



RACL Geartech Ltd.

Corporate Office

B-9, Sector-3, Noida, Uttar Pradesh-201301, INDIA

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Web: www.raclgeartech.com E-mail: info@raclgeartech.com

August 21, 2026

The National Stock Exchange of India Limited
Exchange Plaza, 5th Floor
Plot No. C/1, G Block, Bandra-Kurla Complex
Bandra (East), Mumbai- 400 051
cmlist@nse.co.in
Symbol: RACLGEAR

BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring, Rotunda Building,
P J Towers, Dalal Street, Mumbai-400 001
Corp.relations@bseindia.com
Scrip Code: 520073

Subject: Business Responsibility and Sustainability Report for the Financial Year 2025-26

Dear Sir/Madam,

Pursuant to Regulation 34 of the SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015, enclosed is the Business Responsibility and Sustainability Report ("BRSR") for the financial year 2025-26 which forms an integral part of the Annual Report. The BRSR is also available on the website of the Company at www.raclgeartech.com.

This is for your information and record purpose.

Yours faithfully,
For RACL GEARTECH LIMITED

Neha Bahal
Company Secretary & Compliance Officer

Registered Office

15th Floor, Eros Corporate Tower, Nehru Place, New Delhi-110019, INDIA

Phone: +91-11-66155129

CIN: L34300DL1983PLC016136

D-U-N-S Number: 65-013-7086



TS 16949 : 2009
TS 518901 - 000

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L34300DL1983PLC016136
2.	Name of the Listed Entity	RACL Geartech Limited
3.	Year of incorporation	1983
4.	Registered office address	15th Floor, Eros Corporate Towers, Nehru Place, New Delhi-110019
5.	Corporate address	B-9, Sector-3, Noida-201301 Uttar Pradesh
6.	E-mail	investor@raclegeartech.com
7.	Telephone	0120-4588500
8.	Website	http://www.raclegeartech.com/
9.	Financial year for which reporting is being done	1st April 2025 to 31st March 2026
10.	Name of the Stock Exchange(s) where shares are listed	- National Stock Exchange of India Limited (NSE) (listed on November 27, 2024) - Bombay Stock Exchange (BSE)
11.	Paid-up Capital	As on March 31, 2026 - ₹ 117880800
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report.	<u>Name of Contact Person:</u> Ms. Neha Bahal <u>Contact Number:</u> 0120-4588500 <u>Email:</u> investor@raclegeartech.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	The Financial statements have been prepared on Consolidated Basis, which includes a Foreign Subsidiary (RACL Geartech GmbH). However, disclosures under this report have been made on a standalone basis.
14.	Name of assurance provider	NA
15.	Type of assurance obtained	NA

II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing & services	Manufacturing of auto-components.	100%

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

S. No.	Product/Service	NIC Code	%of total Turnover contributed
1	2 -Wheelers	34300	30%
2	Recreation (ATV/ RTV)	34300	18%
3	Tractor and Agriculture	34300	10%
4	Commercial Vehicles	34300	20%
5	Passenger Cars	34300	13%
6	E-Mobility & others	34300	1%
7	3- Wheelers	34300	3%
8	Industrial Equipments	34300	5%
	TOTAL		100%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	2	2	4
International	Nil	1	1

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	7
International (No. of Countries)	10

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

Particulars	FY-2025-26	FY-2024-25
Export Revenues (in ₹)	336.11 Cr.	290.97 Cr.
Total Revenues (in ₹)	500.22 Cr.	427.29 Cr.
% of Export in Total revenue	67%	68%

c. A brief on types of customers

RACL Geartech Ltd. primarily operates as a business-to-business (B2B) manufacturer of precision-engineered automotive components, supplying products directly to leading Original Equipment Manufacturers (OEMs) and Tier-1 suppliers in India and overseas. The Company's products cater to a wide range of applications, including two-wheelers, passenger vehicles, commercial vehicles, electric mobility, off-highway vehicles, agricultural machinery, construction equipment, and industrial systems.

The company has built strong and lasting relationships with its customers in both local and international markets, including Europe and Asia, by always providing top-notch products, meeting deadlines, and showing great engineering skills. RACL teams up with its customers from the start of product development to the end of manufacturing to make sure everything meets the required technical specs, quality standards, and rules set by regulators.

The Company's diversified customer portfolio reflects its strong manufacturing capabilities, commitment to quality, operational excellence, and ability to meet the evolving requirements of global automotive and engineering customers while maintaining the highest standards of product quality, safety, and responsible business practices.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S.No.	Particulars	Total(A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	688	650	94.5%	38	5.5%
2.	Other than Permanent (E)	112	98	87.5%	14	12.5%
3.	Total Emp. (D + E)	800	748	93.5%	52	6.5%
Workers						
1	Permanent (F)	83	83	100%	Nil	Nil
2	Other than Permanent (G)	882	881	99.8%	1	0.1%
3.	Total Emp. (F+ G)	965	964	99.9%	1	0.1%

b. Differently abled Employees and workers:

S.No.	Particulars	Total(A)	Male		Female	
			No. (B)	%(B/A)	No. (C)	%(C/A)
Differently abled Employees						
1	Permanent (D)	Nil	Nil	Nil	Nil	Nil
2	Other than Permanent (E)	Nil	Nil	Nil	Nil	Nil
3	Total differently abled employees (D + E)	Nil	Nil	Nil	Nil	Nil
Differently abled Workers						
1	Permanent (F)	Nil	Nil	Nil	Nil	Nil
2	Other than Permanent (G)	Nil	Nil	Nil	Nil	Nil
3	Total differently abled workers (F + G)	Nil	Nil	Nil	Nil	Nil

21. Participation/Inclusion/Representation of women

	Total (A)	No. and % of females	
		No. (B)	% (B/A)
Board of Directors	8	2	25%
Key Management Personnel	2	1	50%

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2025-26			FY 2024-25			FY 2023-24		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	6.7%	0%	6.7%	8.7%	0.3%	9%	5%	1%	6%
Permanent Workers	12.4%	0%	12.4%	12%	Nil	12%	13%	Nil	13%

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

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

S.No.	Name of the holding/ subsidiary/ associate companies/joint ventures (A)	Indicate whether holding/Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	RACL Geartech Gmbh	Subsidiary Company	100%	No

VI. CSR Details

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

(ii) Turnover (in ₹ Crore): 500.22

(iii) Net worth (in ₹ Crore): 352.12

VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct: Weblink: [393ipdctfile_RACL PoliciesManual.pdf](#)

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2025-26 Current Financial Year			FY 2024-25 Previous Financial Year		
		Number of complaints filed during the year	Number of complaint spending resolution at close of the year	Remark	Number of complaints filed during the year	Number of complaint spending resolution at close of the year	Remarks
Communities	Same as above	0	0	NIL	0	0	NIL
Investors (other than shareholders)	Same as above	0	0	NIL	0	0	NIL
Shareholders	Same as above	1	0	NIL	1	0	NIL
Employees and workers	Same as above	0	0	NIL	0	0	NIL

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2025-26 Current Financial Year			FY 2024-25 Previous Financial Year		
		Number of complaints filed during the year	Number of complaint spending resolution at close of the year	Remark	Number of complaints filed during the year	Number of complaint spending resolution at close of the year	Remarks
Customers	Same as above	119	0	Most customer concerns related to marking, fitment, functionality, and NVH during development and production. Appropriate corrective actions were implemented to prevent recurrence.	145	0	Most of the complaints were related to quality issues due to development and regular production, and required corrective actions were implemented
Value Chain Partners	Same as above	0	0	NIL	0	0	Nil
Other (please specify)							

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Raw Material Sourcing	Risk: Supply chain disruption, raw material price volatility, ESG non-compliance of suppliers, and environmental impacts associated with extraction.	Availability of quality raw materials and responsible sourcing practices are critical for business continuity, regulatory compliance, and meeting customer	- Conduct supplier ESG due diligence and periodic assessments. - Promote sourcing from compliant and responsible suppliers. - Enhance traceability of critical raw materials.	Cost: Higher procurement and supplier assessment costs. Benefit: Reduced supply chain risk, improved customer trust, lower compliance risk, and enhanced brand reputation.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
		Opportunity: Responsible sourcing enhances supply security, customer confidence, regulatory compliance.	sustainability expectations.	Strengthen supplier engagement through sustainability requirements.	
2	Energy Consumption	Risk: Increasing energy costs, climate-related regulations, and carbon transition risks. Opportunity: Renewable energy and energy efficiency improve operational resilience and reduce GHG emissions.	Energy is a major operational input and contributor to greenhouse gas emissions. Transitioning to renewable energy supports climate commitments and long-term cost optimization.	- Gajraula Plant operates on 100% renewable electricity - Expand renewable energy adoption. - Implement energy efficiency initiatives including HVLS fans, VRF cooling systems, LED lighting, and energy monitoring systems.	Cost: Capital investment in renewable energy and efficiency projects. Benefit: Lower electricity costs, reduced Scope 2 emissions, improved ESG performance, and protection against future carbon-related costs.
3	Water Usage and Management	Risk: Water scarcity, regulatory restrictions, and increasing water costs. Opportunity: Water conservation improves operational resilience and resource efficiency.	Water availability is becoming increasingly important due to climate variability and regulatory expectations. Efficient water management strengthens long-term business sustainability.	- Continuously monitor water consumption and identify conservation opportunities. - Improve awareness on responsible water usage - Maintain Zero Liquid Discharge (ZLD) by ensuring effective treatment, recycling, and reuse of waste water in compliance with applicable regulations.	Cost: Investment in water conservation and treatment infrastructure. Benefit: Reduced freshwater consumption, lower operating costs, improved compliance, and greater resilience against water stress.
4	Waste Management	Risk: Improper waste management may result in environmental impacts, regulatory action, and increased disposal costs. Opportunity: Circular economy practices improve resource efficiency and generate value from waste.	Efficient waste management supports regulatory compliance while reducing environmental impacts and improving material efficiency.	- Maximize recycling of metal scrap, packaging materials, and other recyclable waste. - Ensure disposal of hazardous waste through authorized recyclers and treatment facilities. - Promote waste minimization at source and improve segregation practices. - Increase awareness of circular economy principles across operations.	Cost: Investment in waste management systems and compliance requirements. Benefit: Reduced waste management costs, maximized resource recovery, strengthened regulatory compliance, and improved environmental performance.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Labour Practices and Working Conditions	Risk: Workplace injuries, shortage of skilled manpower, and labour compliance risks. Opportunity: Strong employee engagement, capability development, and safe workplaces improve productivity and retention.	Employees are critical to operational excellence. Strong occupational health & safety practices and responsible labour management improve business performance and customer confidence.	- Conduct regular safety, technical, and behavioural training. - Promote employee well-being, fair labour practices, and effective grievance mechanisms. - Continue monitoring occupational health and safety performance.	Cost: Investment in employee welfare, training, and safety improvements. Benefit: Higher productivity, improved retention, reduced incidents, and stronger customer confidence.
6	Logistics & Supply Chain Disruptions	Risk: Geopolitical developments, transportation disruptions, supplier constraints, and global market uncertainty. Opportunity: Resilient and digital supply chains improve operational continuity and customer service.	Manufacturing operations depend on reliable and resilient supply chains capable of responding to external disruptions.	- Strengthen local sourcing where feasible. - Maintain critical inventory for key materials. - Enhance digital monitoring and supplier performance management. - Periodically review business continuity plans.	Cost: Increased inventory carrying costs and digital investments. Benefit: Reduced disruption risk, improved delivery performance, and greater operational resilience.
7	Exchange Rate Fluctuations	Risk	Global sourcing and export operations	Regular monitoring of foreign exchange exposure, supplier localization, natural hedging, and use of hedging instruments, where appropriate.	Cost: Exchange rate volatility may increase procurement costs, impact export earnings, and reduce operating margins if not effectively managed.
8.	Climate Change & Regulatory Compliance	Risk: Increasing climate regulations, evolving ESG disclosure requirements, carbon pricing, and customer decarbonization expectations. Opportunity: Early climate action strengthens competitiveness and access to global markets.	Customers, investors, and regulators increasingly expect transparent climate disclosures and measurable emissions reduction initiatives.	- Monitor Scope 1 and Scope 2 GHG emissions. - Increase renewable energy adoption and improve energy efficiency. - Enhance ESG data quality and governance. - Strengthen climate-related disclosures and support long-term decarbonization planning.	Cost: Investment in monitoring systems, reporting, and decarbonization initiatives. Benefit: Improved ESG ratings, enhanced investor confidence, stronger customer relationships, and reduced long-term compliance costs.

Summary

The company knows that taking care of the environment and being socially responsible is crucial for its long-term success and for creating value for its stakeholders. It regularly reviews the important issues that affect its business, making sure it's ready to respond to changes in the business world, new regulations, and what its stakeholders expect. RACL Geartech will keep working to make its business practices more sustainable by doing things like using resources more efficiently, managing risks, and finding opportunities that will help it grow in a sustainable way and create value over time. This approach will help the company balance its need to make a profit with its responsibility to the environment and society, which is essential for its survival and success in the long run. By being proactive and responsible, RACL Geartech can reduce its negative impact on the environment, build trust with its stakeholders, and create a better future for itself and the communities it serves.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1a- Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
1b- Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
1c- Web Link of the Policies, if available	Yes: https://www.raclgeartech.com/investors/corporate-governance								
2- Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3- Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4- Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trusted standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle	RACL Geartech Limited has adopted several internationally recognized management system standards that support its commitment to the National Guidelines on Responsible Business Conduct (NGRBC). These include IATF 16949:2016 and ISO 9001:2015 for quality management and responsible products and services, ISO 14001:2015 for environmental management and ISO 45001:2018 for occupational health and safety management. These certifications provide a structured framework for continual improvement, regulatory compliance, operational excellence, and responsible business practices across the Company's operations.								
5- Specific commitments, goals and targets set by the entity with defined timelines, if any.			Health & Safety: By 2027, achieve zero workplace accidents and injuries through rigorous implementation of safety protocols, continuous training, and proactive hazard identification and mitigation measures		Diversity & inclusion: By 2027, achieve a workforce composition reflective of diverse backgrounds and perspectives, ensuring that all employees have equal access to opportunities for advancement and development	Continue reducing Scope 1 GHG emissions through energy efficiency initiatives, maintain absolute net-zero Scope 2 GHG emissions at the Gajraula Plant, and sustain 100% wastewater recycling annually.		Supplier Evaluation: To achieve 100% supplier evaluation of RM & OSP by 2027	Compliance: Maintain 100% statutory and regulatory compliance

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6- Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.			Achieved		Increase female workforce participation up to 10%.	Ongoing transition to renewable energy to reduce LPG dependence, while maintaining net-zero Scope 2 GHG emissions at the Gajraula Plant and 100% wastewater recycling.		100% supplier evaluation through Scope 1 & 2 GHG monitoring and Supplier Code of Conduct compliance.	100% complained
Governance, leadership and oversight									
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) At RACL Geartech Ltd., being sustainable is a key part of how we do business and create value that lasts. We're dedicated to running our operations in a responsible way, while also making sure we're creating value that's good for the environment, society, and our stakeholders, by following strong environmental, social, and governance practices. We made big strides in our environmental, social, and governance efforts this year. One of the highlights was when our Gajraula factory started using 100% renewable energy - we did this by making our own solar power on site and also buying certified green power from elsewhere. We're also working hard to use less energy, reduce waste, and keep our workers safe. On top of that, we're making sure our business practices are honest and fair. We've been investing in new technologies that help the environment, training our employees, and making sure our suppliers are responsible too. All of these efforts are helping us become a more sustainable and responsible company. As global expectations on climate action, responsible sourcing, and regulatory compliance continue to evolve, we recognise these as both challenges and opportunities. Our focus remains on reducing our environmental footprint, strengthening ESG performance across our value chain, enhancing stakeholder engagement, and embedding sustainability into every aspect of our business. We remain committed to continual improvement, innovation, and responsible growth while contributing to a more sustainable and resilient future for our customers, employees, communities, and the environment.									
8- Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Gursharan Singh Designation: Chairman & Managing Director DIN : 00057602 Telephone No: 0120-4588500 Email id: info@raclgeartech.com								
9- Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes. The Board of Directors has the overall responsibility for providing strategic direction and oversight on sustainability-related matters. The Board reviews key environmental, social, and governance (ESG) priorities, associated risks and opportunities, and guides the integration of sustainability considerations into the Company's business strategy, decision-making processes, and long-term growth objectives.								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	YES	YES	YES	YES	YES	YES	YES	YES	YES
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	YES	YES	YES	YES	YES	YES	YES	YES	YES
Subject for Review	Frequency (Annually/ Half yearly/ Quarterly/ Any other)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	QTR	QTR	QTR	QTR	QTR	QTR	QTR	QTR	QTR
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	QTR	QTR	QTR	QTR	QTR	QTR	QTR	QTR	QTR
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.	NO	NO	NO	NO	NO	NO	NO	NO	NO

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

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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

ESSENTIAL INDICATORS

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

Segment	Total number of trainings and awareness programmes held	Topics / principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	6	The Board deliberated on key matters relating to business strategy, sustainability and ESG priorities, business ethics, stakeholder engagement, corporate governance, and significant regulatory and statutory developments impacting the Company's operations. The Board also reviewed emerging business trends and received periodic updates on changes in applicable laws, regulations, and governance requirements to facilitate informed decision-making and effective oversight.	100%
Key Managerial Personnel	6	The Key Managerial Personnel (KMP) deliberated on a broad range of strategic and operational matters, including business strategy, business ethics, internal controls, compliance management, sustainability and ESG initiatives, stakeholder engagement, corporate governance, and key regulatory and statutory developments impacting the Company's operations. The discussions also covered emerging business trends and updates on applicable laws, regulations, and governance requirements. These deliberations were aimed at strengthening leadership oversight, enhancing regulatory compliance, supporting effective risk management, and enabling informed decision-making.	100%
Employees other than BOD and KMPs	515	5S, MSA, ISMS, POSH, Kaizen, Auditing Skill, Automated Instrument Handling , SPC, APQP, Customer Complaint handling & lessons learnt , Productivity Improvement, Die Design, CQI-12, Visual Inspection, GD & T , TPM, 8-D problem Solving Technique, Total Productive, Maintenance , Part Inspection as control Plan, 16 types of losses , Fire Mock Drill, Instrument Gauge Uses, Calibration , Dent Damage Reason Controlling , Poke Yoke, Rejection & Rework and Process, Control awareness, Hobbing & Shaving Process Awareness	100%

Segment	Total number of trainings and awareness programmes held	Topics / principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Workers	268	5S, MSA, ISMS, POSH, Kaizen, Auditing Skill, Automated Instrument Handling, SPC, APQP, lessons learnt, Productivity Improvement, Die Design, CQI-12, Visual Inspection, GD & T, TPM, 8-D problem Solving Technique, Total Productive, Maintenance, Part Inspection as control Plan, 16 types of losses, Instrument Gauge Uses, Calibration, Dent Damage Reason Controlling, Poke Yoke, Rejection & Rework and Process, Control awareness, Hobbing & Shaving Process Awareness.	100%

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

Monetary

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

Non- Monetary

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

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
N/A	N/A

- 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.

RACL Geartech Ltd. has a policy in place to prevent bribery and corruption in all its business dealings. This policy is based on the principles of integrity, transparency, and compliance with relevant laws. The company has a zero-tolerance

approach to bribery, corruption, and unethical business practices, and it expects all its employees and partners to adhere to this policy. By adopting this policy, RACL Geartech Ltd. aims to ensure that its business activities are conducted in a fair and honest manner, and that it maintains the trust and confidence of its stakeholders. The policy also reinforces the company's commitment to ethical business practices and its determination to prevent any form of corruption or unethical conduct.

Our company has a policy that applies to everyone who works with us, including directors, employees, consultants, and business partners. This policy is simple: we don't allow anyone to offer, give, or accept any kind of payment, gift, or advantage that could unfairly influence our business decisions. We want to make sure that all our business dealings are fair and honest. If someone thinks that one of our policies has been broken, they can report it using our special complaint and whistleblower procedures. We take all these reports seriously and look into them carefully, following our company's rules and guidelines. This way, we can make sure that our company is always acting with integrity and transparency. We believe that this policy is essential for maintaining trust and respect in our business relationships. By following these guidelines, we can ensure that our company remains a place where people can work together fairly and honestly.

The weblink of the policy is as follows - [393ipdctfile_RACLPoliciesManual.pdf](#)

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

Particulars	FY-2025-26	FY-2024-25
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

Particulars	FY 2025-26		FY 2024-25	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NIL	0	NIL
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NIL	0	NIL

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

Not Applicable.

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

Particulars	FY-2025-26	FY-2024-25
Number of days of accounts payable	61	62

9- Openness of business

Parameter	Metrics	FY 2025-26	FY 2024-25
Concentration of purchases	a. Purchases from trading houses as % of total purchases	NIL	NIL
	b. Number of trading houses where purchases are made from	NIL	NIL
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NIL	NIL
Concentration of Sales	a. Sales to dealers /distributors as % of total sales	NIL	NIL
	b. Number of dealers / distributors to whom sales are made	NIL	NIL
	c. Sales to top 10 dealers / distributors as % of total sales to dealers /distributors	NIL	NIL
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	2.79%	1.24%
	b. Sales (Sales to related parties / Total Sales)	4.23%	3.58%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	NIL	NIL
	d. Investments (Investments in related parties/Total Investments made)	25.70%	NIL

LEADERSHIP INDICATORS

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
RACL Geartech Ltd. holds regular training sessions to teach its partners about important issues. These partners include contractors, service providers, and other businesses that work with the company at its factories. The training covers key points from the company's Code of Conduct, business ethics, and rules to prevent sexual harassment and protect the environment, health, and safety. The goal is to promote responsible business practices, make sure everyone follows the rules, and align everything with the company's policies and standards. This way, all partners are on the same page and work together smoothly. By doing this, RACL Geartech Ltd. wants to make sure its business is run in a responsible and ethical way, not just within the company, but also with all its partners.		

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

Yes. RACL Geartech Ltd. has established a framework to identify, disclose, and manage potential conflicts of interest involving members of the Board of Directors, Key Managerial Personnel (KMP), and Senior Management.

The Directors are required to disclose their interests, relationships, shareholdings, and associations with other entities on an annual basis and whenever there is any material change. As per the Company's Code of Conduct, Directors, KMP, and Senior Management are required to act in the best interests of the Company and avoid situations that may result in actual or potential conflicts of interest.

Wherever a potential conflict exists, the concerned individuals are required to abstain from participating in related discussions or decision-making processes. The Company's Code of Conduct provides guidance on identifying and managing conflicts of interest and is available on the Company's website. Annual declarations are obtained from Directors, KMP, and Senior Management confirming adherence to the Code.

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.**

	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	RACL Geartech Ltd. does not classify capital expenditure (CAPEX) investments as research and development (R&D) expenditure. The Company's CAPEX investments are primarily undertaken for specific products, customer requirements, capacity enhancement, process improvement, and operational needs.		
Capex	Currently, the Company does not have a separate mechanism to track CAPEX investments specifically attributable to technologies aimed at improving the environmental and social impacts of products and processes. Accordingly, such investments are not separately classified or reported under this category.		

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

Yes. RACL Geartech Ltd. has established procedures for responsible sourcing through its supplier selection, evaluation, and monitoring processes. The Company considers parameters such as quality, statutory compliance, operational capability, and responsible business practices while engaging with suppliers.

The supplier assessment process includes evaluation of Key Raw Material and Outsourced Process suppliers, along with periodic reviews and monitoring to ensure adherence to applicable regulatory requirements, quality standards, and customer-specific requirements. Sustainability-related considerations are progressively being integrated into the supplier evaluation framework to strengthen responsible sourcing practices across the value chain.

2b- If yes, what percentage of inputs were sourced sustainably?

RACL Geartech Ltd. has integrated sustainability considerations into its procurement framework through its Green Procurement Guidelines and supplier assessment processes. Sustainability parameters are considered during supplier selection, evaluation, and onboarding, supported by supplier questionnaires, risk assessment, and periodic monitoring mechanisms.

During the reporting period, 100% of new suppliers were evaluated against defined sustainability-related criteria as part of the supplier selection process. Sustainability-related requirements are also incorporated into relevant supplier documentation and purchase contracts to promote responsible sourcing practices.

However, the Company currently does not separately quantify the percentage of total inputs sourced sustainably based on defined sustainability criteria.

3- Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

A	Plastics (including packaging)	Plastic packaging materials, including bins, trays, covers, and other reusable packaging materials, are returned to and from customers and suppliers wherever applicable for reuse. Discarded plastic packaging materials, plastic containers, covers, and used barrels are segregated and sent to authorized recyclers for recycling and safe disposal. Vendor Name- Bharat Oil & Waste Management Ltd (http://www.bharatoil.com/)
B	E-waste	E-waste generated from the Company's operations is segregated and handed over to authorized e-waste recyclers/vendors for environmentally sound recycling and disposal in compliance with applicable regulatory requirements.
C	Hazardous waste	Hazardous waste generated from manufacturing activities is managed through authorized waste handlers in accordance with applicable environmental regulations. Wherever feasible, such waste is sent for recycling/recovery to minimize environmental impact.
D	other waste	Other waste streams, including paper waste, corrugated boxes, metal/machining scrap, and garden waste, are segregated and managed through authorized vendors for recycling, recovery, or appropriate disposal.

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

Yes. RACL Geartech Ltd. is covered under the applicability of Extended Producer Responsibility (EPR) requirements for plastic packaging and has obtained EPR registration from the Central Pollution Control Board (CPCB) under the Brand Owner category.

The Company has established processes to ensure compliance with its approved EPR plan submitted to the concerned authorities. Plastic packaging waste generated through the Company's activities is managed through segregation, recycling, and environmentally sound disposal practices in accordance with applicable regulatory requirements.

The Company promotes responsible plastic waste management by reducing plastic consumption wherever feasible, encouraging reuse of packaging materials, and ensuring recycling of plastic waste through authorized recyclers as per EPR obligations.

LEADERSHIP INDICATORS

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

NIC Code	Name of Product/Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ assessment was conducted	Whether conducted by Independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
NO					

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

Name of Product / Service	Description of the risk / concern	Action Taken
NA	NA	NA

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2025-26	FY 2024-25
Steel & Casting	90%	90%

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

	FY 2025-26			FY 2024-25		
	Re-Used	Recycled Disposed	Safely	Re-Used	Recycled Disposed	Safely
Plastics (including packaging)	No	No	No	No	No	No
E-waste	No	No	No	No	No	No
Hazardous waste	No	No	No	No	No	No
Other waste	No	No	No	No	No	No

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
No	No

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

ESSENTIAL INDICATORS

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	650	650	100%	650	100%	-	-	-	-	-	-
Female	38	38	100%	38	100%	38	100%	-	-	-	-
Total	688	688	100%	688	100%	38	5.5%	-	-	-	-
Other than Permanent employees											
Male	98	98	100%	98	100%	-	-	-	-	-	-
Female	14	14	100%	14	100%	14	100%	-	-	-	-
Total	112	112	100%	112	100%	14	12.5%	-	-	-	-

1b- Details of measures for the well-being of workers:

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	83	83	100%	83	100%	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	83	83	100%	83	100%	-	-	-	-	-	-
Other than Permanent Workers											
Male	881	881	100%	881	100%	-	-	-	-	-	-
Female	1	1	100%	1	100%	1	100%	-	-	-	-
Total	882	882	100%	882	100%	1	0.1%	-	-	-	-

1c- Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

Particulars	FY-2025-26	FY-2024-25
Cost incurred on wellbeing measures as a % of total revenue of the company	0.48%	0.40%

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

Benefits	FY 2025-26			FY 2024-25		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	NA	100%	100%	NA
ESI	34.4%	100%	Yes	40%	100%	Yes
Others, please specify	NA	NA	NA	NA	NA	NA

3- Accessibility of workplaces.

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

Yes. RACL Geartech Ltd. has provisions for accessibility of its offices and work locations for differently abled employees and workers in accordance with the requirements of the Rights of Persons with Disabilities Act, 2016. The Company provides necessary infrastructure and support to facilitate safe and convenient access at its operational locations.

The Company remains committed to promoting an inclusive workplace and continuously evaluates opportunities to enhance accessibility and provide reasonable support wherever required.

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

Yes. RACL Geartech Ltd. is committed to promoting an inclusive, diverse, and equitable workplace by providing equal opportunities to all employees and candidates. The Company follows fair and ethical employment practices and ensures that employment decisions are based on merit, skills, qualifications, and business requirements.

The Company adheres to the principles of non-discrimination and equal opportunity in line with the requirements of the Rights of Persons with Disabilities Act, 2016. RACL promotes a workplace free from discrimination on the basis of disability and other protected characteristics and provides necessary support and reasonable accommodation wherever required.

The Company's Non-Discrimination Policy, which outlines its commitment towards inclusivity and equal opportunity, is accessible to employees through the Company's website and internal communication platforms. Weblink: 393ipdctfile_RACLPoliciesManual.pdf

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	NA	NA	NA	NA
Female	NA	NA	NA	NA
Total	NA	NA	NA	NA

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

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

Yes. RACL Geartech Ltd. has established grievance redressal mechanisms to enable employees and workers to raise their concerns and grievances in a fair, transparent, and confidential manner.

The mechanism is available for permanent employees, other than permanent employees, permanent workers, and other than permanent workers. Employees and workers can raise their concerns through established channels, including the Human Resource Management System (HRMS), Human Resources function, and the Whistle Blower mechanism, as applicable.

All grievances received are reviewed and addressed by the concerned functions in accordance with defined processes to ensure timely resolution and appropriate corrective actions. The Company also has a Prevention of Sexual Harassment (POSH) framework supported by an Internal Committee to address complaints related to workplace harassment.

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

Category	FY 2025-26			FY 2024-25		
	Total employees/ workers in respective category(A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in respective category(C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	0	0	NA	0	0	NA
Male	0	0	NA	0	0	NA
Female	0	0	NA	0	0	NA
Total Permanent Workers	0	0	NA	0	0	NA
Male	0	0	NA	0	0	NA
Female	0	0	NA	0	0	NA

8- Details of training given to employees and workers.

Category	FY 2025-26					FY 2024-25				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		Number (B)	% (B/A)	Number (C)	% (C/A)		Number (E)	% (E/D)	Number (F)	% (F/A)
Employees										
Male	748	606	81%	307	41%	706	597	84%	232	33%
Female	52	52	100%	23	44%	41	32	78%	15	36%
Total	800	658	82.25%	330	41%	747	629	84%	247	33%
Workers										
Male	964	964	100%	733	76%	781	476	61%	584	75%
Female	1	1	100%	1	100%	-	-	-	-	-
Total	965	965	100%	734	76%	781	476	61%	584	75%

9- Details of performance and career development reviews of employees and worker:

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	748	748	100%	683	683	100%
Female	52	52	100%	41	41	100%
Total	800	800	100%	724	724	100%
Workers						
Male	964	964	100%	781	781	100%
Female	1	1	100%	-	-	-
Total	965	965	100%	781	781	100%

10- Health and safety management system.

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

Yes. RACL Geartech Ltd. has implemented an Occupational Health and Safety (OHS) Management System across its manufacturing facilities, aligned with the requirements of ISO 45001:2018 Occupational Health and Safety Management System. The system provides a structured framework for identifying occupational health and safety risks, implementing preventive and mitigation measures, monitoring performance, and driving continual improvement.

The OHS Management System covers employees, permanent and non-permanent workers, and contractors engaged across the Company's operational locations. The system includes processes related to hazard identification and risk assessment, workplace safety inspections, incident reporting and investigation, emergency preparedness, occupational health monitoring, safety training, and provision of appropriate personal protective equipment (PPE).

The Company also undertakes initiatives to promote a strong safety culture through regular awareness programmes, employee engagement, and implementation of safety practices aimed at preventing workplace injuries and occupational health risks.

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

Yes. RACL Geartech Ltd. has implemented a structured Hazard Identification and Risk Assessment (HIRA) process as an integral part of its Occupational Health and Safety Management System. The Company follows a systematic approach to identify hazards, assess associated risks, and implement appropriate controls to prevent workplace incidents and occupational health risks.

HIRA assessments are conducted for routine and non-routine activities, including manufacturing processes, machinery and equipment operations, maintenance activities, and other workplace activities. The assessment considers the nature of hazards, likelihood of occurrence, and severity of potential consequences to determine the level of risk and required mitigation measures.

For non-routine activities, including maintenance and special operations, risk assessment is carried out through the Work Permit System before commencement of work to ensure that necessary safety precautions and controls are implemented.

The effectiveness of identified controls is periodically reviewed through safety inspections, HIRA reviews, audits, incident/near-miss analysis, and continual improvement initiatives. These practices enable the Company to proactively manage occupational health and safety risks and strengthen its safety culture across operations.

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

Yes. RACL Geartech Ltd. has established processes that enable employees and workers to report work-related hazards, unsafe conditions, and potential risks through defined safety reporting mechanisms.

Workers are encouraged to promptly report unsafe acts, unsafe conditions, near misses, and workplace hazards to the concerned supervisors, safety team, or through established communication channels. Reported hazards are evaluated and appropriate corrective and preventive actions are implemented based on the level of risk.

The Company follows a proactive safety approach under its Occupational Health and Safety Management System, wherein workers are empowered to avoid or stop work in situations involving imminent danger until adequate safety controls are implemented. The Work Permit System and risk assessment processes further ensure that necessary precautions are established before undertaking high-risk or non-routine activities.

These practices support a strong safety culture and enable continuous improvement in workplace health and safety performance.

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

Yes. RACL Geartech Ltd. provides access to non-occupational medical and healthcare services for its employees and workers through various employee welfare initiatives.

The Company extends medical insurance benefits to eligible employees and provides support for healthcare needs. In addition, the Company undertakes health and wellness initiatives, including periodic medical check-ups and awareness programmes, to promote the overall well-being of its workforce.

These initiatives are aimed at ensuring access to necessary healthcare support and enhancing employee health and well-being beyond workplace-related occupational health requirements.

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

Safety Incident/Number	Category	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0	0
Total recordable work-related injuries	Employees	5	0
	Workers	4	5
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

RACL Geartech Ltd. is committed to providing a safe and healthy workplace through a structured Occupational Health and Safety (OHS) Management System aligned with the requirements of **ISO 45001:2018**. The Company follows a proactive approach towards prevention of workplace injuries and occupational health risks through continuous identification, assessment, and mitigation of safety risks.

Key measures implemented by the Company include:

- Conducting Hazard Identification and Risk Assessment (HIRA), safety inspections, and risk evaluations for routine and non-routine activities to identify potential hazards and implement appropriate controls.
- Providing necessary Personal Protective Equipment (PPE) and ensuring compliance with defined safety practices across manufacturing operations.
- Conducting regular safety training, awareness programmes, toolbox talks, and communication sessions to enhance safety awareness among employees, workers, and contractors.
- Implementing machine safety measures, workplace safety procedures, emergency preparedness plans, and periodic safety audits to strengthen operational safety.
- Following a Work Permit System for high-risk and non-routine activities to ensure adequate precautions are implemented before commencement of work.
- Monitoring workplace health through medical support, health check-ups, and employee wellness initiatives.

The Company continuously reviews its safety performance through incident reporting, near-miss analysis, corrective and preventive actions, and improvement initiatives to strengthen its safety culture across operations.

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

	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	NIL	0	0	NIL
Health & Safety	0	0	NIL	0	0	NIL

14- Assessments for the year.

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

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

During the reporting period, **no significant safety-related incidents or material health and safety concerns were identified.** The Company continues to follow a proactive approach towards workplace safety through regular Hazard Identification and Risk Assessment (HIRA), safety inspections, internal audits, and employee awareness initiatives.

Wherever safety observations or improvement opportunities are identified, appropriate corrective and preventive actions (CAPA) are implemented to address the underlying causes and strengthen existing safety controls. The Company remains committed to continual improvement of its Occupational Health and Safety Management System and maintaining a safe and healthy workplace for employees, workers, and contractors.

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).

RACL Geartech Ltd. provides life insurance and applicable compensatory benefits to support employees and workers in the event of death, in accordance with the Company's policies and applicable statutory requirements.

(a) Employees:Yes

Eligible employees are covered under applicable life insurance and compensation benefits as part of the Company's employee welfare and social security initiatives.

(b) Workers:Yes

Eligible workers are provided applicable life insurance and compensation benefits in accordance with Company policies and statutory provisions.

The Company remains committed to ensuring financial security and support for the families of employees and workers through appropriate welfare measures.

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

RACL Geartech Ltd. has established processes to encourage and monitor compliance with applicable statutory requirements among its relevant value chain partners, including contractors and service providers.

The Company incorporates statutory compliance obligations into contractual arrangements and expects its partners to adhere to applicable labour laws and regulatory requirements, including timely deduction and deposit of statutory

dues such as Provident Fund (PF), Employees' State Insurance (ESI), and other applicable contributions.

Compliance of relevant partners is monitored through periodic review of supporting documents and records. Any identified gaps or non-compliances are communicated to the concerned partners for necessary corrective actions.

Through these initiatives, RACL promotes responsible business conduct and strengthens compliance practices across its value chain.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025-26	FY 2024-25	FY 2025-26	FY 2024-25
Employees	0	0	0	0
Workers	0	0	0	0

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

Yes. RACL Geartech Ltd. supports employee transition and continued employability through its human resource practices focused on skill development, knowledge retention, and employee well-being.

The Company promotes continuous learning and capability enhancement through training and development initiatives to support employees in building relevant skills and sustaining professional growth. The Company also follows structured processes for employee separation and retirement in accordance with applicable statutory requirements and internal policies, ensuring a fair and transparent transition.

Where required and based on business needs, the expertise and knowledge of experienced employees may be utilized to support knowledge transfer and business continuity.

5- Details on assessment of value chain partners.

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working Conditions	100%

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.

RACL Geartech Ltd. encourages responsible health and safety practices among its relevant value chain partners, including contractors and service providers engaged at its manufacturing facilities.

The Company monitors safety practices through defined engagement processes, including review of safety compliance requirements, workplace observations, inspections, and interaction with concerned partners. Any identified safety gaps, unsafe conditions, or improvement opportunities are communicated to the respective partners, and appropriate corrective and preventive actions are undertaken.

Corrective actions may include implementation of additional safety controls, awareness and training sessions, strengthening of safe work practices, and follow-up verification to ensure effective closure of identified observations.

Through these initiatives, RACL strives to promote a safe working environment and strengthen occupational health and safety practices across its value chain.

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

ESSENTIAL INDICATORS

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

RACL Geartech Ltd. follows a structured stakeholder identification and engagement process based on the principles of transparency, accountability, and responsible business conduct. The Company identifies stakeholders as individuals, groups, or entities that have a significant influence on, or are impacted by, its business operations, value creation process, and value chain.

The identification and prioritization of key stakeholder groups are carried out considering factors such as the nature of the relationship with the Company, level of influence, degree of impact, business relevance, and stakeholder expectations. The Company's key stakeholder groups include Promoters, Investors, Employees, Workers, Customers, Clients, Vendors, Suppliers, Government and Regulatory Authorities, Local Communities, and CSR partners.

The Company engages with stakeholders through various structured channels, including regular business interactions, meetings, feedback mechanisms, audits, and compliance processes. These engagements enable the Company to understand stakeholder concerns, receive feedback, communicate business and sustainability initiatives, and align its strategies with stakeholder expectations.

Through continuous stakeholder engagement, RACL strives to strengthen relationships, enhance transparency, identify areas of improvement, and create sustainable long-term value for its stakeholders.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors and Shareholders	No	Investor conferences/calls/meetings, Quarterly result calls, Presentations, Annual and Extra - Ordinary General Meeting, Designated email ID for redressal of grievances and queries, functional website, newspaper publications.	Annual, Quarterly, Need Basis	Governance and financial performance, profit, Business updates, risks Growth plans, future roadmap, and product pipeline
Customers (OEMs & Tier-1)	NO	Exhibitions & industry events, digital communication platforms, e-mail, company website, customer audits, technical discussions, and personal meetings.	Continuous	Gaining insight into operational difficulties faced by the business; Exploring ways to enhance the Company's products and services

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Suppliers	No	Routine Meetings, E-mail, Supplier audits, plant visits, dialogue on the industry initiative and training courses	Continuous	RACL Geartech fosters strong and collaborative relationships with its suppliers and vendors to support operational efficiency and mutual growth. The Company places emphasis on the supply of quality goods and materials, ensuring timely deliveries and prompt payments to maintain trust and reliability. Engagements with suppliers also extend to the introduction of new products and the exploration of new business opportunities. RACL prioritizes consistency in values, strategic direction, and day-to-day operations, while also working closely with its partners to effectively address and manage operational challenges. This approach helps reinforce a resilient and forward-looking supply chain ecosystem.
Employees and Workers	No	RACL Geartech leverages a mix of digital and physical communication channels to ensure transparent and effective engagement across the organization. These include, but are not limited to: - Emails and video conferences - Townhalls and leadership touch points - Notice boards, visuals and WhatsApp groups - HR portal and internal messaging platforms - Appraisal discussions and training programs supporting personal and professional development	Ongoing basis	Regular communication on business operations and long-term strategic direction; Opportunities for skill development and continuous learning through training programs; Promotion of an inclusive workplace that respects and values diverse backgrounds Enhanced safety awareness through consistent implementation of safe work procedures; Initiatives to build connection and involvement among employees across all levels

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
		This multi-channel approach fosters open communication, continuous learning, and alignment with organizational goals.		
Community	No	Community projects, gatherings and updates, surveys to see the effect of our actions, other ways of communication such as; emails, ads, magazines, websites, and social media.	as and when required	Community development programmes Implementation through CSR initiatives

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.

RACL Geartech Ltd. has established a structured stakeholder engagement process to understand and address the expectations of its key stakeholders on economic, environmental, social, and governance (ESG) matters. Stakeholder consultations are undertaken through various channels, including meetings, customer interactions, supplier engagements, employee communication forums, investor interactions, grievance mechanisms, audits, surveys, and regulatory discussions.

The responsibility for stakeholder engagement is primarily managed by the respective functional teams and senior management. Feedback and significant issues arising from these engagements are periodically reviewed and escalated to the Key Managerial Personnel (KMP) and the Board of Directors, as appropriate, for consideration during strategic planning, risk management, sustainability initiatives, and business decision-making.

This structured process enables the Company to integrate stakeholder expectations into its business strategies, strengthen governance practices, and support long-term sustainable value creation.

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

Yes. RACL Geartech Ltd. considers stakeholder consultation as an important input for identifying and managing material environmental and social topics. The Company regularly engages with key stakeholders, including customers, employees, suppliers, investors, regulatory authorities, and local communities, through structured communication and engagement mechanisms.

Feedback received from stakeholders is evaluated by the respective functional teams and management and, where relevant, is incorporated into the Company's policies, operational practices, and sustainability initiatives. For instance, customer expectations and regulatory developments have supported the strengthening of environmental initiatives such as renewable energy adoption, energy efficiency, waste management, and responsible sourcing practices. Similarly, feedback from employees and workers has contributed to enhancing workplace health and safety practices, employee welfare initiatives, and learning and development programmes.

The Company continues to integrate stakeholder inputs into its decision-making processes to strengthen responsible business practices and create sustainable long-term value.

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

RACL Geartech Ltd. considers engagement with vulnerable and marginalized stakeholder groups as an integral part of its Corporate Social Responsibility (CSR) strategy. The Company actively engages with local communities and other relevant stakeholders in the vicinity of its operations to understand their needs and identify priority areas for intervention before designing and implementing development programmes.

Based on these engagements, the Company undertook initiatives during the reporting period focusing on education, healthcare, and community development. As part of its education initiatives, RACL continued to support schools by strengthening educational infrastructure and promoting access to quality education for students from economically weaker sections. The Company also implemented community welfare and healthcare initiatives based on identified local needs.

Feedback received through these engagements is incorporated into the Company's CSR planning process, ensuring that its initiatives remain need-based, inclusive, and responsive to stakeholder expectations while contributing to sustainable socio-economic development.

PRINCIPLE 5: Businesses should respect and promote human rights

ESSENTIAL INDICATORS

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	688	688	100%	656	656	100%
Other than permanent	112	112	100%	91	91	100%
Total employees	800	800	100%	747	747	100%
Workers						
Permanent	83	83	100%	96	96	100%
Other than permanent	882	882	100%	685	553	81%
Total workers	965	965	100%	781	649	83%

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

Category	FY 2025-26					FY 2024-25				
	Total (A)	= to min wage		> than min wage		Total (D)	= to min wage		> than min wage	
		#(B)	%B/A	#C	%(C/A)		#(E)	%E/D	No.(F)	%F/D
Employees										
Permanent	688	0	0	688	100%	656	0	0	656	100%
Male	650	0	0	650	100%	628	0	0	628	100%
Female	38	0	0	38	100%	28	0	0	28	100%
Other than permanent	112	0	0	112	100%	91	0	0	91	100%
Male	98	0	0	98	100%	78	0	0	78	100%
Female	14	0	0	14	100%	13	0	0	13	100%

Category	FY 2025-26					FY 2024-25				
		= to min wage		> than min wage			= to min wage		> than min wage	
	Total (A)	#(B)	%B/A	#C	%(C/A)	Total (D)	#(E)	%E/D	No.(F)	%F/D
Workers										
Permanent	83	0	0	83	100%	96	0	0	96	100%
Male	83	0	0	83	100%	96	0	0	96	100%
Female	0	0	0	0	100%	0	0	0	0	100%
Other than permanent	882	229	25.9%	653	74%	685	217	31.67%	468	68.32%
Male	881	229	25.9%	652	74%	685	217	31.67%	468	68.32%
Female	1	0	0	1	100%	0	0	0	0	0%

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

a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BOD)	6	4,33,500	2	21,12,500
Key Managerial Personnel	1	89,25,180	1	15,57,124
Employees* other than BOD and KMP	650	3,72,480	52	234570
Workers*	83	4,98,276	0	NIL

*Only permanent employees and workers have been considered.

3b- Gross wages paid to females as % of total wages paid by the entity, in the following format:

Particulars	FY-2025-26	FY-2024-25
Gross wages paid to females as % of total wages	3.5%	2.54%

4- Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes. RACL Geartech Ltd. has designated the HR & Personnel Department as the focal point for overseeing human rights-related matters across the organization. The Department is responsible for facilitating the implementation of the Company's human rights commitments, addressing concerns raised by employees and workers, and promoting compliance with applicable laws and internal policies.

Human rights-related issues are addressed through established governance mechanisms, including employee grievance redressal processes, the Whistle Blower Mechanism, the Prevention of Sexual Harassment (POSH) framework, and the Code of Conduct. Reported concerns are reviewed by the concerned functions, and appropriate actions are taken based on the nature and severity of the issue.

Where necessary, significant matters are escalated to senior management for review, ensuring appropriate oversight, timely resolution, and continual improvement of the Company's human rights practices.

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

RACL Geartech Ltd. has established a structured grievance redressal framework to address human rights-related concerns in a fair, transparent, and timely manner. Employees, workers, and other relevant stakeholders can raise concerns

through multiple channels, including the HR & Personnel Department, the Whistle Blower Mechanism, the Prevention of Sexual Harassment (POSH) Internal Committee, and other designated grievance redressal mechanisms, as applicable.

All reported concerns are reviewed confidentially and impartially by the concerned function. Appropriate investigations are undertaken, and corrective and preventive actions are implemented based on the nature and severity of the issue. The Company also maintains safeguards against retaliation and encourages stakeholders to report concerns without fear of discrimination or adverse consequences.

The effectiveness of the grievance redressal process is periodically reviewed to strengthen human rights compliance, reinforce ethical business conduct, and promote a respectful, safe, and inclusive workplace.

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

	FY 2025-26		FY 2024-25	
	Filed during the year	Pending resolution at the end of year	Remarks work rate	Filed during the year
Sexual Harassment	No	No	No	No
Discrimination at workplace	No	No	No	No
Child Labour	No	No	No	No
Forced Labour/Involuntary Labour	No	No	No	No
Wages	No	No	No	No
Other human rights related issues	No	No	No	No

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

Particulars	FY-2025-26	FY-2024-25
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees/ workers	0	0
Complaints on POSH upheld	0	0

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

RACL Geartech Ltd. is committed to maintaining a safe, inclusive, and respectful workplace free from discrimination, harassment, and retaliation. The Company has established appropriate governance mechanisms, including the **HR & Personnel Department**, the **Internal Committee** constituted under the Prevention of Sexual Harassment (POSH) Act, the **Whistle Blower Mechanism**, and the **Code of Conduct**, to address such concerns.

All complaints are handled in a fair, impartial, confidential, and time-bound manner through established grievance redressal processes. The Company maintains a **zero-tolerance approach** towards discrimination, harassment, and any form of retaliation against individuals who report concerns in good faith or participate in an investigation.

Appropriate corrective and disciplinary actions are taken, wherever required, based on the outcome of the investigation. Through these mechanisms, RACL strives to ensure that complainants and witnesses are protected from adverse consequences while promoting a workplace culture founded on dignity, respect, and ethical conduct.

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

Yes. RACL Geartech Ltd. incorporates human rights and ethical business conduct expectations into its business relationships through applicable contractual terms, the Supplier Code of Conduct, and other relevant policies, wherever applicable.

The Company expects its suppliers, contractors, service providers, and other business partners to comply with applicable labour laws, respect internationally recognised human rights principles, prohibit child labour, forced labour, discrimination and harassment, and provide safe and healthy working conditions. These expectations are communicated through contractual obligations, supplier engagement processes, and applicable compliance requirements.

The Company continues to strengthen responsible business practices across its value chain by encouraging compliance with its human rights commitments and applicable regulatory requirements.

10- Assessments for the year.

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Sexual Harassment	100%
Discrimination at workplace	All manufacturing facilities and offices of RACL Geartech Ltd. have been assessed through internal assessments, statutory inspections, and/or third-party assessments, as applicable. These assessments cover relevant areas including workplace practices, occupational health and safety, statutory compliance, and adherence to applicable policies and standards.
Child Labour	
Forced Labour/ Involuntary Labour	
Wages	
Other human rights related issues	

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

During the reporting period, no significant human rights-related risks or concerns were identified through the assessments conducted across RACL Geartech Ltd.'s plants and offices.

Any observations or improvement areas identified through internal reviews, grievance mechanisms, or compliance monitoring processes are evaluated and addressed through appropriate corrective and preventive actions (CAPA), wherever required. The Company continues to strengthen its human rights practices through regular monitoring and awareness initiatives.

LEADERSHIP INDICATORS

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

As part of the Company's ongoing human rights due diligence process, no material human rights grievances or complaints were identified that required modification or introduction of any business process. RACL Geartech Ltd. continues to strengthen its human rights management framework through established policies, periodic employee awareness programmes, training on the Code of Conduct and Human Rights Policy, regular compliance monitoring, and effective grievance redressal mechanisms. Human rights expectations are also communicated to relevant business partners through contractual requirements and ongoing business engagement.

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

RACL Geartech Ltd. undertakes human rights due diligence through its established governance and compliance processes across all its manufacturing facilities and offices. The scope covers key human rights aspects, including non-discrimination, prevention of child labour and forced labour, equal opportunity, freedom of association, workplace health and safety, prevention of sexual harassment, employee welfare, and compliance with applicable labour laws.

The due diligence process is supported through periodic internal assessments, employee grievance redressal mechanisms, the Whistle Blower Mechanism, POSH framework, statutory compliance reviews, and employee awareness programmes. Observations arising from these processes are reviewed by the concerned functions, and appropriate corrective and preventive actions are implemented wherever required.

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?

Yes. RACL Geartech Ltd. is committed to providing an accessible and inclusive environment for differently abled visitors. The Company's offices and manufacturing facilities are equipped with accessible infrastructure, wherever applicable, in line with the requirements of the Rights of Persons with Disabilities Act, 2016. This includes barrier-free access through features such as ramps, lifts, accessible entry and exit points, and other necessary facilities to facilitate safe and convenient access for visitors.

4- Details on assessment of value chain partners.

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	100%
Discrimination at workplace	100%
Child Labour	100%
Forced Labour/ Involuntary Labour	100%
Wages	100%
Other human rights related issues	100%

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

RACL Geartech Ltd. addresses observations arising from value chain partner assessments through a structured corrective and preventive action (CAPA) process. Where assessments identify non-conformities or improvement opportunities, the concerned value chain partners are required to implement time-bound corrective action plans and submit supporting evidence for review.

The effectiveness of corrective actions is verified through follow-up assessments, documentation reviews, and ongoing supplier performance monitoring, wherever applicable. This process enables the Company to strengthen supplier compliance, mitigate potential risks, and promote continuous improvement across its value chain.

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

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

ESSENTIAL INDICATORS

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

Parameters	FY-2025-26	FY-2024-25
From renewable sources		
Total electricity consumption (unit GJ) (A)	65754	62545
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumption (A+B+C)	65754	62545
From non-renewable sources		
Total electricity consumption (D) GJ	4616	3137
*Total fuel consumption (E) GJ	41006	319

Parameters	FY-2025-26	FY-2024-25
Energy consumption through other sources (F)	0	0
Total energy consumption (D+E+F) 45622	3456	
Total energy consumed (A+B+C+D+E+F)	111376	66001
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.0000222	0.0000154
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.0000233	0.0000158
Energy intensity in terms of physical output	0.01674	0.01056
Energy intensity (optional) – the relevant metric may be selected by the entity		

*Increase due to revised calculation methodology, including LPG under fuel 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. NO

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

No. RACL Geartech Ltd. does not have any manufacturing facility identified as a Designated Consumer (DC) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India. Accordingly, the Company is not subject to PAT-specific energy reduction targets under the Scheme.

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

Parameters	FY-2025-26	FY-2024-25
Water withdrawal by source (in kilolitres)		
(i) Surface water		
(ii) Groundwater	14248	15496
(iii) Third-party water	2316	2209
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)		
Total volume of water consumption (in kilolitres)	16564	17705
Water intensity per rupee of turnover (Water consumed / turnover)	0.0000033	0.0000041
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption /Revenue from operations adjusted for PPP)	0.0000035	0.0000042
Water intensity in terms of physical output	0.002489	0.002832
Water intensity (optional) – the relevant metric may be selected by the entity		

4- Provide the following details related to water discharged.

Parameters	FY-2025-26	FY-2024-25
Water discharge by destination and level of treatment (in kilolitres)	The Company has implemented a Zero Liquid Discharge (ZLD) system under which wastewater is treated, recycled, and reused within the facility, ensuring that no liquid effluent is discharged into the environment.	
(i) To Surface water		
- No treatment		
With treatment – please specify level of treatment		
(ii) To Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

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

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

Yes. RACL Geartech Ltd. has implemented a Zero Liquid Discharge (ZLD) mechanism at its manufacturing facilities to promote responsible water management and minimize freshwater consumption. Wastewater generated from operations is treated through the Company's Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP), and the treated water is recycled and reused for appropriate non-potable applications within the premises.

The Company continuously monitors the performance of its treatment systems and undertakes periodic maintenance to ensure effective operation, regulatory compliance, and efficient utilization of water resources as part of its commitment to sustainable manufacturing.

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

Parameter	Please specify unit	FY 2025-26	FY 2024-25
NOx	µg/m ³	40.21	41.62
Sox	µg/m ³	21.33	21.75
Particulate matter (PM) PM10	µg/m ³	84.33	92.5
Persistent organic pollutants (POP)		0	0
Volatile organic compounds (VOC)		0	0
Hazardous air pollutants (HAP)		0	0
Others – please specify		0	0

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

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	2794.15	2299.74
* Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	910.32	623.88
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent/Rs	0.000000741	0.000000684
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent/Rs	0.00000078	0.00000070
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes of CO ₂ equivalent / Total number of parts produced	0.0005567	0.0004676
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

** Electricity consumption increased due to higher production at the Noida Plant. The Gajraula Plant has achieved net-zero Scope 2 GHG emissions, and renewable energy adoption is planned across all facilities.*

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

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

Yes. RACL Geartech Ltd. has undertaken various initiatives to reduce greenhouse gas (GHG) emissions as part of its climate change mitigation and decarbonization strategy.

The key initiatives include:

- **Achieving 100% renewable electricity** usage at the Gajraula manufacturing facility through a combination of renewable energy sources, including on-site solar generation and procurement of certified green power from the grid by paying a green energy premium.
- **Installation of approximately 1.7 MW rooftop solar** capacity across manufacturing facilities to increase renewable energy utilization.
- **Implementation of a 4 MW off-site Solar** Power Purchase Agreement (PPA) to further strengthen renewable energy adoption and reduce Scope 2 GHG emissions.

The Company has implemented several energy efficiency initiatives, including the installation of HVLS (High Volume Low Speed) fans, a VRV (Variable Refrigerant Volume) air-conditioning system, process optimization, and energy monitoring systems. These initiatives have improved operational energy efficiency, optimized cooling performance, and contributed to the reduction of greenhouse gas emissions.

Undertook a large-scale plantation drive during FY 2025–26 by planting 4,800 saplings to enhance green cover, promote biodiversity, and support environmental conservation.

These initiatives support RACL's efforts towards reducing its carbon footprint, improving energy efficiency, and achieving its long-term decarbonization objectives.

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

Parameter	FY 2025-26	FY 2024-25
Total Waste generated (in Kgs/ Litres/ Nos.)		
*Plastic waste (A) kg	57 kg	103 kgs
E-waste (B)	48 kg	58.5kg
Bio-medical waste (C)	NA	NA
Construction and demolition waste (D)	NA	NA
Battery waste (E)	NA	NA
Radioactive waste (F)	NA	NA
Other Hazardous waste. Please specify, if any. (G)	Scrap grinding wheel -448 kg Oil-Soaked cloth -1084 kg	Scrap grinding wheel - 763 kg Oil-Soaked cloth - 885 kg
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	ETP Sludge –991 kg Used Scrap Oil -930litres (Scrap oil and Air) filters – 58kg	ETP Sludge – 866kg Used Scrap Oil - 880 litres Scrap oil and Air filters – 129kg
*Total (A+B + C + D + E + F +G + H)	3616 kg	3684.5 kg
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0000000007	0.0000000009
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.0000000008	0.0000000009
Waste intensity in terms of physical output	0.0000005435	0.0000005893
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste	All waste generated by RACL Geartech Ltd. is managed through authorised waste management vendors in accordance with applicable environmental regulations. The Company ensures proper segregation, collection, and responsible channelisation of waste for recycling, recovery, treatment, or disposal, as applicable.	
(i) Recycled		
(ii) Re-used		
(iii) Other recovery operations		
Total		
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste	Waste generated by RACL Geartech Ltd. is segregated and handed over to authorised waste management agencies for appropriate disposal in accordance with applicable environmental regulations. Disposal methods are selected based on the nature of waste and regulatory requirements, including authorised treatment, disposal, and other approved methods. Category-wise details of waste disposed by nature of disposal method are maintained and disclosed based on records received from authorised waste management partners.	
(i) Incineration		
(ii) Landfilling		
(iii) Other disposal operations		
Total		

**The calculation methodology has been revised to improve data accuracy and enhance the reliability of reporting.*

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

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

RACL Geartech Ltd. has established a structured waste management framework focused on waste minimisation, resource recovery, regulatory compliance, and responsible disposal practices.

Waste generated from operations is segregated at source using designated systems and stored separately for hazardous and non-hazardous categories in identified storage areas following safe storage practices based on the 3C principle (Covered, Concrete, and Containerised). Waste handling, generation, and disposal records are maintained as per applicable regulatory requirements, including prescribed documentation wherever applicable.

The Company promotes resource efficiency through initiatives such as recovery and reuse of used oil through a centrifugal pump, reuse of cotton waste wherever feasible, and increased reuse of plastic bins and containers. Continuous improvement initiatives are undertaken to optimise the consumption of oils, acids, and other process consumables, thereby reducing waste generation and environmental impact.

Hazardous waste generated from operations is managed through authorised waste management agencies in compliance with applicable regulations. The Company follows its Environmental, Health and Safety (EHS) procedures to ensure safe handling, storage, and disposal of waste.

To reduce risks associated with hazardous and toxic chemicals, the Company follows controlled chemical usage, safe storage and handling practices, employee awareness programmes, and process optimisation measures to minimise consumption of chemicals and associated environmental and occupational health impacts.

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

Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
RACL does not have any operations in or around these areas.		

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)
During the reporting period, RACL Geartech Ltd. did not undertake any projects requiring Environmental Impact Assessment (EIA) under the applicable provisions of the Environment Impact Assessment Notification, 2006 and its amendments. Accordingly, no statutory EIA studies were required during the reporting period. The Company continues to ensure compliance with applicable environmental regulations and statutory requirements.				

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

Specify the law /regulation/ guidelines which was not complied with	Provide details of the noncompliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Yes. RACL Geartech Ltd. complies with applicable environmental laws, regulations, and statutory requirements related to its operations, including requirements under the Water (Prevention and Control of Pollution) Act, 1974, Air (Prevention and Control of Pollution) Act, 1981, and applicable environmental regulations. The Company monitors key environmental parameters, including ambient air quality, through periodic monitoring and assessments. During the reporting period, no material environmental non-compliances were reported. The Company continues to ensure regulatory compliance through established Environmental, Health and Safety (EHS) practices and periodic reviews.			

LEADERSHIP INDICATORS

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

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	4701.3	4475.52
Total Scope 3 emissions per rupee of turnover		0.000000940	0.000000105
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

3- With respect to the ecologically sensitive areas reported at Question 11 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.

RACL Geartech Ltd. has not identified any of its operational locations as being situated within or adjacent to notified ecologically sensitive areas. Therefore, no significant direct or indirect impact on biodiversity in such areas was identified during the reporting period.

The Company continues to implement responsible environmental management practices, including compliance with applicable environmental regulations, effective waste management, pollution control measures, and plantation initiatives to support environmental conservation.

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

Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Renewable Energy Adoption	RACL Geartech Ltd. has increased renewable energy utilisation through rooftop solar installations, off-site solar power procurement, and certified green power procurement. The Gajraula facility operates on 100% renewable electricity through a combination of renewable energy sources	Reduction in Scope 2 GHG emissions, increased renewable energy share, and progress towards decarbonisation goals.

Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Energy Efficiency Improvement	The Company has implemented energy efficiency measures including installation of HVLS fans, process optimisation, and monitoring of energy consumption to improve operational efficiency.	Reduction in energy consumption, improved workplace ventilation, and enhanced operational efficiency.
Waste Reduction and Resource Recovery	Waste generated from operations is segregated and managed through authorised recyclers and waste management agencies. Initiatives include recovery and reuse of used oil, reuse of cotton waste wherever feasible, and reuse of plastic bins and containers.	Reduction in waste generation, improved resource utilisation, and increased recycling/recovery of waste streams.
Water Conservation and Wastewater Management	The Company operates STP/ETP systems for treatment and reuse of wastewater, wherever applicable, and undertakes measures to improve water-use efficiency.	Reduction in freshwater dependency and responsible wastewater management.
Green Cover Enhancement	The Company undertakes annual plantation initiatives to enhance green cover within and around its operational areas.	Increased green cover and contribution towards environmental conservation.

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

Yes. RACL Geartech Ltd. has established an integrated Business Continuity and Disaster Management framework to ensure preparedness, resilience, and continuity of critical operations during unforeseen events.

The framework includes identification and assessment of potential emergency scenarios, defined roles and responsibilities for response teams, emergency response procedures, and recovery measures to minimise operational disruptions. The Company conducts periodic mock drills, safety drills, and awareness programmes to strengthen emergency preparedness and enhance employee readiness.

The effectiveness of emergency response measures is reviewed periodically based on drill observations, incidents, and identified improvement areas. These reviews support continual improvement of the Company's disaster preparedness and business resilience capabilities.

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

RACL Geartech Ltd. has not identified any significant adverse environmental impacts arising from its value chain during the reporting period.

The Company engages with its value chain partners through established processes, including supplier assessments, compliance evaluations, and communication of responsible environmental practices. Suppliers and vendors are encouraged to follow applicable environmental regulations and adopt sustainable practices. The Company continues to strengthen value chain engagement to identify potential environmental risks and promote continuous improvement across its supply chain.

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

RACL communicates its expectations to all value chain partners through its **Supplier Code of Conduct**, covering ethics, labour practices, health & safety, environmental management, quality, and regulatory compliance. Suppliers are

periodically assessed by the Supplier Quality Assurance (SQA) team. Any identified Non-Conformities (NCs) require the submission of a Corrective Action Plan (CAP) along with supporting closure evidence. The SQA team reviews and verifies the effectiveness of the corrective actions before formally closing the NCs, reinforcing responsible sourcing, compliance, and continuous improvement across the value chain.

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

ESSENTIAL INDICATORS

- 1- Number of affiliations with trade and industry chambers/ associations. - 5
- 2- List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry	National
2	Indo-German Chamber of Commerce	National
3	Engineering Export Promotion Council	National
4	Export Promotion Bureau	National
5	U P Export Promotion Council	State

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

Name of authority	Brief of the case	Corrective action taken
Not applicable		

LEADERSHIP INDICATORS

- 1- Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/Quarterly/Others-please specify)	Web Link, if available
Nil					

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

ESSENTIAL INDICATORS

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
No assessment undertaken.					

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

Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
No project undertaken					

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

RACL Geartech Ltd. has established mechanisms to receive and address grievances from local communities and other external stakeholders. Community members can raise their concerns through available communication channels, including direct interaction with Company representatives and designated contact points.

All grievances received are reviewed, recorded, and addressed by the concerned functions through appropriate corrective actions. The Company ensures timely resolution of concerns through coordination with relevant stakeholders and maintains records of grievances and actions taken.

The Company continuously engages with surrounding communities through CSR initiatives and stakeholder interactions to understand their concerns and strengthen its relationship with local communities.

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

	FY 2025-26	FY 2024-25
Directly sourced from MSMEs/ small producers	21.03%	12.5%
Sourced directly from within the district and neighbouring districts	5.99%	18%
Directly from within India	72.98%	64.5%

5- Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost.

Location	FY 2025-26	FY 2024-25
Rural	Data will be prepared from the next year onwards	
Semi-Urban		
Urban		
Metropolitan		
(Place to be categorized as per RBI Classification system- rural/ semi-urban/ urban/ metropolitan)		

LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken
No Incident identify	

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

State	Aspirational District	Amount spent (In INR)
Our CSR initiatives are currently not operational in Aspirational Districts.		

- 3- (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)- NO
- (b) From which marginalized /vulnerable groups do you procure? – NOT APPLICABLE
- (c) What percentage of total procurement (by value) does it constitute? – NOT APPLICABLE

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

Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
NIL			

- 5- 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.

Name of authority	Brief of the case	Corrective action taken
NIL		

- 6- Details of beneficiaries of CSR Projects.

CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable & marginalized groups
Education initiatives under the "Bright Tomorrow" computer education program.	400+ Students were benefitted	100%
Women Empowerment/Skill development under shining star	10+	100%
Miscellaneous Activities In addition to the projects mentioned earlier, the Company has extended support to underprivileged students by covering expenses related to tuition fees, books, and uniforms. Special emphasis has been placed on promoting higher education by assisting meritorious yet financially challenged students. These initiatives aim to empower individuals through education, fostering long-term positive impacts and contributing to social upliftment within the communities we serve.	500+ student was benefitted	100%

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

ESSENTIAL INDICATORS

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

RACL Geartech Ltd. primarily operates in a B2B environment and has established structured mechanisms to receive and respond to customer complaints and feedback. Customer concerns are received through designated communication channels, including the dedicated customer care email (customercare@raclegeartech.com), direct customer interactions, customer audits, and regular business reviews.

All complaints and feedback are reviewed by the concerned Sales, Quality, and Vendor Management teams. Issues are investigated through root cause analysis, and appropriate corrective and preventive actions (CAPA) are implemented. The effectiveness of actions taken is monitored to support continual improvement, strengthen customer satisfaction, and enhance product and service quality.

2- Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

	As a percentage to total turnover
Environmental and social parameters relevant to the product	RACL Geartech Ltd. manufactures precision automotive components that are supplied to Original Equipment Manufacturers (OEMs) for integration into the final product (i.e., vehicles). As the Company does not market or sell finished consumer products, product-related information on environmental and social parameters, safe usage, or recycling/disposal is communicated by the respective OEMs. Accordingly, this disclosure is Not Applicable .
Safe and responsible usage	
Recycling and/or safe disposal	

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

Category	FY 2025-26			FY 2024-25		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0		0	0	
Advertising	0	0		0	0	
Cyber-security	0	0		0	0	
Delivery of essential services	0	0		0	0	
Restrictive Trade Practices	0	0		0	0	
Unfair Trade Practices	0	0		0	0	
Other	0	0		0	0	

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

	Number	Reasons for recall
Voluntary recalls	0	NA
Forced recalls	0	

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

Yes. RACL Geartech Ltd. has established policies and guidelines on cyber security, information security, and data privacy to safeguard its information assets, business systems, and confidential information from cyber threats, unauthorised access, misuse, alteration, or disclosure.

The Company has implemented appropriate IT security controls, user access management, responsible internet usage guidelines, and information security practices to protect official records and sensitive business information. Employees are required to comply with these policies as part of the Company's Code of Conduct and Policy Manual, and regular awareness is promoted to strengthen cyber security practices across the organisation.

The cyber security framework is periodically reviewed and updated to address evolving cyber risks and support business resilience. These policies are available in the Company's Policy Manual at 393ipdctfile_RACLPoliciesManual.pdf

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.

During the reporting period, RACL Geartech Ltd. did not receive or identify any significant issues relating to advertising

and marketing communications, delivery of essential services, cyber security and customer data privacy, product recalls, or regulatory actions concerning the safety of its products or services.

Accordingly, no corrective actions were required in these areas. The Company continues to strengthen its governance framework through robust quality management systems, information security practices, regulatory compliance, and periodic monitoring to prevent such occurrences and drive continual improvement.

7- Provide the following information relating to data breaches:

- | | |
|---|-----|
| a. Number of instances of data breaches | NIL |
| b. Percentage of data breaches involving personally identifiable information of customers | NA |
| c. Impact, if any, of the data breaches | NIL |

LEADERSHIP INDICATORS

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

The information is available on Company's website: [RACL Geartech](#)

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

RACL Geartech Ltd. primarily operates as a business-to-business (B2B) organisation, supplying precision automotive components to leading Original Equipment Manufacturers (OEMs). To support the safe and responsible use of its products, the Company provides customers with product-related information, technical documentation, and compliance declarations, including REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) and IMDS (International Material Data System), as applicable.

The Company follows a robust product development and validation process to ensure compliance with customer specifications, applicable material requirements, quality standards, and safety requirements. Product quality and conformity are verified through defined inspection, testing, and validation processes before dispatch.

In addition, RACL follows defined packaging specifications, handling instructions, and transportation requirements to protect product quality and integrity during storage and transit. The Company also engages with customers through technical discussions, quality reviews, audits, and regular business interactions to address product-related requirements and promote the safe and responsible use of its products.

As the Company supplies components to OEMs, information relating to the safe use and operation of the final product is communicated to end consumers by the respective OEMs.

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

NA

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)

Product Information: RACL Geartech complies with all applicable regulations with respect to product information disclosure.

Consumer Satisfaction Survey: No. As a B2B organisation, the Company does not conduct consumer satisfaction surveys. Customer satisfaction is monitored through customer feedback, audits, and regular business reviews

Annexure 17A

Format of BRSR Core

Sr. No.	Attribute	Parameter	Measurement	¹⁷⁰ [Data & Assessment or Assurance Approach]	Cross – reference to the BRSR
1	Green-house gas (GHG) footprint <i>Greenhouse gas emissions may be measured in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard</i>	Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	2794.15 MT	1. Absolute Fossil Fuel (Coal, Natural Gas, Diesel, FO etc.) Consumption (Mn MT / KT / MT / MM BTU etc.) 2. Emission Factor (GHG in CO₂e / Unit of Measure) - IPCC or Actual Testing from Accredited Test Lab 3. Quantity of Carbon Capture (Mn MT/KT / MT) 4. GHG emissions in CO₂ equivalent by process (Non-Fuel Source) (Mn MT/KT / MT / MM BTU) 5. Fugitive emissions 6. Total Scope 1 GHG Emissions: Point 2x Point 1 - Point 3 + Point 4 + Point 5	Principle 6, Question 7 of Essential Indicators
		Total Scope 2 emissions (Break-up of the GHG (CO ₂ e) into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	910.32 MT	1. Total Consumption of Purchased Energy (MW), Steam (MT), Refrigeration (MMBTU) 2. GHG (CO₂e) Emission Factor across all purchased energy sources - IPCC or actual from the supplier (audited certificates) 3. Total Scope 2GHG Emissions: Total Consumption x Emission Factor	Principle 6, Question 7 of Essential Indicators
		GHG Emission Intensity (Scope 1 +2)	0.00000078	1. Total Emission (Scope 1 & 2) 2. Total Revenue from Operations- From Audited P&L Statement 3. PPP (USD / INR)	Principle 6, Question 7 of Essential Indicators
			0.0005567	1. Total Emission (Scope 1 & 2) as above 2. Company & Sector Specific (i.e., No. of Vehicles Produced, MT of Material Produced, Data in Mn TB, No. of Seats / Travel Class, Room-nights etc.)	Principle 6, Question 7 of Essential Indicators
2	Water footprint	Total water consumption	16564 kl	Water consumed is water that it is no longer available for use by the eco-system or local community, such as water that has been withdrawn and incorporated into products or has evaporated or is polluted to the point of being unusable by other users, and is	Principle 6, Question 3 of Essential Indicators

Sr. No.	Attribute	Parameter	Measurement	¹⁷⁰ [Data & Assessment or Assurance Approach]	Cross – reference to the BRSR
				therefore not released back to surface water, groundwater, seawater, or a third party. It also includes water that has been stored during the reporting period for use or discharge in a subsequent reporting period. If the entity cannot directly measure its water consumption, it may calculate this using the following: 1. Input water flow meter logs (Calibrated Meters) 2. Output water flow meter logs (Calibrated Meters) 3. Water consumption = Input Water - Output Water	
		Water consumption intensity	0.0000035	1. Total water consumed 2. Total Revenue from Operations (from audited P&L) 3. PPP (USD / INR)	Principle 6, Question 3 of Essential Indicators
			0.002489	1. Consumption as above 2. Company & Sector Specific (i.e., No. of Vehicles Produced, MT of Material Produced, Data in Mn TB, No. of Seats / Travel Class etc)	Principle 6, Question 3 of Essential Indicators
		Water Discharge by destination and levels of Treatment	100% of treated waste water reused after treatment through STP/ETP for gardening, flushing and other permissible non-potable applications. No untreated wastewater is discharged outside the facility.	1. Untreated Water 2. Primary Treatment (Removal of material that floats or settle out i.e Filtration, Screening, Sedimentation etc.) 3. Secondary Treatment (Removal of Dissolved organic Matter i.e. Oxidation, Digestion etc.) 4. Tertiary Treatment (Disinfecting Water i.e. removal of pathogens, Phosphorous, Nitrogen etc.)	Principle 6, Question 4 of Essential Indicators

Sr. No.	Attribute	Parameter	Measurement	¹⁷⁰ [Data & Assessment or Assurance Approach]	Cross – reference to the BRSR
3	Energy footprint	Total energy consumed	111376 (gj)	Total energy consumption = non-renewable fuel consumed + renewable fuel consumed + purchased electricity, heating, cooling, steam + self-generated electricity, heating, cooling, steam <i>(If the entity generates electricity from a non-renewable or renewable fuel source and then consumes the generated electricity, the energy consumption shall be counted only once)</i> Energy consumed through renewable sources / total energy consumed	Principle 6, Question 1 of Essential Indicators
		% of energy consumed from renewable sources	59 %		
			0.0000233	1. Total energy consumed 2. Total Revenue from Operations (from audited P&L) 3. PPP (USD / INR)	Principle 6, Question 1 of Essential Indicators
		Energy intensity	0.01674	1. Consumption as above 2. Company & Sector Specific (i.e., No. of Vehicles Produced, MT of Material Produced, Data in Mn TB, No. of Seats / Travel Class etc)	Principle 6, Question 1 of Essential Indicators
4	Embracing circularity - details related to waste management by the entity	Plastic waste (A)	57Kg	Absolute weight of the packaging material (Bags, Bottles, Pallets etc.) discarded as defined under the plastic waste management rules 2016 and amendments thereof	Principle 6, Question 9 of Essential Indicators
		E-waste (B)	48Kg	Discarded Computers, televisions, cell phones, VCRs, stereos, DVD players, copiers, and fax machines etc. as listed under e-waste management rules 2016 and amendments thereof	Principle 6, Question 9 of Essential Indicators
		Bio-medical waste (C)	NA	Solids and liquid waste including its container and any intermediate product, which is generated during the diagnosis, treatment or immunization of human beings or animals or research activities as listed under Bio-medical waste management rules 2016 and amendments thereof	Principle 6, Question 9 of Essential Indicators
		Construction and demolition waste (D)	NA	Construction waste as per C&D waste management Rules 2016 and amendments thereof like concrete, plaster, metal rods / wires, wood, plastics etc.	Principle 6, Question 9 of Essential Indicators

Sr. No.	Attribute	Parameter	Measurement	¹⁷⁰ [Data & Assessment or Assurance Approach]	Cross – reference to the BRSR
		Battery waste (E)	NA	Discarded batteries i.e., Li-ion, Alkaline, Lead Acid etc used in vehicles, computers & laptops, mobiles other electronics, UPS, Power Back up etc. as per Battery Waste management Rules 2016 and amendments thereof	Principle 6, Question 9 of Essential Indicators
		Radioactive waste (F)	NA	Discarded material such as paper, plastic, clothes, equipment, machine parts etc having exposure to radiation across Nuclear Power Plants, Hospitals, Research Laboratories, Industrial Applications etc.)	Principle 6, Question 9 of Essential Indicators
		Other Hazardous waste. Please specify, if any. (G)	Scrap grinding wheel -448 kg Oil-Soaked cloth -1084 kg	As per hazardous waste management rules of CPCB	Principle 6, Question 9 of Essential Indicators
		Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	ETP Sludge-991 kg Used Scrap Oil -930litres (Scrap oil and Air) filters – 58kg	Waste not identified as Hazardous as per CPCB	Principle 6, Question 9 of Essential Indicators
		Total waste generated ((A+B + C + D + E + F + G + H)	3616 kg	self-explanatory	Principle 6, Question 9 of Essential Indicators
		Waste intensity	0.0000000008	1. Total waste generated 2. Total Revenue from Operations (from audited P&L) 3. PPP (USD / INR)	Principle 6, Question 9 of Essential Indicators
			0.0000005434	1. Total waste generated 2. Company & Sector Specific (i.e., No. of Vehicles Produced, MT of Material Produced, Data in Mn TB, No. of Seats /Travel Class etc)	Principle 6, Question 9 of Essential Indicators
		Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations	100% of recyclable waste generated by the Company is sent to authorized recyclers for recovery through recycling.	Absolute quantity Kg of Waste Recycled Recovered / Total Waste generated ¹⁷¹ [Disclosure may be provided if certificates from vendors have been relied upon for assessment or assurance of KPIs on waste management]	Principle 6, Question 9 of Essential Indicators

¹⁷¹Substituted with the issuance of Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dated Mar 28, 2025. Prior to its substitution the note read as "Disclosure may be provided if certificates from vendors have been relied upon for assurance of KPIs on waste management".

Sr. No.	Attribute	Parameter	Measurement	¹⁷⁰ [Data & Assessment or Assurance Approach]	Cross – reference to the BRSR
		For each category of waste generated, total waste disposed by nature of disposal method	100% of recyclable waste generated by the Company is sent to authorized recyclers for recovery through recycling.	1. Amount of material in MT disposed through Incineration 2. Amount of Material to Landfill 3. Any other method Kg of Waste Recycled Recovered /Total Waste generated	Principle 6, Question 9 of Essential Indicators
5	Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company	0.48 %	To check sources including – • Insurance Policies & Premium Paid Details • Infant Care Policy • Amount billed/invoices towards providing such facilities <i>(The following measures may be included – health insurance, accident insurance, maternity benefits, paternity benefits, day care facilities, health & safety measures including access to mental health)</i>	Principle 3, Question 1(c) of Essential Indicators
		Details of safety related incidents for employees and workers (including contract-work force e.g. workers in the company's construction sites)	0	To check on the basis of claims 1. Total number of lost time injuries 2. Total No. of working hours 3. LTIFR = (Total number of lost time injuries*10,00,000) / Total No. of working hours To check on the basis of claims as reported to the Factory Inspector	Principle 3, Question 11 of Essential Indicators
6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	3.5%	Employee Master / Register	Principle 5, Question 3(b) of Essential Indicators
		Complaints on POSH	0		Principle 5, Question 7 of Essential Indicators
7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – <i>Directly sourced from MSMEs/ small producers and from within India</i>	21.03 %	self-explanatory' <i>Input material' - includes all types of procurement such as raw material, spares, services, capex procurement items etc.</i>	Principle 8, Question 4 of Essential Indicators

Sr. No.	Attribute	Parameter	Measurement	¹⁷⁰ [Data & Assessment or Assurance Approach]	Cross – reference to the BRSR
		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent/ on contract) as % of total wage cost		Place of employment of employees/ workers (Place to be categorized based on with RBI classification system on rural / semi-urban / urban / metropolitan)	Principle 8, Question 5 of Essential Indicators
8	Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	0		Principle 9, Question 7 of Essential Indicators
		Number of days of accounts payable	61	To check from financial statements	Principle 1, Question 8 of Essential Indicators
9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	NA	1. RPT audited by Financial Auditors (Refer Financial Audit Report) 2. Financial statements / invoices	Principle 1, Question 9 of Essential Indicators
			NA NA Share of RPTs (as respective %age) in - • Purchases- 2.79 % • Sales-4.23% • Loans & advances- NIL • Investments- 25.70%		