

**Date:** 9<sup>th</sup> August, 2023

The Manager,  
Listing Department,  
National Stock Exchange of India Limited  
Exchange Plaza, C-1,  
Block G, Bandra – Kurla Complex,  
Bandra (East), Mumbai – 400 051

The General Manager,  
The Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

**Symbol: SAREGAMA**

**Scrip Code: 532163**

**Subject: Business Responsibility and Sustainability Report for the Financial Year 2022-23**

Dear Sir/ Madam,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations'), please find enclosed the Business Responsibility and Sustainability Report ('BRSR') of the Company for the Financial Year 2022-23, which also forms part of the Integrated Annual Report for the Financial Year 2022-23.

The same is also available on the website of the company at [www.saregama.com](http://www.saregama.com).

You are requested to kindly take the afore-mentioned on record and oblige.

Yours Faithfully,  
For **SAREGAMA INDIA LIMITED**

**Priyanka Motwani**  
**Company Secretary and Compliance Officer**

## 'ANNEXURE - D' TO THE BOARDS' REPORT BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

Saregama India Ltd. (hereinafter 'Saregama' or 'the Company' or 'We') welcomes the reporting framework 'Business Responsibility and Sustainability Reporting' ('BRSR') introduced by the Securities and Exchange Board of India ("SEBI") containing detailed Environmental, Social and Governance ("ESG") disclosures and the Company has mandatorily adopted the framework for the FY 2022-23.

This report also illustrates the Company's ESG approach.

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

1. **Corporate Identity Number (CIN) of the Listed Entity** - L22213WB1946PLC014346
2. **Name of the Listed Entity** - Saregama India Limited
3. **Year of incorporation** - 13/08/1946
4. **Registered office address** - 33, Jessore Road, Dum Dum, Kolkata-700028, West Bengal, India
5. **Corporate address** - 2<sup>nd</sup> Floor, Spencer Building, 30, Forjett Street, Grant Road (W), Mumbai - 400036
6. **E-mail** - [co.sec@saregama.com](mailto:co.sec@saregama.com)
7. **Telephone** - (022) 6688 6200
8. **Website** - [www.saregama.com](http://www.saregama.com)
9. **Financial year for which reporting is being done** - FY 2022-23
10. **Name of the Stock Exchange(s) where shares are listed**

Name of the Exchange	Stock Code
BSE Limited	532163
National Stock Exchange of India Limited	SAREGAMA

11. **Paid-up Capital** - Rs. 19,28,09,490/-
12. **Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report**  
Ms. Priyanka Motwani  
Company Secretary  
Phone: (022) 6688 6200  
Email: [priyanka.motwani@rpsq.in](mailto:priyanka.motwani@rpsq.in)
13. **Reporting boundary** - The disclosures under this report are made on Standalone basis for Saregama India Limited. The statements mentioned in the report would provide insight of the Company's performances and therefore information regarding the holding company and subsidiaries is not considered.

#### II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Information and Communication	Motion picture, video and television program production, sound recording and music publishing activities	82.39
2	Trade	Retail Trading	17.61

\*Break. Up is given for operating revenue

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

S. No.	Product/ Service	NIC Code	% of total Turnover contributed
1	Music Licensing	592	64.71
2	Films, Series and Events	591	17.68
3	Music Retail	474	17.61

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

Location	Number of plants	Number of offices	Total
National	NA	4	4
International*	NA	4	4

\* The Company through its subsidiaries has presence in Dubai, UK, US & Mauritius

**17. Markets served by the entity:**

## a) Number of locations

Locations	Number
National (No. of States)	PAN India
International* (No. of Countries)	World

\* The Company's content is consumed throughout the world through various deals

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

**39.85% of its total turnover is generated from exports of its products and services.**

## c) A brief on types of customers

- (i) Business to Business (B2B): Saregama's customers include leading audio and video streaming platforms, Broadcasting Channels and other social media platforms.
- (ii) Business to Consumer (B2C): Saregama sells carvaan and its variants directly to consumers through its website and online market places

**Employees****18. 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)	325	263	80.92	62	19.08
2.	Other than Permanent (E)	47	41	87.23	6	12.77
3.	Total employees (D + E)	372	304	81.72	68	18.28

\*Employees include Managing Director & Key Managerial Persons (KMPs).

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI. Hence, in all sections details sought of the "Workers" category are not applicable to the Company.

b) Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)					
2.	Other than Permanent (E)	The Company does not have any differently abled employees				
<b>3.</b>	<b>Total differently abled employees (D + E)</b>					

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

#### 19. Participation/ Inclusion/ Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	3	33.33
Key Management Personnel	3	1	33.33

#### 20. Turnover rate for permanent employees and workers

	FY 2022-23			FY 2021-22			FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	28.45%	34.11%	31.28%	34.82%	32.26%	33.54%	33.76%	26.55%	30.15%
Permanent Workers	NIL			NIL			NIL		

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

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

S. No	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% 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.	Composure Services Private Limited	Holding	-	No
2.	Saregama Limited (formerly Saregama Plc.)	Subsidiary	76.41	No
3.	Digidrive Distributors Limited*	Subsidiary	100.00	No
4.	RPG Global Music Limited	Subsidiary	100.00	No
5.	Kolkata Metro Networks Limited	Subsidiary	100.00	No
6.	Open Media Network Private Limited*	Subsidiary	100.00	No
7.	Saregama Inc	Step-down Subsidiary	76.41	No
8.	Saregama FZE	Subsidiary	100.00	No
9.	Saregama Regency Optimedia Private Limited**	Joint venture	26.00	No

\* Refer Boards' Report [para (F)] on Scheme of Arrangement between Saregama India Limited and Digidrive Distributors Limited.

\*\* Under liquidation effective 19 September 2016.

## V. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: - **Yes**

(ii) Turnover (in Rs. Lakhs) - **56,830.77**

(iii) Net worth (in Rs. Lakhs) - **118,569.22**

Above numbers are for FY22

## VI. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2022-23			FY 2021-22		
		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	The communities involved in social welfare activities of the Company, can raise concerns, provide feedback on ongoing projects, and raise grievances related to CSR projects/ programs/ activities, by accessing the Company's website <a href="http://www.saregama.com">www.saregama.com</a> .		NIL			NIL	
Investors (other than shareholder)	Yes, Investors and shareholders have direct access to Company Secretary and Compliance Officer via a dedicated email id: <a href="mailto:co.sec@saregama.com">co.sec@saregama.com</a> . Further, the Company's 'Whistle-Blower' mechanism allows not only employees and workers but also other stakeholders, a platform to report grievances. It also ensures that complainants are protected with full anonymity and any anti-retaliation or victimization practices. The Policy is available at - <a href="https://r.saregama.com/resources/pdf/investor/whistle_blower_policy.pdf">https://r.saregama.com/resources/pdf/investor/whistle_blower_policy.pdf</a> .		NIL			NIL	
Shareholders		3	NIL	All complaints filed during the FY 2022-23 were duly resolved	4	NIL	All complaints Filed during the FY 2021-22 were duly resolved
Employees and workers		1	NIL	ICC took up the case with utmost priority and resolved the complaint. Upon the completion of the adjudication process of ICC, the accused person was terminated immediately.	NIL	NIL	NA
Customers#	To connect with customers and register their grievances, the Company has setup a dedicated customer care service that resolves customer grievances and quality and product related complaints via different mechanisms including toll free tele-calling and email: <a href="mailto:feedback@saregama.com">feedback@saregama.com</a> Customers of the Company can contact on its website - <a href="https://www.saregama.com/static/contact-us">https://www.saregama.com/static/contact-us</a>	72,986	NIL	Complaints were predominantly related to products. The same were resolved completely by providing either a replacement or refund	52,596	NIL	Complaints were predominantly related to a few defects in products. The same were resolved completely by providing either a replacement or refund

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2022-23			FY 2021-22		
		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
Value Chain Partners	Frequent interactions with value chain partners occur whereby they are encouraged to put forth the grievances for satisfactory resolution		NIL			NIL	

# The Company has considered all the customer feedbacks expressing dissatisfaction or reporting an issue, which includes both major and minor concerns, as complaints.

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

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.	Infringement of our IP	Risk	Unauthorised use of copyrighted works.	<ul style="list-style-type: none"> <li>While piracy levels have significantly declined in India with the support of the judicial system, we have a dedicated team to constantly monitor every infringement and take corrective action.</li> <li>We are part of industry body IMI (Indian Music Industry) that works closely with the government to protect interests of music industry stakeholders</li> </ul>	Negative
2.	Digitalization	Opportunity	Digitalization has played an important role in shaping the music industry. Music streaming, downloads, Internet radios and other subscription-based music services have become an important channel for the distribution of music for the Company. Digital technologies and processes have changed the landscape within the music industry by altering ways in which revenue is being generated. This has opened new avenues of revenue generation for the Company.	NA	Positive

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)
3.	Employee Engagement	Opportunity	<ul style="list-style-type: none"> <li>Decentralized decision making empowers people to take the right steps for the company's interests</li> <li>My Inputs Count (MIC) is a Company wide survey that enables people to express their opinions freely</li> <li>We have implemented employee friendly policies, and undertake regular engagements, surveys, learning and development programs and health camps reinforcing our reputation as an employer of choice</li> </ul>	NA	Positive
4.	Plastic Waste & EPR Obligation	Risk	The products business of the Company requires the Company to be compliant with the E-waste & Plastic waste regulations. Non adherence to recent changes in the environmental legislations regulating the generation, collection & disposal of E-waste & Plastic waste can lead to monetary risks for the Company.	The Company has obtained Extended Producers Responsibility ("EPR") authorisation for E-waste & plastic waste and would take care of the disposal, collection, reuse & recycling obligations that the relevant provisions of the law casts on it.	Negative

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
1.	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available									
	1. Terms and conditions of appointment of Independent Directors									
	URL: <a href="https://r.saregama.com/resources/pdf/investor/website_update_terms_and_conditions_of_independen_directors.pdf">https://r.saregama.com/resources/pdf/investor/website_update_terms_and_conditions_of_independen_directors.pdf</a>									

2. Code of conduct of Board of Directors and Senior Management Personnel:  
URL: [https://r.saregama.com/resources/pdf/investor/code\\_of\\_conduct\\_for\\_board\\_of\\_directors\\_and\\_senior\\_management.pdf](https://r.saregama.com/resources/pdf/investor/code_of_conduct_for_board_of_directors_and_senior_management.pdf)
3. Whistle Blower Policy:  
URL: [https://r.saregama.com/resources/pdf/investor/whistle\\_blower\\_policy.pdf](https://r.saregama.com/resources/pdf/investor/whistle_blower_policy.pdf)
4. Policy on Materiality of Related Party Transactions and on Dealing with Related Party Transactions:  
URL: [https://r.saregama.com/resources/pdf/investor/Policy\\_Statement\\_on\\_Materiality\\_and\\_Dealings\\_with\\_Related\\_Parties\\_01.pdf](https://r.saregama.com/resources/pdf/investor/Policy_Statement_on_Materiality_and_Dealings_with_Related_Parties_01.pdf)
5. Policy for determining 'Material' Subsidiaries:  
URL: [https://r.saregama.com/resources/pdf/investor/material\\_subsidary\\_policy.pdf](https://r.saregama.com/resources/pdf/investor/material_subsidary_policy.pdf)
6. CSR Policy  
URL: [https://r.saregama.com/resources/pdf/investor/csr\\_policy.pdf](https://r.saregama.com/resources/pdf/investor/csr_policy.pdf)
7. HR related policies, IT Process manual, POSH Policy, Code for Insider Trading, Equal Opportunity Policy are available to the employees on the Company's intranet.

The Company is in the process of strengthening its Policy hub and fortify its governance mechanism and shall be formulating effectively working policies, procedures & SOPs in coming years.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	No	No	No	No	No	No	No	No	No
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 strives to be ahead of the curve in its ESG journey and as a part of it, considering to obtain global mark of approval by way of relevant national/ international certifications.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	In its ESG Journey, the Company looks forward to set short, medium and long term targets for sustainability KPIs related to climate change, energy, water, waste management, air emission reduction, GHG reduction and biodiversity protection.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Since, the Company is in its early days of walking the journey of strengthening ESG, it is in the process of setting its goals & commitments and looks forward to abide by the path decided.								

**Governance, leadership and oversight**

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements  
The perspective of Saregama India Ltd. towards addressing societal challenges in business is encapsulated in the concept of a "Sustainable Earth." Its objective is to leverage information and communication technology to maximize the positive impact on society and resolve pressing issues. Saregama India Ltd. places significant emphasis on environmental management activities and actively contributes to preventing and resolving diverse environmental problems. We thoroughly analyse the mass balance within our business operations and employ this information to devise strategies aimed at minimizing our environmental footprint. The Managing Director of the Company has some wonderful thoughts and presents his perspective on the ESG as follows:



Dear Stakeholders,

Saregama is pleased to present to you its first Business Responsibility and Sustainability Report FY23 which supersedes BRR (Business Responsibility Report) developed previously. We are thankful to all our stakeholders for investing their trust & belief in us that has helped us to grow exponentially over the past years. Our approach to sustainability is not based on merely meeting compliances but goes a step beyond towards institutionalization of sustainability practices. We ensure all our business activities are conducted in accordance with ethical principles, internal policies, procedures, and relevant laws and regulations. Hence prevention of corruption and promotion of fair competition is another important dimension of the compliance efforts at Saregama. We strongly believe that success and sustainable growth of any organisation depends on creating long-lasting relationship with its stakeholders. We have created communication channels for all our stakeholders to ensure that they are granted their very own right "to be heard" to enable us address their concerns in the best possible manner. We ensure adherence to all environmental and other applicable compliances. We make sure that all our employees and value chain partners have safe, supportive and respectful workplaces where the dignity of every associate is recognized. While we can see significant changes in the lives of people we work with, our efforts to enable the economic empowerment of our communities, and to making a positive difference, will continue. While we do all this, we believe that we can deliver value and contribute our bit in furthering the sustainable development agenda. We continue to keep ourselves committed to the growth of our nation and our people at all times.

Regards

**Vikram Mehra**

Managing Director

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Mr. Vikram Mehra Managing Director
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.	Mr. Vikram Mehra, Managing Director, is the authority to deal with all sustainability related issues.

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)																	
		P1	P2	P3	P4	P5	P6	P7	P8	P9									
Performance against above policies and follow up action	Compliance with the laws of land are the first step in responsible business conduct.																		
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The compliance review with all the statutory requirements of relevance to the principles of National Guidelines on Responsible Business Conduct has been done by the respective committees of the Board.																		

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.	<b>P1</b>	<b>P2</b>	<b>P3</b>	<b>P4</b>	<b>P5</b>	<b>P6</b>	<b>P7</b>	<b>P8</b>	<b>P9</b>
	No, the policies are evaluated internally from time to time and updated whenever required. The Company seeks external assistance and advice as and when required.								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE 1:

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



### Essential Indicators

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

Segment	Total Number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	2	The Company conducts detailed and exhaustive familiarisation programs on various topics including induction programmes for new Independent directors and discussion on the Director's roles and responsibilities and Business Review.	100%
Key Managerial Personnel	2	Training on BRSR and updates on SEBI Insider Trading Regulations were covered during the trainings/ sensitization sessions conducted during the reporting period for KMPs & Employees.	100%
Employees other than BoD and KMPs	2		80%
Workers			Not Applicable

#### 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:

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (in Rs.)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine					
Settlement					
Compounding Fee					
No monetary penalties have been imposed on Directors/ KMPs of the Company					
Non-Monetary					
Imprisonment					
Punishment					
No non-monetary punishments have been imposed on Directors/ KMPs of the Company					

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
	None

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

Yes, the Company has anti-corruption and anti-bribery policy.

URL: [https://r.saregama.com/resources/pdf/investor/Anti\\_Corruption\\_Anti\\_Bribery\\_policy.pdf](https://r.saregama.com/resources/pdf/investor/Anti_Corruption_Anti_Bribery_policy.pdf)

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

	FY 2022-23	FY 2021-22
Directors	None	None
KMPs		
Employees		
Workers		

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	None		None	
Number of complaints received in relation to issues of Conflict of Interest of the KMPs				

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

Not Applicable since no fines/ penalties imposed.

### Leadership Indicators

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

Total number of awareness programmes held	Topic/ principles covered under the training	% age of value chain partners covered (by value chain partner)
Value Chain Partners are essential aspects of the operations of the Company. Considering the growing importance of responsible business conduct issues, the Company looks forward to assess its value chain partners and creating a training mechanism for essential topics in coming years		

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. We have adopted Code of Conduct for the Board of Directors, which sets out clear guidelines for avoiding and disclosing actual or potential conflict of interest with the Company. We receive annual statutory declarations and changes, if any, from time to time from all the directors at the start of each financial year disclosing the directorships and memberships. Additionally, the directors do not participate in the business at the board meetings, in the matters in which they are interested.

**PRINCIPLE 2:**

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



Essential Indicators

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

	FY 2022-23	FY 2021-22	Details of improvements in the environmental and social impacts
R&D	Considering nature of business, Company has not made specific R&D or Capex investments for improving social and		
Capex	environment impacts.		

- 2 (a) Does the entity have procedures in place for sustainable sourcing? (Yes/No)  
 (b) If yes, what percentage of inputs were sourced sustainably?

The consumption of resources is limited to running of back office operations and sourcing of inputs is not relevant to the core activities of the Company. However, striving to be a responsible corporate, the Company has been using egg-tray instead of thermocol for packaging of its product- Carvaan. The tray is made from recycled pulp and is economical, efficient and environment friendly and can be recycled easily. This is not quantified.

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

Considering the nature of business, the consumption of resources is limited to the back office operational level for our digital content activities. In addition to above, for the waste generated out of our products business, we have following mechanism in place:

- **Plastics (including packaging):** As the Company is required to abide by its Extended Producer Responsibility (EPR) obligation, it has set up mechanism as detailed in point 4 below.
- **E- Waste:** As the Company is required to abide by its Extended Producer Responsibility (EPR) obligation, it has set up mechanism as detailed in point 4 below.
- **Hazardous waste:** There is no hazardous waste generation owing to the nature of business.
- **Other waste:** There are no other kinds of waste generated in our office other than listed above.

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

Yes. The Company has obtained EPR for Plastic and E-waste management. The Company is registered with CPCB and has submitted its waste collection-action plan in alignment with CPCB guidelines on the subject during the reporting period. The business complies with requirement of the EPR and waste collection plan is in line with the EPR plan. The Company has registered itself as a 'Brand owner' under plastic waste regulations.

Specifically for the E-waste generated, the Company has taken a 'Sustainable Earth' commitment and it has tied up with Waste Management Partners to channelize its e-waste in an environmentally responsible manner. The details of the e-waste management programme are available at: [https://r.saregama.com/resources/pdf/saregama\\_e\\_waste\\_plan.pdf?srgm\\_tracker=footer](https://r.saregama.com/resources/pdf/saregama_e_waste_plan.pdf?srgm_tracker=footer)

### Leadership Indicators

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

NIC Code	Name of Product/ Service	% of total Turnover Contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
Considering the nature of business, Life Cycle Perspective/ Assessments(LCA) is not applicable to the Company.					

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

Name of Product/ Service	Description of the risk/ concern	Action Taken
Not applicable since LCA is not conducted		

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2022-23	FY 2021-22
Considering our nature of business, this is not applicable		

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

	FY 2022-23			FY 2021-22		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	The Company does not reclaim the product from the customer, once sold. However, the product returned by the customer, if not resealable are safely disposed off.					
E-waste						
Hazardous Waste						
Other waste						

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

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

**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:

	% of employees covered by											
	Total (A)		Health Insurance		Accident Insurance		Maternity Insurance		Paternity Benefits		Day Care facilities	
	Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)		
<b>Permanent Employees</b>												
Male	263	263	100.00	263	100.00	0	0	263	100.00	0	0.00	
Female	62	62	100.00	62	100.00	62	100.00	0	0.00	0	0.00	
<b>Total</b>	<b>325</b>	<b>325</b>	<b>100.00</b>	<b>325</b>	<b>100.00</b>	<b>62</b>	<b>19.08</b>	<b>263</b>	<b>80.92</b>	<b>0</b>	<b>0.00</b>	
<b>Other than Permanent Employees</b>												
Male	41	40	97.56	40	97.56	0	0.00	40	97.56	0	0.00	
Female	6	6	100.00	6	100.00	6	100.00	0	0.00	0	0.00	
<b>Total</b>	<b>47</b>	<b>46</b>	<b>97.87</b>	<b>46</b>	<b>97.87</b>	<b>6</b>	<b>12.77</b>	<b>40</b>	<b>85.11</b>	<b>0</b>	<b>0.00</b>	

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

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

Benefits	FY 2022-23			FY 2021-22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100.00	NA	Y	100.00	NA	Y
Gratuity	100.00	NA	Y	100.00	NA	Y
ESI	NA	NA	NA	NA	NA	NA
Others - Please specify	NA	NA	NA	NA	NA	NA

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

#### 3. Accessibility of workplaces

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

The Company is committed to creating an inclusive and accessible environment for all individuals.

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, Saregama has an equal opportunity policy in accordance with the Rights of Persons with Disabilities Act, 2016. This policy is accessible on the Company's Intranet and is an integral part of our HR manual. It outlines our commitment to providing equal opportunities and promoting inclusivity for individuals with disabilities.

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

Gender	Permanent Employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-	-	NA	NA
Female	66.67%	50%	NA	NA
<b>Total</b>	<b>66.67%</b>	<b>50%</b>	<b>NA</b>	<b>NA</b>

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Not Applicable, as the Company does not employ any workers.
Other than Permanent Workers	
Permanent Employees	Yes
Other than Permanent Employees	Yes

YES, employees can reach out to their reporting managers/ HR to redress their grievances.

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

7. Membership of employees and worker in association(s) or Unions recognized by the listed entity: - Not applicable

Category	FY 2022-23			FY 2021-22		
	Total employees / workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D / C)
<b>Total Permanent Employees</b>	Not Applicable, since no employees are part of any association/ union.					
Male						
Female						

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

	FY 2022-23					FY 2021-22				
	Total (A)	On Health and Safety measures		On Skill upgradation		Total (D)	On Health and Safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	263	263	100.00	263	100.00	210	210	100.00	210	100.00
Female	62	62	100.00	62	100.00	72	72	100.00	72	100.00
<b>Total</b>	<b>325</b>	<b>325</b>	<b>100.00</b>	<b>325</b>	<b>100.00</b>	<b>282</b>	<b>282</b>	<b>100.00</b>	<b>282</b>	<b>100.00</b>

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	304	304	100.00	183	183	100.00
Female	68	68	100.00	52	52	100.00
<b>Total</b>	<b>372</b>	<b>372</b>	<b>100.00</b>	<b>235</b>	<b>235</b>	<b>100.00</b>

At Saregama, the Company has a PMS - Performance Management System for performance reviews. After joining, all the permanent employees fill out a KRA (Key Responsibility Area) post which a mid-year discussion is conducted in the month of November for all employees. Annual appraisal discussion happens in the month of June and increments are effected from July. During Appraisal discussions two level discussions take place based purely on KRAs set, performance shown, targets achieved and skills improved. Managing Director & HR Head have the final authority to conclude the performance review cycle. The entire process is carried out in a transparent and professional manner.

The Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

## 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, an occupational health and safety management system has been implemented by the Company, eventhough, considering the nature of business, there are no or critical occupational health risks in the operations of the Company. The Company recognizes the paramount importance of ensuring the well-being and safety of its employees, customers, and stakeholders. Further, appropriate fire safety precautions are taken to ensure safe working environment.

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

Apart from general safety and well-being of employees, considering the nature of operations of the Company, there are no work-related hazards which may arise.

- c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)  
Not Applicable, as the Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.

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

Yes, employees of the Company have access to non-occupational medical and healthcare services. The Company provides a comprehensive mediclaim facility that extends beyond occupational health coverage.



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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees		NIL
Total recordable work-related injuries		Not applicable, as the Company does not have any workers as defined in the guidance note on BRSR, issued by SEBI.	
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.

- The Company is dedicated to provide comprehensive healthcare services to its employees and their families. In August 2022, a Booster Camp was organized, followed by a wellness camp in February 2023. The Company conducts regular Dental & Eye Check-ups and seeks consultations from health experts. Additionally, a health camp was held in November 2022. The Company emphasizes cleanliness and adheres to hygiene protocols. It also offers 24/7 medical support, aiming to create a safe work environment that benefits employees and allows them to stay focused.
- The Company prioritizes the safety and well-being of all employees and third-party workers present on its premises. Health, safety and environmental performance are assessed across all offices. Administration staff are trained in fire safety and evacuation drills. No employee accidents occurred during the reporting year.
- Regular equipment checks are conducted to address wear and tear, including air conditioners and UPS systems. Fire alarm systems and smoke detectors are installed at all premises, and fire extinguishers are kept filled for effective use in emergencies. The Company has doctors dedicatedly available for medical assistance.

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions						
Health & Safety			There were no complaints pertaining to these aspects during reporting period.			

## 14. Assessments for the year:

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

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

Not Applicable as there were no safety related incidents during FY 2022-23.

### 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).

Yes, the Company has a Term Life Insurance Policy in place covering all its Employees in the event of their death.

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

Company closely tracks and monitors whether statutory dues deducted/collected by its value chain partners have been deposited properly and timely with government and credit of same is flowing to the Company.

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 are 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 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
Employees	NIL	NIL	NIL	NIL
Workers				

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 is committed to continuously reviewing and improving its employee support programs, and it may consider implementing such programs in the future to better assist its employees during career transitions.

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	NIL
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.

Not Applicable, as no quantification is not done

#### 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.

To identify key stakeholder groups of Saregama India Ltd., a systematic approach is followed. This involves conducting stakeholder mapping exercises, engaging with customers, investors, employees, suppliers, regulatory bodies and the local community. Feedback mechanisms, surveys, and consultations are utilized to understand their interests, concerns, and expectations, ensuring effective stakeholder management.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community, Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Emails, Meetings	On regular basis, the senior management team interacts with employees across departments where employee gets a chance to engage freely. On a quarterly basis, there is a town-hall meeting organized to discuss the key updates with respect to the Organisation.	Predominantly, grievance redressal, Feedback on Culture & benefits of organization, Celebration of festivals, Celebrating WOW Wednesday - games, Personal connect, Meetings for financial consultancy, appraisal discussions, mediclaim helpdesk, Investment planning, refresher sessions related to HR systems & processes
Suppliers	No	Emails, Meetings	Monthly	Follow up, planning and delivery
Investors & Shareholders	No	Quarterly calls with investors post announcement of results & meetings with investors as and when requested are held; predominantly to update the investors about progress of company and address concerns, if any.		
Regulatory Bodies	No	Emails, Submissions	Event Based	Intimation, updates
Customers	No	Emails, Project-related calls and meetings; project management reviews; relationship meetings and reviews	As and when required	Identifying opportunities, challenges, and grievances. Understanding client's data privacy & security requirements
Community			No specific periodicity & purpose	

### Leadership Indicators

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

The Company encourages responsible and responsive communication with all its stakeholders be it customers, media, investors, analysts, regulatory authorities, vendors, etc. by way of calls, meetings, press releases or any other mode depending on the type of stakeholder. The management provides periodic updates to the Board of Directors.

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

Yes, stakeholder consultation is used to support the identification and management of environmental and social topics. The Company actively engages with stakeholders through surveys, meetings, and feedback mechanisms to gather input on sustainability concerns. Inputs received are carefully analyzed and incorporated into the development of policies and activities, ensuring alignment with stakeholders' expectations.

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

Not Applicable, as no instances of engagement with vulnerable/ marginalized stakeholder groups was identified.

**PRINCIPLE 5: Businesses should respect and promote human rights**



**Essential Indicators**

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	325	325	100.00	210	210	100.00
Other than permanent	47	47	100.00	72	72	100.00
<b>Total Employees</b>	<b>372</b>	<b>372</b>	<b>100.00</b>	<b>282</b>	<b>282</b>	<b>100.00</b>

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

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Permanent	325	0	0.00	325	100.00	282	0	0.00	282	100.00
Male	263	0	0.00	263	100.00	210	0	0.00	210	100.00
Female	62	0	0.00	62	100.00	72	0	0.00	72	100.00
Other than Permanent	<b>NIL</b>					<b>NIL</b>				
Male										
Female										

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

	Male			Female		
	Number	Median remuneration/ Salary/ Wages of respective category	Number	Median remuneration/ Salary/ Wages of respective category	Number	Median remuneration/ Salary/ Wages of respective category
Board of Directors (BoD)	5	Not applicable, as all Non-Executive Directors/ Independent Directors receive remuneration in the form of sitting fees, and the Managing Director's compensation is included in the Key Management Personnel (KMP) details mentioned below.	3	Not applicable, as all Non-Executive Directors/ Independent Directors receive remuneration in the form of sitting fees, and the Managing Director's compensation is included in the Key Management Personnel (KMP) details mentioned below.		
Key Managerial Personnel	2	Rs. 587.02 Lakhs	1	Rs. 7.32 Lakhs		
Employees other than BoD and KMP	261	Rs.9.50 Lakhs	61	Rs.9.50 Lakhs		
Workers					Not Applicable	

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

Yes, HR is the focal point responsible for addressing the Human rights impacts or issues caused or contributed to by the business.

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

The grievances pertaining to human rights can be addressed to the HR of the Company who is responsible to get them resolved.

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

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

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

The Code of Ethics and Business Conduct and Whistle Blower Policy provides the mechanism to prevent adverse consequences to the complainant in discrimination and harassment cases.

## 8. Do human rights requirements form part of your business agreements and contracts?

Currently, human rights requirements are not explicitly included as part of the Company's business agreements and contracts.

9. Assessments for the year:

	<b>% of your plants and Offices that were assessed (by entity or statutory authorities or third parties)</b>
Child Labour	Assessments are not carried out
Forced/involuntary labour	
Sexual Harassment	
Discrimination at workplace	
Wages	
Others - please specify	

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

Not Applicable

**Leadership Indicators**

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

None of the Company's business process required any modification introduced as a result of addressing human rights grievances/ complaints.

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

Company has not conducted any due diligence on Human rights issues. However, its human rights policy covers different components as compliance to all Government regulations, continuous engagement with stakeholders on human rights and related matters, diversity at workplace, harassment free workplace, and grievance mechanisms.

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?

The Company is committed to creating an inclusive and accessible environment for all individual and is dedicated to actively working towards implementing accessibility measures for the differently abled employees and visitors in the near future.

4. Details on assessment of value chain partners:

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual Harassment	NIL
Discrimination at workplace	
Child Labour	
Forced Labour / 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.

Not Applicable.

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.****Essential Indicators****1. Details of total energy consumption (in Megajoules) and energy intensity, in the following format:**

Parameter	Units	FY 2022-23	FY 2021-22
<b>Total electricity consumption (A)</b>	Megajoules	3740011.2	3212979.5
<b>Total fuel consumption (B)</b>	Megajoules	122456.9	151756.9
<b>Energy consumption through other sources (C)</b>	Megajoules	NIL	NIL
<b>Total energy consumption (A+B+C)</b>	Megajoules	3862468.1	3364736.4
<b>Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)</b>	Megajoules/Rupees Lakhs	55.56	59.21

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

**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**

Not Applicable.

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

Parameter	Units	FY 2022-23	FY 2021-22
<b>Water withdrawal by source</b>			
(i) Surface water	kilolitres	NIL	NIL
(ii) Groundwater	kilolitres	NIL	NIL
(iii) Third party water	kilolitres	253.21	190.98
(iv) Seawater / desalinated water	kilolitres	NIL	NIL
(v) Others	kilolitres	NIL	NIL
Total volume of water withdrawal (i + ii + iii + iv + v)	kilolitres	253.21	190.98
Total volume of water consumption	kilolitres	253.21	190.98
Water intensity per rupee of turnover (Water consumed / turnover)	kilolitres/Rupees Lakhs	0.0036	0.0034

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

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

Considering nature of business, this indicator is Not applicable.

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

The Company does not have any significant air emissions other than those arising from operation of DG sets during power outages. The Company's operations in India have obtained the required consent under the Air (Prevention & Control of Pollution) Act (1981) for operating DG sets, and it ensures strict compliance with all specified conditions, including stack emission parameters such as

nitrous oxide, non-methane hydrocarbons, carbon monoxide, particulate matter, etc. Regular stack emission monitoring is carried out in accordance with the frequency mandated by the Consent to Operate (CTO) for the generator sets.

Parameter	Please specify unit	FY 2022-23	FY 2021-22
NOx		Not being assessed as mentioned in note above.	Not being assessed as mentioned in note above.
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others - please specify			

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	275.96	282.31
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	841.5	722.92
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO <sub>2</sub> equivalent/ Rupees Lakhs	0.016	0.018

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency

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

At present, the Company does not have any specific projects related to reducing greenhouse gas (GHG) emissions. However, the company is actively taking various internal measures to minimize its GHG footprint. These efforts include the usage of power strips with multiple pin holders to consolidate power usage, switching off electrical devices when not in use to prevent energy waste, installing energy-efficient light bulbs to reduce electricity consumption, and opting for laptops with LCD screens instead of power-intensive PCs to decrease overall energy usage. While external projects are not currently in progress, the company's internal initiatives demonstrate a commitment to sustainability and energy conservation. The Company actively participates in tree plantation drive in its Kolkata's Premises.

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

Parameter	FY 2022-23	FY 2021-22
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	-	-
E-waste (B)	0.25	0.98
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please Specify, if any. (G)	-	-



Parameter	FY 2022-23	FY 2021-22
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	-	-
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>0.25</b>	<b>0.98</b>
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	Computers and related accessories are handed over to vendors or to certified disposal agencies. The data cannot be quantified.	
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
<b>Total</b>	<b>-</b>	<b>-</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	NA	NA
(ii) Landfilling	NA	NA
(iii) Other disposal operations	NA	NA
<b>Total</b>	<b>NA</b>	<b>NA</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

Apart from plastic waste which is generated in negligible quantities, the Company does not generate any other waste aforementioned.

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

The Company does not produce any hazardous and toxic chemicals. However, the Company is committed to develop systems to reduce and recycle the water used and emphasise on the use of biodegradable garbage bags and dispose them in a systematic way.

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

S. No.	Location of operations/offices	Types of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
Not Applicable, as the Company has no such operations or offices near or around ecologically sensitive area.			

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

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

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

Serial Number	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective taken, if any action
NIL. The Company adheres to all applicable environmental laws				

### Leadership Indicators

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

Parameter	FY 2022-23	FY 2021-22
<b>From renewable sources</b>		
Total electricity consumption (A)		
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)		
Total energy consumed from renewable sources (A+B+C)		
<b>From non-renewable sources</b>		
Total electricity consumption (D)	3740011.2	3212979.5
Total fuel consumption (E)	122456.9	151756.9
Energy consumption through other sources (F)	NIL	NIL
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>3862468.1</b>	<b>3364736.4</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

2. Provide the following details related to water discharged: The Company does not discharge any water.

Parameter	FY 2022-23	FY 2021-22
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) To Surface water</b>	NA	NA
- No treatment	NA	NA
- With treatment - please specify level of treatment	NA	NA
<b>(ii) To Groundwater</b>	NA	NA
- No treatment	NA	NA
- With treatment - please specify level of treatment	NA	NA
<b>(iii) To Seawater</b>	NA	NA
- No treatment	NA	NA
- With treatment - please specify level of treatment	NA	NA
<b>(iv) Sent to third-parties</b>	NA	NA
- No treatment	NA	NA
- With treatment - please specify level of treatment	NA	NA
<b>(v) Others</b>	NA	NA
- No treatment	NA	NA
- With treatment - please specify level of treatment	NA	NA
<b>Total water discharged (in kilolitres)</b>	<b>NA</b>	<b>NA</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

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

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

Name of the area

Nature of operations

Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23	FY 2021-22
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
<b>Total volume of water withdrawal (in kilolitres)</b>		
<b>Total volume of water consumption (in kilolitres)</b>		
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>		
<b>Water intensity (optional) - the relevant metric may be selected by the entity</b>		
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) Into Surface water</b>		
- No treatment		
- With treatment - please specify level of treatment		
<b>(ii) Into Groundwater</b>		
- No treatment		
- With treatment - please specify level of treatment		
<b>(iii) Into Seawater</b>		
- No treatment		
- With treatment - please specify level of treatment		
<b>(iv) Sent to third-parties</b>		
- No treatment		
- With treatment - please specify level of treatment		
<b>(v) Others</b>		
- No treatment		
- With treatment - please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>		

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

The above-mentioned table is not applicable to the Company, as none of the Company's offices are in any water stress area.

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)			
Total Scope 3 emissions per rupee of turnover			

Considering the level of quantification required for scope 3 calculation, currently the Company is not evaluating the emission and intensity.

However, it shall start assessing the same in the due course.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Considering the Company's Business Operations, evaluation is not being conducted from any external agency.

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

Not Applicable. As none of the Company's operations or offices are near or around ecologically sensitive area.

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Water Faucets rather than the Water Taps		It helps to conserve water, in various ways: Precise water control by use of such lever handles or knobs, reduced flow rate by use of modern water faucets with built-in flow restrictors or aerators and prompt leakage detection.
2	LED lights for energy conservation		It helps to conserve energy, in various ways by use of LED lights
3	Usage of wheat straw based paper		Benefits of the usage are: 1. Environmental Sustainability: Wheat straw-based paper is made from agricultural waste, specifically the leftover stalks and stems of wheat crops after harvesting the grains. 2. Waste Reduction: Wheat straw is often considered agricultural waste and is typically burned or discarded after the grain harvest. 3. Reduced Carbon Footprint: Compared to traditional wood-based paper, wheat straw-based paper has a lower carbon footprint. 4. Economic Opportunities: Utilizing wheat straw for paper production can create economic opportunities for farmers and rural communities.
4	Usage on Biodegradable Garbage Bags		Benefits of the usage are: 1. Environmental Friendliness: Biodegradable garbage bags are designed to break down and decompose naturally over time through biological processes. 2. Reduced Plastic Waste: By using biodegradable garbage bags, the reliance on traditional plastic bags is reduced. 3. Landfill Management: Biodegradable garbage bags can facilitate more efficient waste management in landfills.

**7. Does the entity have a business continuity and disaster management plan?**

The data backup process of the Company is carried out daily as independent rolling active backups. The data in the production environment is backed up on independent data cartridges. These cartridges are then archived for future reference. These backups are verified for data integrity. From a business continuity perspective, we have a real-time data synchronization with a disaster recovery setup.

Further, the Company has offices located at multiple locations across the country. In case of any unforeseen situations or a natural disaster the employees can work from any of these offices or any other remote places including from their homes, as they have the necessary IT infrastructure. This guarantees that in the event of any disruptions, business operations are not impacted.

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

The Company did not encounter any such adverse impact to the environment arising from its Value Chain Partners, however as a good practice the Company transitioned to eco-friendly egg trays, which resulted in a reduced environmental footprint.

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

NIL. Assessment for Value Chain Partner are not been conducted.

**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.**

The Company is affiliated with 5 National industry chambers.

**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	Confederation of Indian Industry (CII)	National
2	Phonographic Performance Limited (PPL)	National
3	Indian Performing Rights Society Limited (IPRS)	National
4	Indian Music Industry (IMI)	National
5	Indo American Chamber of Commerce	National

**2. Provide details of corrective action taken or underway on any issues related to anticompetitive conduct by the entity, based on adverse orders from regulatory authorities- No such order from regulatory authority**

Name of authority	Brief of the case	Corrective active taken
Not Applicable as no such case		

**Leadership Indicators**

Sr. 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
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The Company through various Industry associations, participates in advocating matters for the advancement of the Industry and Public Good. The Company has a Code of Conduct Policy to ensure that the highest standards of business conduct are followed while engaging with aforesaid Trade associations/Industry bodies.

**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
Social Impact Assessment is not applicable to the Company as Currently the Company does not have any SIA projects in place.					

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)	5 of PAFs covered by R&R	Amounts paid to PAFs in the FY (in Rs.)
Not Applicable considering operations of the Company.						

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

Company's CSR Committee at the Board level oversees CSR activities, along with the corporate CSR team handle stakeholder grievances and engage with the community directly or through implementing agencies. Grievances received are communicated to the CSR team and discussed with the board-level committee in quarterly meetings. Resolutions are then conveyed back to the community members or their representatives.

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

	FY 2022-23	FY 202021-22
Directly sourced from MSMEs/ small producers	Not applicable, as the Company is not in manufacturing of goods and sourcing of goods is not a part of its principal business activities. The Company only assembles the product and does not manufacture it.	
Sourced directly from within the district and neighbouring districts		

**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
Not Applicable	

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)
Not Applicable			

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

No. There is no such policy in place.

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

Not Applicable

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

Not Applicable.

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

Sr. No	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
	The Company has not derived any benefits from Traditional Knowledge.			

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

Name of authority	Brief of the case	Corrective Action taken
	Not Applicable	

## 6. Details of beneficiaries of CSR Projects:

Sr. No	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
	The Company has only one on-going project of setting up of an IB School in Kolkata with modern facilities for promoting Education	The students of this school will be the beneficiaries in future	There is no quantified amount for the same

**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.

Customers have multiple avenues to raise complaints with the Company, including the company's website, Business WhatsApp account (8657499000), IVR, Toll-Free number (18001027799), and email address ([feedback@saregama.com](mailto:feedback@saregama.com)). Once a complaint is lodged, a unique ticket or complaint ID is generated. Depending on the nature of the complaint, a service technician is assigned to address and resolve the issue. If necessary, the Company undertakes product replacement or recalls to ensure a satisfactory resolution. For mobile-related complaints, customers are directed to designated service centres for appropriate assistance and resolution.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	17.61% (This percentage denotes the turnover of the Company with respect to sale of its product "Carvaan")
Safe and responsible usage	NIL
Recycling and/or safe disposal	NIL

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

	FY 2022-23			FY 2021-22		
	Received during the Year	Pending resolution at end of year	Remarks	Received during the Year	Pending resolution at end of year	Remarks
Data Privacy						
Advertising						
Cyber-security						
Delivery of essential services		NIL			NIL	
Restrictive Trade Practices						
Unfair Trade Practices						
Other	72,986	NIL	Complaints were predominantly related to a few defects in products. The same were resolved completely by providing either a replacement or refund	52,596	NIL	Complaints were predominantly related to a few defects in products. The same were resolved completely by providing either a replacement or refund

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

	Number	Reasons for recall
Voluntary recalls		
Forced recalls		NIL

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

The Company has a systematic IT Process manual. Basis the organisation structure and the security guidelines setup by the organization; issues like network/ server security, back-up policy, work-station security policy, information Integrity and continuity etc. are reported and are addressed. Instances of non-compliances are reviewed and approved by the chief information officer of the Company.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

No such incidents occurred during the reporting period.



### Leadership Indicators

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

[www.saregama.com](http://www.saregama.com).

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

The company ensures that each product is accompanied by a comprehensive User Manual, which contains crucial information regarding safety guidelines and instructions on how to use the product effectively.

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

None of the company products fall under essential service.

4. **Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/ Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes, the Company ensures proper display of all required information on product labels and packaging in accordance with applicable rules and regulations. Additionally, comprehensive product information is available on the company's website.

Company for its music retail business, after every service resolution, a customer satisfaction form is sent to customers to collect independent feedback of the service. Also, customer satisfaction calls are made after every service request closure to get quality feedback from the customers.

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

- a. Number of instances of data breaches along-with impact

None

- b. Percentage of data breaches involving personally identifiable information of customers

None