

NWML/SEC/2025/42

July 12, 2024

The Manager,
Listing Department,
BSE Limited,
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai - 400 001.
BSE Scrip Code: 543988

The Manager,
Listing Department,
National Stock Exchange of India Ltd.,
Exchange Plaza, 5 Floor, Plot C/1, G Block,
Bandra - Kurla Complex, Bandra (E),
Mumbai - 400 051.
NSE Symbol: NUVAMA

Subject: - Business Responsibility & Sustainability Report for the financial year 2023-24

Dear Sir(s)/Madam(s),

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Business Responsibility & Sustainability Report which forms part of the Annual Report for the F.Y. 2023-24.

Kindly take the same on record.

Thanking you,

Yours faithfully,

**For Nuvama Wealth Management Limited
(formerly known as Edelweiss Securities Limited)**

**Sneha Patwardhan
Company Secretary and Compliance Officer**

Encl: as above

Business Responsibility & Sustainability Reporting Format (BRSR)

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Company	L67110MH1993PLC344634
2. Name of the Listed Entity	Nuvama Wealth Management Limited (formerly known as Edelweiss Securities Limited)
3. Year of incorporation	1993
4. Registered office address	801- 804, Wing A, Building No. 3, Inspire BKC, G Block, Bandra-Kurla Complex, Bandra East, Mumbai – 400 051
5. Corporate Address	801- 804, Wing A, Building No. 3, Inspire BKC, G Block, Bandra Kurla Complex, Bandra East, Mumbai – 400 051
6. E-mail	esg@nuvama.com
7. Telephone	022- 6620 3030
8. Website	nuvama.com
9. Financial year for which reporting is being done	FY 2023 -2024
10. Name of the Stock Exchange(s) where shares are listed	National Stock Exchange (NSE) and BSE Limited (BSE)
11. Paid-up Capital	INR 35,30,86,030
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Rashmi Nagori Designation: Head ESG & CSR Email: esg@nuvama.com
13. Reporting boundary	Consolidated. The disclosures in this report cover the activities and progress made by Nuvama Wealth Management Limited, its subsidiary companies, Associates and Joint Ventures on ESG and Sustainability. The report covers information pertaining to the period from April 1, 2023 to March 31, 2024. The boundary of this report includes our operations in India only.
14. Name of assurance provider	Not applicable. With reference to SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/ CIR/2023/122 dated July 12, 2023, and in accordance with the market capitalization of the Company as on March 31, 2024, the Company is not required to undertake reasonable assurance of BRSR Core for the financial year 2023-24. Accordingly, the Company has not appointed an assurance provider.
15. Type of assurance obtained	Not Applicable

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	Financial Services	The Company is an integrated wealth management platform providing clients with tailored wealth management solutions and advice.	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	Wealth Management Services	66190	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	Not applicable	94	94
International	Not applicable	5	5

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	22
International (No. of Countries)	5

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

The contribution of exports as a percentage of the total turnover of the entity stands at 5.74%.¹

c. A brief on types of customers:

Nuvama Wealth Management Limited (NWML) operates as a client-centric financial services firm, catering to a diverse range of clientele. Our integrated platform serves entrepreneurs, promoters, high net worth individuals (HNIs), ultra-high net worth individuals (UHNIs), corporate and institutional investors, affluent segments, and family offices. With a vision to offer comprehensive and customized solutions across wealth management, asset management, capital market and advisory services, we prioritize understanding and meeting the unique needs of each client segment.

Our clientele is further segmented across various business verticals:

- **Wealth Management:**

- **Nuvama Private (Ultra High Net Worth Clients):** We serve a substantial client base comprising over 3,600 families, including business owners, entrepreneurs, family offices, CXOs, professional investors, and institutions.
- **Nuvama Wealth (Affluent and High Net Worth Clients):** Catering to over 1.2 million clients, this segment primarily includes salaried individuals and small to medium enterprise owners.

- **Asset Management:**

Our asset management services extend to institutions, family offices, UHNIs, and HNIs. We distribute our products through both internal channels, such as Nuvama Private and Nuvama Wealth, as well as through external distributors.

¹This figure encompasses income of foreign entities, treated as Non-INR entities for reporting purposes

- **Capital Markets:**

Our capital markets business encompasses asset services, institutional equities, and investment banking. We serve approximately 1,000 corporates and institutions, leveraging our expertise to offer holistic solutions to wealth management clients. Additionally, our client base includes institutional investors, both domestic and foreign.

In summary, Nuvama's clientele spans across various segments, reflecting our commitment to providing tailored financial solutions and unparalleled service excellence across all our offerings. For further insights, please refer to our Business Overview section.

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)	3,104	2,328	75%	776	25%
2.	Other than Permanent (E)	463	394	85%	69	15%
3.	Total employees (D + E)	3,567	2,722	76%	845	24%
WORKERS:						
4.	Permanent (F)		Given the nature of business, the Company does not employ any			
5.	Other than Permanent (G)		worker as defined in guidance note on BRSR, issued by SEBI and			
6.	Total workers (F + G)		thus all worker related details in this report are not applicable.			

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)	3	3	100%	0	0%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	3	3	100%	0	0%

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	11	1	9%
Key Management Personnel	4	1	25%

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2024 (Turnover rate in current FY)			FY 2023 (Turnover rate in previous FY)			FY 2022 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	26%	34%	28%	35%	43%	37%	28%	30%	28%

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	Nuvama Clearing services Limited	Wholly Owned Subsidiary	100%	Yes
2	Nuvama Asset Management Limited	Wholly Owned Subsidiary	100%	Yes
3	Nuvama Wealth Finance Limited	Wholly Owned Subsidiary	100%	Yes
4	Nuvama Investment Advisors (Hongkong) Private Limited	Wholly Owned Subsidiary	100%	Yes
5	Nuvama Financial Services Inc	Wholly Owned Subsidiary	100%	Yes
6	Nuvama Financial Services (UK) Limited	Wholly Owned Subsidiary	100%	Yes
7	Nuvama Investment Advisors Private Limited	Wholly Owned Subsidiary	100%	Yes
8	Nuvama Capital (IFSC) Services Limited	Wholly Owned Subsidiary	100%	Yes
9	Nuvama Wealth and Investment Limited	Wholly Owned Subsidiary	100%	Yes
10	Nuvama Investment Advisors LLC	Wholly Owned Subsidiary	100%	Yes
11	Pickright Technologies Private Limited	Subsidiary	74%	Yes
12	Nuvama Custodial Services Limited	Associate	49%	Yes
13	Nuvama and Cushman & Wakefield Management Private Limited *	Joint Venture	50%	Yes

*JV through Nuvama Asset Management Limited

VI. CSR Details (table format)

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013:	Yes, CSR is applicable to the Company as per section 135 of the Companies Act, 2013
(ii) Turnover (in Rs. on consolidated basis)	31,577 million
(iii) Net worth (in Rs. on consolidated basis)	28,989 million

CSR spent on standalone basis during FY 2023-24: NIL as the average net profits as per section 135(5) were negative

CSR spent on consolidated basis during FY 2023-24: Rs. 54.95 million

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Over the past year, our CSR initiatives have been conducted in collaboration with the CSR partner. The methods for receiving and addressing community grievances are channeled through our CSR partner. This organization serves as the primary point for managing any grievances related to our CSR activities. They have established protocols to ensure that any concerns from the community are received, thoroughly evaluated, and resolved in a manner that is both efficient and respectful of all parties involved.						
Investors (other than shareholders) and Shareholders	Yes https://www.nuvama.com/investor-relations/investor-information/	86	NIL	NWML was listed on September 26, 2023. Accordingly, the complaints with respect to NWML w.e.f. September 26, 2023	NIL	NIL	-
Employees and workers	Yes, employee can access internal policy	2	NIL	-	NIL	NIL	-
Customers	Yes, the company has established multiple touch points through which customers can file grievances. The procedure for the same can be found in the weblink: https://www.nuvamawealth.com/ewwebimages/WebFiles/disclaimer/complaintFilingProcedure.pdf	1,155	14	These complaints will be closed within respective TAT	5,272	51	Matters which are pending for resolution in the FY 2022-2023 have been closed in the next FY. i.e FY 2023-2024
Value Chain Partners	Currently, the grievances are not measured.						
Other (please specify)	None						

Note: The complaints are reported on consolidated basis

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

Nuvama conducted a materiality assessment survey covering the internal and external stakeholders. The survey covered topics like Emissions, Energy, Waste and Water management, Customer satisfaction, Brand reputation, Employee well-being, Stakeholder engagement, Ethics and transparency, etc. The following ESG factors were identified as focus areas and material topics.

Environment	Social	Governance
Emission Management	Customer Satisfaction	Business Ethics & Transparency
Climate change	Employee Well-being	Corporate Governance and Compliance
	Talent Attraction & Retention	Risk Management
		Digitization, Data Privacy and Security

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	Business ethics and Transparency to ensure Customer Satisfaction	Risk / Opportunity	Nuvama philosophy is to always put our customer interest first. By enhancing service offerings and maintaining high standards of conduct, the company strengthens trust and loyalty, fostering customer retention and business growth.	Emphasizing a "customer first" philosophy, regularly measuring customer satisfaction, and maintaining a robust grievance redressal policy.	Positive: Higher customer retention rates translate into increased revenue stability and potential for upselling and cross-selling products and services.
2	Corporate Governance and Compliance	Risk	Strong corporate governance and compliance systems reinforce the company's reputation and operational efficiency, mitigating legal risks and enhancing reliability.	Maintaining robust policies (refer to Section B of this report) and a board-level committee to oversee corporate governance and compliance.	Positive: Enhances investor confidence and stability in company operations.
3	Risk Management	Risk	Proactive risk management converts potential challenges into opportunities, enhancing strategic resilience and securing long-term growth.	Implementing a comprehensive business continuity plan and maintaining updated policies to manage various business risks effectively.	Positive: Mitigation of potential financial losses ensures business continuity and protects shareholder value.
4	Data Privacy and Security	Risk	Strengthening data privacy and security measures protects against cyber threats, enhancing customer trust and safeguarding the company's digital assets.	By developing and enforcing stringent cybersecurity policies, conducting regular training for employees, and securing ISO certifications in cybersecurity, we are committed to maintaining robust data protection standards	Positive: Prevention of financial penalties and losses due to data breaches, maintaining operational integrity and customer confidence.

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	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y ²	Y ³	Y ⁴	Y ⁵	Y ⁶	Y ⁷	NA ⁸	Y ⁹	Y ¹⁰
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	N ¹¹	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	<p>The company has enacted the following policies and processes aligning with the Nine (9) NGRBC principles as prescribed by the Ministry of Corporate Affairs.</p> <ul style="list-style-type: none"> • Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information • Policy on Preservation of Documents-Archival Policy • Board Diversity Policy • Board Evaluation Policy • Familiarisation programme of Independent Director • Dividend Distribution Policy • Policy on dealing with Related Party Transactions • Determination of material subsidiary • Terms and Conditions of Appointment of Independent Directors • Performance Evaluation Policy • Policy for Determination of Materiality of Information or Events • Succession Planning Policy • Whistle Blower Vigil Mechanism Policy • Code of Conduct of Board and Senior Management Team • CSR Policy • Remuneration Policy • Anti Bribery & Corruption • Anti-Money Laundering • Prevention of Sexual Harassment (POSH) • Prevention of Insider Trading 								

¹ Policies covering aspects of Principle 1 include the Code of Conduct (CoC), Whistleblower, Unpublished Price Sensitive Information (UPSI), Anti Money Laundering (AML), Cybersecurity, Related Party Transactions (RPT), Personal Investment Trading (PIT), and Conflict of Interest. Considering the nature of business of the Company,

² Principle - 2 may not be directly applicable. However, the Company endeavour to comply with all the applicable rules and regulations w. r. t. its services. We attempt to be transparent, fair in our advice and responsive to customer requirements and feedback.

⁴ Policies covering aspects of Principle 3 include Health & Safety (H&S), Equal Opportunity, and Prevention of Sexual Harassment (POSH).

⁵ Policies covering aspects of Principle 4 include Grievance Redressal and Dividend Distribution.

⁶ Policies covering aspects of Principle 5 include the Code of Conduct (CoC).

⁷ Policies covering aspects of Principle 6 include Environmental, Social, and Governance (ESG) practices.

⁸ Principle 7 is not applicable to Nuvama because our operations do not directly influence public and regulatory policy. Our commitment lies in being responsible and transparent in our business practices.

⁹ Policies covering aspects of Principle 8 include Corporate Social Responsibility (CSR).

¹⁰ Policies covering aspects of Principle 9 include Grievance Redressal and Cybersecurity.

¹¹ Within Principle 3, while Health & Safety (H&S) and Prevention of Sexual Harassment (POSH) policies have been approved by the Board, the Equal Opportunity policy awaits board approval.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9										
	<p>The above mentioned policies and processes have been developed inline with the guidelines of NGRBC and other global frameworks followed by a benchmarking of best practices adopted by industry peers. The process of developing such policies also involved detailed consultations with various stakeholders of the company. The policies and processes are available at https://www.nuvama.com/investor-relations/corporate-governance/ and https://www.nuvama.com/wp-content/uploads/2023/12/Nuvama-ESG-Report.pdf</p> <p>It shall be also noted that some policies are internal and are available to the employees through the company's intranet.</p>																		
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	NA	Y	NA										
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	N	NA	N	N	N	N	NA	N	NA										
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The company's information security management program is based on ISO 27001:2022 standard.																		
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>Nuvama has defined internal goals/targets with defined timelines. Additionally, Nuvama strategically aligns its business operations with the United Nations Sustainable Development Goals (SDGs) to enhance its contributions toward sustainable development. The table below details out the SDG's that align with the company's initiatives under each of the NGRBC principles. In total, the company's initiatives postiviely impact thirteen (13) SDGs. This commitment enhances Nuvama's corporate responsibility initiatives and amplifies its positive social and environmental impacts, underscoring a strong commitment to fostering sustainable development alongside maintaining business excellence.</p> <table border="1"> <thead> <tr> <th>NGRBC Principles</th> <th>Nuvama's initiatives align with the following SDGs</th> </tr> </thead> <tbody> <tr> <td>Principle 1</td> <td> <ul style="list-style-type: none"> SDG 16: Peace, Justice and Strong Institutions SDG 17: Partnership for the Goals </td> </tr> <tr> <td>Principle 2</td> <td> <ul style="list-style-type: none"> SDG 7: Affordable and Clean Energy SDG 9: Industry, Innovation and Infrastructure SDG 12: Responsible Consumption and Production </td> </tr> <tr> <td>Principle 3</td> <td> <ul style="list-style-type: none"> SDG 3: Good Health and Well-Being SDG 5: Gender Equality SDG 8: Decent Work and Economic Growth SDG 16: Peace, Justice and Strong Institutions </td> </tr> <tr> <td>Principle 4</td> <td> <ul style="list-style-type: none"> SDG 8: Decent Work and Economic Growth SDG 11: Sustainable Cities and Communities SDG 16: Peace, Justice and Strong Institutions SDG 17: Partnership for the Goals </td> </tr> </tbody> </table>									NGRBC Principles	Nuvama's initiatives align with the following SDGs	Principle 1	<ul style="list-style-type: none"> SDG 16: Peace, Justice and Strong Institutions SDG 17: Partnership for the Goals 	Principle 2	<ul style="list-style-type: none"> SDG 7: Affordable and Clean Energy SDG 9: Industry, Innovation and Infrastructure SDG 12: Responsible Consumption and Production 	Principle 3	<ul style="list-style-type: none"> SDG 3: Good Health and Well-Being SDG 5: Gender Equality SDG 8: Decent Work and Economic Growth SDG 16: Peace, Justice and Strong Institutions 	Principle 4	<ul style="list-style-type: none"> SDG 8: Decent Work and Economic Growth SDG 11: Sustainable Cities and Communities SDG 16: Peace, Justice and Strong Institutions SDG 17: Partnership for the Goals
NGRBC Principles	Nuvama's initiatives align with the following SDGs																		
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Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Principle 5									
Principle 6									
Principle 7									
Principle 8									
Principle 9									

- 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.**
- Nuvama has internally committed to various ESG goals and targets that focus on environmental conservation, leveraging digital tools for customers, digital payment collection, fostering an inclusive workplace etc. Such goals/targets are tracked internally and the details of progress made against some of these targets are included in our ESG report – <https://www.nuvama.com/wp-content/uploads/2023/12/Nuvama-ESG-Report.pdf>

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)**
- Dear all,
- We are delighted to introduce our inaugural Business Responsibility and Sustainability Report (BRSR) for the fiscal year 2023–2024. At Nuvama, our ethos revolves around doing things right – for our clients, our employees, our stakeholders and in the way we conduct our business. Expanding this philosophy to encompass our sustainability responsibilities, we have articulated our ESG Vision succinctly: ‘Let’s do it right, for people, planet, and profits,’ with keen focus to ensure a sustainable and positive impact across all dimensions.
- Our ESG journey began in January 2023 marked by a comprehensive materiality assessment conducted through extensive stakeholder consultations. In this financial year, we have defined our ESG strategy and fortified our governance framework by forming the ESG Committee. These early initiatives ensure that our sustainability agendas are built on a strong foundation and are in alignment with our core values and business objectives.
- In this edition of the BRSR, we highlight a myriad of initiatives and responsible practices undertaken by Nuvama, all centred around our three ESG pillars: people, planet, and profits. Our dedication to CSR (corporate social responsibility) remains unwavering, evidenced by the various initiatives we have supported across the themes of women empowerment, education and CRCA (Community resilience and climate action).
- As we look towards the future, we continue our commitment across all vectors of sustainability – Environment, Social and Governance by embracing emerging trends and adopting the best practices to ensure our impact resonates positively within our communities and beyond.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Ashish Kehair Managing Director & CEO 07789972								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes. The company has constituted a dedicated ESG committee chaired by an independent director and consists of one non-executive director and one executive director. The ESG committee is mandated for formulating the company's policies, commitments, strategies and actions to be undertaken towards Environmental Social and Governance aspects. The committee provides recommendations to the Board of Directors along with an annual action plan and ESG roadmap. Additionally, the committee also monitors the implementation of company's ESG strategy and provides guidance on management of various ESG risks and ensuring an effective and timely disclosure of company's ESG performance to the stakeholders. The terms of reference for the ESG committee can be found in the weblink: https://www.nuvama.com/investor-relations/corporate-governance/board-committees-constitutions/								
	Name of the Members				Designation				
	• Mr. Sameer Kaji				Independent Director				
	• Mr. Nikhil Kumar Srivastava				Non-executive Director				
	• Mr. Shiv Sehgal				Executive Director				
10. Details of Review of NGRBCs by the Company:									
Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee								
	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow-up action	All Company policies undergo regular or as-needed reviews by ESG committee, department/ business heads or senior management. These policies are then brought before the Board of Directors for necessary action. This assessment also includes a review of the policies' effectiveness and the implementation of any required changes.								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company complies with all applicable regulations. The audit and ESG committees are mandated to ensure compliance with all statutory requirements relevant to the principles and rectification of any non-compliance associated with the same.								
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.	All policies and processes, are subject to internal audits conducted by the organisation. Further, the company had engaged E&Y to review existing policies, identify gaps and provide recommendations for developing any new policies in alignment with global standards and rating agencies. Also, corresponding departments periodically review and update the policies to ensure compliance and effectiveness.								

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

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:

S. No.	Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
1	Board of Directors		The Company organizes meeting of Directors with the senior management to discuss the functioning of the organisation and the nature of operations. The organisation makes presentations in Board and Committee Meetings to familiarize the Independent Directors & Non- Executive Directors with the strategy, financial performance, budgets, overview of business performances, statutory reporting, compliance process of the organisation, etc. During the year, the Independent Directors of the organisation spent an aggregate 24 hours,. For more details, please refer to the link below: https://www.nuvama.com/wp-content/uploads/2024/05/Familiarisation-programme-of-Independent-Director.pdf	NA
2	Key Management Personnel	4	The KMP underwent four (4) trainings covering the following compliance topics during the reporting year. <ul style="list-style-type: none"> Anti-Money Laundering Information Security Management System (ISMS) Prevention Of Sexual Harassment (PoSH) Prohibition Of Insider Trading (PIT); 	100%

S. No.	Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
3	Employees other than BODs and KMPs	53	<p>The employees of the company underwent several training programs categorized under the following five (5) themes during the reporting year.</p> <p>Theme 1: Compliance Training</p> <ul style="list-style-type: none"> • Anti-Money Laundering (AML) • Prevention of Insider Trading (PIT) • Information Security Management System (ISMS) • Prevention Of Sexual Harassment (PoSH) <p>Theme 2: Technical Skills Training</p> <ul style="list-style-type: none"> • Excel Basics • Excel Advance • MS EXCEL • MS PowerPoint • Fund Accounting • Clearing Operations <p>Theme 3: Leadership and Professional Development</p> <ul style="list-style-type: none"> • Alpha Q • Art of Powerful Presentations • Making Powerful Presentations • Effective Communication • Emotional Intelligence • Essentials of Leadership – ISB • Interpersonal Effectiveness and Team Building – IIM A • Managerial Effectiveness – IIM A • Service leadership excellence • The Evolving Workplace: Navigating Inter-generational Dynamics <p>Theme 4: Personal and Career Development</p> <ul style="list-style-type: none"> • Big Thinking • Biz Training • Communicate to differentiate • Crafting Brand You • Power Dressing and Impactful First Impressions <p>Theme 5: Onboarding and Orientation</p> <ul style="list-style-type: none"> • MT Induction Program • OnBoarding Ops • Nuvama Platform Orientation • Bloomberg • Client Servicing • Debriefing Session: Thomas PPA Assessments • Debriefing Thomas PPA Assessments • ISG Workshop 	<p>100%</p> <p>3%</p> <p>7%</p> <p>72%</p> <p>10%</p>

During the year 2023–2024, Nuvama achieved 68.2 average manhours of training per employee which is 3% higher than the previous year 2022–2023.

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					
Settlement			NIL		
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 are preferred in cases where monetary or non-monetary action has been appealed.

Not applicable

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web link to the policy.

Yes, the company adheres to strict anti-corruption and anti-bribery standards as outlined in our Code of Conduct. This policy details acceptable behaviors and practices concerning overall conduct and also emphasizes on the exchange of gifts and entertainment, defining what is considered ethical, aligning with our commitment to upholding good corporate governance. It includes specific monetary thresholds and an approval process for exceptions, ensuring transparency and accountability. The policy is readily accessible to all employees through the company's intranet for ongoing reference and compliance.

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

Category	FY 2024	FY 2023
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL

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

	FY 2024		FY 2023	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	-	NIL	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	-	NIL	-

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

No such incidents have been reported.

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

Number of days of accounts payables	FY 2024	FY 2023
	(Current Financial Year)	(Previous Financial Year)
	54.39	50.74

9. Open-ness of business

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

Parameter	Metrics	FY 2024	FY 2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases		
	b. Number of trading houses where purchases are made from		
	c. Purchases from top 10 trading houses as % of total purchases from trading houses		
Concentration of Sales	a. Sales to dealers/distributors as % of total sales		
	b. Number of dealers /distributors to whom sales are made		
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers /distributors		
Share of RPTs in	a. Purchases (Purchases with related parties /Total Purchases) *	1.83%	5.90%
	b. Sales (Sales to related parties /Total Sales) **	1.10%	22.45%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0.00%	0.00%
	d. Investments (Investments in related parties /Total Investments made)	16.67%	15.88%

* calculated as total expenses paid to related parties to total expenses.

**calculated as total income earned from related parties to total income.

Leadership Indicators

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

Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in value chain covered by the awareness programmes
Programs for Value Chain Partners were not conducted in FY 2023-2024, however, the company plans to conduct such programs in the future.		

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, The Board of Directors are subject to the Board-approved Code of Ethics / Conduct which mandates that the Board members shall avoid conflict of interest and disclose to the Board any material transaction or relationship that reasonably could be expected to give rise to such a conflict. The Board members are required to disclose any change in their interest in any entities to the Board as and when such change occurs, and at a minimum at the first meeting of the Board held in the financial year. In line with applicable Rules and Regulations, the Board members are required to provide Disclosures to the Company on an annual basis and at the time of their appointment / re-appointment. This declaration also contains information of entities in which the directors have interest. As and when any director is appointed / re-appointed, the Company's Secretarial team carries out a due diligence exercise which inter-alia examines the possibility of conflict of interest.

PRINCIPLE 2 Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	Reflecting the nature of our business, our capital expenditures (CAPEX) are primarily aimed at enhancing our digital platform, encompassing both infrastructure and processes. During the reporting period, we focused our CAPEX on upgrading our IT infrastructure and systems. These investments covered hardware, including laptops and other devices, as well as software and necessary updates.		
Capex			

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

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

NWML's core operations primarily revolve around offering financial products and services, resulting in minimal resource consumption. Consequently, sustainable sourcing practices have limited applicability to the company's service portfolio and thus not included as part of current procurement strategy. However, the company considers sustainability aspects such as energy efficiency standards during the purchase of electronic equipment such as computers, laptops, lightning devices, ACs etc. Further, the BKC building where the company's corporate office is located is a LEED Gold certified green building by IGBC demonstrating Nuvama's dedication to innovate the workplace of the future, where sustainability and innovation merge seamlessly for a work environment that helps improve productivity.

- 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.**

Given that the Company operates in the financial services sector, it does not produce any hazardous waste, with the main types of waste being paper, plastic, and electronic waste. The company recognizes the need to dispose of waste responsibly, despite having constrained capacity to influence these practices. For the disposal of electronic waste, the company collaborates with government authorized e-waste recyclers and dismantlers. Additionally, the company actively works to reduce its plastic footprint by evaluating and minimizing the use of single-use plastics across its premises and operations. For more information with respect to reducing paper consumption through digital alternatives and promoting recycling programs for office waste please refer to Principle 6.

- 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.**

Extended Producer Responsibility (EPR) does not apply to our activities due to the nature of our operations.

Leadership Indicators

- 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?**

Given the nature of our business and operations, such assessments are not applicable.

- 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.**

Given the nature of our business and operations, such assessments are not applicable.

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

Given the nature of our business operations, the use of recycled or reused input material in our service offerings is not applicable. Nonetheless, the company is dedicated to advancing waste management and environmental sustainability in its office locations through various initiatives discussed under Principle 6.

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:**

Given the nature of our business operations, reclaiming of products and packaging is not applicable.

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

Given the nature of our business operations, reclaiming of products and packaging is not applicable.

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

Essential Indicators

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

Nuvama places strong emphasis on employee well-being, offering a range of benefits to support the physical, mental and financial health of our employees. Some of the well-being initiatives include Medclaim policies, personal loan benefits, happiness time-off, paternity and maternity leave & benefits, health counselling and annual health check-up. All employees of the company are covered by health and accident insurance. We also launched Nuvama Cares – a holistic platform focused on mental well-being and physical fitness. In the light of maternity leave and financial allowance provided to new mothers, the return to work rate and retention rate of female employees that took parental leave stood at 94% and 98% for the year respectively.

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
	Number (B)	Number (B / A)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	2,328	2328	100%	2,328	100%	NA	NA	2,328	100%	NIL	NIL
Female	776	776	100%	776	100%	776	100%	NA	NA	NIL	NIL
Total	3,104	3104	100%	3,104	100%	776	100%	2,328	100%	NIL	NIL
Other than Permanent employees											
Male	394	394	100%	394	100%	NA	NA	394	100%	NIL	NIL
Female	69	69	100%	69	100%	69	100%	NA	NA	NIL	NIL
Total	463	463	100%	463	100%	69	100%	394	100%	NIL	NIL

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

This is not applicable to Nuvama as there are no workers

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

	FY 2024 Current Financial Year	FY 2023 Previous Financial Year
Cost incurred on well- being measures as a % of total revenue of the company	0.65%	1.15%

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

Benefits	FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF*	96%	NA	Y	96%	NA	Y
Gratuity	100%	NA	Y	100%	NA	Y
ESI	1%	NA	Y	1%	NA	Y
Others – please Specify (NPS)*	3%	NA	Y	3%	NA	Y

Note: *The option to choose PF & NPS benefits is available to all employees, but the percentages shown in the table above represent the proportion of employees who have opted for the respective benefits.

Accessibility of workplaces
3. 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.

The office premises of the company are designed to be accessible to differently-abled employees, in compliance with the requirements outlined in the Rights of Persons with Disabilities Act, 2016. Our facilities feature ramps and elevators to facilitate easy movement and ensure inclusivity for individuals with disabilities.

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

Yes, the company adheres to an Equal Opportunity Policy aligned with the Rights of Persons with Disabilities Act, 2016. This policy prohibits discrimination based on religion, race, caste, gender, sexual orientation, national origin, age, veteran or military status, disability, disease including HIV, genetic information, or any other characteristic protected by applicable law. The company's focus on inclusivity extends to differently abled individuals and the recruitment efforts are targeted towards attracting and empowering talented individuals with diverse abilities, fostering an environment that values their unique talents and contributions. Additionally, we prioritize training and development opportunities based on merit, striving to ensure equality of opportunity and non-discrimination throughout all company policies and practices.

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

Gender	Permanent employees	
	Return to work rate	Retention rate
Male	100%	100%
Female	94%	98%
Total	98%	99%

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 Employees	Yes, Nuvama's Whistle-Blower Policy/Vigil Mechanism embodies commitment to fostering a culture of integrity and accountability throughout the organization. Anchored in principles of professionalism, honesty, and ethical behavior, this framework empowers stakeholders, including employees, contractors, vendors, and customers, to confidentially report concerns.
Other than Permanent Employees	By encouraging the disclosure of violations of laws, breaches of the Code of Conduct, and unethical practices, Nuvama demonstrates its dedication to upholding transparency and ethical standards. The whistle blower vigil mechanism policy of the company can be found in the weblink: https://www.nuvama.com/wp-content/uploads/2023/08/Nuvama-Whistle-Blower-Vigil-Mechanism-Policy.pdf In addition, Nuvama is committed to establishing and maintaining a congenial, safe and fair work environment that is free from discrimination, intimidation and sexual harassment of women at workplace. The Policy on Prevention of Sexual Harassment (POSH) is formulated on the aforesaid principles which are part of the cornerstone of the Nuvama Group's philosophy and in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules noticed thereunder. The policy outlines the mechanism to report actual or suspected complaints related to harassment, discrimination or retaliation. The company also provides mandatory POSH training for all its employees reiterating its commitment to human rights and prevention of sexual harassment. The company also enforces a strict no-retaliation policy, which is clearly outlined in its Prevention of Sexual Harassment (POSH) and Whistleblower policies.

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

Category	FY 2024			FY 2023		
	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)
Permanent Employees						
Male						
Female	Given the nature of our business operations, the company does not warrant union or associations.					
Total						

8. Details of training given to employees and workers:

With regards to health & safety measures, the company prioritizes fire safety through regular mock fire drills conducted by the building management team for all tenants in large offices exceeding 10,000 square feet. These drills provide crucial training on fire safety protocols, including the proper use of fire extinguishers. In addition, 80% of the company's offices have been assessed for health & safety practices by the internal team.

On skill upgradation, the employees of the company underwent several training programs in the reporting year categorized under the following five (5) themes during the reporting year: (1) Compliance Training; (2) Technical Skills Training; (3) Leadership and Professional Development; (4) Personal and Career Development and (5) Onboarding and Orientation.

On an ongoing basis training need identification is undertaken and various training programs to upgrade skills and knowledge levels of our employees are accordingly provided. By investing in our employees' learning and development, we aim to enhance their skills and expertise, improve their job satisfaction and retention, and ultimately contribute to the overall success of our business. During the FY 2023-2024, the company has achieved an average of 68.2 manhours of training.

Looking ahead, the company is committed to further enhancing employee training and talent development with an ESG focus in mind. Some of the future training focused initiatives planned by the company include incorporation of an ESG module within the induction curriculum, mandatory training of ESG and BRSR for all employees, dedicated ESG information hub in the intranet etc.

Category ¹²	FY 2024 (Current Financial Year)				FY 2023 (Previous Financial Year)					
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	2,328	2328	100%	2,328	100%	2,127	2,127	100%	2,127	100%
Female	776	776	100%	776	100%	718	718	100%	718	100%
Total	3,104	3104	100%	3,104	100%	2,845	2,845	100%	2,845	100%

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

At Nuvama, performance reviews are conducted annually that commence with a goal setting exercise in the beginning of the FY. The Performance review allows all employees to do a self-assessment on pre-defined KRA/KPIs and document their training needs. Annual Performance conversation and check-ins during the year are done between employee and reporting manager which covers performance feedback, discussion on career goals and training needs. During the current year, 100% of our employees received a regular performance and career development review.

Category ¹³	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	2,328	2,328	100%	2,127	2,127	100%
Female	776	776	100%	718	718	100%
Total	3,104	3,104	100%	2,845	2,845	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, the company has implemented several initiatives to manage occupational health and safety effectively.

- Fire safety is prioritized through regular mock fire drills conducted by the building management team for all tenants in large offices exceeding 10,000 square feet. These drills provide crucial training on fire safety protocols, including the proper use of fire extinguishers.
- Additionally, ergonomic equipment such as movable backrest chairs is provided to employees to promote comfort and reduce the risk of strain-related injuries.
- Hygiene measures include regular lab testing of tap water and filtered water every six months, provision of covered dustbins to prevent infections, pest control measures, and the installation of HVAC systems with HEPA filters to ensure cleaner air within the office premises.
- 80% of the company's offices have been assessed for health & safety practices by the internal team.
- The company conducts regular training sessions and workshops to raise awareness about various issues including stress, anxiety, depression, and burnout. These programs aim to promote open discussions, and provide employees with tools and resources for self-care and seeking support.

¹² Health & Safety Trainings include only permanent employees

¹³ Career Development Trainings include only permanent employees

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

Periodic communications and alerts are sent out to employees and awareness sessions are conducted on safety related aspects. Employees are given periodic training on Fire safety, including evacuation drills. In addition, 80% of the company's offices have been assessed for health & safety practices by the internal team.

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

Nuvama does not have workers; therefore, processes for workers to report work-related hazards and remove themselves from such risks are not applicable. However, the company has implemented e-surveillance measures in its offices to identify and prevent hazards to employees as well as protect and safeguard office premises.

d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Y/N)

Yes, employees of Nuvama have access to non-occupational medical and healthcare services. This includes services such as access to healthcare providers, health insurance, maternity leave and allowance, annual health checkup and wellness programs aimed at promoting overall employee well-being.

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

Safety Incident/Number	Category	FY 2024	FY 2023
		Current Financial Year	Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)			
Total recordable work-related injuries	Employees	NIL	NIL
No. of fatalities			
High consequence work-related injury or ill-health (excluding fatalities)			

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

Yes, The company is dedicated to ensuring the health and welfare of the workforce while maintaining seamless business operations and productivity. Our offices maintain high standards of cleanliness and hygiene, with strict protocols for personal and public hygiene. The HR team regularly communicates with employees through digital channels to monitor their well-being and to provide necessary support for them and their families.

We have implemented the following initiatives:

- The company is committed to establishing and maintaining a friendly, safe, and fair work environment that is free from discrimination, intimidation, and sexual harassment of women in the workplace. The company has policies such as Prevention of Sexual Harassment (POSH), Whistle-blower Policy, and Disciplinary Policy to address all untoward incidents. Employees also undergo mandatory POSH training to ensure awareness and compliance.
- The company is committed to fostering a safe and secure environment for employees to thrive personally and professionally. The company has a strong communication strategy to align all employees to one vision and provide a safe channel for sharing information, providing feedback, and addressing concerns. Across the organisation, multiple town halls and employee pulse connect are conducted at regular intervals.
- The building management team (for large offices exceeding 10,000 sq. ft.) conducts mock fire drills for all tenants every six months, ensuring preparedness and safety.
- The company ensures well-being of our employees by maintaining an on-site doctor room equipped with required first aid kits for immediate medical assistance when needed. We also have a special room to rest and recoup in case of sudden illness during workhours

- All our offices have developed and prominently displayed emergency evacuation floor plans to facilitate easy navigation to emergency exit in case of any emergencies.
- We actively advocate utilization of low-emission materials in our HVAC systems to enhance the quality of indoor air in the offices. Moreover, we have implemented measures such as indoor plants and air purifiers in select areas to complement these efforts and promote clean and healthy indoor environments.

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

	FY 2024			FY 2023		
	(Current Financial Year)			(Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	NIL	NIL	-	NIL	NIL	-
Health & Safety	NIL	NIL	-	NIL	NIL	-

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	80% offices have been assessed for health & safety practices by the internal team
Working Conditions	80% offices have been assessed for health & safety practices by the internal team

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.

No incidences of breach were reported.

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

a. Employees (Yes/No)	Yes, Company provides its employees with group term life and personal accident cover in addition to medical insurance.
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2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

The company through its vendor agreements and mandatory checks ensures that all relevant statutory dues are properly deducted and deposited for their value chain partners and suppliers.

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 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Employees	NIL	NIL	NIL	NIL

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

The company provides Transition Assistance Programs to support employees through career transitions, including retirement and termination of employment. In cases of retirement, the company offers sensitivity and support, including the option for the retiring employee to continue as an Internal Contract employee for a certain period and retainership modules for up to a year depending on their health conditions and organizational requirements (the extension is organization need basis). These programs aim to demonstrate our commitment to our employees' wellbeing throughout their career.

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	The assessment for Value Chain Partners was not conducted in FY 2023-2024, but the company plans to conduct assessments in the future.
Working Conditions	

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.

Since assessments of health and safety practices and working conditions of value chain partners were not conducted in the FY 2023-2024, this question is not applicable.

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.

At Nuvama, stakeholders are defined as individuals or groups who contribute to or create value for the organization, aligning with its core vision and mission. These stakeholders include employees at all managerial levels, shareholders and investors, customers, channel partners, knowledge management partners, regulators, lenders, researchers, and communities benefiting from CSR initiatives. The Company identifies and maps key stakeholders according to their role, relevance, and influence.

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

S. No.	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
1	Employees	No	Emails and meetings, Employee satisfaction survey, Training and capacity building programmes, Performance review and recognition, Employee volunteering, Leadership connects and townhalls	Continuous	<ul style="list-style-type: none"> Career growth and Job security. Learning and development initiatives. Talent management and Employee Participation
2	Customers	No	Customer feedback, Customer surveys, Emails/ phone calls/ meetings, Customer (in-person/ one-on-one) visits and Customer care channels/ social media interactions	Frequent and need-based	<ul style="list-style-type: none"> Post-engagement support Grievances Advisory Service Quality Data protection Product personalization Digital interface experience

S. No.	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
3	Shareholders & Investors	No	Press releases, Investor/ analyst meets, Investor conferences, Investor Presentations, Direct investor engagement, Investor grievance redressal, Annual General Meeting, Stock Exchange Intimations and Regulatory disclosures	Frequent and need-based	<ul style="list-style-type: none"> Financial performance Business developments Sustainability/ ESG performance Compliance updates
4	Government and Regulators	No	Meetings held with key regulatory bodies, participate in the various industry standard forums, Exchanging communications, Presentations, Industry associations, Mandatory filings, Meetings with top management of regulators, Investor presentations, Quarterly and annual reports, Public disclosures, Company website	Periodically	<ul style="list-style-type: none"> Compliance with statutory and legal guidelines To meet the compliance needs and engage with regulators
5	Communities	Yes	CSR initiatives are managed and communicated by CSR partners	As per program requirements	<ul style="list-style-type: none"> Monitoring and evaluation Sustainable development of the community
6	Vendors and Business Associates	No	NA	NA	NA

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.**

In the FY 2023–2024, the company conducted its first materiality assessment involving both internal and external stakeholders, facilitating an open dialogue and exchange of perspectives. The Board acknowledges the organization's dedication to continuous engagement with diverse stakeholders, ensuring that feedback and insights from these consultations are efficiently relayed for strategic decision-making.

- 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.**

Nuvama places a strong emphasis on stakeholder engagement as a crucial aspect of its operations. The company recognizes that engaging with its stakeholders is essential for understanding their needs, addressing concerns, and building long-term relationships based on trust and mutual benefit.

The ongoing stakeholder consultations were vital in identifying the Company's key environment and social concerns. The results from these consultations were integral in shaping Nuvama's ESG policy framework, which clearly outlines the company's commitment to prioritize areas such as environmental stewardship and social responsibility. This framework guides all corporate actions and policies, ensuring that stakeholder insights directly influence the company's strategic initiatives and operational practices.

As part of its ESG journey, the company embarked on a comprehensive stakeholder engagement program to identify critical material topics. Our first materiality assessment, which involved both internal and external stakeholders, was completed in the FY 2022-2023. As an outcome of this process, the company identified nineteen (19) material ESG topics that remains a cornerstone of the company's ESG strategy. Furthermore, we have established an ESG policy framework that articulates our commitment to the identified focus areas and material topics, ensuring our strategic alignment with our sustainability objectives.

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

The company is dedicated to improving the quality of life for individuals and empowering institutions that serve the community. It actively engages in CSR projects designed with careful consideration of the environmental and societal contexts. While these initiatives benefit all communities, the company focuses particularly on supporting vulnerable and marginalized groups, ensuring that its CSR efforts are both inclusive and impactful.

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:

Nuvama ensures that its employees undergo comprehensive training sessions covering various human rights issues and policies, including but not limited to Prevention of Sexual Harassment (POSH), Whistleblower Mechanism, and Code of Conduct (CoC). Details regarding the coverage of these trainings are outlined in the following table.

Category	FY 2024 Current Financial Year			FY 2023 Previous Financial Year		
	Total (A)	No. of Employees / workers covered (B)	% (B / A)	Total (C)	No. of employee / workers covered (D)	% (D / C)
Employees						
Permanent	3,104	3,104	100%	2,845	2,845	100%
Other than permanent	463	463	100%	437	437	100%
Total Employees	3,567	3,567	100%	3,282	3,282	100%

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

Category	FY 2024 Current Financial Year				FY 2023 Previous Financial Year					
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	3,104			3,104	100%	2,845			2,845	100%
Male	2,328			2,328	100%	2,127			2,127	100%
Female	776			776	100%	718			718	100%
Other than Permanent	463			463	100%	437			437	100%
Male	394			394	100%	374			374	100%
Female	69			69	100%	63			63	100%

3. Details of remuneration/salary/wages

a. Median remuneration / wages as on 31 March 2024:

S. No.	Type of employee	Gender	Total Number	Median remuneration/ salary/ wages
1	Board of Directors (BoD)	Male*	10	34,70,000
		Female	1	31,90,000
2	Key Management Personnel (KMP)	Male	3	5,97,80,700
		Female	1	66,25,452
3	Employees other than BoD and KMP	Male	2,693	10,00,000
		Female	839	9,50,000

* Includes 2 Key Managerial Personnel.

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

	FY 2024 Current Financial Year	FY 2023 Previous Financial Year
Gross wages paid to females as % of total wages	17%	16%

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

The Human Resources team is responsible to protect Human Rights across all employees. The company is committed to upholding human rights and ensures the same by promoting fairness, equality, and safety across all its operations. The company fosters an inclusive work environment and encourages open communication. In addition, the ESG committee is mandated to review and assess the company's performance on ESG goals as well as addressing any impacts or issues concerning ESG including human rights.

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

Nuvama has established robust internal mechanisms to redress grievances related to human rights issues like misbehaviour, discrimination based on gender, caste, sex and sexual harassment of employees. The company's framework includes several policies aimed at protecting human rights and facilitating grievance resolution:

- **Prevention of Sexual Harassment (POSH):** This policy, in compliance with national laws, addresses sexual harassment at work, providing clear protocols for handling complaints. In addition, the company also provides mandatory POSH training for all its employees reiterating its commitment to human rights and prevention of sexual harassment.
- **Whistleblower Mechanism:** Enables employees and stakeholders to report unethical behavior or violations anonymously and securely.
- **Disciplinary Mechanism:** Ensures prompt and effective action against human rights violations and breaches of company policy.
- **Equal Opportunity Policy:** Upholds principles of non-discrimination and equality, ensuring all employees are treated fairly regardless of their background.
- **No-Retaliation Policy:** The company also enforces a strict no-retaliation policy, which is clearly outlined in its Prevention of Sexual Harassment (POSH) and Whistleblower policies.

Nuvama prioritizes continuous communication and education to foster awareness among employees about these policies and their rights. An independent redressal process, supported by these frameworks, helps ensure that the workplace remains safe and respectful for all employees. All human rights related grievances are centrally managed by the ESG committee.

6. Number of Complaints on the following made by employees and workers at Nuvama level:

Category	FY 2024 (Current Financial Year)			FY 2023 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	2	NIL	-	NIL	NIL	-
Discrimination at workplace	NIL	NIL	-	NIL	NIL	-
Child Labour	NIL	NIL	-	NIL	NIL	-
Forced Labour/ Involuntary Labour	NIL	NIL	-	NIL	NIL	-
Wages	NIL	NIL	-	NIL	NIL	-
Other human rights related issues	NIL	NIL	-	NIL	NIL	-

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

	FY 2024	FY 2023
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	2	NIL
Complaints on POSH as a % of female employees/workers	0.24%	0.00%
Complaints on POSH upheld	100%	100%

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

Nuvama is committed to maintaining a safe and equitable workplace, ensuring that complainants in discrimination and harassment cases are protected from adverse consequences. The company enforces a strict no-retaliation policy, which is clearly outlined in its Prevention of Sexual Harassment (POSH) and Whistleblower policies. Additionally, Nuvama provides options such as role or managerial changes to safeguard the complainant's well-being. Continuous monitoring and support are offered to ensure the complainant does not face any discrimination or backlash following a complaint. This proactive approach fosters a culture of trust and integrity within the workplace. Further the mechanisms to prevent adverse consequences to the complainant are reiterated in the POSH trainings conducted for employees.

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

Given the nature of company's business operations, the human rights related risks are considered to be not material. Currently, Nuvama does not explicitly include human rights requirements in its business agreements and contracts. However, the company is committed to ethical business practices and upholds human rights standards across all operations as part of its broader ESG commitments.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	
Forced/involuntary labour	Given the nature of company's business operations, the human rights related risks are considered to be not material.
Sexual harassment	
Discrimination at workplace	However, Nuvama maintains stringent internal checks to ensure compliance to the regulatory requirements and statutes.
Wages	
Others – please specify	

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

Nuvama is committed to continuous improvement in its operations. The company's proactive approach includes regular policy reviews, training programs, and updates to ensure ongoing compliance and address any potential human rights risks identified during internal checks. Nuvama has conducted sensitization workshops for Leaders and enhanced communication to ensure there is increased awareness on policies and platforms available for employees to raise any discrimination or harassment or any other grievance freely.

Leadership Indicators

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

No human rights related grievances/complaints were received in FY 2023-2024 and thus there have been no changes implemented in the business processes.

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

Given the nature of company's business operations, the human rights related risks are considered to be not material. Thus, human rights due diligence has not yet been conducted. However, the company plans to undertake this assessment in the future to ensure compliance and uphold its commitment to human rights standards.

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, Nuvama's offices are designed to be accessible for differently abled visitors, in compliance with the Rights of Persons with Disabilities Act, 2016. The facilities include ramps and elevators, ensuring barrier-free access in alignment with statutory requirements and Nuvama's commitment to inclusivity.

4. Details on assessment of value chain partners:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Sexual harassment	
Discrimination at workplace	
Child labour	Nuvama did not conduct value chain assessments in FY 2023-2024 but acknowledges their importance. The company is refining its strategies to improve oversight and ensure compliance across its value chain in future reporting periods.
Forced/involuntary labour	
Wages	
Others – please specify	

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

No assessments were conducted on value chain partners in FY 2023-2024; thus, no corrective actions were needed.

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

Essential Indicators

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	-	
Total fuel consumption (B)	-	Not measured last year
Energy consumption through other sources (C)	-	year
Total energy consumed from renewable sources (A+B+C)	2,695.95 GJ	

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
From non-renewable sources		
Total electricity consumption (D)	7,667.53 GJ	
Total fuel consumption (E)	0	
Energy consumption through other sources (F)	0	
Total energy consumed from renewable sources (D+E+F)	7,667.53 GJ	
Total energy consumed (A+B+C+D+E+F)	10,363.48 GJ	
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.33 ¹⁴	Not measured last year
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	0.014 ¹⁵	
Energy intensity in terms of physical output	NA	
Energy intensity (optional) – the relevant metric may be selected by the entity	-	

- b. 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 independent evaluation or assurance was carried out in FY 2023-2024.

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.

Our business operations do not fall within the scope of the PAT (Perform Achieve and Trade) scheme targets.

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	44,188 kL	38,487.6
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	-	-
Total volume of water consumption (in kilolitres)	44,188 kL	38,487.6 ¹⁶
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	1.40	Not measured last year
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.06	Not measured last year
Water intensity in terms of physical output	NA	Not measured last year
Water intensity (optional) – the relevant metric may be selected by the entity	-	Not measured last year

¹⁴ Revenue from operations (in Rs. In million): 31,509.84 (for intensity calculation purpose)

¹⁵ Purchasing power parities (PPP) conversion rates : 22.882 (INR/USD) – OECD Data

¹⁶ Water consumption figures reported in ESG Report 2023 was estimated considering only drinking water consumption. To provide a more comprehensive y-o-y comparison, both FY2022-2023 and FY 2023-2024 water consumption figures have been recalculated considering all water usage across all offices by the employees (using the CPHEEO recommended water consumption figure of 45 litres per person per day).

- b. Indicate if any independent assessment/ evaluation Assurance has been carried out Water Withdrawal and Consumption data by an external for agency? (Yes/No)

No independent evaluation or assurance was carried out in FY 2023-2024.

4. Provide the following details related to water discharged:

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment		
- With treatment – please specify the level of treatment		
(ii) To Groundwater		
- No treatment		
- With treatment – please specify the level of treatment		
(iii) To Seawater		
- No treatment		
- With treatment – please specify the level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify the level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify the level of treatment		
Total water discharged (in kiloliters)		

The only source of wastewater from the company's operations is the domestic wastewater generated from the office locations. The domestic wastewater is sent to the respective municipal corporations for treatment and disposal via the building management.

- b. 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 independent evaluation or assurance was carried out in FY 2023-2024.

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

Based on the nature of company's operations, this is not applicable to Nuvama.

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

	Please specify unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
NOx	mg/m3		
SOx	mg/m3		
Particulate matter (PM)	mg/m3		
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)	mg/m3		
Others – please specify	PPM		

Based on the nature of company's operations, this is not applicable to Nuvama.

- b. Indicate if any independent assessment/ evaluation Assurance has been carried out for Air Emissions (other than GHG Emissions) by an external agency? (Yes/No)

Since, air emissions are not applicable to Nuvama, no assessment was carried out for the same.

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

Parameter	Please specify unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	Given the nature of company's operations and services, Scope 1 emissions are not applicable to Nuvama	
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	2,878	2,059
Total Scope 1 and Scope 2 emission intensity per million rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	tCO ₂ e/INR	0.09	Not measured last year
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	tCO ₂ e/INR	0.004	Not measured last year
Total Scope 1 and Scope 2 emission intensity in terms of physical output	tCO ₂ e/INR	NA	Not measured last year
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	tCO ₂ e/INR	-	Not measured last year

- b. Indicate if any independent assessment/ evaluation Assurance has been carried out for total GHG Emissions by an external agency? (Yes/No)

No independent evaluation or assurance was carried out in FY 2023-2024.

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

Currently, the company does not have any direct projects specifically aimed at reducing greenhouse gas (GHG) emissions. However, we actively contribute to GHG reduction through the use of HVAC systems with refrigerants that have zero ozone depletion potential (ODP) and low global warming potential (GWP), thereby minimizing their environmental impact. Moving forward, the company is committed to furthering its environmental conservation efforts by establishing a baseline for greenhouse gas emissions, which will aid in the development of targeted initiatives to reduce our carbon footprint. Some of the existing measures implemented by the company that aid in indirect reduction of GHG emissions include energy efficient lighting and use of renewable power in the offices.

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

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	Included under the other Non-Hazardous waste category	
E-waste (B)	0.34 MT ¹⁷	Not Measured ¹⁸

¹⁷ In the FY 2023-2024, following the migration of infrastructure and the sunset/transition of unused infrastructure, NWIL disposed of 0.34 MT of E-Waste. This trend is anticipated to persist for upcoming fiscal years, as NWIL now rents infrastructure instead of purchasing it.

¹⁸ For the FY 2022-2023, the reported figure of 7.84 MT of E-Waste disposal was an estimate, as it was based on infrastructure that was yet to be transferred from the ERCSL entity (Edelweiss Rural and Corporate Services Limited) to Nuvama Wealth Management Ltd. Actual E-Waste disposal was expected to be estimated post migration to the Nuvama Wealth Management Ltd. entity. However, E-Waste disposal at the NWIL level did not occur during FY 2022-2023 due to migration activities.

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Bio-medical waste (C)	The company does not engage in the production, disposal, or handling of biomedical, construction debris, or radioactive waste and hence this does not apply to the company	
Construction and demolition waste (D)		
Battery waste (E)		
Radioactive waste (F)		
Other Hazardous waste. Please specify, if any. (G)		
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	298 MT	340 MT
Total (A+B + C + D + E + F + G + H)	298.34MT	340 MT
Waste intensity per rupee of turnover (Total waste generated/ Revenue from operations)	0.009	Not measured last year
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.0004	Not measured last year
Waste intensity in terms of physical output	NA	Not measured last year
Waste intensity (optional) – the relevant metric may be selected by the entity	-	Not measured last year

Note: The only source of waste generation from the company's operations are the office premises. The waste generated from the offices are non-hazardous and primarily consists of waste paper, plastics and food waste. Such waste are segregated into wet and dry waste and are categorized as non-hazardous waste in the above table. The segregated waste is disposed to the respective municipal corporations (through the building management) for treatment and disposal adhering to local waste disposal regulations. The company will develop systems and processes to segregate and measure different categories in non-hazardous waste in future.

E-waste generated from the company's operations are disposed through a government authorized E-waste recycling vendor. Necessary documentation and waste recycling certificates are maintained for the same. The company complies with all applicable waste related statutory legislations.

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

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	NIL	NIL
(ii) Re-used	NIL	NIL
(iii) Other recovery operations	NIL	NIL
Total	NIL	NIL
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	The company segregates wet and dry waste within its office premises which is then handed over to the respective building management. All such waste is then disposed to the municipal corporation, adhering to local environmental management regulations.	
(ii) Landfilling		
(iii) Other disposal operations		
Total		

b. Indicate if any independent assessment/ evaluation assurance has been carried out by an external agency?

No independent evaluation or assurance was carried out in FY 2023-2024.

11. 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.

The company has established waste segregation and recycling protocols, and it also ensures the responsible disposal of electronic and other waste. Given the nature of company's operations and services, usage of hazardous or toxic chemicals is not applicable.

12. 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:

Nuvama's operations and offices are not located in or around ecologically sensitive areas designated by environmental regulations. Consequently, our business activities do not necessitate environmental approvals or clearances specific to these locations

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

S. No.	Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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Given the nature of business, EIA is not applicable to the company. However at Nuvama, we consider material ESG topics to be those that may have a direct or indirect impact on our ability to create and sustain economic, environmental, and social value, as well as our relationships with stakeholders. To ensure that we uphold our commitment to sustainability while delivering value to stakeholders, we have established a comprehensive materiality assessment process. Through this process, we conducted a materiality assessment to identify the topics that got impacted due to the nature of our operations. As an outcome of this process, the company identified nineteen (19) material ESG topics that remain a cornerstone of the company's ESG strategy.

14. 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:

Based on the nature of its business, the Company complies with applicable environmental norms.

Leadership Indicators

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

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

- Name of the area
- Nature of operations
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		Nuvama operates within the financial services sector and does not have facilities or plants located in areas of water stress, nor does it engage in industrial activities that significantly withdraw, consume, or discharge water. Therefore, metrics related to water withdrawal by source, consumption, and discharge are not applicable for the company.
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed/turnover?)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		The only source of wastewater from the company's operations is the domestic wastewater generated from the office locations. The domestic wastewater is sent to the respective municipal corporations for treatment and disposal via the building management. Most of the company's leased office premises are part of larger buildings occupied by multiple tenants and thus a standalone measurement of domestic wastewater generated from Nuvama's premises is currently not feasible.
- 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 kiloliters)		

b. 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 independent evaluation or assurance was carried out in FY 2023-2024.

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

Parameter	Unit	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
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 of equivalent	The company has not yet measured its Scope 3 emissions for FY 2023-2024.	
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

Since the Scope 3 emissions are not measured, this does not apply to the company.

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.

Nuvama's operations do not fall under ecologically sensitive areas and hence this is not applicable.

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

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	GSB With Timers	GSB technology with timers has been implemented across 100% of Pan India office spaces, optimizing energy usage and improving building operations efficiency.	Optimize the energy usage
2	Energy efficiency	This initiative utilizes light sources with a minimum rated life of 24,000 hours and restricts direct overhead lighting to 25% or less of the total connected lighting load, enhancing energy efficiency.	Limitation of Direct Overhead Lighting
3	Individual lighting controls	Individual lighting controls, allowing for adjustable lighting levels, are installed in at least 90% of spaces in the LEED certified BKC building. Automation of all electrical and AC fixtures is planned.	Improved energy conservation
4	Green Electricity	By switching to solar or wind power, 34% of office spaces now utilize green electricity, significantly reducing the carbon footprint and supporting cleaner energy grids.	Minimize the CO ₂ generation
5	Double Flush system	A double flush system has been introduced in restrooms within 23% of office spaces, allowing for water savings and more efficient use.	Minimize the Water wastage
6	Water sensors	Water sensors are installed in over 44% of offices to detect leaks and monitor usage, promoting efficient water use and minimizing waste.	Minimize the Water wastage
7	Water Faucet & Water Meter	Water Faucet & Water Meter are installed in over 23% of offices to monitor usage, promoting efficient water use and minimizing waste.	Minimize the Water wastage
8	Removal of Paper Cups	More than 51% of office spaces have adopted reusable cups or glasses instead of disposable paper cups, reducing waste and environmental impact.	Minimize the waste generation
9	Removal of Plastic water bottles	Offices have moved away from single-use plastic water bottles to reusable alternatives or provided water stations with glasses in over 44% of spaces, significantly reducing plastic waste and pollution.	No Plastic used
10	Hand-dryer	Hand dryers have replaced paper towels in at least 44% of occupant spaces, reducing paper waste and disposal costs while enhancing restroom cleanliness.	Reduction in Tissue Paper usage in Washrooms

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
11	Indoor Plants	Indoor plants, present in at least 44% of occupant spaces, improve air quality, aesthetics, and employee well-being and productivity.	Improve Air Quality
12	Hygiene Bins In Offices	Hygiene bins are available in at least 51% of occupant spaces, promoting cleanliness and proper waste disposal and thus creating a healthier workspace.	Creating a healthier workspace

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

Yes, Nuvama has a comprehensive Business Continuity to ensure resilience and uninterrupted business operations. Developed following a thorough impact assessment, the plan covers all critical business functions. We perform routine tests to verify operational readiness and conduct annual reviews to keep the plan current with organizational and environmental changes. Additionally, we maintain a Disaster Recovery (DR) site strategically located in a different seismic zone to minimize risk, with regular drills to ensure our disaster response capabilities are effective and efficient. These proactive measures reflect our commitment to business sustainability and risk mitigation.

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.

Given the nature of the business, there has been no adverse impact on the environment.

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

There was no assessment of value chain partners done during the reporting period.

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

Essential Indicators

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

Nuvama is affiliated with four (4) trade and industry associations as indicated below.

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Bombay Stock Exchange Brokers' Forum (BBF)	All India Broker-Dealer
2	Association Of National Exchanges Members Of India (ANMI)	All India Broker-Dealer
3	Commodity Participants Association of India (CPAI)	All India Broker-Dealer
4	Asia Securities Industry & Financial Markets Association (ASIFMA)	Global Asia Forum
5	Association of Portfolio Managers in India	All India Level
6	Indian Venture and Alternate Capital Association	All India Level
7	Broker's Industry Standards Forum	All India Level

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

Name of authority	Brief of the case	Corrective action taken
	NIL	

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
The company does not advocate public policy positions					

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 Social Impact Assessments were conducted for FY 2023–2024. The mandatory requirement for such assessments applies to entities with an average CSR spend of INR 10 crore or more over the past three financial years. Additionally, it targets CSR projects with budgets of INR 1 crore or more that have been completed a year prior to the assessment. Nuvama's CSR expenditure does not meet this threshold, hence the SIA was not required. However, the company will consider undertaking SIA in future in case of any change in regulatory mandates or increase in the CSR spend. All CSR related policy, action plans and expenditures are currently overseen by the CSR committee.					

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

S. No.	Name of project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (in INR)
Given the nature of the company's services, none of the company's operating locations warrants a rehabilitation and resettlement and hence this is not Applicable.						

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

The methods for receiving and addressing community grievances are channeled through our CSR partner. Over the past year, our CSR initiatives have been conducted in collaboration with the CSR partner. This organization serves as the primary point for managing any grievances related to our CSR activities. They have established protocols to ensure that any concerns from the community are received, thoroughly evaluated, and resolved in a manner that is both efficient and respectful of all parties involved.

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	Not Measured	Not Measured
Directly from within India	Not Measured	Not Measured

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 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Rural	0.00%	0.00%
Semi-urban	0.10%	0.11%
Urban	3.14%	3.19%
Metropolitan	96.76%	96.70%

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
This is not applicable as Social Impact Assessments were not carried out	

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

S. No.	State	Aspirational District	Amount spent (in INR)
1	Odisha	Koraput	25,35,466

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

No. Currently, the company does not have a preferential procurement policy targeting marginalized or vulnerable groups. However, we ensure fairness and competitive opportunity for all our suppliers.

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

Given the nature of the business, the company's opportunities to purchase from marginalized or vulnerable groups are limited.

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

Given the nature of the business, the company's opportunities to purchase from marginalized or vulnerable groups are limited.

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

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

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

Name of authority	Brief of the Case	Corrective action taken
NIL		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Strengthening education system for improved learning outcomes	4,000	100%
2	Science Centre, Operation Vasantha, Young Instructor Leader, Lab in a Box and Innovation Hub	13,800	100%
3	Mobile Science Lab	10,400	100%
4	Scaling up Vrutti's 3Fold model (building wealthy, resilient and responsible smallholder farmers) in Pudukkottai and Kanker districts, India	3,330	100%
5	Empower rural women's collectives for gender equality and economic empowerment	10,400	100%
6	Strengthening Support Systems for Access to Justice	8,300	100%

S. No.	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
7	SHAKTI – Building Sustainable Community Based Rehabilitation Models	1,007	100%
8	Salamat Kutch	2,500	100%
9	Learning Orbit for Village Excellence	3,400	100%
10	English Literate Maharashtra	2,00,000	100%
11	RAHAT- Enabling access to justice to victims of sexual violence	430	100%
12	Initiative for the Education of underprivileged children during & post COVID-19 pandemic period	1,800	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.

Nuvama offers a robust framework for managing customer feedback and resolving complaints efficiently. Our approach ensures that clients have multiple avenues for communication and that all concerns are addressed promptly and thoroughly.

Communication Channels:

- **Phone:** Customers can reach out via our dedicated customer care numbers, 1800-102-3335 or 040-49059999, for general inquiries, or contact our Grievance Resolution Team at 040-40316936/040-41151621 for specific issues.
- **Email:** General inquiries can be directed to helpdesk@nuvama.com. For depository services, customers can use dpservicesnwil@nuvama.com, and for feedback on services, servicefeedback@nuvama.com is available.
- **Physical Mail:** Customers can send letters to the Manager – Investor Grievance at our Corporate Office in Mumbai for formal written grievances.
- **Chat:** A live chat feature is available on our website and trading app for real-time problem resolution.
- **In-Person:** Clients are welcomed to visit any of our nationwide branches or Authorized Person offices to submit issues directly. Issues are logged into the Grievance Register on-site and escalated appropriately.
- **SEBI SCORES Portal:** Clients can also register complaints through SEBI's centralized system, SCORES, ensuring that grievances are addressed under regulatory oversight.

Escalation Process:

- If resolutions provided through standard channels do not meet customer expectations, grievances can be escalated to the Head of Customer Care at head.customer@nuvama.com or the Head of CXO at headcxo@nuvama.com.
- Our website features a detailed escalation matrix, guiding customers on further steps they can take if initial resolutions are unsatisfactory.

Monitoring and Continuous Improvement:

- The entire complaint resolution process is monitored rigorously to ensure adherence to turnaround times.
- The quality of redressal is regularly reviewed and improved based on customer feedback and monthly performance metrics.

Nuvama is committed to transparency and responsiveness in handling customer feedback. Our multi-channel support system is designed to cater to all types of inquiries and grievances, ensuring that every client feels heard and valued.

The procedure for filing customer complaint can be found in the weblink: <https://www.nuvamawealth.com/ewwebimages/WebFiles/disclaimer/complaintFilingProcedure.pdf>

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

As a percentage to total turnover	
Environmental and social parameters relevant to the product	Given the nature of company's services, this is not applicable
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2024 (Current Financial Year)		Remarks	FY 2023 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data Privacy	NIL	NIL	-	NIL	NIL	-
Advertising	NIL	NIL	-	NIL	NIL	-
Cyber-security	NIL	NIL	-	NIL	NIL	-
Delivery of essential services	NIL	NIL	-	NIL	NIL	-
Restrictive Trade Practices	NIL	NIL	-	NIL	NIL	-
Unfair Trade Practices	NIL	NIL	-	NIL	NIL	-
Other	1155	14	These complaints will be closed within respective TAT	5272	51	Matters which are pending for resolution in this FY have been closed in the next FY. i.e FY 2023-2024

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

This is not applicable for Nuvama

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.

Nuvama's Cyber Security and Data Privacy Policy is designed to protect sensitive data and reduce cyber threats. It requires the adoption of a comprehensive Information Security Management System (ISMS) across all technologies and processes. The company adheres to all applicable regulatory, legal, and contractual guidelines to ensure the protection of personal data. Nuvama cultivates an organizational culture focused on cyber risk awareness and continuous improvement, equipping all employees to actively participate in data security. Through diligent risk assessments and proactive measures, Nuvama mitigates vulnerabilities and strengthens its defenses against cyber incidents. The policy limits data access to authorized individuals and emphasizes the development of an extensive Business Continuity Plan to ensure service continuity during disruptions. This dedication to cyber security and data privacy secures stakeholder trust in Nuvama.

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.

Nuvama has implemented a comprehensive cybersecurity and data privacy programme, incorporating a number

of initiatives aimed at enhancing awareness and strengthening systems against cyber threats. Various awareness programs have been conducted across different business departments, including periodic phishing campaigns to assess and improve employee awareness. Employees identified as frequent offenders undergo customized awareness modules to reinforce cybersecurity best practices. Additionally, all employees are required to complete training courses on information and cybersecurity to enhance their knowledge and skills. The Information Security team regularly disseminates emails and information campaigns to keep employees informed about the latest trends and developments in cybersecurity, fostering a culture of vigilance and proactive risk management throughout the organization.

7. Provide the following information relating to data breaches:

- a) **Number of instances of data breaches:** No instances noted
- b) **Percentage of data breaches involving personally identifiable information of customers:** Not Applicable
- c) **Impact, if any, of the data breaches:** Not Applicable

Leadership Indicators

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

Details about the range of services offered by Nuvama can be found on the company's website.

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

The Company runs campaigns of Email, Whatsapp, SMS, and notification wherein we ask customers to follow regulatory norms and not share password or OTPs with anybody to safeguard their accounts. This is sent on fortnightly basis. We also send important regulatory updates to clients in a mail (which covers all the links of important circulars). In our monthly transactional mails as well we have embedded the links of important circulars which act as reminders. We also send Do's and Don't's to clients to be followed before and after trading and regular alerts by compliance team are also sent to clients via notifications.

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

The company takes proactive measures to ensure reliability and seamless continuity to the operations. As a financial services company, digital transformation backed by a robust information technology (IT) infrastructure plays an indispensable role in keeping our customers' information and the company's proprietary information confidential. We have deployed Data Loss Prevention Solutions in our environment which helps to stop the transfer of critical data including PII data by safeguarding and analyzing the data being transferred. We also conduct a vulnerability assessment on a regular basis to mitigate risk within the organization. In addition to encrypting data, we have deployed network firewalls and web application firewalls. We also have privilege access monitoring in place to limit and monitor access. Security Operations Center is in place to closely monitor any incidents and to act promptly. Endpoints are protected through Endpoint Detection & Response deployments which effectively monitors the endpoint risks. Our cyber-security infrastructure is robust, and we back up our data using remote or off-site storage. Our Information Security team conducts regular phishing assessments and cyber quizzes to assess employee awareness, and we regularly send out awareness emails, and posters. In addition, the company has a robust Business Continuity Policy in place. It is established based on impact assessment and made available for all business-critical processes. Necessary tests are carried out to assess the operational effectiveness. The plan is reviewed annually and updated whenever there are changes. The Disaster Recovery (DR) site is located in a different seismic zone. We regularly conduct tests to assess our preparedness.

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 about consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Yes, our company actively engages in measuring consumer satisfaction to enhance our services and maintain high-quality standards. We employ two primary metrics to evaluate customer sentiment:

- Net Promoter Score (NPS): This metric assesses customer loyalty and propensity to recommend our services by asking them to rate on a scale of 0 to 10 their likelihood of recommending our products or services to others. NPS helps us understand and improve customer loyalty, driving our efforts to generate positive referrals and strengthen customer relationships.
- Customer Satisfaction (CSAT): Our CSAT surveys provide detailed insights into various aspects of our offerings, allowing us to pinpoint the exact factors contributing to customer satisfaction. Feedback is collected on product performance, service quality, and support experiences, highlighting both strengths and areas for improvement.
- Feedback Management: All feedback collected through NPS and CSAT surveys is meticulously analyzed in a closed-loop process. Regular reviews with key stakeholders ensure that customer insights are integrated into our business strategy, fostering accountability and continuous enhancement of customer experience.

These initiatives are crucial in our ongoing efforts to improve the customer experience and demonstrate our commitment to delivering service excellence.