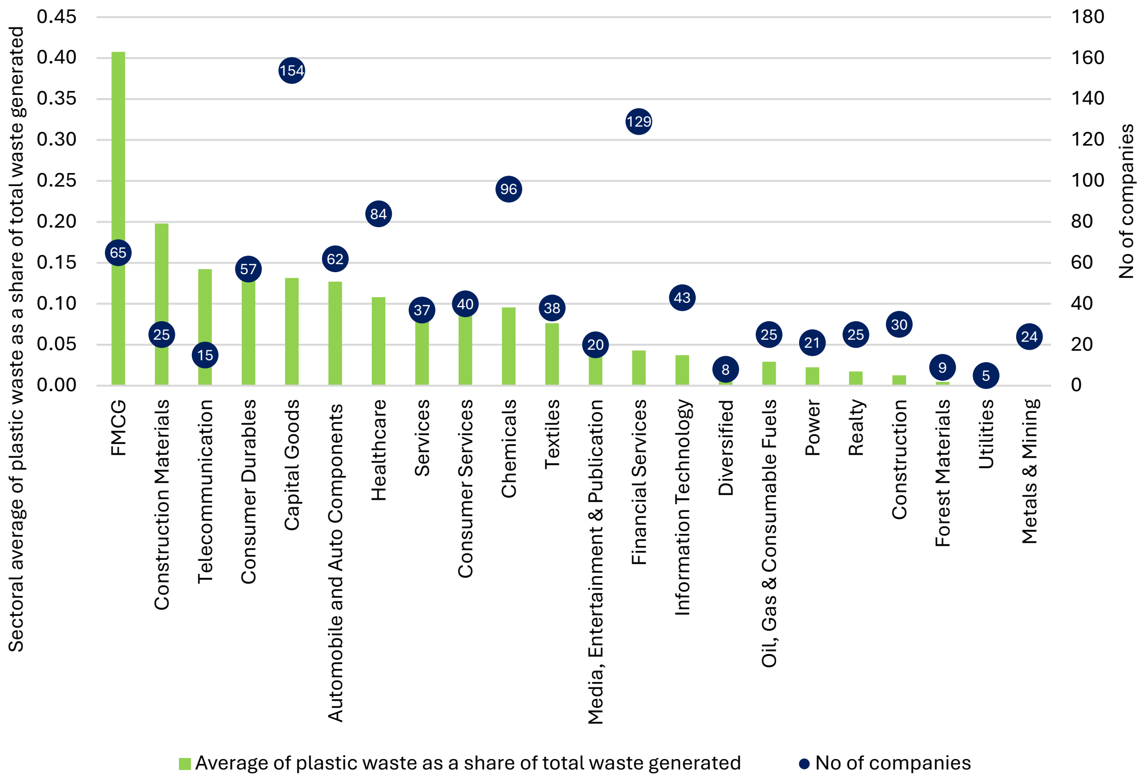
Figure 2.8 shows that this ratio is high for the Forest Materials, Construction Materials, Capital Goods, Consumer Services, and FMCG sectors. These sectors have a sizeable consumption of renewable energy relative to their revenue generation. However, sectors such as Telecommunication, Media, Entertainment & Publication, Construction, Utilities, and Automobile and Auto Components are motivated to increase their renewable energy consumption relative to their turnover. Increasing this ratio can lead to improved sustainability practices and reduced environmental impact. We identified four companies as outliers and excluded them from the calculation of this ratio. One company from the Healthcare sector is an outlier, with a ratio of 299.9 petajoule/INR crores. The ratio for this sector falls within the range of 0.2–4475 GJ/INR crores. Three out of four companies from the FMCG sector have been identified as outliers, and their ratios are higher than 13000 GJ/INR crores.

### Plastic waste as a share of total waste generated

The sectoral average of plastic waste as a share of total waste generated ranges from 0 to 41%.

This ratio quantifies the proportion of plastic waste relative to the total waste generated by each company within a sector. Figure 2.9 shows the results of this ratio. The analysis indicates that this ratio is the highest for the FMCG, Construction Materials, Telecommunication, Consumer Durables, Capital Goods, and Automobile and Auto Components sectors. This highlights the significant impact of plastic waste within these sectors and the need for targeted waste management and reduction strategies to mitigate environmental impact.

***Figure 2.9 Sector-wise average plastic waste as a share of total waste generated***




This higher level of plastic waste generation can be attributed to the nature of the materials and products involved in these sectors. For instance, the FMCG sector relies heavily on plastic for packaging, leading to significant plastic waste. The Government of India has introduced Plastic Waste Management (PWM) Rules, 2016 to address the issue of plastic waste; these rules were last amended in 2022. The EPR, introduced under this act, casts responsibility on the producers of plastic waste to mitigate its negative impacts on the environment throughout the product lifecycle (CPCB, 2024). In this cycle of BRSR reporting, 628 out of 1012 companies (62.1%) reported EPR-related essential indicators of principle 2. Despite the existing regulatory push, the results of the ratio and indicator-level reporting show that there is a lot of room for improvement in tracking and reporting the relevant indicators.

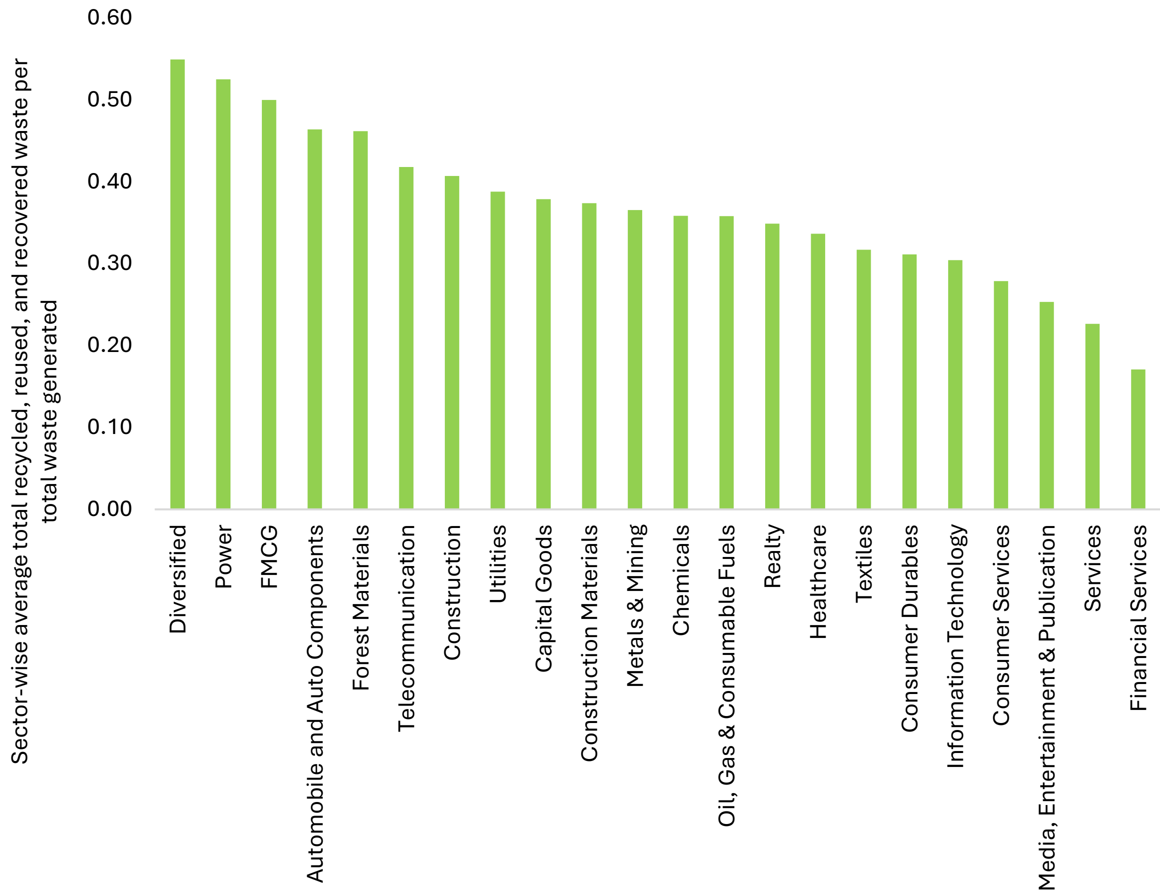
### Total recycled, reused, and recovered waste per total waste generated

Sectoral average total recycled, reused, and recovered waste per total waste generated falls in the 17–55% range.

This ratio quantifies the proportion of waste recycled, reused, or recovered relative to the total waste generated within a company.

Figure 2.10 shows the sector-wise results of this ratio. The Diversified, Power, and FMCG sectors are leaders in recycling, reusing, and recovering waste as a proportion of total waste. These sectors may have effective waste management practices, contributing to environmental sustainability and resource conservation.

***Figure 2.10 Sector-wise average total recycled, reused, and recovered waste per total waste generated***




However, sectors such as Financial Services, Services, Media, Entertainment & Publication, Consumer Services, and Information Technology are encouraged to enhance their waste management practices. These sectors should focus on improving the reduce, reuse, and recycle practices to align with sustainability goals and minimising their adverse environmental impacts.

*Figure 2.11 Sector-wise average total recycled, reused, and recovered waste per total waste generated for 49 companies (with more waste recovered than waste generated)*

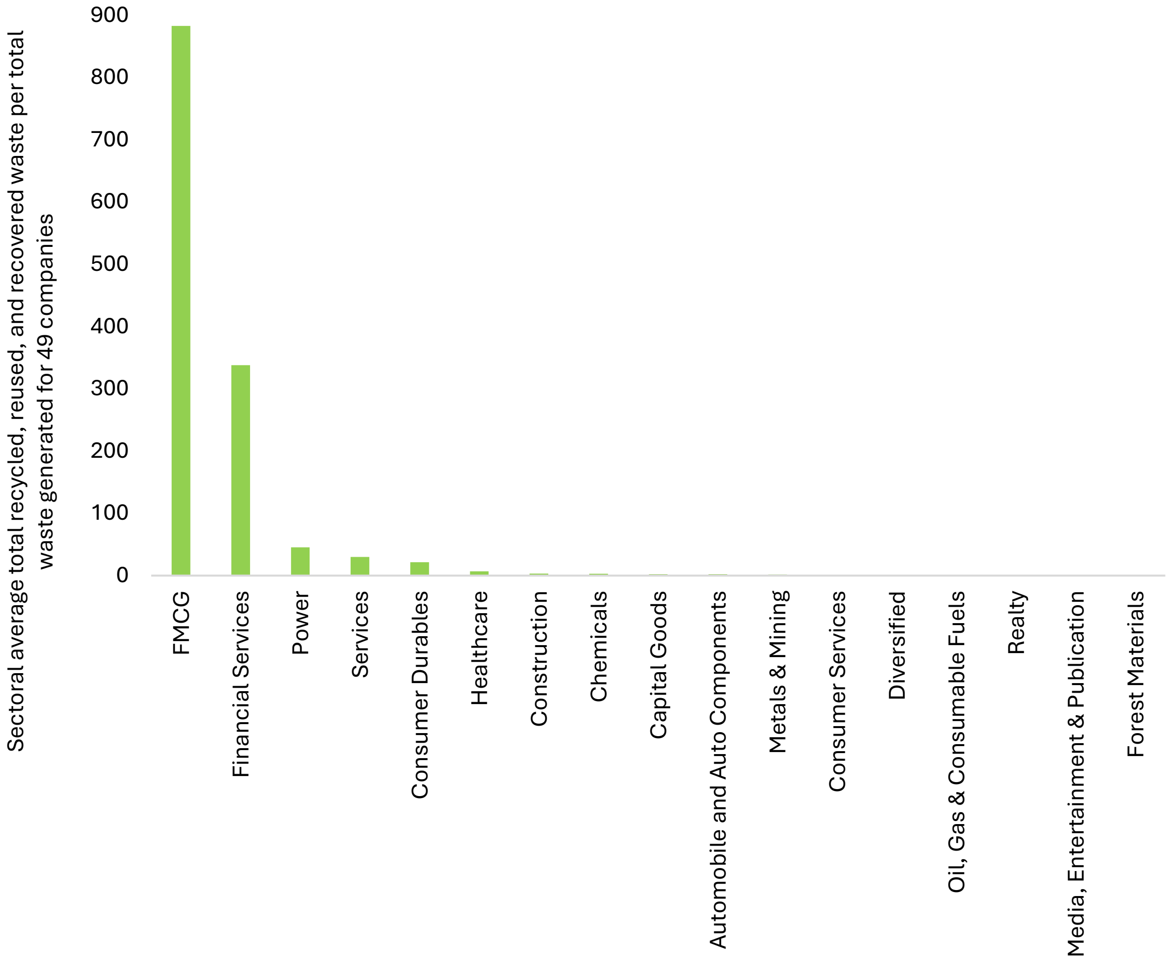


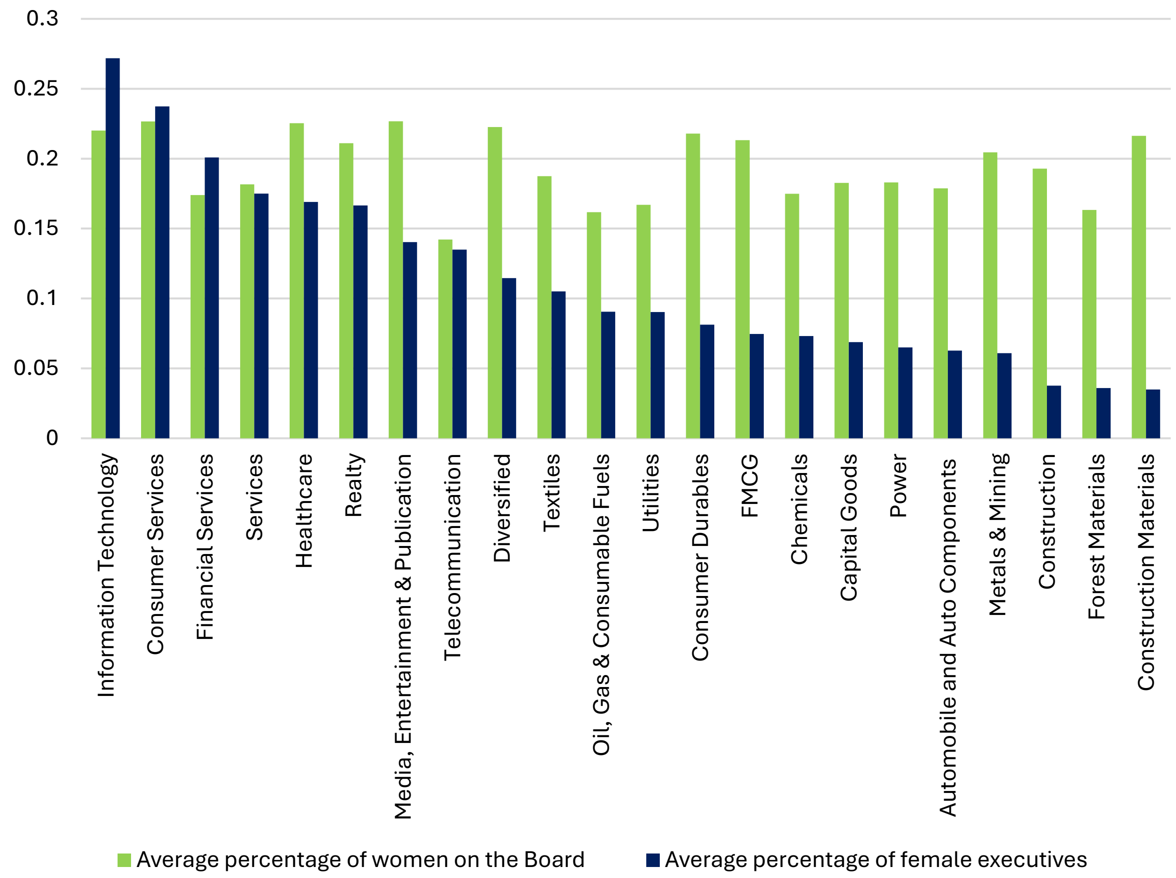

Figure 2.11 presents the results of the ratio analysis of 49 companies (out of 1012 companies) that had reported more waste recovered than generated. There seems to be an error in reporting or incomplete disclosures by these companies. The reasons for such anomalies have to be reported by each company, if relevant to it.

## Social Disclosures

### Percentage of women on the Board and percentage of female executives

The percentage of women on the Board represents the gender balance on a company's Board – the highest decision-making body. The percentage of female executives reflects the proportion of women holding executive positions within a company.

## *Figure 2.12 Sector-wise average percentage of women on the Board and female executives*




> The sector-wise percentage of women on the board falls within the 14–23% range.

As Figure 2.12 shows, the percentage of women on the board across most sectors falls within the 14–23% range. The Media, Entertainment & Publication, Consumer Services, Healthcare, Diversified, Information Technology, Consumer Durables, and Construction Materials sectors reported higher women representation (around 22–23%) on their Boards. However, sectors such as Telecommunication, Oil, Gas & Consumable Fuels, and Forest Materials should aspire to improve women's representation on their Boards. Higher female representation in these sectors can help improve diversity, drive innovation, and improve overall corporate governance (Hunt et al., 2015).

Furthermore, most sectors have less representation of women in executive positions, with the Information Technology sector having the highest proportion of women executives (27.2%). Manufacturing-focused sectors such as Construction Materials, Forest Materials, Construction, Power, Automobile and Auto Components, and Metals & Mining have relatively lower female executive representation, possibly due to the nature of these sectors. However, these sectors can make progress in this direction by encouraging and supporting more female participation through targeted recruitment, mentorship programmes, and policies that promote diversity and inclusion.

Such efforts can ultimately enhance innovation and performance within these sectors (Hunt et al., 2015).

The average percentage of female executives in businesses is 11.3%.

An interesting trend observed from the results is that the Consumer Services, Financial Services, and Information Technology sectors have a higher average percentage of females in executive roles than the average percentage of women on their Boards. This may be attributed to the nature of the business operations of these three sectors and may finally help break any glass ceiling for more females joining the Board.

### 2.5. Climate Commitments and Indian Businesses

Transitioning sustainably to a green and clean economy is critical for mitigating climate change's adverse impacts and promoting sustainable life on earth. Hence, as a part of its commitments towards the Paris Agreement, India is targeting to achieve net zero (NZ) emissions by 2070 (MEA GoI, 2021). The Government of India has also set eight Nationally Determined Contributions (NDCs) to be achieved by 2030 (MoEFCC, 2022a). These include reducing GHG emission intensity of its GDP by 45% by 2030 from 2005 level (see Figure 2.14), achieving about 50% cumulative electric power installed capacity from non-fossil fuel based energy resources by 2030 (solar, wind, all types of hydro, bioenergy, nuclear and other renewables) (see Figure 2.7, which captures renewable energy share of total energy consumption), and creating an additional carbon sink of 2.5 to 3 billion tonnes of $CO_2$ equivalent through additional forest and tree cover by 2030. There are also five more commitments that include international support through technology transfers and financial flows, and social and capacity-building aspects, including adherence to the LiFE mission (Lifestyle for Environment) (MoEFCC, 2022b). The government is steadily moving toward fulfilling these eight commitments, and businesses should play their role in implementing climate actions to achieve the goals set by the Government of India. In Europe, for instance, about 50% of the EU's GHG mitigation goals have been transferred to more than 12000 companies through the EU Emission Trading System (European Commission, 2024). Hence, here, we try to understand the extent to which Indian businesses are aligning with the national NZ goal. We have used both content analysis and ratio analysis techniques for this assessment.

179 out of 1012 companies (17.7%) have mentioned their goal of achieving carbon neutrality or NZ.

As shown in Figure 2.13, out of 1012 companies, 179 (17.7%) explicitly mentioned either NZ commitment or carbon neutrality and 119 (11.8%) companies explicitly reported the year by which they aim to achieve this goal. Out of 1012 companies, 26 (2.6%) plan to be NZ or carbon neutral by 2030, 33 (3.3%) aim for 2030–40, and 42 (4.2%) aim for 2040–50. Out of the remaining 78 companies, 18 aligned with India's commitment to achieving NZ by 2070, while the other 60 have not explicitly mentioned the commitment year.

*Figure 2.13 NZ- or carbon-neutrality-committed companies in the BRSR (2022–23)*

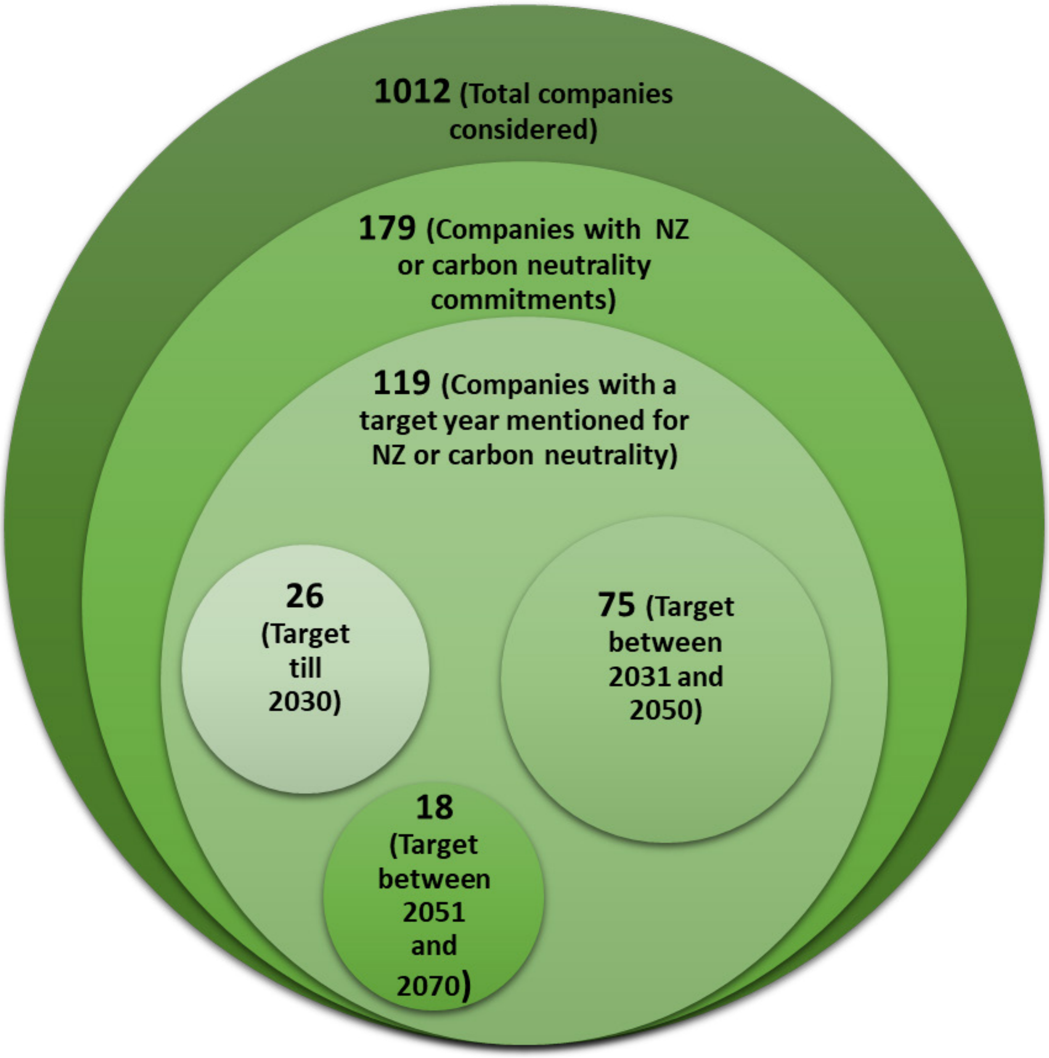



*Table 2.27 Sector-wise distribution of the companies that have set NZ or carbon neutrality goals in a specific year*

| Sector (no of companies) | No of companies that aim to be NZ till 2030 | No of companies that aim to be NZ between 2031 and 2050 | No of companies that aim to be NZ between 2051 and 2070 | No of companies that did not mention a year | Total no of companies that aim to be NZ or carbon neutral |
|---|---|---|---|---|---|
| Automobile and Auto Components (62) | 0 | 8 | 3 | 7 | 18 |
| Capital Goods (154) | 2 | 8 | 4 | 12 | 26 |
| Chemicals (96) | 1 | 4 | 1 | 3 | 9 |
| Construction (30) | 0 | 2 | 0 | 2 | 4 |
| Construction Materials (25) | 0 | 3 | 1 | 6 | 10 |
| Consumer Durables (57) | 1 | 3 | 0 | 4 | 8 |
| Consumer Services (40) | 0 | 1 | 0 | 2 | 3 |

| Sector (no of companies) | No of companies that aim to be NZ till 2030 | No of companies that aim to be NZ between 2031 and 2050 | No of companies that aim to be NZ between 2051 and 2070 | No of companies that did not mention a year | Total no of companies that aim to be NZ or carbon neutral |
|---|---|---|---|---|---|
| Diversified (8) | 0 | 1 | 0 | 0 | 1 |
| FMCG (65) | 4 | 4 | 0 | 3 | 11 |
| Financial Services (129) | 2 | 1 | 5 | 1 | 9 |
| Forest Materials (9) | 0 | 0 | 0 | 0 | 0 |
| Healthcare (84) | 4 | 6 | 0 | 3 | 13 |
| Information Technology (43) | 7 | 8 | 0 | 5 | 20 |
| Media, Entertainment & Publication (20) | 0 | 0 | 1 | 0 | 1 |
| Metals & Mining (24) | 1 | 6 | 0 | 1 | 8 |
| Oil, Gas & Consumable Fuels (25) | 0 | 7 | 0 | 4 | 11 |
| Power (21) | 0 | 3 | 2 | 0 | 5 |
| Realty (25) | 1 | 2 | 0 | 0 | 3 |
| Services (37) | 1 | 3 | 0 | 3 | 7 |
| Telecommunication (15) | 0 | 2 | 1 | 2 | 5 |
| Textiles (38) | 1 | 3 | 0 | 2 | 6 |
| Utilities (5) | 1 | 0 | 0 | 0 | 1 |
| Grand Total (1012) | 26 | 75 | 18 | 60 | 179 |

Table 2.27 shows the sector-wise distribution of the companies that have set NZ goals and their target years. The commitments vary across different sectors, with some sectors setting more aggressive targets than others. The Information Technology, Capital Goods, Automobile and Auto Components, and Healthcare sectors show robust engagement.

Varied emission profiles across different sectors require tailored emission reduction strategies.

Companies are employing various strategies to achieve NZ, including carbon-neutrality pledges, SBTi commitments, internalising carbon pricing by fixing up a default carbon price for themselves, and specific carbon reduction milestones. For example, companies in the Construction Materials sector are deploying different strategies such as emission reductions through energy efficiency, adopting clean energy, and offsetting any unavoidable emissions. This may serve as a model for organisations aiming to achieve carbon neutrality or NZ.

NZ or carbon neutrality commitments require companies to understand their GHG emissions in terms of their sources, patterns, and quantum. Table 2.28 shows sector-wise numbers of companies that have reported scope 1, 2, and 3 emissions.

The variability in emissions is quite pronounced across different sectors. The Construction Materials sector has substantial variations in scope 1 and 2 emissions, with maximum values reaching 62.5 MMT for scope 1 and 1.7 MMT for scope 2. This indicates significant direct and indirect emissions, likely due to heavy manufacturing processes and extensive electricity use. The Metals & Mining sector has high maximum values for scope 1 emissions at 75.8 MMT and scope 3 emissions at 17.9 MMT, reflecting the sector's intensive energy and material use along with significant supply chain emissions. Similarly, the Oil, Gas & Consumable Fuels sector reported high emission values across all scopes, with scope 3 emissions peaking at 277 MMT, underscoring the extensive downstream impacts of this sector. These variations highlight the diverse emission profiles and environmental challenges different sectors face. Even diverse sectors such as the Construction and Automobile and Auto Components have reported substantial emissions across all scopes, reflecting the energy-intensive nature of material production and vehicle manufacturing. These insights underscore the varied emission profiles across different sectors and the need for tailored emission reduction strategies.

A noteworthy contrast is visible in scope 1 and 2 (~75%) and scope 3 (18.1%) GHG emissions.

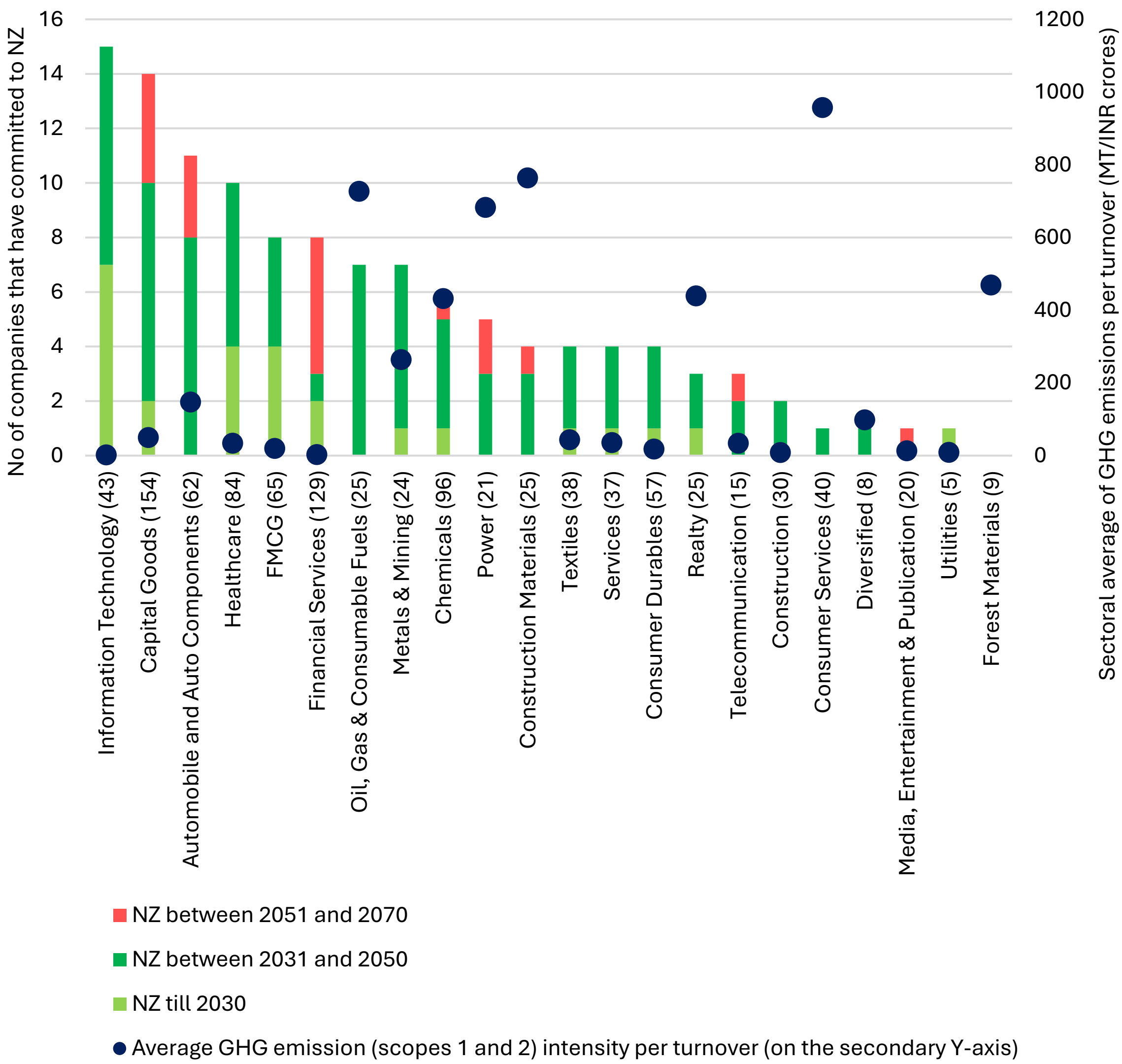
***Table 2.28 Sector-wise number of companies that have reported scope 1, 2, and 3 emissions***

| Sector (no of companies) | Scope 1 reporting level (in no of companies) | Scope 2 reporting level (in no of companies) | Scope 3 reporting level (in no of companies) |
|---|---|---|---|
| Automobile and Auto Components (62) | 57 | 56 | 10 |
| Capital Goods (154) | 123 | 119 | 21 |
| Chemicals (96) | 79 | 76 | 18 |
| Construction (30) | 21 | 21 | 1 |
| Construction Materials (25) | 23 | 23 | 9 |
| Consumer Durables (57) | 43 | 43 | 7 |
| Consumer Services (40) | 31 | 31 | 5 |
| Diversified (8) | 6 | 7 | 3 |
| FMCG (65) | 49 | 43 | 5 |
| Financial Services (129) | 66 | 76 | 27 |
| Forest Materials (9) | 9 | 9 | 2 |
| Healthcare (84) | 67 | 65 | 17 |
| Information Technology (43) | 31 | 32 | 13 |
| Media, Entertainment & Publication (20) | 14 | 16 | 0 |
| Metals & Mining (24) | 20 | 20 | 7 |
| Oil, Gas & Consumable Fuels (25) | 23 | 22 | 10 |
| Power (21) | 16 | 14 | 6 |
| Realty (25) | 19 | 18 | 4 |
| Services (37) | 25 | 28 | 11 |

| Sector (no of companies) | Scope 1 reporting level (in no of companies) | Scope 2 reporting level (in no of companies) | Scope 3 reporting level (in no of companies) |
|---|---|---|---|
| Telecommunication (15) | 11 | 13 | 2 |
| Textiles (38) | 27 | 26 | 3 |
| Utilities (5) | 5 | 5 | 2 |
| Grand total (1012) | 765 | 763 | 183 |

Figure 2.14 highlights varying GHG emissions and NZ targets across sectors. The Consumer Services, Construction Materials, and Oil, Gas & Consumable Fuels sectors have the highest GHG emissions per turnover; however, the number of companies from these sectors that have committed to achieving NZ is relatively low, i.e., one from the Consumer Services sector, four from the Construction Materials sector, and seven from the Oil, Gas & Consumable Fuels sector.

*Figure 2.14 Sector-wise average GHG emissions per turnover and number of companies committed to NZ*



Some sectors have higher GHG emissions per turnover; however, the number of companies committed to achieving NZ in these sectors is relatively lower.

The sectors with a relatively lower number of companies making a NZ commitment, such as Power, Oil, Gas & Consumable Fuels, and Utilities, are GHG intensive and hence "hard-to-take-actions-to-abate" in some aspects compared to the sectors that are more service oriented. The Power sector companies (21) that have reported BRSR in this round emit around 14.6% of the total national emissions (total emissions by these companies = 3132 MMT) (Niti Aayog, 2024). Similarly, Oil, Gas & Consumable Fuels sector companies (25) have emitted around 20.8%, and Utilities sector companies (5) have 0.2% of the total national emissions. For the businesses in these GHG-intensive sectors, the need to transition to and align with the national commitments on NDC and NZ is higher so as to mitigate some of the risks they face in the light of the changing climate. Companies in these sectors are, therefore, encouraged to take greater responsibility for achieving NZ emissions, and more companies should have climate commitments. However, implementing these commitments is subject to the availability of technology and the finance to support such transitions, which international financial institutions and developed countries should be willing to provide so as to facilitate cleaner transitions for Indian businesses. Financial support from developed nations would have to play a pivotal role in ensuring the successful implementation of NDC and NZ commitments.

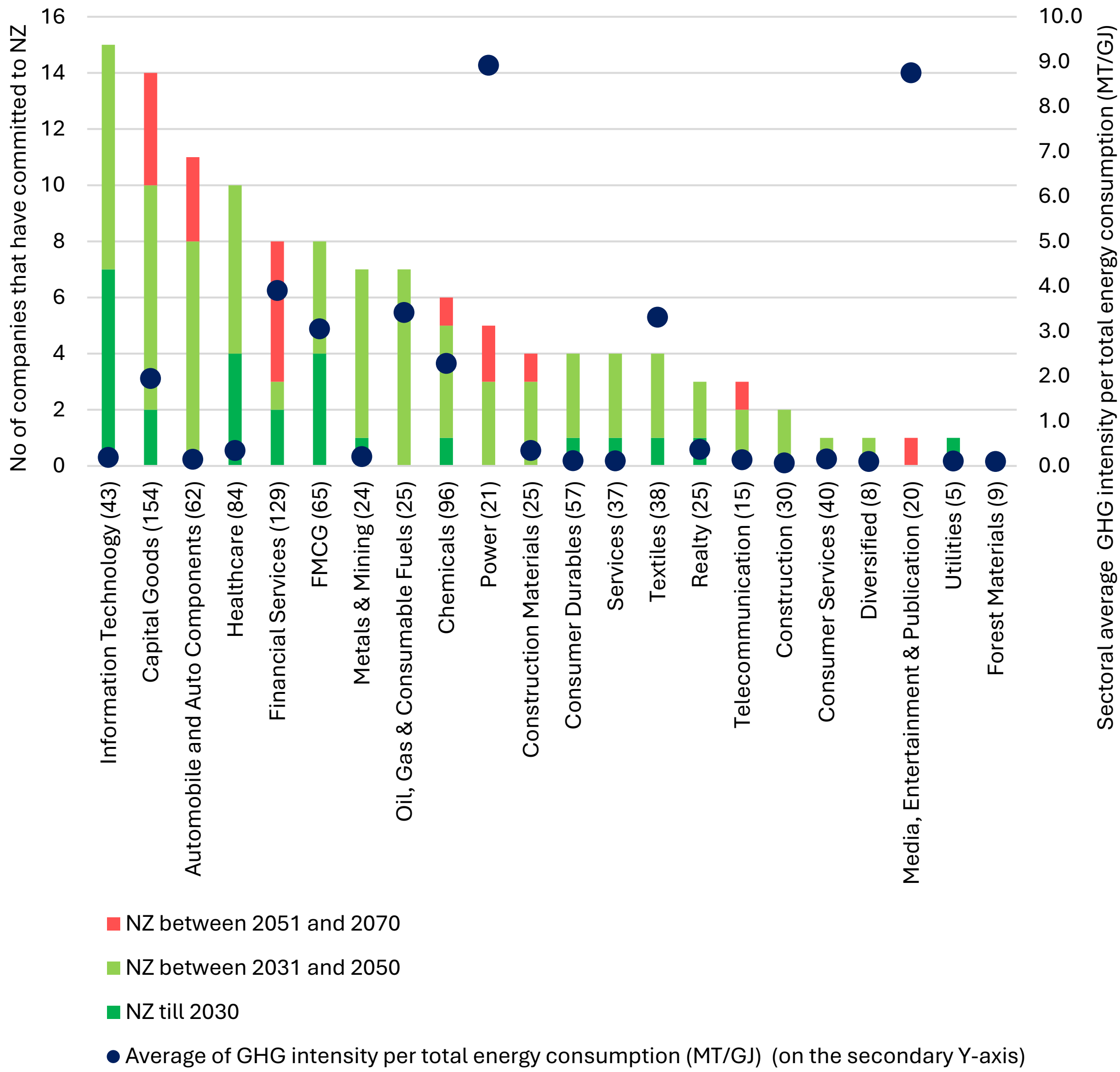
The Power sector shows the highest GHG intensity; however, just three out of 21 companies are aiming to achieve NZ by 2050.

The Metals & Mining and Automobile and Auto Components sectors have moderately high GHG emissions per turnover. However, a greater number of companies from these sectors have commitments to NZ targets, indicating a proactive approach of these sectors. The Metal and Mining sector is also expected to go through a transition due to changing demand patterns for minerals critical to low-carbon technologies (Garg et al., 2024). As the economy transits away from fossil fuels and GHG emissions are reduced, the demand for clean technologies such as solar, wind, and nuclear will increase, leading to a shift in demand from fossil fuels to critical metals and minerals used in clean technologies, impacting the businesses involved in the mining sector. The other sector that needs to be mentioned is the Forest Materials. The average GHG emission per turnover for the sector stands at 469 MT/INR crores, which is higher than that of the Metals and Mining sector, but there are no firms from this sector that have set NZ or carbon neutrality goals. However, the Forest Materials sector has a crucial role to play in enhancing the GHG removals and supporting in achieving India's NZ commitments.

The Healthcare and FMCG sectors have moderate emissions and substantial NZ goals. Meanwhile, the Financial Services and Information Technology sectors, with the lowest emissions, have adopted proactive NZ targets. This could mainly be due to the nature of businesses where scope 2 emissions are higher; hence, for these businesses, it may be comparatively "low-hanging fruit" and easier to reduce their GHG intensity.  Overall, sectors show a wide range of GHG intensities and have set targets to achieve NZ emissions or carbon neutrality by different timelines.

Figure 2.15 represents an analysis of various sectors according to their average GHG intensity relative to their total energy consumption, as well as their targets for achieving NZ emissions across three different timeframes: by 2030, between 2031 and 2050, and between 2051 and 2070. The Power sector shows the highest GHG intensity at 8.9 MT/GJ, with just three out of 21 companies aiming to achieve NZ emissions by 2050.

***Figure 2.15 Sector-wise average GHG intensity per total energy consumption and number of companies committed to NZ***




The Media, Entertainment & Publication sector has a GHG intensity of 8.7 MT/GJ, with only one company out of 20 targeting NZ by 2050. The Oil, Gas & Consumable Fuels sector has a GHG intensity of 3.4 MT/GJ, with 7 companies out of 25 targeting NZ by 2050. The Information Technology sector has a lower GHG intensity of 0.2 MT/GJ, and as many as 15 companies out of 43 are aiming for NZ. Out of these 15 companies, 7 have committed to becoming NZ by 2030 and 8 between 2031 and 2050.

### Renewables

502 companies explicitly mentioned using, investing in, or proactively promoting solar energy.

Sourcing energy from non-fossil fuels is a common practice for reducing emissions and aligns with one of India's main NDCs, as mentioned earlier. Recently, Google signed a deal to buy 500 MW of nuclear power from Kairos Power to meet their zero-emission target by 2030 (Segal, 2024). Indian companies should be no exception to this strategy. Analysis of the subjective (text) responses from companies provides significant insights into adopting renewable energy sources across various sectors. As shown in Figure 2.16, 502 companies explicitly mentioned using, investing in, or proactively promoting solar energy. For wind and hydro power, the numbers were lower, with 195 companies mentioning wind and just 17 mentioning hydro. This variability in the adoption of different energy sources is highly dependent on factors such as price, location, topography, and project feasibility.

*Figure 2.16 Renewable energy (solar, wind and hydro)-wise reporting by companies*

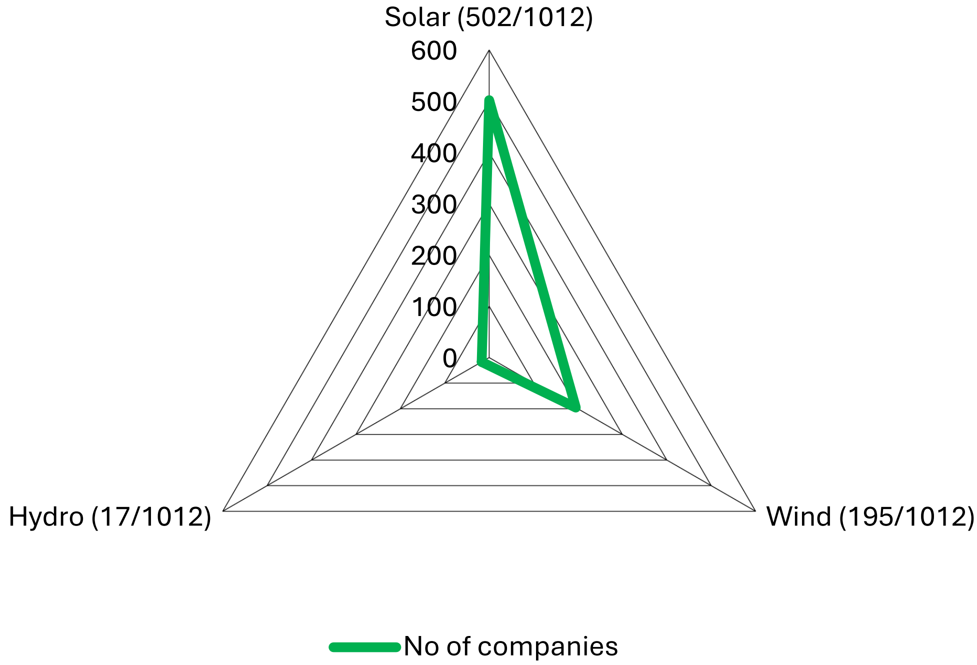
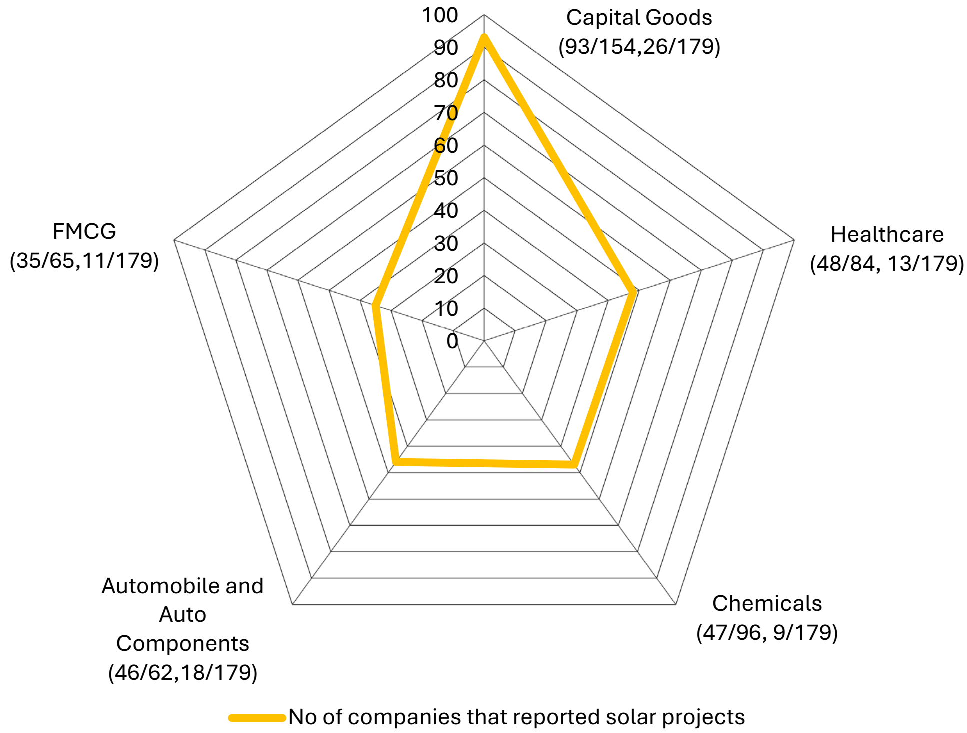



Figure 2.17 (the X-axis shows the number of companies) shows the top five sectors that reported solar, wind, and hydro energy usage. It highlights how these sectors are proactively opting for emission reductions by adopting, investing in, and promoting solar, wind, and hydro energy. The magnitude of reporting is shown by the distance from the centre of the radar chart, where the Capital Goods sector has the highest reporting in solar and wind, i.e., 93 and 37, respectively, while the Power Sector has the highest reporting in hydro.

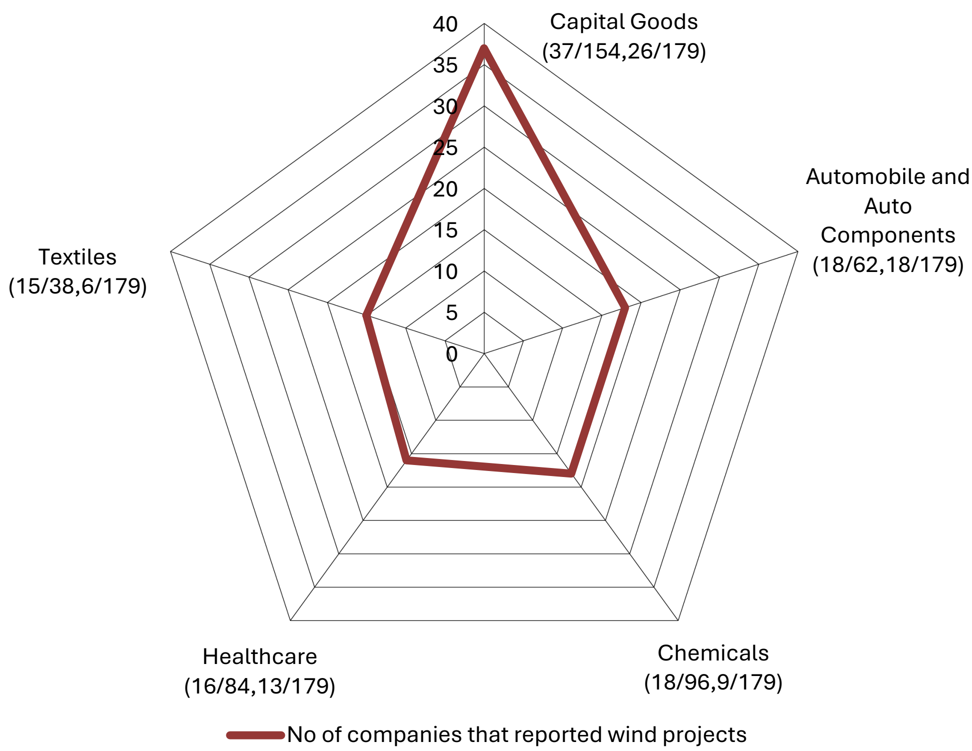
## Figure 2.17 Sector-wise solar, wind, and hydro energy reporting

### 2.17(A) Top five sectors that reported solar energy



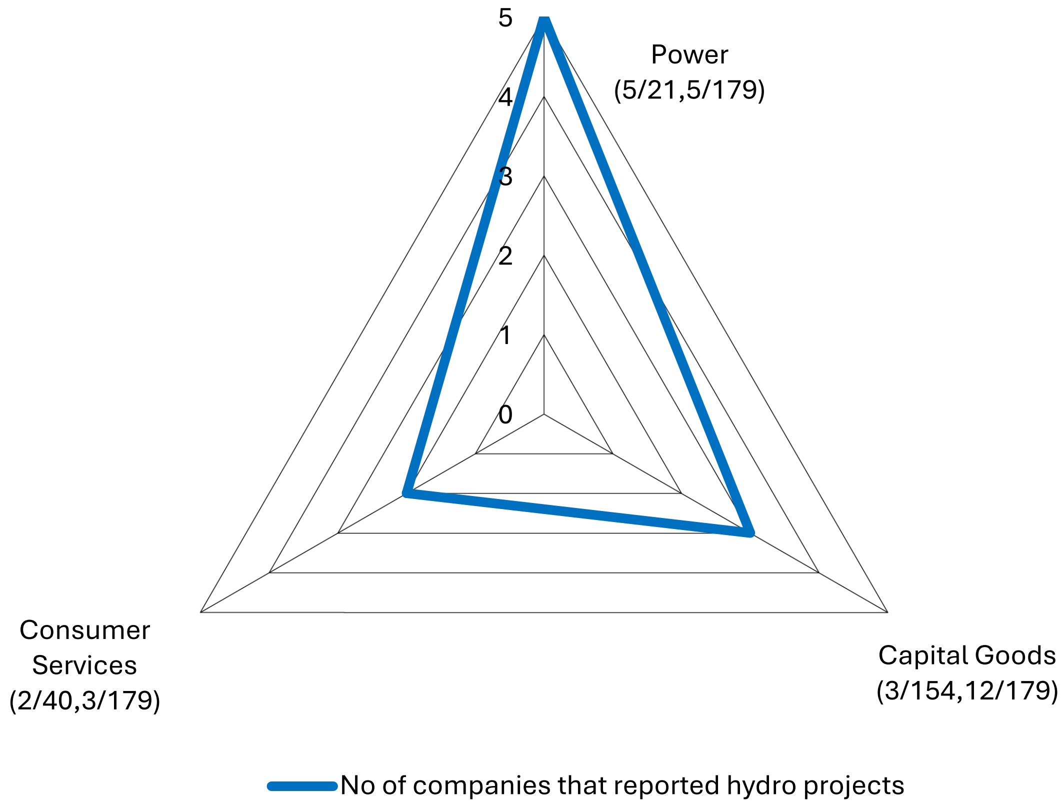

***Note:*** Numbers in the bracket show the number of companies that reported solar energy out of the total number of companies in the sector

### 2.17(B) Top five sectors that reported wind energy




**Note:** Numbers in the bracket show the sector-wise number of companies that reported wind energy out of the total number of companies in the sector

## *2.17(C) Top three sectors that reported hydro energy*



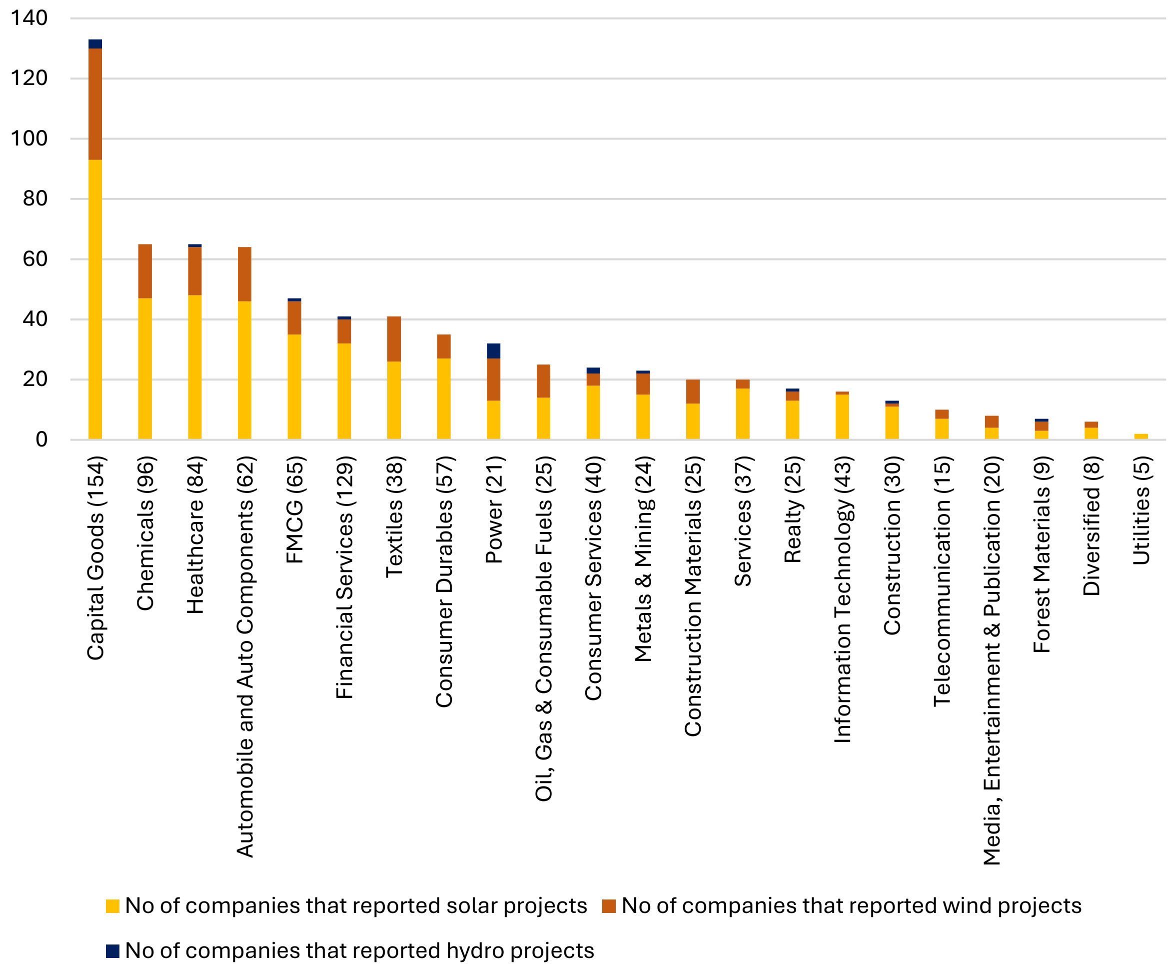

**Note:** Numbers in the bracket show the sector-wise number of companies that reported hydro energy out of the total number of companies in the sector

Our analysis indicates a clear preference for solar energy across most sectors.

Overall, Figures 2.17 and 2.18 indicate a clear preference for solar energy across most sectors, with solar reporting figures generally higher than those for wind and hydro. Figure 2.17(A) shows that the top five sectors reporting solar energy are Capital Goods, Healthcare, and Chemicals, Automobile and Auto Components, and FMCG. This trend highlights the accessibility and feasibility of solar installations in these sectors. Comparing Figures 2.17 (A) and 2.18 reveals that solar energy adoption is very prominent in the above sectors. However, other sectors should strive to increase their solar energy adoption.

Wind energy, while also significant, is reported less frequently, i.e., with only 195 mentions. The results from Figures 2.17(B) and 2.18 show notable adoption of wind energy in key sectors such as Capital Goods, Chemicals, and Healthcare. As shown in Figure 2.17(C), despite its lower reporting figures of 17, hydro energy remains an important renewable source for specific sectors such as Power and Capital Goods. This analysis highlights the varied adoption rates of renewable energy sources across different sectors, reflecting both the unique energy needs and strategic choices made by each sector.

**Figure 2.18 Sectoral distribution of the number of companies reporting solar, wind, and hydro projects by companies committed to NZ**




241 out of 502 companies have mentioned using solar energy, and their renewable energy consumption has increased over the last two years.

Additionally, out of 502 companies, data reported about renewable energy (in principle 6) reveals that 241 have increased their renewable consumption and provided proactive statements specifically regarding solar energy, indicating a strong commitment to this renewable source. Similarly, 90 out of 195 companies made such commitments for wind energy and 8 out of 17 companies for hydro energy, indicating these companies have shown their preference for renewable energy consumption. The higher inclusion of renewable energy while disclosing different indicators means a growing commitment to sustainability and a transition towards cleaner energy solutions.

Table 2.29 shows that 90 companies with NZ commitments have increased their renewable energy consumption. The Capital Goods, Automobile and Auto Components, and Information Technology sectors are taking steps to reduce their emissions by increasing renewable energy consumption. However, the renewable energy consumption of the remaining 84 companies has either not increased or may have reduced. Also, among the 179 companies from 21 sectors that have committed to

NZ, 5 (4 from Construction and 1 from Media, Entertainment & Publication) did not report any increase in renewable energy consumption. This lack of increase may be related to the unique energy demands of the sector, where energy requirements are often unpredictable and can vary significantly depending on the project phase. Such energy needs make it challenging for these sectors to rely more heavily on renewable energy sources.

*Table 2.29 Increasing renewable energy consumption and NZ pledges*

| Sector (no of companies) | Increasing renewable energy consumption and NZ pledges: A year-on-year analysis | | | | | Total number of companies that have NZ or carbon neutrality goals | Average GHG emissions per turnover (MT/INR crores) |
|---|---|---|---|---|---|---|---|
| | Till 2030 (A) | 2031 and 50 (B) | 2051 and 70 (C) | Year not mentioned (D) | Total (A + B + C + D) | | |
| Consumer Services (40) | 0 | 1 | 0 | 0 | 1 | 3 | 956.9 |
| Construction Materials (25) | 0 | 2 | 0 | 3 | 5 | 10 | 763.4 |
| Oil, Gas & Consumable Fuels (25) | 0 | 6 | 0 | 2 | 8 | 11 | 726.7 |
| Power (21) | 0 | 0 | 1 | 0 | 1 | 5 | 682.4 |
| Realty (25) | 1 | 2 | 0 | 0 | 3 | 3 | 438.9 |
| Chemicals (96) | 0 | 2 | 0 | 1 | 3 | 9 | 431.5 |
| Metals & Mining (24) | 1 | 3 | 0 | 1 | 5 | 8 | 263.8 |
| Automobile and Auto Components (62) | 0 | 6 | 1 | 6 | 13 | 18 | 147.0 |
| Diversified (8) | 0 | 1 | 0 | 0 | 1 | 1 | 97.8 |
| Capital Goods (154) | 1 | 5 | 1 | 7 | 14 | 26 | 49.2 |
| Textiles (38) | 0 | 2 | 0 | 0 | 2 | 6 | 43.4 |
| Services (37) | 1 | 1 | 0 | 0 | 2 | 7 | 35.4 |
| Telecommunication (15) | 0 | 1 | 0 | 1 | 2 | 5 | 33.8 |
| Healthcare (84) | 2 | 2 | 0 | 1 | 5 | 13 | 33.8 |
| FMCG (65) | 2 | 3 | 0 | 1 | 6 | 11 | 19.7 |
| Consumer Durables (57) | 0 | 1 | 0 | 3 | 4 | 8 | 17.6 |
| Utilities (5) | 1 | 0 | 0 | 0 | 1 | 1 | 8.7 |
| Financial Services (129) | 1 | 1 | 1 | 1 | 4 | 9 | 2.7 |
| Information Technology (43) | 3 | 3 | 0 | 4 | 10 | 20 | 1.6 |
| Total | 13 | 42 | 4 | 31 | 90 | 174 | - |

Moreover, Table 2.29 shows that fewer companies from the sectors with high "average GHG emissions per turnover" ratio, i.e., Consumer Services, Construction Materials, Oil, Gas & Consumable Fuels, and Power, have increased their renewable

90 companies out of 179 with NZ commitments have increased their renewable energy consumption.

energy consumption. This implies that companies from these sectors have committed to NZ; however, this is not reflected in their renewable energy consumption – one of the most common methods for reducing emissions. On the other hand, half of the companies from the sector with a lower "average GHG emissions per turnover" ratio, i.e., Information Technology and Consumer Durables, have noted an increase in their renewable energy consumption. Noteworthily, these sectors have a higher number of companies that mentioned achieving NZ. Out of the 179 companies that have explicitly mentioned achieving NZ emissions, the frontrunner companies that have increased their renewable energy consumption in absolute terms are listed in Table 2.30.

***Table 2.30 Companies with NZ commitment and their renewable energy consumption increase (arranged as per share of renewable energy in total energy consumption)***

| Sr no | Leading company from a specific sector | RE consumption increase in absolute terms (GJ) | Share of renewable energy in total energy consumption (in %) |
|---|---|---|---|
| 1 | A leading company from the FMCG sector | 1,52,881 | 93.7 |
| 2 | A leading company from the FMCG sector | 1,82,329 | 86.8 |
| 3 | A leading company from the FMCG sector | 4,23,000 | 82.0 |
| 4 | A leading company from the Information Technology sector | 1,68,320 | 58.3 |
| 5 | A leading company from the Information Technology sector | 42,03,98,856 | 55.2 |
| 6 | A leading company from the Information Technology sector | 93,525 | 47.9 |
| 7 | A leading company from the Automobile and Auto Components sector | 1,75,550 | 36.0 |
| 8 | A leading company from the Services sector | 1,60,798 | 34.0 |
| 9 | A leading company from the FMCG sector | 1,12,55,460 | 31.6 |
| 10 | A leading company from the Healthcare sector | 6,15,092 | 28.5 |
| 11 | A leading company from the Metals & Mining sector | 5,43,183 | 13.1 |
| 12 | A leading company from the Automobile and Auto Components sector | 1,69,932 | 11.8 |

Top-performing companies could provide encouragement for those wanting to increase renewable energy adoption. As India is committed to NDC by 2030 and NZ emissions by 2070, renewables (non-fossil fuel energy) are the key resources for sustainable energy transition.

# 3

# Observed Limitations and Way Forward

3

# Observed Limitations and Way Forward

There should be consistency in terms of the units used for disclosing indicators.

## 3.1 Observed Limitations[23]

1. Data-assimilation-related challenges
2. The BRSR format defines how businesses should report information, which can be presented as a percentage or in table form, depending on the indicator. However, some businesses have strayed from using this format. For example, while the BRSR requests R&D data to be reported in percentage terms, some companies have instead reported this data in absolute terms. Some companies have even provided the disclosures as text.

**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**

| | FY23 | FY22 | Details of improvements in environmental and social impacts |
|---|---|---|---|
| R&D | ₹ 17.06 crore | ₹ 13.72 crore | This represents the total R&D expense incurred by the Company which also includes investments in specific technologies to improve the Environmental and Social Impacts |
| Capex | 44% | 63% | Capex represents spend on clean and green business |

Another example is of CSR details:

**VI. CSR Details**

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

[illegible] was established as per [illegible], [illegible] As such, [illegible] is not a company governed by the provisions of Section 135 of the Companies Act, 2013.The Corporation does not come under the purview of CSR activities mandated under the Indian Companies Act, 2013, even after the recent amendments to the [illegible]

[illegible], a Charitable Trust registered with Charity Commissioner under the Bombay Public Trust Act, 1950, was formed in the year 2006, the [illegible] and has been voluntarily carrying out various community development activities. The objectives of the [illegible] include Relief of Poverty or Distress, Advancement of Education, Medical Relief and Advancement of any other Project of general public utility. The [illegible] undertakes community development activities across the country. Preference is given to disadvantaged, marginalised and underprivileged sections of society which include women, disabled, differently abled, leprosy patients, sex workers, jail inmates, senior citizens, destitute, AIDS victims, cancer patients, persons with heart ailments etc. The projects range from scholarships, health initiatives, rural education programmes and providing infrastructural support in field of education and health. Since inception, the [illegible] has sanctioned 723 projects with outgo of ₹145.22 Crs.

3. Data should be provided in the report itself instead of in annexures. Changes have been made to the reporting format as well.

[23] Images in the Section 3.1 are excerpt from BRSR disclosures submitted by specific companies (from 1012 businesses considered for analysis) in NSE (2023) (https://www.nseindia.com/companies-listing/corporate-filings-bussiness-sustainabilitiy-reports), available in the public domain.

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

| Parameter | FY 2022-23 Current Financial Year | FY 2021-22 Previous Financial Year |
|---|---|---|
| Total electricity consumption (A) | As per attached Annexure - I | |
| Total fuel consumption (B) | | |
| Energy consumption through other sources (C) | | |
| **Total energy consumption (A+B+C)** | | |
| Energy intensity per rupee of turnover (Total energy consumption / turnover in rupees) | | |
| Energy intensity (optional) – the relevant metric may be selected by the entity | | |

4. One of the main objectives of BRSR reporting is to enable stakeholders to access sustainability-related information in a standardised format. Therefore, companies are encouraged to adhere to the BRSR format for reporting their disclosures. However, many companies have changed the format in the current reporting cycle to suit their feasibility This, in turn, defies the main objective of the BRSR and makes data extraction even more difficult. Conversely, improving the quality of the reporting format could make data extraction easier, allowing various stakeholders to access relevant information and ultimately helping the BRSR fulfil its main objective. The following is one such example:

The following is the original BRSR format:

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **(Yes/No)**
(ii) Turnover (in Rs.)
(iii) Net worth (in Rs.)

VII. Transparency and Disclosures Compliances

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

**Source:** (SEBI, 2021a)

However, the company reported the same indicators using different formats (by removing specific sub-indicators 22(ii) and 22(iii)):

projects range from scholarships, health initiatives, rural education programmes and providing infrastructural support in field of education and health. Since inception, the [redacted] has sanctioned 723 projects with outgo of ₹145.22 Crs.

**VII. Transparency and Disclosures Compliances**

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

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy) | FY 2022-23 Current Financial Year | | | FY 2021-22 Previous Financial Year | | |
|---|---|---|---|---|---|---|---|
| | | Number of complaints | Number of complaints | Remarks | Number of complaints | Number of complaints | Remarks |

5. Many companies (49) have reported higher waste recovered than waste generated. This has been addressed in the ratio analysis section as well.

| Parameter | FY 2022-23 | FY 2021-22 |
|---|---|---|
| **Total Waste generated (in metric tonnes)** | | |
| Plastic waste **(A)** | 9.66 | 10.06 |
| E-waste **(B)** | 0.02 | 0.01 |
| Bio-medical waste **(C)** | 0.46 | 0.45 |
| Construction and demolition waste **(D)** | 0.13 | 0.21 |
| Battery waste **(E)** | 3.73 | 0.45 |
| Radioactive waste **(F)** | 0.00 | 0.00 |
| Other Hazardous waste. Please specify, if any. **(G)** | 301.47 | 412.85 |

| Parameter | FY 2022-23 | FY 2021-22 |
|---|---|---|
| Other Non-hazardous waste generated **(H)**. Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) | 24.48 | 36.30 |
| **Total (A+B + C + D + E + F + G+ H)** | **339.98** | **460.35** |
| **For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)** | | |
| **Category of waste** | | |
| (i) Recycled | 13423.65 | 13448.60 |
| (ii) Re-used | 31.18 | 24.14 |
| (iii) Other recovery operations | 0.00 | 0.00 |
| **Total** | **13454.83** | **13472.74** |
| **For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)** | | |
| **Category of waste** | | |
| (i) Incineration | 83.22 | 137.58 |
| (ii) Landfilling | 227.68 | 239.90 |
| (iii) Other disposal operations | 0.00 | 0.00 |
| **Total** | **310.90** | **377.48** |

6. There should be consistency in terms of the units used for disclosing indicators. Specific guidance may be provided separately to bring consistency to the reporting process. A few examples are included below:

   CSR details:

**VI. CSR Details**

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

Turnover (₹) : 283839.33 lakhs

Net worth (₹) : 122980.07 lakhs

**VI. CSR Details**

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

(ii) Turnover (in Rs.) - Rs. 1431.02 Crores (FY 2022-23)

(iii) Net worth (in Rs.)- Rs. 1099.85 Crores (FY 2022-23)

Energy consumption:

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

| Parameter | FY 22-23 | FY 21-22 |
|---|---|---|
| From renewable sources | | |
| Total electricity consumption (A) | 0.13 Mn GJ | 0.13 Mn GJ |
| Total fuel consumption (B) | - | - |
| Energy consumption through other sources (C) | - | - |
| Total energy consumed from renewable sources (A+B+C) | 0.13 Mn GJ | 0.13 Mn GJ |
| From non-renewable sources | | |
| Total electricity consumption (D) | 1.21 Mn GJ | 1.18 Mn GJ |
| Total fuel consumption (E) | 9.39 Mn GJ | 1.18 Mn GJ |
| Energy consumption through other sources (F) | - | - |
| Total energy consumed from non-renewable sources (D+E+F) | 10.61 Mn GJ | 9.56 Mn GJ |

Workers and staff facilitation about electrical consumption

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.

Note: No, Company has not conducted any assessment by an external agency.

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

| Parameter | FY 2022-23 (Current Financial Year) | FY 2021-22 (Previous Financial Year) |
|---|---|---|
| Total electricity consumption (A) | 352.11 | 74.73 |
| Total fuel consumption (B) | 37,42,695.46 | 33,85,762.61 |
| Energy consumption through other sources (C) | - | - |
| **Total energy consumption (A+B+C)** | 37,43,047.57 | 33,85,837.35 |
| Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees) | 21.03 | 25.08 |
| Energy intensity (optional) – the relevant metric may be selected by the entity | 10.01 | 10.08 |

**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, assurance has been conducted by KPMG

| Parameter | FY 2022-23 (Current Financial Year) | FY 2021-22 (Previous Financial Year) |
|---|---|---|
| Total energy consumed from renewable sources (A+B+C) | 246.70 TJ | 497.29 TJ |

7. Our analysis is restricted to the BRSR reports submitted by the businesses for FY2022–23.
8. We performed data clean-up and accuracy checks after data extraction. Data was retrieved from BRSR reports and annual reports available in the public domain.
9. The analysis was conducted using data available in the public domain and, therefore, relies on information available from the relevant reports. Data were assumed to be true and used without further cross-verification for analysis purposes, as it is beyond the scope of this work.
10. We performed this analysis with the utmost care, objectivity, and due diligence. Data validations and accuracy checks were conducted to ensure the highest level of accuracy. Because of such a large size of data, some data points might have been

If companies adhere to the prescribed BRSR format, data-related challenges will be addressed while providing a true picture of the actions taken to reach ESG goals.

missed or erroneously captured. However, because of our rigorous data validation and accuracy check processes, such data points are unlikely to have any material impact on the results of the analysis.

11. If companies strictly adhere to the prescribed BRSR format for disclosure reporting in future reporting cycles, data-related challenges will surely be addressed. Also, it will provide the true picture of the actions taken by the companies to reach their ESG goals.

### 3.2 Way Forward

It is suggested to explore the possibility of creating a centralised repository for BRSR annual data as submitted by all companies.

1. Companies should aspire to report their sustainability disclosures more thoroughly, as these reports will guide their future sustainability efforts while addressing stakeholder concerns and attracting investor interest.
2. Companies are encouraged to get third-party verification. This will improve data accuracy and transparency in data reporting.
3. Companies should aim to improve disclosure reporting related to value chain partners. This will help them deliver better outcomes in their sustainability journey. This is a strategic decision each company has to take individually to disclose their supply chains and GHG emissions. We understand that it will require large efforts, but it may be desirable to enhance the credibility of Indian businesses in global supply chains.
4. Overall, companies have disclosed a higher number of indicators for principles 3, 4, 5, and 9. Principles 2 and 6 have been moderately disclosed, while principles 1, 7, and 8 are probably the least disclosed principles. This presents an area of improvement for all the companies. Businesses and policymakers should come together and address the concerns of businesses to improve the reporting levels in future reporting cycles.
5. Businesses are encouraged to frame disclosures in such a way that it brings more objectivity and transparency, leading to better insights and making the BRSR report more stakeholder-friendly.
6. Regulated entities are motivated to guide the dependent (nonregulated) entities, as this will help make the BRSR ecosystem stronger.

Disclosures should be framed in such a way that it brings more objectivity and transparency.

7. We suggest the following ratios to be included in the BRSR reporting:
    7.1. GHG intensity of total energy consumption (MT/GJ)
    7.2. Share of total electricity consumption in total energy consumption (GJ)
    7.3. GHG emission intensity (scope 1 and scope 2) per turnover (MT/INR crores)
    7.4. Total energy consumption per turnover (TJ/INR crores)
    7.5. Total renewable energy share of total energy consumption (GJ)

Calculated and suggested E, S, and G ratios may be included in the BRSR reporting for more relevant insights into the Indian context.

Companies should aim to improve disclosure reporting related to value chain partners.

Some leadership indicators with more than 75% of disclosure reporting by businesses may be included as essential indicators in the BRSR format.

7.6. Total renewable energy consumption per turnover (GJ/INR crores)

7.7. Plastic waste as a share of total waste generated (MT)

7.8. Total recycled, reused, and recovered waste as a share of total waste generated (MT)

8. Moreover, we suggest including the following social and governance ratios in the BRSR, keeping the Indian context in mind:

8.1. Ratio of percentage increase in managing director's remuneration to increase in profit before tax (social focus)

8.2. **Cash yield = Other income/(current investments + cash and bank):** This ratio determines whether the cash on the company's balance sheet is under-earning or over-earning (should be around 10-year bond yield (governance focus)).

8.3. **Depreciation rate = Depreciation/gross block:** This ratio indicates whether the management is depreciating its assets faster than the sector norm, which is usually done to underreport profits (governance focus).

8.4. **Auditor cost as a percentage of revenue**: Compare across the sector (governance focus).

8.5. **Earnings before interest and depreciation as a percentage of cash flow from operations (CFO)**: This ratio shows how much of the earnings are being converted into cash flow, usually between 80% and 120% (governance focus).

8.6. **Related party transactions as a percentage of the previous three years' cumulative CFO**: The higher this ratio, the more questionable the quality of earnings (governance focus).

The suggested ratios can be derived by combining the relevant data points from the companies' annual reports. Incorporating such data disclosures in the BRSR format will allow various stakeholders to access such information from a single source, and these ratios will provide more relevant insights into the Indian context.

9. It is suggested to explore the possibility of creating a centralised repository for BRSR annual data as submitted by all companies. This would make it easier for different stakeholders to access and analyse the relevant data and make informed decisions. SEBI may coordinate the development of such a centralised repository or an online portal where businesses could submit their reports.

10. Capacity-building sessions may be conducted to hone the skills of companies in developing their BRSR reports and increasing stakeholder engagement.

11. For some leadership indicators, businesses have done more than 75% of disclosure reporting. These leadership indicators may be included as essential indicators of the BRSR format in the next reporting cycle. The list of such leadership indicators is shown in Table 3.1.

*Table 3.1 Suggested leadership indicators to be included as essential indicators in the BRSR*

| Principle name | Leadership indicator number |
|---|---|
| Principle 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable. | Leadership indicator 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. |
| Principle 2 Businesses should provide goods and services in a manner that is sustainable and safe | Leadership indicator 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? |
| Principle 6 Businesses should respect and make efforts to protect and restore the environment | Leadership indicator 1 - Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format: |
| | Leadership indicator 7 - Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link. |
| Principle 8 Businesses should promote inclusive growth and equitable development | Leadership indicator 3 - (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes/No)<br>(b) From which marginalized /vulnerable groups do you procure?<br>(c) What percentage of total procurement (by value) does it constitute? |
| Principle 9 Businesses should engage with and provide value to their consumers in a responsible manner | Leadership indicator 1 - Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available). |
| | Leadership indicator 2 - Steps taken to inform and educate consumers about safe and responsible usage of products and/or services. |

**Source:** For indicator description from Section C: Principle wise performance disclosure. Business Responsibility & Sustainability Reporting format. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF). In the public domain.

Sector-specific additional indicators may be introduced to get clear picture of the actions taken.

12. Businesses should be encouraged to build their capacity to disclose more leadership indicators in the next few reporting cycles to enhance their performance. We suggest that companies with a turnover of more than INR 90,000 crores (25 companies) may be mandated to start reporting the leadership indicators from the immediate reporting cycle. Businesses with turnover between INR 51,000 and 90,000 crores (17 companies) should start reporting leadership indicators in the next reporting cycle. Similarly, businesses with a turnover ranging from INR 9,000 to 50,000 crores (114 companies) should report leadership indicators in the next two reporting cycles. Meanwhile, companies with turnover below INR 9,000 crores (856 companies) may start working on capacity building to report these indicators and gradually disclose them.

13. Sector-specific additional indicators may be introduced (apart from the existing ones) to understand the actual impact of ESG activities undertaken by the specific sector. It will provide more relevant data to the stakeholders (in a further standardised way) and enable better benchmarking within the sector. For example, disclosure for the financial sector may include green/sectoral-lending-data-specific indicators. Other examples may include (but are not limited to) the Construction and Metal & Mining sectors.
14. We hope that the quality of the disclosures provided will continue to improve. Businesses are encouraged to consider the BRSR format as a tool (rather than a reporting mandate) that can guide and help them have a sustainable and fruitful outcome of adopting ESG practices. This attitude shift can be a catalyst for driving higher and better BRSR reporting by the businesses.

Regulated entities are motivated to guide the dependent entities to make the BRSR ecosystem stronger.

Findings from this report can help businesses understand their position within their sector. Similarly, a particular sector may use the findings to identify a better-performing sector in a specific area and learn, tweak, and adapt the best practices of that sector to improve its own performance. The sector-specific results presented in this report provide a basis for further improvement, and stakeholders are urged to take advantage of the relevant findings and suggestions of this report.

# 4

# Conclusions

# Conclusions

Indian businesses have made significant efforts to develop their BRSR reports, which is reflected in the analysis of these reports. Our report attempts to provide in-depth observations on the basis of the analysis of BRSR sections, principles, and indicators. In addition, ratio analysis allows different sectors to gain an objective understanding. The report further drills down by trying to gauge the NZ alignment of the Indian businesses.

The findings of this report underscore the need for continuous monitoring, support and encouragement for all the sectors to achieve NZ or carbon neutrality.

The analysis of disclosures submitted using the BRSR framework uncovers important observations and potential areas that need attention. While the framework provides businesses with a standardised approach to reporting, businesses should aspire to increase objectivity and transparency in the disclosures. This improvement is necessary for gaining better insights and making the BRSR report more stakeholder-oriented and insightful. The main results indicate that although companies have higher reporting levels of disclosures for principles 3, 4, 5, and 9, there is still a lot of room for improvement for principles 1, 7, and 8. The differences in disclosure levels across the principles highlight the need for businesses to focus more on underreported areas to create a more balanced and comprehensive sustainability report. The Forest Materials, Metals & Mining, Diversified, Automobile and Auto Components, and Oil, Gas & Consumable Fuels sectors are leaders in reporting disclosures for the overall principles. Similarly, the Forest Materials, Metals & Mining, and Construction Materials sectors lead in reporting the essential indicators. The Metals & Mining, Diversified, Automobile and Auto Components, Oil, Gas & Consumable Fuels, and Utilities are the frontrunners in disclosing the leadership indicators.

Ratio analysis highlights the different challenges and opportunities across sectors to improve emissions, energy consumption, reliance on renewable energy, and waste management indicators. The analysis highlights the need to improve women's representation at various levels. While some sectors are leading, others are encouraged to improve these indicators. To enhance the performance of the relevant indicator across the board, sectors should strive to expedite their transition to non-fossil fuel energy options, reduce emissions, improve resource efficiency, and foster further women's participation in the workforce. Businesses are motivated to improve these indicators to enhance their sustainability performance and engage more effectively with different stakeholders.

Indian businesses have shown a noteworthy inclination towards emission reduction by setting NZ or carbon neutrality goals. Over the coming years, it is very much possible that the number of businesses aligning themselves to NZ goals will keep growing. Businesses have started disclosing their inclination and taking necessary steps by adopting renewable energy options. However, the analysis highlights existing variations both in terms of emissions and the adoption of renewable energy across different sectors. Sectors with high emissions and a lower number of companies going for NZ or carbon neutrality are highly encouraged to accelerate their efforts to transition to NZ and align themselves with overall national NZ commitment. The findings of this report underscore the need for continuous monitoring, support, and encouragement for all the sectors to achieve NZ or carbon neutrality.

Instead of considering it a mandatory reporting requirement, businesses should view the BRSR format as a tool that can guide them in adopting fruitful ESG practices.

This report offers recommendations to improve the transparency, accuracy, and usefulness of BRSR reporting for various stakeholders. Businesses should aspire to increase their use of third-party verification to ensure the accuracy and transparency of the data reported by them. We recommend creating a centralised repository or an online portal to allow easier access to data for benchmarking. Regulated entities (listed entities) should aspire to guide nonregulated entities (value chain partners) to strengthen the overall BRSR ecosystem.

Our report also suggests a few ratios that would be relevant in the Indian context. These ratios can be calculated by combining relevant data points from the BRSR and companies' annual reports. Hence, including such data points in the BRSR format will help various stakeholders gain more relevant insights into the Indian context. Some leadership indicators have more than 75% reporting levels and may be included as essential indicators in the BRSR format in the next reporting cycle. Furthermore, businesses should aspire to build their capacity to disclose more leadership indicators in the next few reporting cycles to enhance their performance. Also, capacity-building activities may be conducted to hone the skills required to develop transparent and accurate BRSR reports and engage stakeholders more actively and effectively.

Implementing these recommendations would result in improved BRSR disclosure reporting for businesses and regulatory authorities, which would also help stakeholders make better-informed decisions and lead to a win–win–win situation for the stakeholders.

The BRSR reports submitted by businesses for the first round lay a strong foundation for future reporting cycles. Continuous progress will result in enhanced reporting levels across all principles. Businesses should aim to bridge the existing gaps and adopt the best practices included in this report or those of other sectors. This will help them report their BRSR disclosures better and meet stakeholders' expectations. Instead of considering it a mandatory reporting requirement, businesses should view the BRSR format as a tool that can guide them in adopting fruitful ESG practices. This shift in perception can act as a catalyst to drive higher and better BRSR reporting by businesses.

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# Annexures

# Annexures

## Annexure 1: E, S, and G-wise segregation of the 140 BRSR indicators[24]

*Table B.1 BRSR section-wise segregation of ESG indicators*

| BRSR sections | Basic information indicators | Environmental indicators | Social indicators | Governance indicators | Total indicators |
|---|---|---|---|---|---|
| Section A: General disclosures | 13 | 1 | 3 | 7 | 24 |
| Section B: Management and process disclosures | 0 | 0 | 0 | 12 | 12 |
| Section C: Principle-wise performance disclosure | 0 | 27 | 35 | 42 | 104 |
| **Total** | **13** | **28** | **38** | **61** | **140** |

### Section A – General disclosures (see Section 2.2 for in-depth analysis)

*Table B.2 Section A – General disclosures – E, S, and G-wise segregation*

| Sr no | Indicator description | E, S, or G | Principles/ BRSR tag | BRSR indicator number |
|---|---|---|---|---|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | Basic Information | I | 1 |
| 2 | Name of the Listed Entity | Basic Information | I | 2 |
| 3 | Year of incorporation | Basic Information | I | 3 |
| 4 | Registered office address | Basic Information | I | 4 |
| 5 | Corporate address | Basic Information | I | 5 |
| 6 | E-mail | Basic Information | I | 6 |
| 7 | Telephone | Basic Information | I | 7 |
| 8 | Website | Basic Information | I | 8 |
| 9 | Financial year for which reporting is being done | Basic Information | I | 9 |
| 10 | Paid-up Capital | Basic Information | I | 11 |
| 11 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | Basic Information | I | 12 |
| 12 | 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). | Basic Information | I | 13 |
| 13 | Name of the Stock Exchange(s) where shares are listed | Basic Information | I | 10 |
| 14 | Details of business activities (accounting for 90% of the turnover) | Governance | II | 14 |

[24] Segregation of indicators in the E, S, and G basket is based on our assessment.

| Sr no | Indicator description | E, S, or G | Principles/ BRSR tag | BRSR indicator number |
|---|---|---|---|---|
| 15 | Products/Services sold by the entity (accounting for 90% of the entity's Turnover) | Governance | II | 15 |
| 16 | Number of locations where plants and/or operations/offices of the entity are situated | Governance | III | 16 |
| 17 | Markets served by the entity | Governance | III | 17 (a+b+c) |
| 18 | Details as at the end of Financial Year | Social | IV | 18 (a+b) |
| 19 | Participation/Inclusion/Representation of women | Social | IV | 19 |
| 20 | Turnover rate for permanent employees and workers (Disclose trends for the past 3 years) | Social | IV | 20 |
| 21 | CSR Details | Governance | VI | 22 (a+b+c) |
| 22 | Names of holding / subsidiary / associate companies / joint ventures | Governance | V | 21 |
| 23 | Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct | Governance | VII | 23 |
| 24 | 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 | Environmental | VII | 24 |

**Source:** For indicator description from Section A: General disclosures. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

## Section B – Management and process disclosures (see Section 2.2 for in-depth analysis)

### *Table B.3 Section B – Management and process disclosures – E, S, and G-wise segregation*

| Sr no. | Indicator description | E, S, or G | Principles/ BRSR tag | BRSR indicator number |
|---|---|---|---|---|
| 1 | Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) Has the policy been approved by the Board? (Yes/No) Web Link of the Policies, if available | Governance | NGRBC principle | 1 (a+b) |
| 2 | Whether the entity has translated the policy into procedures. (Yes / No) | Governance | NGRBC principle | 2 |
| 3 | Do the enlisted policies extend to your value chain partners? (Yes/No) | Governance | NGRBC principle | 3 |
| 4 | Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | Governance | NGRBC principle | 4 |
| 5 | Specific commitments, goals and targets set by the entity with defined timelines, if any. | Governance | NGRBC principle | 5 |
| 6 | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | Governance | NGRBC principle | 6 |
| 7 | Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) | Governance | NGRBC principle | 7 |
| 8 | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | Governance | NGRBC principle | 8 |
| 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. | Governance | NGRBC principle | 9 |
| 10 | Details of Review of NGRBCs by the Company. | Governance | NGRBC principle | 10 |
| 11 | If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated. | Governance | NGRBC principle | 11 |
| 12 | 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. | Governance | NGRBC principle | 12 |

**Source:** For indicator description from Section B: Management and process disclosures. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

## Section C – Principle-wise performance disclosures (see Section 2.3 for in-depth analysis)

*Table B.4 Section C – Principle-wise performance disclosures – E, S, and G-wise segregation*

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 1 | Percentage coverage by training and awareness programmes on any of the Principles during the financial year. | Governance | Principle 1 | Essential indicator 1 |
| 2 | Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website) | Governance | Principle 1 | Essential indicator 2 |
| 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. | Governance | Principle 1 | Essential indicator 3 |
| 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. | Governance | Principle 1 | Essential indicator 4 |
| 5 | Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption | Governance | Principle 1 | Essential indicator 5 |
| 6 | Details of complaints with regard to conflict of interest | Governance | Principle 1 | Essential indicator 6 |
| 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. | Governance | Principle 1 | Essential indicator 7 |
| 8 | Awareness programmes conducted for value chain partners on any of the Principles during the financial year. | Governance | Principle 1 | Leadership indicator 1 |
| 9 | 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. | Governance | Principle 1 | Leadership indicator 2 |
| 10 | 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. | Governance | Principle 2 | Essential indicator 1 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 11 | Does the entity have procedures in place for sustainable sourcing? (Yes/No) If yes, what percentage of inputs were sourced sustainably? | Environmental | Principle 2 | Essential indicator 2 |
| 12 | Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste. | Environmental | Principle 2 | Essential indicator 3 |
| 13 | 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 | Environmental | Principle 2 | Essential indicator 4 |
| 14 | 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? | Environmental | Principle 2 | Leadership indicator 1 |
| 15 | 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. | Governance | Principle 2 | Leadership indicator 2 |
| 16 | Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry). | Environmental | Principle 2 | Leadership indicator 3 |
| 17 | Of the products and packaging reclaimed at end of life of products, amount (in metri tonnes) reused, recycled, and safely disposed, as per the following format. | Environmental | Principle 2 | Leadership indicator 4 |
| 18 | Reclaimed products and their packaging materials (as percentage of products sold) for each product category. | Environmental | Principle 2 | Leadership indicator 5 |
| 19 | Details of measures for the well-being of employees. Details of measures for the well-being of workers. | Social | Principle 3 | Essential indicator 1(a+b) |
| 20 | Details of retirement benefits, for Current FY and Previous Financial Year. | Social | Principle 3 | Essential indicator 2 |
| 21 | 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. | Social | Principle 3 | Essential indicator 3 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 22 | 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. | Social | Principle 3 | Essential indicator 4 |
| 23 | Return to work and Retention rates of permanent employees and workers that took parental leave. | Social | Principle 3 | Essential indicator 5 |
| 24 | Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief. | Social | Principle 3 | Essential indicator 6 |
| 25 | Membership of employees and worker in association(s) or Unions recognised by the listed entity: | Social | Principle 3 | Essential indicator 7 |
| 26 | Details of training given to employees and workers. | Social | Principle 3 | Essential indicator 8 |
| 27 | Details of performance and career development reviews of employees and worker | Social | Principle 3 | Essential indicator 9 |
| 28 | Health and safety management system. | Social | Principle 3 | Essential indicator 10 (a+b+c+d) |
| 29 | Details of safety related incidents, in the following format | Social | Principle 3 | Essential indicator 11 |
| 30 | Describe the measures taken by the entity to ensure a safe and healthy work place | Social | Principle 3 | Essential indicator 12 |
| 31 | Number of Complaints on the following made by employees and workers (Principle 3) | Social | Principle 3 | Essential indicator 13 |
| 32 | Assessments for the year (Principle 3) | Social | Principle 3 | Essential indicator 14 |
| 33 | 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 | Social | Principle 3 | Essential indicator 15 |
| 34 | Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N). | Social | Principle 3 | Leadership indicator 1 |
| 35 | Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners. | Governance | Principle 3 | Leadership indicator 2 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 36 | Provide the number of employees / workers having suffered high consequence workrelated injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment. | Social | Principle 3 | Leadership indicator 3 |
| 37 | 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) | Social | Principle 3 | Leadership indicator 4 |
| 38 | Details on assessment of value chain partners (Principle 3) | Governance | Principle 3 | Leadership indicator 5 |
| 39 | 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 | Governance | Principle 3 | Leadership indicator 6 |
| 40 | Describe the processes for identifying key stakeholder groups of the entity. | Governance | Principle 4 | Essential indicator 1 |
| 41 | List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group. | Governance | Principle 4 | Essential indicator 2 |
| 42 | 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. | Governance | Principle 4 | Leadership indicator 1 |
| 43 | 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. | Governance | Principle 4 | Leadership indicator 2 |
| 44 | Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups. | Social | Principle 4 | Leadership indicator 3 |
| 45 | Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format | Social | Principle 5 | Essential indicator 1 |
| 46 | Details of minimum wages paid to employees and workers, in the following format | Governance | Principle 5 | Essential indicator 2 |
| 47 | Details of remuneration/salary/wages, in the following format | Governance | Principle 5 | Essential indicator 3 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 48 | Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? | Governance | Principle 5 | Essential indicator 4 |
| 49 | Describe the internal mechanisms in place to redress grievances related to human rights issues. | Governance | Principle 5 | Essential indicator 5 |
| 50 | Number of Complaints on the following made by employees and workers (Principle 5) | Social | Principle 5 | Essential indicator 6 |
| 51 | Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases. | Governance | Principle 5 | Essential indicator 7 |
| 52 | Do human rights requirements form part of your business agreements and contracts? (Yes/No) | Social | Principle 5 | Essential indicator 8 |
| 53 | Assessments for the year (Principle 5) | Social | Principle 5 | Essential indicator 9 |
| 54 | Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above. | Governance | Principle 5 | Essential indicator 10 |
| 55 | Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints. | Governance | Principle 5 | Leadership indicator 1 |
| 56 | Details of the scope and coverage of any Human rights due-diligence conducted. | Social | Principle 5 | Leadership indicator 2 |
| 57 | 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? | Social | Principle 5 | Leadership indicator 3 |
| 58 | Details on assessment of value chain partners (Principle 5) | Social | Principle 5 | Leadership indicator 4 |
| 59 | Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above. | Governance | Principle 5 | Leadership indicator 5 |
| 60 | Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format: | Environmental | Principle 6 | Essential indicator 1 |
| 61 | Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any | Environmental | Principle 6 | Essential indicator 2 |
| 62 | Provide details of the following disclosures related to water, in the following format: | Environmental | Principle 6 | Essential indicator 3 |
| 63 | Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation. | Environmental | Principle 6 | Essential indicator 4 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 64 | Please provide details of air emissions (other than GHG emissions) by the entity, in the following format. | Environmental | Principle 6 | Essential indicator 5 |
| 65 | Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format. | Environmental | Principle 6 | Essential indicator 6 |
| 66 | Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details. | Environmental | Principle 6 | Essential indicator 7 |
| 67 | Provide details related to waste management by the entity, in the following format | Environmental | Principle 6 | Essential indicator 8 |
| 68 | 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. | Environmental | Principle 6 | Essential indicator 9 |
| 69 | If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format. | Environmental | Principle 6 | Essential indicator 10 |
| 70 | Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year. | Environmental | Principle 6 | Essential indicator 11 |
| 71 | Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format. | Environmental | Principle 6 | Essential indicator 12 |
| 72 | Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format | Environmental | Principle 6 | Leadership indicator 1 |
| 73 | Provide the following details related to water discharged. | Environmental | Principle 6 | Leadership indicator 2 |
| 74 | 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 (ii) Nature of operations (iii) Water withdrawal, consumption and discharge in the following format. | Environmental | Principle 6 | Leadership indicator 3 (a+b+c) |
| 75 | Please provide details of total Scope 3 emissions & its intensity, in the following format | Environmental | Principle 6 | Leadership indicator 4 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 76 | 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. | Environmental | Principle 6 | Leadership indicator 5 |
| 77 | 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. | Environmental | Principle 6 | Leadership indicator 6 |
| 78 | Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link. | Governance | Principle 6 | Leadership indicator 7 |
| 79 | 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 | Environmental | Principle 6 | Leadership indicator 8 |
| 80 | Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts | Environmental | Principle 6 | Leadership indicator 9 |
| 81 | Number of affiliations with trade and industry chambers/ associations. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to. | Governance | Principle 7 | Essential indicator 1(a+b) |
| 82 | Provide details of corrective action taken or underway on any issues related to anticompetitive conduct by the entity, based on adverse orders from regulatory authorities. | Governance | Principle 7 | Essential indicator 2 |
| 83 | Details of public policy positions advocated by the entity. | Governance | Principle 7 | Leadership indicator 1 |
| 84 | Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year. | Social | Principle 8 | Essential indicator 1 |
| 85 | Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format: | Social | Principle 8 | Essential indicator 2 |
| 86 | Describe the mechanisms to receive and redress grievances of the community. | Social | Principle 8 | Essential indicator 3 |
| 87 | Percentage of input material (inputs to total inputs by value) sourced from suppliers. | Social | Principle 8 | Essential indicator 4 |
| 88 | Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above). | Social | Principle 8 | Leadership indicator 1 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 89 | Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies. | Social | Principle 8 | Leadership indicator 2 |
| 90 | Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) From which marginalized / vulnerable groups do you procure? What percentage of total procurement (by value) does it constitute? | Social | Principle 8 | Leadership indicator 3(a+b+c) |
| 91 | 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. | Governance | Principle 8 | Leadership indicator 4 |
| 92 | Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved. | Social | Principle 8 | Leadership indicator 5 |
| 93 | Details of beneficiaries of CSR Projects | Social | Principle 8 | Leadership indicator 6 |
| 94 | Describe the mechanisms in place to receive and respond to consumer complaints and feedback. | Social | Principle 9 | Essential indicator 1 |
| 95 | Turnover of products and/ services as a percentage of turnover from all products/service that carry information about. | Governance | Principle 9 | Essential indicator 2 |
| 96 | Number of consumer complaints in respect of the following | Governance | Principle 9 | Essential indicator 3 |
| 97 | Details of instances of product recalls on account of safety issues. | Governance | Principle 9 | Essential indicator 4 |
| 98 | 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. | Governance | Principle 9 | Essential indicator 5 |
| 99 | 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. | Governance | Principle 9 | Essential indicator 6 |
| 100 | Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available). | Governance | Principle 9 | Leadership indicator 1 |
| 101 | Steps taken to inform and educate consumers about safe and responsible usage of products and/ or services. | Governance | Principle 9 | Leadership indicator 2 |

| Sr No. | Indicator description | E, S, or G | BRSR principle number | BRSR indicator number |
|---|---|---|---|---|
| 102 | Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services. | Governance | Principle 9 | Leadership indicator 3 |
| 103 | Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No) | Governance | Principle 9 | Leadership indicator 4 |
| 104 | Provide the following information relating to data breaches: a-Number of instances of Data Breaches along with impact. ; b- Percentage of DataBreaches involving personally identifiable information of customers. | Governance | Principle 9 | Leadership indicator 5(a+b) |

**Source:** For indicator description from Section C: Principle wise performance disclosure. *Business Responsibility & Sustainability Reporting format*. Annexure I, by SEBI (2021) (https://www.sebi.gov.in/sebi_data/commondocs/may2021-/Business20%responsibility20%and20%sustainability20%reporting20%by20%listed20%entitiesAnnexure1_p.PDF). In the public domain.

## Annexure 2: Analysis of the ESG indicators of nine principles from Section C.

The following tables show an analysis of the ESG indicators of nine principles from Section C.

### Principle 1: "Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable." (SEBI, 2021a)

*Table B.5 Sector- and ESG-wise disclosure levels of indicators of principle 1*

All numbers are in %.[25]

| Sector (no of companies) | Principle 1 (9 indicators) | | |
|---|---|---|---|
| | Overall | Governance (9) | |
| | Principle 1 and governance (9) | Essential indicators (7) | Leadership indicators (2) |
| Automobile and Auto Components (62) | 53.4 | 46.5 | 77.4 |
| Capital Goods (154) | 48.8 | 45.3 | 61.4 |
| Chemicals (96) | 52.3 | 49.4 | 62.5 |
| Construction (30) | 52.2 | 51.0 | 56.7 |
| Construction Materials (25) | 47.6 | 42.9 | 64.0 |
| Consumer Durables (57) | 48.3 | 44.6 | 61.4 |
| Consumer Services (40) | 49.7 | 46.4 | 61.3 |
| Diversified (8) | 61.1 | 62.5 | 56.3 |
| FMCG (65) | 48.7 | 48.4 | 50.0 |
| Financial Services (129) | 50.9 | 48.4 | 59.7 |
| Forest Materials (9) | 40.7 | 38.1 | 50.0 |
| Healthcare (84) | 47.2 | 44.9 | 55.4 |
| Information Technology (43) | 46.3 | 43.9 | 54.7 |
| Media, Entertainment & Publication (20) | 47.2 | 50.0 | 37.5 |
| Metals & Mining (24) | 55.6 | 52.4 | 66.7 |
| Oil, Gas & Consumable Fuels (25) | 56.0 | 50.9 | 74.0 |
| Power (21) | 48.1 | 43.5 | 64.3 |
| Realty (25) | 48.0 | 46.9 | 52.0 |
| Services (37) | 50.8 | 48.3 | 59.5 |
| Telecommunication (15) | 50.4 | 50.5 | 50.0 |
| Textiles (38) | 46.2 | 45.1 | 50.0 |
| Utilities (5) | 55.6 | 48.6 | 80.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[25] The following is the colour coding range for presenting results:

**Principle 2: "Businesses should provide goods and services in a manner that is sustainable and safe." (SEBI, 2021a)**

***Table B.6 Sector- and ESG-wise disclosure levels of indicators of principle 2***

All numbers are in %.[26]

| Sector (no of companies) | Principle 2 (9 indicators) | | | | | | |
|---|---|---|---|---|---|---|---|
| | Overall principle 2 (9) | Environmental (7) | | | Governance (2) | | |
| | | Overall (7) | Essential indicators (3) | Leadership indicators (4) | Overall (2) | Essential indicators (1) | Leadership indicators (1) |
| Automobile and Auto Components (62) | 66.3 | 68.9 | 86.6 | 55.6 | 57.3 | 88.7 | 25.8 |
| Capital Goods (154) | 58.2 | 60.1 | 77.1 | 47.4 | 51.3 | 87.0 | 15.6 |
| Chemicals (96) | 62.5 | 64.1 | 84.7 | 48.7 | 56.8 | 93.8 | 19.8 |
| Construction (30) | 43.7 | 43.3 | 55.6 | 34.2 | 45.0 | 70.0 | 20.0 |
| Construction Materials (25) | 63.6 | 66.3 | 92.0 | 47.0 | 54.0 | 96.0 | 12.0 |
| Consumer Durables (57) | 63.9 | 67.9 | 86.0 | 54.4 | 50.0 | 82.5 | 17.5 |
| Consumer Services (40) | 55.0 | 58.6 | 69.2 | 50.6 | 42.5 | 67.5 | 17.5 |
| Diversified (8) | 66.7 | 69.6 | 75.0 | 65.6 | 56.3 | 75.0 | 37.5 |
| FMCG (65) | 62.2 | 65.7 | 88.7 | 48.5 | 50.0 | 87.7 | 12.3 |
| Financial Services (129) | 44.0 | 47.6 | 55.8 | 41.5 | 31.4 | 55.0 | 7.8 |
| Forest Materials (9) | 69.1 | 74.6 | 88.9 | 63.9 | 50.0 | 100.0 | 0.0 |
| Healthcare (84) | 61.0 | 62.8 | 80.6 | 49.4 | 54.8 | 90.5 | 19.0 |
| Information Technology (43) | 48.8 | 50.2 | 62.8 | 40.7 | 44.2 | 79.1 | 9.3 |
| Media, Entertainment & Publication (20) | 51.1 | 55.7 | 71.7 | 43.8 | 35.0 | 60.0 | 10.0 |
| Metals & Mining (24) | 64.4 | 66.7 | 77.8 | 58.3 | 56.3 | 95.8 | 16.7 |
| Oil, Gas & Consumable Fuels (25) | 60.0 | 62.3 | 72.0 | 55.0 | 52.0 | 84.0 | 20.0 |
| Power (21) | 49.7 | 49.7 | 66.7 | 36.9 | 50.0 | 81.0 | 19.0 |
| Realty (25) | 48.4 | 51.4 | 66.7 | 40.0 | 38.0 | 64.0 | 12.0 |
| Services (37) | 45.3 | 46.3 | 59.5 | 36.5 | 41.9 | 62.2 | 21.6 |
| Telecommunication (15) | 51.9 | 56.2 | 77.8 | 40.0 | 36.7 | 60.0 | 13.3 |
| Textiles (38) | 59.6 | 63.2 | 80.7 | 50.0 | 47.4 | 78.9 | 15.8 |
| Utilities (5) | 53.3 | 54.3 | 86.7 | 30.0 | 50.0 | 100.0 | 0.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[26] The following is the colour coding range for presenting results:

**Principle 3: "Businesses should respect and promote the well-being of all employees, including those in their value chains." (SEBI, 2021a)**

*Table B.7 Sector- and ESG-wise disclosure levels of indicators of principle 3*

All numbers are in %.[27]

| Sector (no of companies) | Principle 3 (21 indicators) | | | | |
|---|---|---|---|---|---|
| | Overall principle 3 (21) | Social (18) | | | Governance (3) |
| | | Overall (18) | Essential indicators (15) | Leadership indicators (3) | Overall and leadership indicators (3) |
| Automobile and Auto Components (62) | 83.3 | 85.2 | 90.0 | 61.3 | 72.0 |
| Capital Goods (154) | 78.3 | 82.5 | 87.6 | 57.4 | 52.6 |
| Chemicals (96) | 77.5 | 81.4 | 86.2 | 57.6 | 53.8 |
| Construction (30) | 75.7 | 80.9 | 87.1 | 50.0 | 44.4 |
| Construction Materials (25) | 78.7 | 83.3 | 88.8 | 56.0 | 50.7 |
| Consumer Durables (57) | 75.3 | 80.6 | 85.7 | 55.0 | 43.3 |
| Consumer Services (40) | 73.5 | 76.8 | 81.5 | 53.3 | 53.3 |
| Diversified (8) | 79.8 | 79.2 | 83.3 | 58.3 | 83.3 |
| FMCG (65) | 75.9 | 80.1 | 85.1 | 54.9 | 50.8 |
| Financial Services (129) | 70.4 | 73.8 | 76.5 | 60.5 | 49.6 |
| Forest Materials (9) | 82.0 | 86.4 | 91.9 | 59.3 | 55.6 |
| Healthcare (84) | 77.0 | 81.0 | 86.7 | 52.8 | 52.8 |
| Information Technology (43) | 67.4 | 72.1 | 76.3 | 51.2 | 39.5 |
| Media, Entertainment & Publication (20) | 65.5 | 71.9 | 78.7 | 38.3 | 26.7 |
| Metals & Mining (24) | 83.1 | 87.5 | 90.0 | 75.0 | 56.9 |
| Oil, Gas & Consumable Fuels (25) | 80.6 | 83.6 | 87.2 | 65.3 | 62.7 |
| Power (21) | 77.6 | 81.0 | 84.8 | 61.9 | 57.1 |
| Realty (25) | 74.7 | 77.8 | 83.7 | 48.0 | 56.0 |
| Services (37) | 71.2 | 76.0 | 80.4 | 54.1 | 42.3 |
| Telecommunication (15) | 70.2 | 74.8 | 81.8 | 40.0 | 42.2 |
| Textiles (38) | 75.8 | 79.4 | 84.2 | 55.3 | 54.4 |
| Utilities (5) | 83.8 | 84.4 | 88.0 | 66.7 | 80.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[27] The following is the colour coding range for presenting results:

Lowest value in %

Highest value in %

**Principle 4: "Businesses should respect the interests of and be responsive to all its stakeholders." (SEBI, 2021a)**

*Table B.8 Sector- and ESG-wise disclosure levels of indicators of principle 4*

All numbers are in %.[28]

| Sector (no of companies) | Principle 4 (5 indicators) | | | | |
|---|---|---|---|---|---|
| | | Social (1) | Governance (4) | | |
| | Overall principle 4 (5) | Overall social and leadership indicators (1) | Overall (4) | Essential indicators (2) | Leadership indicators (2) |
| Automobile and Auto Components (62) | 84.8 | 77.4 | 86.7 | 98.4 | 75.0 |
| Capital Goods (154) | 82.5 | 72.7 | 84.9 | 99.4 | 70.5 |
| Chemicals (96) | 80.0 | 72.9 | 81.8 | 97.9 | 65.6 |
| Construction (30) | 80.7 | 70.0 | 83.3 | 96.7 | 70.0 |
| Construction Materials (25) | 79.2 | 64.0 | 83.0 | 100.0 | 66.0 |
| Consumer Durables (57) | 87.0 | 82.5 | 88.2 | 99.1 | 77.2 |
| Consumer Services (40) | 78.5 | 70.0 | 80.6 | 95.0 | 66.3 |
| Diversified (8) | 70.0 | 50.0 | 75.0 | 100.0 | 50.0 |
| FMCG (65) | 82.5 | 76.9 | 83.8 | 98.5 | 69.2 |
| Financial Services (129) | 83.6 | 76.7 | 85.3 | 98.1 | 72.5 |
| Forest Materials (9) | 86.7 | 66.7 | 91.7 | 100.0 | 83.3 |
| Healthcare (84) | 75.7 | 60.7 | 79.5 | 98.8 | 60.1 |
| Information Technology (43) | 84.7 | 79.1 | 86.0 | 98.8 | 73.3 |
| Media, Entertainment & Publication (20) | 78.0 | 70.0 | 80.0 | 100.0 | 60.0 |
| Metals & Mining (24) | 83.3 | 75.0 | 85.4 | 97.9 | 72.9 |
| Oil, Gas & Consumable Fuels (25) | 75.2 | 60.0 | 79.0 | 100.0 | 58.0 |
| Power (21) | 80.0 | 71.4 | 82.1 | 95.2 | 69.0 |
| Realty (25) | 79.2 | 72.0 | 81.0 | 100.0 | 62.0 |
| Services (37) | 84.3 | 70.3 | 87.8 | 98.6 | 77.0 |
| Telecommunication (15) | 74.7 | 66.7 | 76.7 | 93.3 | 60.0 |
| Textiles (38) | 82.6 | 76.3 | 84.2 | 96.1 | 72.4 |
| Utilities (5) | 84.0 | 80.0 | 85.0 | 100.0 | 70.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[28] The following is the colour coding range for presenting results:

## Principle 5: “Businesses should respect and promote human rights.” (SEBI, 2021a)

### *Table B.9 Sector- and ESG-wise disclosure levels of indicators of principle 5*

All numbers are in %.[29]

| Sector (no of companies) | Principle 5 (15 indicators) | | | | | | |
|---|---|---|---|---|---|---|---|
| | Overall principle 5 (15) | Social (7) | | | Governance (8) | | |
| | | Overall (7) | Essential indicators (4) | Leadership indicators (3) | Overall (8) | Essential indicators (6) | Leadership indicators (2) |
| Automobile and Auto Components (62) | 82.0 | 73.4 | 79.0 | 62.1 | 87.8 | 95.7 | 72.0 |
| Capital Goods (154) | 78.8 | 66.1 | 72.9 | 52.6 | 87.3 | 96.4 | 69.0 |
| Chemicals (96) | 75.9 | 62.5 | 71.1 | 45.3 | 84.8 | 95.5 | 63.5 |
| Construction (30) | 70.7 | 57.8 | 72.5 | 28.3 | 79.3 | 91.1 | 55.6 |
| Construction Materials (25) | 76.5 | 65.3 | 74.0 | 48.0 | 84.0 | 94.7 | 62.7 |
| Consumer Durables (57) | 77.0 | 62.6 | 71.5 | 44.7 | 86.5 | 95.9 | 67.8 |
| Consumer Services (40) | 80.0 | 69.2 | 82.5 | 42.5 | 87.2 | 95.8 | 70.0 |
| Diversified (8) | 80.0 | 66.7 | 65.6 | 68.8 | 88.9 | 93.8 | 79.2 |
| FMCG (65) | 75.6 | 64.9 | 73.5 | 47.7 | 82.7 | 92.3 | 63.6 |
| Financial Services (129) | 76.5 | 60.7 | 66.1 | 50.0 | 87.1 | 93.5 | 74.2 |
| Forest Materials (9) | 80.7 | 63.0 | 72.2 | 44.4 | 92.6 | 100.0 | 77.8 |
| Healthcare (84) | 78.9 | 67.5 | 77.4 | 47.6 | 86.5 | 95.4 | 68.7 |
| Information Technology (43) | 75.3 | 63.6 | 71.5 | 47.7 | 83.2 | 91.1 | 67.4 |
| Media, Entertainment & Publication (20) | 69.3 | 52.5 | 70.0 | 17.5 | 80.6 | 97.5 | 46.7 |
| Metals & Mining (24) | 80.6 | 70.8 | 78.1 | 56.3 | 87.0 | 96.5 | 68.1 |
| Oil, Gas & Consumable Fuels (25) | 78.9 | 64.7 | 71.0 | 52.0 | 88.4 | 94.7 | 76.0 |
| Power (21) | 79.7 | 69.8 | 76.2 | 57.1 | 86.2 | 93.7 | 71.4 |
| Realty (25) | 76.3 | 60.7 | 63.0 | 56.0 | 86.7 | 96.0 | 68.0 |
| Services (37) | 73.9 | 63.1 | 73.6 | 41.9 | 81.1 | 91.9 | 59.5 |
| Telecommunication (15) | 75.1 | 60.0 | 71.7 | 36.7 | 85.2 | 96.7 | 62.2 |
| Textiles (38) | 76.8 | 61.4 | 71.1 | 42.1 | 87.1 | 94.3 | 72.8 |
| Utilities (5) | 84.0 | 80.0 | 80.0 | 80.0 | 86.7 | 93.3 | 73.3 |

**Note:** The “numbers in %” means the percentage of indicators reported by all the companies together from that specific sector.

[29] The following is the colour coding range for presenting results:

Lowest value in %

Highest value in %

**Principle 6: "Businesses should respect and make efforts to protect and restore the environment." (SEBI, 2021a)**

### *Table B.10 Sector- and ESG-wise disclosure levels of indicators of principle 6*

All numbers are in %.[30]

| Sector (no of companies) | Principle 6 (21 indicators) | | | | |
|---|---|---|---|---|---|
| | Overall principle 6 (21) | Environmental (20) | | | Governance (1) |
| | | Overall (20) | Essential indicators (12) | Leadership indicators (8) | Governance and leadership indicators (1) |
| Automobile and Auto Components (62) | 69.7 | 68.6 | 75.8 | 57.9 | 90.3 |
| Capital Goods (154) | 62.5 | 61.7 | 73.5 | 43.8 | 78.6 |
| Chemicals (96) | 68.6 | 67.9 | 77.9 | 53.0 | 81.3 |
| Construction (30) | 54.9 | 54.3 | 71.4 | 28.8 | 66.7 |
| Construction Materials (25) | 68.6 | 68.0 | 83.7 | 44.5 | 80.0 |
| Consumer Durables (57) | 62.0 | 61.1 | 71.9 | 45.0 | 78.9 |
| Consumer Services (40) | 59.0 | 58.0 | 69.6 | 40.6 | 80.0 |
| Diversified (8) | 68.5 | 67.5 | 71.9 | 60.9 | 87.5 |
| FMCG (65) | 63.3 | 62.6 | 72.8 | 47.3 | 76.9 |
| Financial Services (129) | 50.0 | 48.1 | 56.0 | 36.1 | 88.4 |
| Forest Materials (9) | 72.0 | 71.7 | 84.3 | 52.8 | 77.8 |
| Healthcare (84) | 66.6 | 65.9 | 75.0 | 52.2 | 79.8 |
| Information Technology (43) | 55.1 | 54.0 | 64.1 | 38.7 | 79.1 |
| Media, Entertainment & Publication (20) | 48.6 | 47.5 | 63.3 | 23.8 | 70.0 |
| Metals & Mining (24) | 77.2 | 76.3 | 88.9 | 57.3 | 95.8 |
| Oil, Gas & Consumable Fuels (25) | 72.2 | 71.2 | 82.3 | 54.5 | 92.0 |
| Power (21) | 66.2 | 65.2 | 78.2 | 45.8 | 85.7 |
| Realty (25) | 59.6 | 59.4 | 73.7 | 38.0 | 64.0 |
| Services (37) | 53.8 | 52.6 | 64.0 | 35.5 | 78.4 |
| Telecommunication (15) | 55.6 | 55.3 | 67.2 | 37.5 | 60.0 |
| Textiles (38) | 64.2 | 63.2 | 75.0 | 45.4 | 84.2 |
| Utilities (5) | 70.5 | 69.0 | 78.3 | 55.0 | 100.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[30] The following is the colour coding range for presenting results:

**Principle 7: "Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent." (SEBI, 2021a)**

*Table B.11 Sector-and ESG-wise disclosure levels of indicators of principle 7*

All numbers are in %.[31]

| Sector (no of companies) | Principle 7 (3 indicators) | | |
|---|---|---|---|
| | Overall | Governance (3) | |
| | Principle 7 and governance (3) | Essential indicators (2) | Leadership indicators (1) |
| Automobile and Auto Components (62) | 49.5 | 62.9 | 22.6 |
| Capital Goods (154) | 42.0 | 53.6 | 18.8 |
| Chemicals (96) | 44.4 | 55.7 | 21.9 |
| Construction (30) | 36.7 | 50.0 | 10.0 |
| Construction Materials (25) | 52.0 | 62.0 | 32.0 |
| Consumer Durables (57) | 43.9 | 53.5 | 24.6 |
| Consumer Services (40) | 43.3 | 52.5 | 25.0 |
| Diversified (8) | 41.7 | 56.3 | 12.5 |
| FMCG (65) | 42.6 | 52.3 | 23.1 |
| Financial Services (129) | 42.6 | 50.8 | 26.4 |
| Forest Materials (9) | 55.6 | 61.1 | 44.4 |
| Healthcare (84) | 43.7 | 57.7 | 15.5 |
| Information Technology (43) | 35.7 | 46.5 | 14.0 |
| Media, Entertainment & Publication (20) | 38.3 | 52.5 | 10.0 |
| Metals & Mining (24) | 48.6 | 58.3 | 29.2 |
| Oil, Gas & Consumable Fuels (25) | 52.0 | 60.0 | 36.0 |
| Power (21) | 38.1 | 50.0 | 14.3 |
| Realty (25) | 42.7 | 48.0 | 32.0 |
| Services (37) | 38.7 | 48.6 | 18.9 |
| Telecommunication (15) | 42.2 | 53.3 | 20.0 |
| Textiles (38) | 41.2 | 51.3 | 21.1 |
| Utilities (5) | 46.7 | 40.0 | 60.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[31] The following is the colour coding range for presenting results:

Lowest value in %

Highest value in %

**Principle 8: "Businesses should promote inclusive growth and equitable development." (SEBI, 2021a)**

*Table B.12 Sector- and ESG-wise disclosure levels of indicators of principle 8*

All numbers are in %.[32]

| Sector (no of companies) | Principle 8 (10 indicators) | | | | |
|---|---|---|---|---|---|
| | | Social (9) | | | Governance (1) |
| | Overall principle 8 (10) | Overall (9) | Essential indicators (4) | Leadership indicators (5) | Overall and leadership indicators (1) |
| Automobile and Auto Components (62) | 43.7 | 47.0 | 51.2 | 43.5 | 14.5 |
| Capital Goods (154) | 38.4 | 42.0 | 49.5 | 36.0 | 6.5 |
| Chemicals (96) | 41.7 | 44.8 | 50.8 | 40.0 | 13.5 |
| Construction (30) | 36.3 | 39.6 | 50.0 | 31.3 | 6.7 |
| Construction Materials (25) | 43.2 | 47.1 | 52.0 | 43.2 | 8.0 |
| Consumer Durables (57) | 36.7 | 40.2 | 50.0 | 32.3 | 5.3 |
| Consumer Services (40) | 34.8 | 38.3 | 42.5 | 35.0 | 2.5 |
| Diversified (8) | 43.8 | 47.2 | 43.8 | 50.0 | 12.5 |
| FMCG (65) | 36.0 | 39.5 | 48.5 | 32.3 | 4.6 |
| Financial Services (129) | 35.9 | 39.1 | 32.4 | 44.5 | 7.0 |
| Forest Materials (9) | 32.2 | 35.8 | 50.0 | 24.4 | 0.0 |
| Healthcare (84) | 38.6 | 41.7 | 49.1 | 35.7 | 10.7 |
| Information Technology (43) | 33.5 | 36.2 | 45.3 | 28.8 | 9.3 |
| Media, Entertainment & Publication (20) | 28.5 | 30.6 | 40.0 | 23.0 | 10.0 |
| Metals & Mining (24) | 48.8 | 53.7 | 59.4 | 49.2 | 4.2 |
| Oil, Gas & Consumable Fuels (25) | 44.8 | 48.4 | 49.0 | 48.0 | 12.0 |
| Power (21) | 42.4 | 46.6 | 57.1 | 38.1 | 4.8 |
| Realty (25) | 35.2 | 38.7 | 50.0 | 29.6 | 4.0 |
| Services (37) | 39.2 | 42.9 | 46.6 | 40.0 | 5.4 |
| Telecommunication (15) | 37.3 | 40.7 | 50.0 | 33.3 | 6.7 |
| Textiles (38) | 39.2 | 43.0 | 53.9 | 34.2 | 5.3 |
| Utilities (5) | 42.0 | 46.7 | 60.0 | 36.0 | 0.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[32] The following is the colour coding range for presenting results:

**Principle 9: "Businesses should engage with and provide value to their consumers in a responsible manner." (SEBI, 2021a)**

*Table B.13 Sector- and ESG-wise disclosure levels of indicators of principle 9*

All numbers are in %.[33]

| Sector (no of companies) | Principle 9 (11 indicators) | | | | |
|---|---|---|---|---|---|
| | Overall principle 9 (11) | Social (1) | Governance (10) | | |
| | | Overall and essential indicators (1) | Overall (10) | Essential indicators (5) | Leadership indicators (5) |
| Automobile and Auto Components (62) | 70.1 | 100.0 | 67.1 | 63.5 | 70.6 |
| Capital Goods (154) | 68.8 | 99.4 | 65.7 | 64.2 | 67.3 |
| Chemicals (96) | 71.9 | 97.9 | 69.3 | 69.6 | 69.0 |
| Construction (30) | 47.0 | 96.7 | 42.0 | 37.3 | 46.7 |
| Construction Materials (25) | 70.5 | 100.0 | 67.6 | 68.0 | 67.2 |
| Consumer Durables (57) | 66.8 | 94.7 | 64.0 | 64.9 | 63.2 |
| Consumer Services (40) | 69.8 | 97.5 | 67.0 | 65.5 | 68.5 |
| Diversified (8) | 75.0 | 100.0 | 72.5 | 70.0 | 75.0 |
| FMCG (65) | 68.4 | 95.4 | 65.7 | 68.0 | 63.4 |
| Financial Services (129) | 66.3 | 96.9 | 63.3 | 56.9 | 69.6 |
| Forest Materials (9) | 67.7 | 100.0 | 64.4 | 57.8 | 71.1 |
| Healthcare (84) | 73.6 | 95.2 | 71.4 | 72.6 | 70.2 |
| Information Technology (43) | 57.7 | 93.0 | 54.2 | 46.5 | 61.9 |
| Media, Entertainment & Publication (20) | 62.3 | 95.0 | 59.0 | 61.0 | 57.0 |
| Metals & Mining (24) | 72.7 | 100.0 | 70.0 | 62.5 | 77.5 |
| Oil, Gas & Consumable Fuels (25) | 71.6 | 100.0 | 68.8 | 63.2 | 74.4 |
| Power (21) | 62.8 | 95.2 | 59.5 | 48.6 | 70.5 |
| Realty (25) | 65.1 | 100.0 | 61.6 | 57.6 | 65.6 |
| Services (37) | 60.7 | 94.6 | 57.3 | 56.2 | 58.4 |
| Telecommunication (15) | 57.6 | 93.3 | 54.0 | 53.3 | 54.7 |
| Textiles (38) | 66.3 | 100.0 | 62.9 | 58.4 | 67.4 |
| Utilities (5) | 69.1 | 100.0 | 66.0 | 64.0 | 68.0 |

**Note:** The "numbers in %" means the percentage of indicators reported by all the companies together from that specific sector.

[33] The following is the colour coding range for presenting results:

## Overall sector- and principle-wise disclosure levels

*Table B.14 Sector-wise overall principle disclosure level indicators for all nine principles*

All numbers are in %.[34]

| Sector (no of companies) | Principle 1: Business ethics (9 indicators) | Principle 2: Sustainable delivery of products (9 indicators) | Principle 3: Focus on employee health and well-being (21 indicators) | Principle 4: Consideration of stakeholder interests (5 indicators) | Principle 5: Advocacy for human rights (15 indicators) | Principle 6: Environmental conservation (21 indicators) | Principle 7: Clear policies and active public involvement (3 indicators) | Principle 8: Inclusive growth and fair development (10 indicators) | Principle 9: Responsible value delivery to consumers (11 indicators) |
|---|---|---|---|---|---|---|---|---|---|
| Automobile and Auto Components (62) | 53.4 | 66.3 | 83.3 | 84.8 | 82.0 | 69.7 | 49.5 | 43.7 | 70.1 |
| Capital Goods (154) | 48.8 | 58.2 | 78.3 | 82.5 | 78.8 | 62.5 | 42.0 | 38.4 | 68.8 |
| Chemicals (96) | 52.3 | 62.5 | 77.5 | 80.0 | 75.9 | 68.6 | 44.4 | 41.7 | 71.9 |
| Construction (30) | 52.2 | 43.7 | 75.7 | 80.7 | 70.7 | 54.9 | 36.7 | 36.3 | 47.0 |
| Construction Materials (25) | 47.6 | 63.6 | 78.7 | 79.2 | 76.5 | 68.6 | 52.0 | 43.2 | 70.5 |
| Consumer Durables (57) | 48.3 | 63.9 | 75.3 | 87.0 | 77.0 | 62.0 | 43.9 | 36.7 | 66.8 |
| Consumer Services (40) | 49.7 | 55.0 | 73.5 | 78.5 | 80.0 | 59.0 | 43.3 | 34.8 | 69.8 |
| Diversified (8) | 61.1 | 66.7 | 79.8 | 70.0 | 80.0 | 68.5 | 41.7 | 43.8 | 75.0 |
| FMCG (65) | 48.7 | 62.2 | 75.9 | 82.5 | 75.6 | 63.3 | 42.6 | 36.0 | 68.4 |
| Financial Services (129) | 50.9 | 44.0 | 70.4 | 83.6 | 76.5 | 50.0 | 42.6 | 35.9 | 66.3 |
| Forest Materials (9) | 40.7 | 69.1 | 82.0 | 86.7 | 80.7 | 72.0 | 55.6 | 32.2 | 67.7 |
| Healthcare (84) | 47.2 | 61.0 | 77.0 | 75.7 | 78.9 | 66.6 | 43.7 | 38.6 | 73.6 |
| Information Technology (43) | 46.3 | 48.8 | 67.4 | 84.7 | 75.3 | 55.1 | 35.7 | 33.5 | 57.7 |

[34] The following is the colour coding range for presenting results:

| Sector (no of companies) | Principle 1: Business ethics (9 indicators) | Principle 2: Sustainable delivery of products (9 indicators) | Principle 3: Focus on employee health and well-being (21 indicators) | Principle 4: Consideration of stakeholder interests (5 indicators) | Principle 5: Advocacy for human rights (15 indicators) | Principle 6: Environmental conservation (21 indicators) | Principle 7: Clear policies and active public involvement (3 indicators) | Principle 8: Inclusive growth and fair development (10 indicators) | Principle 9: Responsible value delivery to consumers (11 indicators) |
|---|---|---|---|---|---|---|---|---|---|
| Media, Entertainment & Publication (20) | 47.2 | 51.1 | 65.5 | 78.0 | 69.3 | 48.6 | 38.3 | 28.5 | 62.3 |
| Metals & Mining (24) | 55.6 | 64.4 | 83.1 | 83.3 | 80.6 | 77.2 | 48.6 | 48.8 | 72.7 |
| Oil, Gas & Consumable Fuels (25) | 56.0 | 60.0 | 80.6 | 75.2 | 78.9 | 72.2 | 52.0 | 44.8 | 71.6 |
| Power (21) | 48.1 | 49.7 | 77.6 | 80.0 | 79.7 | 66.2 | 38.1 | 42.4 | 62.8 |
| Realty (25) | 48.0 | 48.4 | 74.7 | 79.2 | 76.3 | 59.6 | 42.7 | 35.2 | 65.1 |
| Services (37) | 50.8 | 45.3 | 71.2 | 84.3 | 73.9 | 53.8 | 38.7 | 39.2 | 60.7 |
| Telecommunication (15) | 50.4 | 51.9 | 70.2 | 74.7 | 75.1 | 55.6 | 42.2 | 37.3 | 57.6 |
| Textiles (38) | 46.2 | 59.6 | 75.8 | 82.6 | 76.8 | 64.2 | 41.2 | 39.2 | 66.3 |
| Utilities (5) | 55.6 | 53.3 | 83.8 | 84.0 | 84.0 | 70.5 | 46.7 | 42.0 | 69.1 |

**Note:** The “numbers in %” means the percentage of indicators reported by all the companies together from that specific sector.

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