

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

|                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1: Corporate Identity Number (CIN) of the Listed Entity                                                                                                                                                                                                               | L85110KA1994PLC016663                                                                                                                                                                                                                                                    |
| 2: Name of the Listed Entity                                                                                                                                                                                                                                          | Subex Limited                                                                                                                                                                                                                                                            |
| 3: Year of incorporation                                                                                                                                                                                                                                              | 1994                                                                                                                                                                                                                                                                     |
| 4: Registered office address                                                                                                                                                                                                                                          | Pritech Park-SEZ, Block-9, 4 <sup>th</sup> floor, B Wing, Survey No. 51-64/4, Outer Ring Road, Bellandur Village, Varthur Hobli, Bengaluru- 560 103                                                                                                                      |
| 5: Corporate address                                                                                                                                                                                                                                                  | Pritech Park-SEZ, Block-9, 4 <sup>th</sup> floor, B Wing, Survey No. 51-64/4, Outer Ring Road, Bellandur Village, Varthur Hobli, Bengaluru- 560 103                                                                                                                      |
| 6: E-mail                                                                                                                                                                                                                                                             | <a href="mailto:investorrelations@subex.com">investorrelations@subex.com</a>                                                                                                                                                                                             |
| 7: Telephone                                                                                                                                                                                                                                                          | 080 37451377                                                                                                                                                                                                                                                             |
| 8: Website                                                                                                                                                                                                                                                            | <a href="https://www.subex.com/">https://www.subex.com/</a>                                                                                                                                                                                                              |
| 9: Financial year for which reporting is being done                                                                                                                                                                                                                   | Financial Year 2023-2024                                                                                                                                                                                                                                                 |
| 10: Name of the Stock Exchange(s) where shares are listed                                                                                                                                                                                                             | BSE Limited and The National Stock Exchange of India Limited                                                                                                                                                                                                             |
| 11: Paid-up Capital                                                                                                                                                                                                                                                   | ₹ 281 Crores                                                                                                                                                                                                                                                             |
| 12: Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report                                                                                                                                  | G V Krishnakanth<br>Company Secretary & Compliance Officer<br>Contact: 080 37451377<br>Email: <a href="mailto:investorrelations@subex.com">investorrelations@subex.com</a>                                                                                               |
| 13: Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together) | The information against the disclosures provided in this report by Subex Limited are presented on a standalone basis for our operations in India, unless specifically indicated otherwise. These disclosures pertain solely to our performance within the Indian market. |
| 14: Name of assurance provider                                                                                                                                                                                                                                        | Not applicable                                                                                                                                                                                                                                                           |
| 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     | Services, and related activities | 62099                            | 99%                         |
| 2     | IT Software                      | 62099                            | 1%                          |

#### 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     | Sub-contracting services         | 62099    | 70%                             |
| 2     | Managed services                 | 62099    | 11%                             |
| 3     | Support services                 | 62099    | 10%                             |
| 4     | Implementation and customisation | 62099    | 6%                              |
| 5     | Support services                 | 62099    | 2%                              |
| 6     | Sale of license                  | 62099    | 1%                              |

## 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      | 0                | 1                 | 1     |
| International | 0                | 6                 | 6     |

## 19. Markets served by the entity:

## a. Number of locations

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 1      |
| International (No. of Countries) | 6      |

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

97%

## c. A brief on types of customers

Subex Limited is a trusted partner to many of the world's leading telecommunications companies. The Company provides solutions / products which are useful in Revenue Assurance, Fraud Management, Network Analytics, Data Integrity Management and Partner Lifecycle Management.

## 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)            | 645       | 432    | 67.0%  | 213     | 33.0%  |
| 2         | Other than Permanent (E) | 26        | 13     | 50.0%  | 13      | 50.0%  |
| 3         | Total employees (D + E)  | 671       | 445    | 66.3%  | 226     | 33.7%  |
| WORKERS   |                          |           |        |        |         |        |
| 4         | Permanent (F)            | 0         | 0      | 0      | 0       | 0      |
| 5         | Other than Permanent (G) | 0         | 0      | 0      | 0       | 0      |
| 6         | Total workers (F + G)    | 0         | 0      | 0      | 0       | 0      |

## 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)                             | 0         | 0      | 0      | 0       | 0      |
| 2                           | Other than Permanent (E)                  | 0         | 0      | 0      | 0       | 0      |
| 3                           | Total differently abled employees (D + E) | 0         | 0      | 0      | 0       | 0      |
| DIFFERENTLY ABLED WORKERS   |                                           |           |        |        |         |        |
| 4                           | Permanent (F)                             | 0         | 0      | 0      | 0       | 0      |
| 5                           | Other than Permanent (G)                  | 0         | 0      | 0      | 0       | 0      |
| 6                           | Total differently abled workers (F + G)   | 0         | 0      | 0      | 0       | 0      |

## 21. Participation/Inclusion/Representation of women

|                          | Total (A) | No. and percentage of Females |        |
|--------------------------|-----------|-------------------------------|--------|
|                          |           | No.(B)                        | %(B/A) |
| Board of Directors       | 5         | 2                             | 40.0%  |
| Key Management Personnel | 3         | 1                             | 33.3%  |

## 22. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)

|                     | FY- 2024<br>(Turnover rate in current FY) |        |       | FY- 2023<br>(Turnover rate in previous FY) |        |       | FY- 2022<br>(Turnover rate in the year prior to the previous FY) |        |       |
|---------------------|-------------------------------------------|--------|-------|--------------------------------------------|--------|-------|------------------------------------------------------------------|--------|-------|
|                     | Male                                      | Female | Total | Male                                       | Female | Total | Male                                                             | Female | Total |
| Permanent Employees | 33.9%                                     | 30.6%  | 32.8% | 42.1%                                      | 32.3%  | 39.0% | 40.8%                                                            | 43.5%  | 41.6% |
| Permanent Workers   | 0                                         | 0      | 0     | 0                                          | 0      | 0     | 0                                                                | 0      | 0     |

## 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     | Subex Assurance LLP                                                         | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 2     | Subex Digital LLP                                                           | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 3     | Subex Technologies Limited                                                  | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 4     | Subex Americas Inc.                                                         | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 5     | Subex (UK) Limited                                                          | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 6     | Subex Middle East (FZE)                                                     | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 7     | Subex Bangladesh Private Limited                                            | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 8     | Subex Azure Holdings Inc.                                                   | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 9     | Subex (Asia Pacific) Pte Limited                                            | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 10    | Subex Inc.                                                                  | Subsidiary                                                     | 100%                              | No                                                                                                                           |
| 11    | Subex Account Aggregator Services Private Limited                           | Subsidiary                                                     | 100%                              | No                                                                                                                           |

## VI. CSR Details

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

No.

## (ii) Turnover (in ₹)

₹ 269.01 Crores

## (iii) Net worth (in ₹)

₹ 213.88 Crores

## 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                                       | Yes. <a href="https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf">https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf</a>                                                                                                                                                              | -                                          | -                                                            | -       | -                                          | -                                                            |         |
| Investors (other than shareholders)               | Not Applicable                                                                                                                                                                                                                                                                                                                                                                    |                                            |                                                              |         |                                            |                                                              |         |
| Shareholders                                      | Yes. <a href="mailto:investorrelations@subex.com">investorrelations@subex.com</a> & <a href="https://scores.sebi.gov.in/scores-home">https://scores.sebi.gov.in/scores-home</a>                                                                                                                                                                                                   | 17                                         | 0                                                            | -       | 36                                         | 0                                                            | -       |
| Employees and workers                             | Yes. <a href="https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf">https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf</a> .                                                                                                                                                            | 1                                          | 0                                                            | -       | 0                                          | 0                                                            | -       |
| Customers                                         | Yes, Given the enterprise B2B nature of our business, we have support teams which are put in place to proactively address any customer issues. These complaints are addressed as per the process laid down.                                                                                                                                                                       |                                            |                                                              |         |                                            |                                                              |         |
| Value Chain Partners                              | Yes. <a href="https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf">https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf</a> . Also we have support teams which are put in place to proactively address any customer issues. These complaints are addressed as per the process laid down. |                                            |                                                              |         |                                            |                                                              |         |
| Other (please specify)                            | Not Applicable                                                                                                                                                                                                                                                                                                                                                                    |                                            |                                                              |         |                                            |                                                              |         |

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

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

| S.No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity                                                                                                                                                                                              | In case of risk, approach to adapt or mitigate                                                                                                                                                                               | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-------|---------------------------|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 1     | Data Privacy And Security | Risk                                       | Safeguarding of the enterprise data and also to fulfil the contractual responsibility to customers. The increasing landscape of data privacy laws across the globe also possess a risk of penalties on non-compliances and reputational loss. | Enhanced cyber security measures like robust processes, policies, and awareness and sensitization program. Also implemented Passwordless authentication and implemented security tools to improve the cybersecurity Posture. | Positive                                                                                       |

|   |                                          |                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                       |          |
|---|------------------------------------------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------|
| 2 | Changing expectations of workplace       | Opportunity / Risk | <b>Opportunity</b> <ul style="list-style-type: none"> <li>Emphasizing employee well-being and mental health initiatives creates a supportive work environment, fostering higher levels of engagement and loyalty.</li> <li>Utilizing advanced collaborative tools and platforms can enhance teamwork and communication, leading to greater innovation and more efficient project execution.</li> </ul> <b>Risk</b> <ul style="list-style-type: none"> <li>Managing a remote or hybrid workforce requires new strategies and tools to ensure accountability and productivity. Ineffective management can lead to decreased performance and employee dissatisfaction.</li> </ul> | Periodic employee connects enables collaboration and reduces disengagement                            | Positive |
| 3 | Health & Safety                          | Opportunity / Risk | The Company's emphasis on providing safe environment may impact cost, time and availability                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Periodic awareness to employees on health and safety. Organizing safety camps for employee well being | Negative |
| 4 | Ethical And Transparent Business Conduct | Risk               | Ethical behaviour is critical for the success of all companies and any such unethical behaviour will be risks, which can result in reputation loss and damage to stakeholder trust and business disruption.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Periodical internal reviews, audit and presentations on changes introduced by regulators.             | 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.

The National Guidelines on Responsible Business Conduct (NGRBC) released by the Ministry of Corporate Affairs has updated and adopted nine areas of Business Responsibility. These are briefly as under:

|    |                                                                                                                                     |
|----|-------------------------------------------------------------------------------------------------------------------------------------|
| P1 | Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable         |
| P2 | Businesses should provide goods and services in a manner that is sustainable and safe                                               |
| P3 | Businesses should respect and promote the well-being of all employees, including those in their value chains                        |
| P4 | Businesses should respect the interests of and be responsive to all its stakeholders                                                |
| P5 | Businesses should respect and promote human rights                                                                                  |
| P6 | Businesses should respect and make efforts to protect and restore the environment                                                   |
| P7 | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |
| P8 | Businesses should promote inclusive growth and equitable development                                                                |
| P9 | Businesses should engage with and provide value to their consumers in a responsible manner                                          |

| Disclosure Questions                                                                                                                                                                                                                                        | P1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | P2  | P3                   | P4  | P5                   | P6                 | P7                  | P8                  | P9             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------|-----|----------------------|--------------------|---------------------|---------------------|----------------|
| Policy And Management Processes                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |     |                      |     |                      |                    |                     |                     |                |
| 1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)                                                                                                                                              | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |                      |     |                      |                    |                     |                     |                |
| b. Has the policy been approved by the Board? (Yes/No)                                                                                                                                                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |                      |     |                      |                    |                     |                     |                |
| c. Web Link of the Policies, if available                                                                                                                                                                                                                   | <a href="https://www.subex.com/investors/shareholder-services/">https://www.subex.com/investors/shareholder-services/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |                      |     |                      |                    |                     |                     |                |
| 2. Whether the entity has translated the policy into procedures. (Yes / No)                                                                                                                                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |                      |     |                      |                    |                     |                     |                |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No)                                                                                                                                                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |                      |     |                      |                    |                     |                     |                |
| 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. | ISO                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | ISO | Relevant Labour laws | ISO | Relevant Labour laws | EMS as part of ISO | Relevant Legal laws | Relevant Legal laws | ISO 27001:2013 |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any.                                                                                                                                                                | Subex Limited is committed to taking proactive steps towards environmental sustainability. We have set a specific and ambitious goal to achieve Net-Zero emissions by the year 2035. This target encompasses all aspects of emissions, including Scope 1, Scope 2, and Scope 3 emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |                      |     |                      |                    |                     |                     |                |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.                                                                                                                           | At Subex Limited, we consider the performance against our specific commitments, goals, and targets as an integral part of our sustainability journey. We follow a structured approach to review and monitor the progress of each principle and associated objectives, which is led by various committees as applicable, and overseen by our Management and Board of Directors.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |     |                      |     |                      |                    |                     |                     |                |
| 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)                                       | <p>The Company is committed to integrating environmental, social and governance (ESG) principles into its businesses which is central to improving the quality of life of the stakeholders it serves. The Company is committed to conducting beneficial and fair business practices to benefit the labour force, human capital and the communities it serves. It provides employees and business associates with working conditions that are clean, safe, healthy and fair.</p> <p>However, as with any commitment, challenges are inevitable. The complexity of the business landscape, evolving regulations, and external factors sometimes pose hurdles. Yet, we view these challenges as opportunities to innovate, collaborate, and improve. By addressing these challenges head-on, we learn, adapt, and reinforce our commitment to ESG principles.</p> <p>Our dedication to ESG principles is reflected not only in our words but in our actions. We are committed to transparently sharing our progress, challenges, and successes as we strive to create lasting value for our stakeholders while leaving a positive impact on society and the environment.</p> <p>Thank you for your trust and support as we continue on this important journey.</p> |     |                      |     |                      |                    |                     |                     |                |
| 8: Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).                                                                                                                               | At Subex Limited, the implementation and oversight of our Business Responsibility policies are entrusted to our Managing Director & Chief Executive Officer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |                      |     |                      |                    |                     |                     |                |
| 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.                                                                                 | <p>No, Subex Limited does not have a specified Committee of the Board or Director solely dedicated to sustainability-related issues.</p> <p>The Board provides valuable direction and guidance to the Management team to ensure that safety and sustainability aspects are thoroughly considered in all new strategic initiatives, budget allocations, audit actions, and improvement plans.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     |                      |     |                      |                    |                     |                     |                |

## 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 | P1                                                                       | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies and follow up action                                                          | As a practice, policies on Business Responsibility of the Company are reviewed periodically or on a need basis by the Senior Leadership Team including the CEO. During the review, the efficacy of the policies is reviewed and necessary changes to policies & procedures are implemented |    |    |    |    |    |    |    |    | Annually                                                                 |    |    |    |    |    |    |    |    |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | The Company is in compliance with the existing regulations as applicable and a Statutory Compliance Certificate on applicable laws is provided to the Board of Directors                                                                                                                   |    |    |    |    |    |    |    |    | Annually                                                                 |    |    |    |    |    |    |    |    |

|                                                                                                                                                                       | P1                                                                                                                                                                                                                                                                                                        | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|----|----|----|----|----|----|
| 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. | The Company has various policies in place which are reviewed from time to time by the Board, its Committees and Senior Management. Further, the above policies and processes may be subject to regulatory compliances and changes, as applicable. Subex is certified for ISO 9001:2015 and ISO 27001:2013 |    |    |    |    |    |    |    |    |
| 12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:                                                    | All principles are covered by the policies                                                                                                                                                                                                                                                                |    |    |    |    |    |    |    |    |
| 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:

| 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                | During the year, the Board of Directors of the Company invested their time on various updates pertaining to the business, regulations, environmental, social, governance etc. These topics comprise insights on the said Principles |                                                                                                                                                                                                                                                                             |                                                                             |
| Key Managerial Personnel          | 1                                                                                                                                                                                                                                   | All training are done through our online portal. It is mandatory for all employees to attend available trainings on an ongoing process for their career progression<br>1. Code of Conduct<br>2. Whistleblower Policy<br>3. Prevention of Sexual Harassment at the Workplace | 100%                                                                        |
| Employees other than BoD and KMPs | Every new employee joining the company must undertake mandatory trainings on Anti-Bribery, Prevention of Sexual Harassment at Workplace, Data privacy and confidentiality .                                                         |                                                                                                                                                                                                                                                                             |                                                                             |
| Workers                           | Not Applicable                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                             |                                                                             |

Note: All the principles laid down in this Report are covered in the Company's Code of Conduct which is mandatorily adhered to by all employees of the Company.

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):

The following are the details of the fines paid to National Stock Exchange and The BSE Limited with respect to non-compliance of Regulation 17(1) of Securities and Exchange Board of India (Listing obligations and Disclosure Requirements), Regulations, 2015

**Monetary**

| Sl No           | NGRBC Principle                                                                                                                                                                                                                                                                                            | Name of the Regulator / Enforcement Agencies / Judicial institutions | Amount in INR | Brief of the case | Has appeal been preferred? (Yes / No) |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|---------------|-------------------|---------------------------------------|
| Penalty         | Refer to the Company's website for all disclosures made under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 at <a href="https://www.subex.com/investors/announcement-filing/#disclosures">https://www.subex.com/investors/announcement-filing/#disclosures</a> |                                                                      |               |                   |                                       |
| Settlement      |                                                                                                                                                                                                                                                                                                            |                                                                      |               |                   |                                       |
| Compounding Fee |                                                                                                                                                                                                                                                                                                            |                                                                      |               |                   |                                       |

**Non-Monetary**

| Sl No        | NGRBC Principle | Name of the Regulator / Enforcement Agencies / Judicial institutions | Amount in INR | Brief of the case | Has appeal been preferred? (Yes / No) |
|--------------|-----------------|----------------------------------------------------------------------|---------------|-------------------|---------------------------------------|
| Imprisonment | NIL             |                                                                      |               |                   |                                       |
| Punishment   | NIL             |                                                                      |               |                   |                                       |

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.

NIL

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, Subex Limited has a stringent anti-corruption and anti-bribery policy that reflects our unwavering commitment to ethical business practices. We maintain a zero-tolerance stance toward any form of non-conformity with our Code of Conduct, which is a comprehensive framework guiding the behaviour of our employees across all locations.

Our Code of Conduct and Whistle Blower policy have been designed to encompass a wide spectrum of stakeholders, including employees, contractors, suppliers, and other relevant parties. These policies set clear guidelines and expectations for preventing corruption, bribery, and unethical practices within our operations. Our employees are expected to uphold the highest standards of integrity and transparency in all their interactions, both within the organization and with external stakeholders. The Code of Conduct emphasizes the importance of fairness, honesty, and accountability in our business dealings.

Through these policies and practices, Subex Limited strives to foster a culture of ethical behaviour, integrity, and responsible business conduct, ensuring that our operations are aligned with the highest standards of compliance and transparency.

Weblink to anti corruption or anti bribery policy - <https://www.subex.com/investors/shareholder-services/>

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

There have been no cases involving disciplinary action taken by any law enforcement agency for the charges of bribery / corruption against directors / KMP / employees / workers that have been brought to our attention for the current financial year as well as for the previous year.

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

At Subex Limited, we are fully committed to addressing issues related to conflicts of interest with the utmost seriousness and dedication. We understand the importance of maintaining an environment free from such concerns and continuously strive to take proactive measures to prevent and manage conflicts of interest.

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.

NIL

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

|                                | FY 2024 (Current Financial year) | FY 2023 (Previous Financial year) |
|--------------------------------|----------------------------------|-----------------------------------|
| No of days of Accounts payable | 141                              | 179                               |

9. Open-ness of business

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                  | Metric                                                                                | FY 2024 (Current Financial year) | FY 2023 (Previous Financial year) |
|----------------------------|---------------------------------------------------------------------------------------|----------------------------------|-----------------------------------|
| Concentration of Purchases | Purchases from trading houses as % of total purchases                                 | NIL                              | NIL                               |
|                            | Number of trading houses where purchases are made from                                | NIL                              | NIL                               |
|                            | Purchases from top 10 trading houses as % of total purchases from trading houses      | NIL                              | NIL                               |
| Concentration of Sales     | Sales to dealers / distributors as % of total sales                                   | NIL                              | NIL                               |
|                            | Number of dealers / distributors to whom sales are made                               | NIL                              | NIL                               |
|                            | Sales to top 10 dealers / distributors as % of total sales to dealers / distributors  | NIL                              | NIL                               |
| Share of RPTs in           | Purchases (Purchases with related parties / Total Purchases)                          | 75.31%                           | 74.19%                            |
|                            | Sales (Sales to related parties / Total Sales)                                        | 71.13%                           | 75.52%                            |
|                            | Loans & advances (Loans & advances given to related parties / Total loans & advances) | 0.00                             | 0.00                              |
|                            | Investments ( Investments in related parties / Total Investments made)                | 94.91%                           | 97.77%                            |

**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.

NIL

2. Does the entity have procedures in place for sustainable sourcing? If yes, what percentage of inputs were sourced sustainably?

Yes. The Company has developed process for vendor selection. This includes various principles and guidelines such as Safety, Health and Environment Policy, Legal Compliance, adherence to Code of Conduct, etc.

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.

Yes, all types of waste which are generated in-house are handed over to the authorized vendor for recycling. Subex is based in a technology park and all the environment related reports are submitted to the prescribed authority by the Owner of the park. Subex co-operates with the owner and the vendors towards ensuring the timely recycling of waste. Being environmentally cautious and waste sensitive, over 93% of the waste is managed, with less than 7% going into landfills.

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

No

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

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

| Category                       | % of employees covered by |                  |         |                    |         |                    |         |                    |         |                     |         |
|--------------------------------|---------------------------|------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                                | Total (A)                 | Health insurance |         | Accident insurance |         | Maternity benefits |         | Paternity Benefits |         | Day Care facilities |         |
|                                |                           | Number (B)       | % (B/A) | Number (C)         | % (C/A) | Number (D)         | % (D/A) | Number (E)         | % (E/A) | Number (F)          | % (F/A) |
| Permanent employees            |                           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                           | 432                       | 432              | 100%    | 432                | 100%    | 0                  | 0%      | 432                | 100%    | 0                   | 0%      |
| Female                         | 213                       | 213              | 100%    | 213                | 100%    | 213                | 100%    | 0                  | 0%      | 0                   | 0%      |
| Total                          | 645                       | 645              | 100%    | 645                | 100%    | 213                | 33.0%   | 432                | 67.0%   | 0                   | 0%      |
| Other than Permanent employees |                           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                           | 13                        | 1                | 7.69%   | 0                  | 0%      | 0                  | 0%      | 0                  | 0%      | 0                   | 0%      |
| Female                         | 13                        | 6                | 46.15%  | 0                  | 0%      | 0                  | 0%      | 0                  | 0%      | 0                   | 0%      |
| Total                          | 26                        | 7                | 27%     | 0                  | 0%      | 0                  | 0%      | 0                  | 0%      | 0                   | 0%      |

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

| Category                     | % of workers covered by |                  |         |                    |         |                    |         |                    |         |                     |         |
|------------------------------|-------------------------|------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                              | Total (A)               | Health insurance |         | Accident insurance |         | Maternity benefits |         | Paternity Benefits |         | Day Care facilities |         |
|                              |                         | Number (B)       | % (B/A) | Number (C)         | % (C/A) | Number (D)         | % (D/A) | Number (E)         | % (E/A) | Number (F)          | % (F/A) |
| Permanent workers            |                         |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                         | Not Applicable          |                  |         |                    |         |                    |         |                    |         |                     |         |
| Female                       | Not Applicable          |                  |         |                    |         |                    |         |                    |         |                     |         |
| Total                        | Not Applicable          |                  |         |                    |         |                    |         |                    |         |                     |         |
| Other than Permanent workers |                         |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                         | Not Applicable          |                  |         |                    |         |                    |         |                    |         |                     |         |
| Female                       | Not Applicable          |                  |         |                    |         |                    |         |                    |         |                     |         |
| Total                        | Not Applicable          |                  |         |                    |         |                    |         |                    |         |                     |         |

## C. Spending on measures towards well-being of employees and workers (including permanent and other than permanent)

|                                                                            | FY 2024<br>(Current Financial year) | FY 2023<br>(Previous Financial year) |
|----------------------------------------------------------------------------|-------------------------------------|--------------------------------------|
| Cost incurred on wellbeing measures as a % of total revenue of the company | 0.63%                               | 0.65%                                |

## 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                     | 96.1%                                              | Not applicable                                 | Y                                                    | 89.1%                                              | Not Applicable                                 | Y                                                    |
| Gratuity               | 96.1%                                              | Not Applicable                                 | Y                                                    | 89.0%                                              | Not Applicable                                 | Y                                                    |
| ESI                    | Not Applicable                                     |                                                |                                                      |                                                    |                                                |                                                      |
| Other (Please specify) | Not Applicable                                     |                                                |                                                      |                                                    |                                                |                                                      |

## 3. Accessibility of workplaces

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

Yes, Subex Limited is committed to ensuring inclusivity and accessibility for all employees, including those with disabilities, in alignment with the requirements outlined in the Rights of Persons with Disabilities Act, 2016. Our premises, located within a tech park, have been selected to provide a conducive environment for all individuals, including differently abled employees and workers.

## 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 is governed by the Code of Conduct whereby all the employees and those eligible are provided with equal opportunities. The Company is committed to an inclusive work culture without any discrimination on the grounds of race, caste, religion, colour, marital status, gender, sex, age, nationality, ethnic origin, disability and such other grounds as prescribed and protected by the applicable laws. The weblink is <https://www.subex.com/privacy-policy/#equal-opportunity-policy>

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

|              | Permanent employees |                | Permanent workers   |                |
|--------------|---------------------|----------------|---------------------|----------------|
| Gender       | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male         | 100%                | 100%           | NA                  | NA             |
| Female       | 100%                | 100%           | NA                  | NA             |
| <b>Total</b> |                     |                |                     |                |

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              | NA                                                                                         |
| Other than Permanent Workers   | NA                                                                                         |
| Permanent Employees            | Yes. We have a Global redressal policy which is accessible by all employees of the company |
| Other than Permanent Employees |                                                                                            |

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

None of our employees are part of any employee union or association.

8. Details of training given to employees and workers:

| Category  | 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      | 432                            | 432                           | 100%    | 432                  | 100%    | 461                             | 461                           | 100%    | 461                  | 100%    |
| Female    | 213                            | 213                           | 100%    | 213                  | 100%    | 216                             | 216                           | 100%    | 216                  | 100%    |
| Total     | 645                            | 645                           | 100%    | 645                  | 100%    | 677                             | 677                           | 100%    | 677                  | 100%    |
| Workers   |                                |                               |         |                      |         |                                 |                               |         |                      |         |
| Male      | Not Applicable                 |                               |         |                      |         |                                 |                               |         |                      |         |
| Female    | Not Applicable                 |                               |         |                      |         |                                 |                               |         |                      |         |
| Total     | Not Applicable                 |                               |         |                      |         |                                 |                               |         |                      |         |

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

| Category         | FY-2024 Current Financial Year |            |             | FY-2023 Previous Financial Year |            |             |
|------------------|--------------------------------|------------|-------------|---------------------------------|------------|-------------|
|                  | Total (A)                      | No. (B)    | % (B / A)   | Total (C)                       | No. (D)    | % (D / C)   |
| <b>Employees</b> |                                |            |             |                                 |            |             |
| Male             | 432                            | 432        | 100%        | 461                             | 461        | 100%        |
| Female           | 213                            | 213        | 100%        | 216                             | 216        | 100%        |
| <b>Total</b>     | <b>645</b>                     | <b>645</b> | <b>100%</b> | <b>677</b>                      | <b>677</b> | <b>100%</b> |
| <b>Workers</b>   |                                |            |             |                                 |            |             |
| Male             | Not Applicable                 |            |             |                                 |            |             |
| Female           | Not Applicable                 |            |             |                                 |            |             |
| <b>Total</b>     | Not Applicable                 |            |             |                                 |            |             |

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?

No, the nature of our business does not involve inherent occupational health and safety hazards, however we are committed to prioritising the well-being of our employees. We carry out relevant trainings from time to time.

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

Not Applicable

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

Not Applicable

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

Not Applicable

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

There were no instances of safety related incidents at Subex Limited

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

Subex Limited is committed to fostering a safe and healthy work environment through a range of initiatives. These include proactive measures such as mental health sessions, emotional wellness sessions, yoga sessions, financial wellness programs, oral wellness programs, and managing sessions. These initiatives aim to promote the overall well-being of our employees and contribute to a positive workplace atmosphere.

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

|                    | FY-2024 Current Financial Year |                                       |         | FY-2023 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 | 0                              | 0                                     | -       | 0                               | 0                                     | -       |
| Health & Safety    | 0                              | 0                                     | -       | 0                               | 0                                     | -       |

14. Assessments for the year:

|                           |                                                                                                                                                     |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)                                               |
| Health & Safety Practices | Even though we have not formally conducted any assessment, since we are based in a tech park, the premises meets all required regulatory guidelines |
| Working conditions        |                                                                                                                                                     |

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

Subex Limited does not have any safety-related incidents or significant risks/concerns related to health and safety practices and working conditions that require corrective action. Our commitment to maintaining a safe and healthy work environment remains steadfast, and we continue to uphold rigorous standards to prevent incidents and address any concerns promptly.

**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 Subex Limited, we recognize the significance of engaging with a diverse range of stakeholders who play a pivotal role in shaping our operations and influencing our decisions. Our process for identifying key stakeholder groups is structured to encompass both internal and external stakeholders who hold a direct impact on our company.

Our engagement strategy begins by categorizing stakeholders into internal and external groups. This segmentation helps us understand the distinct perspectives and expectations of each group, enabling us to tailor our engagement efforts accordingly.

For our internal stakeholders, which include our employees, we prioritize fostering a positive work environment, providing growth opportunities, and ensuring their well-being. We acknowledge that their dedication and contributions are vital to our success, and we are committed to creating an inclusive and supportive workplace for them.

Externally, we have identified key stakeholder groups that hold immediate influence on our operations. These groups encompass shareholders, customers, communities, suppliers, partners, and vendors. We recognize the importance of transparent communication and engagement with these stakeholders to build strong relationships, understand their needs, and address their concerns effectively.

**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                                                                                              |
|----------------------|----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Shareholders         | No                                                             | Annual General Meeting, Shareholder meets, email, Stock Exchange intimations, investor/ analysts meet/ conference calls, annual report, quarterly results, media releases and Company/SE website                                                                    | Ongoing                                                                              | Share price appreciation, dividends, profitability and financial stability, growth prospects                                                                                                 |
| Employees            | No                                                             | Senior leaders' communication/talk / forum, Employee Communication, goal setting and performance appraisal meetings/ review, wellness initiatives, engagement survey, email, intranet, websites, poster campaigns, circulars, quarterly publication and newsletters | Ongoing                                                                              | Responsible Care, innovation, operational efficiencies, improvement areas, long- term strategy plans, training and awareness, brand communication, health, safety and engagement initiatives |
| Customers            | No                                                             | Website, distributor / direct customer, senior leader-customer meets / visits, customer plant visits, Dealer's meet, trade body membership, complaints management, helpdesk, conferences, customer surveys.                                                         | Ongoing                                                                              | Product quality and availability, responsiveness to needs, after sales service, responsible guidelines / manufacturing, climate change disclosures, Safety awareness.                        |
| Suppliers / Partners | No                                                             | Prequalification/ vetting, communication and partnership meets, plant visits, MoU and framework agreements, professional networks, contract management/ review, on site presentations, satisfaction surveys                                                         | Ongoing                                                                              | Quality, timely delivery and payments, ESG consideration (sustainability, safety checks, compliances, ethical behaviour), collaboration and digitalisation opportunities                     |
| Communities          | No                                                             | Meets of community / local authorities / location heads, community projects, partnership with local charities, volunteerism, seminars/ conferences, CSR Partner's meet                                                                                              | Ongoing                                                                              | Community development, disaster relief, Education, Skill development, etc.                                                                                                                   |

## PRINCIPLE 5 Businesses should respect and promote human rights

### Essential Indicators

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

| 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 employees / workers covered (D) | % (D / C) |
| <b>Employees</b>     |                                |                                        |           |                                 |                                        |           |
| Permanent            | 645                            | 645                                    | 100%      | 677                             | 677                                    | 100%      |
| Other than Permanent | 26                             | 26                                     | 100%      | 84                              | 84                                     | 100%      |
| Total Employees      | 671                            | 671                                    | 100%      | 761                             | 761                                    | 100%      |
| <b>Workers</b>       |                                |                                        |           |                                 |                                        |           |
| Permanent            | Not Applicable                 |                                        |           |                                 |                                        |           |
| Other than Permanent | Not Applicable                 |                                        |           |                                 |                                        |           |
| Total Workers        | Not Applicable                 |                                        |           |                                 |                                        |           |

- 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            |                                |                       |         |                        |         |                                 |                       |         |                        |         |
| Male                 | 432                            | 0                     | 0%      | 432                    | 100%    | 461                             | 0                     | 0%      | 461                    | 100%    |
| Female               | 213                            | 0                     | 0%      | 213                    | 100%    | 216                             | 0                     | 0%      | 216                    | 100%    |
| Other than Permanent |                                |                       |         |                        |         |                                 |                       |         |                        |         |
| Male                 | 13                             | 0                     | 0%      | 13                     | 100%    | 49                              | 0                     | 0%      | 49                     | 100%    |
| Female               | 13                             | 0                     | 0%      | 13                     | 100%    | 35                              | 0                     | 0%      | 35                     | 100%    |
| Workers              |                                |                       |         |                        |         |                                 |                       |         |                        |         |
| Permanent            |                                |                       |         |                        |         |                                 |                       |         |                        |         |
| Male                 | Not Applicable                 |                       |         |                        |         |                                 |                       |         |                        |         |
| Female               | Not Applicable                 |                       |         |                        |         |                                 |                       |         |                        |         |
| Other than Permanent |                                |                       |         |                        |         |                                 |                       |         |                        |         |
| Male                 | Not Applicable                 |                       |         |                        |         |                                 |                       |         |                        |         |
| Female               | Not Applicable                 |                       |         |                        |         |                                 |                       |         |                        |         |

- Details of remuneration/salary/wages:

- Median remuneration / wages:

|                                  | Male           |                                                           | Female |                                                           |
|----------------------------------|----------------|-----------------------------------------------------------|--------|-----------------------------------------------------------|
|                                  | Number         | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| Board of Directors (BoD)*        | 3              | Not Applicable*                                           | 2      | Not Applicable*                                           |
| Key Managerial Personnel         | 2              | ₹ 6.46 Mn                                                 | 1      | ₹ 17.30 Mn                                                |
| Employees other than BoD and KMP | 430            | ₹ 0.97 Mn                                                 | 212    | ₹ 0.72 Mn                                                 |
| Workers                          | Not Applicable |                                                           |        |                                                           |

\*Remuneration of Executive Directors are considered for median calculation.

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

|                                                 | <b>FY-2024</b><br>Current Financial Year | <b>FY-2023</b><br>Previous Financial Year |
|-------------------------------------------------|------------------------------------------|-------------------------------------------|
| Gross wages paid to females as % of total wages | 27%                                      | 22%                                       |

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, at Subex Limited, we take human rights impacts and issues seriously and have established a dedicated focal point to address them effectively. Our approach to addressing human rights impacts is guided by our global grievance policy, which ensures that we uphold human rights standards across our operations.

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

At Subex Limited, we are fully committed to addressing human rights issues and grievances in a prompt, fair, and effective manner. To ensure that individuals who are affected by our operations have a reliable and transparent channel to voice their concerns, we have established internal grievance redressal mechanisms guided by our global grievance policy.

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

|                                   | FY-2024 Current Financial Year |                                       |         | FY-2023 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 |
| Sexual Harassment                 | 0                              | 0                                     | -       | 0                               | 0                                     | -       |
| Discrimination at workplace       | 0                              | 0                                     | -       | 0                               | 0                                     | -       |
| Child Labour                      | 0                              | 0                                     | -       | 0                               | 0                                     | -       |
| Forced Labour/Involuntary Labour  | 0                              | 0                                     | -       | 0                               | 0                                     | -       |
| Wages                             | 0                              | 0                                     | -       | 0                               | 0                                     | -       |
| Other human rights related issues | 0                              | 0                                     | -       | 0                               | 0                                     | -       |

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

|                                                                                                                                     | <b>FY-2024</b><br>Current Financial Year | <b>FY-2023</b><br>Previous Financial Year |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0                                        | 0                                         |
| Complaints on POSH as a % of female employees / workers                                                                             | 0                                        | 0                                         |
| Complaints on POSH upheld                                                                                                           | 0                                        | 0                                         |

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

At Subex Limited, we are committed to fostering a work environment that is inclusive, respectful, and free from discrimination and harassment. We recognize the importance of preventing any form of harassment. Subex has policies in place which covers its employees against inhuman practices. Few policies which are in place include Prevention of Sexual Harassment at Workplace, Grievance policy, Equal Employment etc. These policies are applicable to all our employees across all locations and all our affiliates.

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

No, currently human rights requirements are not explicitly incorporated into our business agreements and contracts. However, we recognize the importance of upholding human rights across our value chain and actively encourage our partners and stakeholders to comply with human rights standards.

## 10. Assessments for the year:

|                             | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|-------------------------------------------------------------------------------------------------------|
| Child labour                | 100%                                                                                                  |
| Forced/involuntary labour   | 100%                                                                                                  |
| Sexual harassment           | 100%                                                                                                  |
| Discrimination at workplace | 100%                                                                                                  |
| Wages                       | 100%                                                                                                  |

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

No corrective actions are required as no significant risks or concerns were identified from the assessments conducted in response to Question 9.

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

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

| Parameter                                                                                                                                            | FY-2024<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|------------------------------------|
| <b>From renewable sources</b>                                                                                                                        |                                   |                                    |
| Total electricity consumption (A)                                                                                                                    | 1098.6 GJ                         | 151.20 GJ                          |
| Total fuel consumption (B)                                                                                                                           | 0 GJ                              | 0 GJ                               |
| Energy consumption through other sources (C)                                                                                                         | 0 GJ                              | 0 GJ                               |
| <b>Total energy consumed from renewable sources (A+B+C)</b>                                                                                          | 1098.6 GJ                         | 151.20 GJ                          |
| <b>From non-renewable sources</b>                                                                                                                    |                                   |                                    |
| Total electricity consumption (D)                                                                                                                    | 2563.4 GJ                         | 352.80 GJ                          |
| Total fuel consumption (E)                                                                                                                           | 81.03 GJ                          | 957.25 GJ                          |
| Energy consumption through other sources (F)                                                                                                         |                                   |                                    |
| <b>Total energy consumed from non-renewable sources (D+E+F)</b>                                                                                      | 2644.43 GJ                        | 1310.05 GJ                         |
| <b>Total energy consumed (A+B+C+D+E+F)</b>                                                                                                           | 3743.03 GJ                        | 1461.25 GJ                         |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total energy consumption/ turnover in rupees adjusted for PPP) | 1.39 GJ/Mn                        | 0.53 GJ/Mn                         |
| Energy intensity (optional) – the relevant metric may be selected by the entity                                                                      | NA                                |                                    |

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.

## 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                                                                                                                                             | FY-2024<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|------------------------------------|
| <b>Water withdrawal by source (in kilolitres)</b>                                                                                                     |                                   |                                    |
| (i) Surface water                                                                                                                                     | 0                                 | 0                                  |
| (ii) Groundwater                                                                                                                                      | 4800                              | 4500                               |
| (iii) Third party water                                                                                                                               | 0                                 | 0                                  |
| (iv) Seawater / desalinated water                                                                                                                     | 0                                 | 0                                  |
| (v) Others                                                                                                                                            | 0                                 | 0                                  |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)                                                                              | 4800                              | 4500                               |
| Total volume of water consumption (in kilolitres)                                                                                                     | 4800                              | 4500                               |
| Water intensity per rupee of turnover (Water consumed / turnover)                                                                                     | 1.78 KI/Mn                        | 1.64 KI/Mn                         |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) | 1.78 KI/Mn                        | 1.64 KI/Mn                         |
| Water intensity in terms of physical output                                                                                                           | NA                                |                                    |
| Water intensity (optional) – the relevant metric may be selected by the entity                                                                        | NA                                |                                    |

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.

## 4. Details related to water discharged:

| Parameter                                                                                              | FY-2024<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|--------------------------------------------------------------------------------------------------------|-----------------------------------|------------------------------------|
| <b>Water discharge by destination and level of treatment (in kilolitres)</b>                           |                                   |                                    |
| 1. To Surface water<br>- No treatment<br>- With treatment – Please specify the level of treatment      | NA                                | NA                                 |
| 2. To Groundwater<br>- No treatment<br>- With treatment – Please specify the level of treatment        | NA                                | NA                                 |
| 3. To Sea Water<br>- No treatment<br>- With treatment – Please specify the level of treatment          | NA                                | NA                                 |
| 4. Sent to third Parties<br>- No treatment<br>- With treatment – Please specify the level of treatment | NA                                | NA                                 |
| 5. Others<br>- No treatment<br>- With treatment – Please specify the level of treatment                | NA                                | NA                                 |
| Total water discharged (in kilolitres)                                                                 |                                   |                                    |

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

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

Not Applicable

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

Not Applicable

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

| Parameter                                                                                                                                                                                                | Unit                      | FY-2024<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------------------|------------------------------------|
| Total Scope 1 Emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)                                    | tCO <sub>2</sub> e        | 0.22                              | 66.91                              |
| Total Scope 2 Emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)                                    | tCO <sub>2</sub> e        | 2.68                              | 100.10                             |
| Total Scope 1 and Scope 2 emissions per rupee of turnover<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)                                                                         | tCO <sub>2</sub> e/INR Mn | 0.001                             | 0.061                              |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover<br>adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2<br>GHG emissions / Revenue from operations adjusted for PPP) | tCO <sub>2</sub> e/INR Mn | 0.001                             | 0.061                              |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output                                                                                                                                 | NA                        |                                   |                                    |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant<br>metric may be selected by the entity                                                                                           |                           |                                   |                                    |

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

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

While Subex Limited occupies a rented space in a tech park, we are in constant discussion with builder of the facility to reduce Greenhouse Gas (GHG) emissions associated with the building. These efforts align with our commitment to environmental sustainability and contribute to the reduction of our carbon footprint.

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

- (a) Total Waste generated (in metric tonnes)

| Parameter                                                                                                                           | FY-2024<br>Current Financial Year                                                                                                                                                                                                                                                                                                                                 | FY-2023<br>Previous Financial Year |
|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Total Waste generated (in metric tonnes)                                                                                            | All relevant types of waste which are generated in-house are handed over to the authorized vendor for recycling. Subex is based in a technology park and all the environment related reports are submitted to the prescribed authority by the owner of the park. Subex co-operates with the owner and the vendors towards ensuring the timely recycling of waste. |                                    |
| Plastic waste (A)                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                   |                                    |
| E-waste (B)                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                   |                                    |
| Bio-medical waste (C)                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                   |                                    |
| 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) |                                                                                                                                                                                                                                                                                                                                                                   |                                    |
| Total (A+B + C + D + E + F + G + H)                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                   |                                    |

| Parameter                                                                                                                                              | FY-2024<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|------------------------------------|
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)                                                                | 0                                 | 0                                  |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total waste generated / Revenue from operations adjusted for PPP) | 0                                 | 0                                  |
| Waste intensity in terms of physical output                                                                                                            | 0                                 | 0                                  |
| Waste intensity (optional) – the relevant metric may be selected by the entity                                                                         | 0                                 | 0                                  |
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>         |                                   |                                    |
| Category of waste                                                                                                                                      |                                   |                                    |
| i) Re-cycled                                                                                                                                           | 0                                 | 0                                  |
| ii) Re-used                                                                                                                                            | 0                                 | 0                                  |
| iii) Other recovery operations                                                                                                                         | 0                                 | 0                                  |
| Total                                                                                                                                                  | 0                                 | 0                                  |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>                                      |                                   |                                    |
| Category of waste                                                                                                                                      |                                   |                                    |
| i) Incineration                                                                                                                                        | 2952                              | 2755.20                            |
| ii) Landfilling                                                                                                                                        | 0                                 | 0                                  |
| iii) Other disposal operations                                                                                                                         | 0                                 | 0                                  |
| Total                                                                                                                                                  | 2952                              | 2755.20                            |

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.

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

As a software product Company, the impact that the Company has on the environment from its own operations is relatively low when compared to companies in other industries. However, the Company recognizes that it still has a role to play in reducing the impact that global business has on the environment. Subex is committed to following the best practices to reduce utilization of power, natural resources like water and limited E-Waste disposal, executed through government recognized agencies. Though Subex does not fall under the category of manufacturing products and services impacting the environment, we implement few of the best practices with minimal investments through a five-year plan - agreement with an industry stalwart having expertise in energy conservation. This investment thereby results in monetary benefits / savings month on month, helping us recover the invested amount in few months, ensuring continued savings through this initiative.

Subex aims to reduce its impact on the environment by:

1. Monitoring the level of water and energy used along with the waste produced.
2. Targeting a reduction in the use of plastics, electricity and water, along with an increase in amount of waste that is recycled/ reused etc.
3. Increasing the awareness on environment safety and engagement of employees in such measures.
4. Adopting sustainable practices designed to ensure the health and safety of Subex's employees, stakeholders, and the environment.
5. Operating its business in compliance of applicable environmental laws and regulations.

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

Not Applicable

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

Not Applicable

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

Not Applicable

## 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.

1

- 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      | FKCCI (Federation of Karnataka Chambers of Commerce and Industry) | State                                                               |

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.

| Name of authority                 | Brief of the case | Corrective action taken |
|-----------------------------------|-------------------|-------------------------|
| Not applicable. No action needed. |                   |                         |

## 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.

Not Applicable

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

Not Applicable

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

A mechanism is in place to interact with community leaders to understand and address their concerns, if any. More details can be found at <https://www.subex.com/pdf/investors/Corporate-Governance/Subex-Global-Whistle-blowing-Policy.pdf>

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

|                                                                      | FY-2024<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|----------------------------------------------------------------------|-----------------------------------|------------------------------------|
| Directly sourced from MSMEs/ small producers                         | 6                                 | 9                                  |
| Sourced directly from within the district and neighbouring districts | Data not available                | Data not available                 |

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<br>Current Financial Year | FY-2023<br>Previous Financial Year |
|--------------|-----------------------------------|------------------------------------|
| Rural        | NIL                               | NIL                                |
| Semi-urban   | NIL                               | NIL                                |
| Urban        | 99.70%                            | 99.74%                             |
| Metropolitan | NIL                               | NIL                                |

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

**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.

At Subex Limited, we are dedicated to delivering exceptional products and services to our customers and value their feedback as an important source of improvement. We have established user-friendly mechanisms to receive and respond to consumer complaints and feedback effectively.

Customers seeking to connect with us can utilize our 'Contact Us' page on our official website. Additionally, we have set up an email address, [info@subex.com](mailto:info@subex.com), through which customers can communicate their queries, complaints, and suggestions.

We take all customer feedback seriously and are committed to responding promptly and professionally. Our customer support teams are well-equipped to address a wide range of inquiries, and we ensure that each communication is acknowledged and addressed in a timely manner.

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

Not applicable as the Company does not have specific consumer product or product range

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

|                                | FY-2024 Current Financial Year |                                   |         | FY-2023 Previous Financial Year |                                   |         |
|--------------------------------|--------------------------------|-----------------------------------|---------|---------------------------------|-----------------------------------|---------|
|                                | Received during the year       | Pending resolution at end of year | Remarks | Received during the year        | Pending resolution at end of year | Remarks |
| Data privacy                   | 0                              | 0                                 | -       | 0                               | 0                                 | -       |
| Advertising                    | 0                              | 0                                 | -       | 0                               | 0                                 | -       |
| Cyber-security                 | 0                              | 0                                 | -       | 0                               | 0                                 | -       |
| Delivery of essential services | 0                              | 0                                 | -       | 0                               | 0                                 | -       |
| Restrictive Trade Practices    | 0                              | 0                                 | -       | 0                               | 0                                 | -       |
| Unfair Trade Practices         | 0                              | 0                                 | -       | 0                               | 0                                 | -       |
| Other                          | 0                              | 0                                 | -       | 0                               | 0                                 | -       |

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

Not Applicable as there have been no instances of product recalls on account of safety issues.

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

Yes. Subex views security as a multi-dimensional matrix that covers privacy, security and risk mitigation through Subex Security Policy, Subex Risk Assessment Strategy and Subex Data Privacy Policy.

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

NIL. However, we have improved by monitoring and ensuring the cybersecurity posture is better by implementing new monitoring technologies and increasing the cybersecurity score.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches : NIL
- Percentage of data breaches involving personally identifiable information of customers : NIL
- Impact, if any, of the data breaches : NIL